

# THE VICTORIA FALLS WORLD HERITAGE SITE

## STATE OF DEVELOPMENT REPORT 2023



*Lights from the newly constructed Baines Restaurant intrude on the view of the Devil's Cataract in a picture taken at night on a special tour to experience the lunar rainbow (August 2023)*

PRODUCED BY  
**KEEP VICTORIA FALLS WILD**  
AUGUST 2023

## ACRONYMS

EMA	Environmental Management Agency
ESIA	Environmental and Social Impact Assessment
HESZ	Highly Ecologically Sensitive Zone
IUCN	International Union for the Conservation of Nature
JIMP	Joint Integrated Management Plan
MESZ	Medium Ecologically Sensitive Zone
NRZ	National Railways of Zimbabwe
NMMZ	National Museums and Monuments of Zimbabwe
OUV	Outstanding Universal Values
SESIA	Strategic Environmental and Social Impact Assessment
UNESCO	United Nations Educational, Scientific and Cultural Organization
VFCC	Victoria Falls City Council
VFNP	Victoria Falls National Park
WHS	World Heritage Site
WHC	World Heritage Committee
ZNP	Zambezi National Park
ZPWMA	Zimbabwe Parks and Wildlife Management Authority
ZTA	Zimbabwe Tourism Authority

## DEFINITIONS

Buffer Zone - the 500m zone surrounding the VFWHS which is supposed to be managed with sensitivity to the WHS.

Rainforest - the rich area of vegetation which has developed under the spray from the Victoria Falls.

Riverine Fringe/Strip - the woodland fringe which runs along the edge of the Zambezi River in this region.

State Parties - the National State Authorities of Zambia and Zimbabwe.

Transport Corridor - the road and rail corridor, including international border facilities and the Victoria Falls Bridge, which transects the site

Victoria Falls visitor park - the area of the fenced visitor park, a sub-section of the Victoria Falls National Park (Area B), often referred to as the 'Rainforest.'

World Heritage Site - the Victoria Falls/Mosi-oa-Tunya World Heritage Site, the 'Site'

ZimParks - the Zimbabwe Parks and Wildlife Management Authority (ZPWMA)

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## **1.0.0 SUMMARY**

This report has been independently commissioned by Keep Victoria Falls Wild, a group of concerned residents and individuals who are campaigning against a wave of proposed tourism developments which threaten the southern (Zimbabwean) side of the Victoria Falls World Heritage Site (VFWHS). The report has been compiled by a freelance ecological consultant with extensive local knowledge of the Site.

The report is intended to inform and update members of the World Heritage Committee, in advance of the 45th Session of the World Heritage Committee, to be held in September 2023, of developments on the ground and issues and problems relating to the management and conservation of the site that have arisen since February 2022 when the joint World Heritage Centre/IUCN Reactive Monitoring mission visited the site.

Since the time of the mission visit a wave of tourism development proposals have emerged on the southern side of the site. Many of the developments specifically threaten the vulnerable riverine fringe along the upstream river corridor above the Victoria Falls, and although supposedly protected within the Highly Ecologically Sensitive Zone (HESZ) preventing all new infrastructure, have none-the-less been authorised by the Zimbabwean National Park Authority (ZPWMA).

Several of these developments have progressed significantly since the site visit, with some developments advancing from planing to construction and completion during this time - for example the highly controversial development of a riverside restaurant constructed immediately above the Falls and opened in mid-2023 (4.2.14). The developers of this project incorrectly argue that the site is located in the MESZ, and an EIA certificate was awarded on the basis of this claim, with their application apparently containing a recommendation from the UNESCO 'local office.' Guy Broucke, the regional UNESCO representative based in Harare, has not commented to either confirm or deny the claimed approval for the project. The facts of this matter have implications for a legal challenge against the development raised by a group of local residents and there is an urgent need to establish if indeed approval was given and on what basis.

### ***1.0.1 Conservation Concerns***

The report raises widespread and serious concerns over the management of the Site, with conservation priorities ignored (3.1.1), concerns over the rapidly increasing number of tourism concessions within the area of the WHS (3.1.2), new concerns over the identification of the Site's boundary (3.1.3), significant and serious concerns over the boundary of management zones within the Site (3.1.4) with implications for recent developments within the HESZ which have falsely been claimed to be outside this

zone, including a new National Park development (4.2.13) and a commercial restaurant immediately above the Falls (4.2.14). While we can understand how a private developer may have misinterpreted the 2016-21 JIMP document, we fail to understand how the Zimbabwe National Park Authority have misinterpreted their own management document in their support of these developments, or how the Environmental Impact Assessment did not bring this error to light.

Within the boundaries of the WHS the report identifies two proposed developments within the ZNP, one of which (4.1.2) is located within the HESZ (which prohibits all new development), and four potential new hotel/lodge developments proposed within the VFNP (4.2.3, 4.2.5, 4.2.10 and 4.3.2), one of which has subsequently been withdrawn (4.2.3). Two new tourism facilities have been developed on the ground (4.2.13 and 4.2.14) and one new tourism activity - tours to one of the most ecologically sensitive areas of the site, Cataract Island (4.2.15) - all again within the HESZ which supposedly prohibits all new infrastructure developments. In addition we raise concerns over the expansion of existing developments within the ZNP (4.1.3 and 4.1.5) and VFNP (4.2.8, 4.3.1 and 4.3.3), and highlight development pressures within the road and rail transport corridor which dissects the Site (4.2.17).

The report also identifies one case where the Victoria Falls City Council attempted to illegitimately terminate a long-standing tourism lease in order to allow the plot to be redeveloped as a tourism hotel (4.2.3) and one case of a National Park concession agreement being cancelled due to reported corruption, although the same tourism operator has subsequently signed a new agreement and work is ongoing on the redevelopment (4.1.5). A group of local residents are currently progressing a legal challenge against new tourism developments in the VFNP HESZ including the construction of a riverside restaurant immediately above the Falls (4.2.14) and the launch of tours to Cataract Island (4.2.15). It should also be noted that individuals involved in some of the developments identified in this report have also been accused of intimidating and threatening behaviour.

We also raise serious concerns over the management reporting on the Site, especially in relation to the reporting of visitors to the Site, with figures from Zimbabwe appearing to be at variance with those published in the Zimbabwe Tourism Authority's Annual Reports, and lack of reporting on tourism activity levels at the site (numbers of tourists undertaking boat cruises, helicopter flights or any of the other activities which utilise the Site). We believe the monitoring and reporting of these visitors is key to understanding the tourism pressures which affect the Site and should be a core part of the State Parties regular reporting on the Site.

We believe the combined mismanagement and increasing tourism development

pressures outlined in this report raise serious concerns over the future viability of the World Heritage Site with serious negative impacts on the Site's Outstanding Universal Values already caused by recent developments along Zambezi Drive (4.2.13 and 4.2.14). While by the Committee's own admission the monitoring mission "*identified numerous shortfalls and non-compliance with World Heritage status*" (World Heritage Committee, 2023) it appears that the Committee is now itself in danger of not acting sufficiently to address these concerns.

The management of Site is in urgent need of detailed review and increasing scrutiny is needed to monitor and mitigate the negative impacts and pressures on the Site, and in which the Zimbabwe National Parks and Wildlife Management Authority appear themselves to be complicit by authorising and agreeing concession licenses within the HESZ. Failure to react strongly to the current wave of developments which threaten the Site will be seen as a green light to the State Parties to continue their commercial development, and ecological degradation, of the Site.

### **1.0.2      *Recommendations to the Committee***

We believe the Committee's draft decisions, published in advance of the 45th Session of the World Heritage Committee to be held in September 2023, are inadequate to address the serious and urgent problems facing the Site, especially in relation to developments which have already been authorised by Park Authorities on the southern, Zimbabwean, side of the property (World Heritage Committee, 2023; this report, Appendix 6.0.8). The wording of decision point 5 is particularly concerning:

*"5. Reiterates its concern over the increasing pressure from tourism infrastructure within and around the property, exacerbated by the absence of strategic planning and also requests the States Parties to produce a blueprint for infrastructure development in and around the property that ensures the protection of the property's OUV, and to not approve any further developments until the blueprint is finalized and submitted to the World Heritage Centre, together with an impact assessment for each proposed project in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to taking any decision that is difficult to reverse."* ([World Heritage Committee, 2023a, p.19](#))

The wording of the current draft request for the 'blueprint' overview "*together with the individual ESIA's of the developments proposed for approval, prior to authorizing any further projects*" appears to do nothing in terms of addressing the current wave of unsuitable developments within the WHS HESZ and identified in this report, which have already been authorised and agreed between the Zimbabwean National Park Authority and private tourism operators.

After the delays faced by the monitoring mission to the Site, originally requested in 2019 and only undertaken in February 2022, and the subsequent delays in the dates for the 45th Session, there is an urgent and pressing need for the Committee to further investigate and consider its response to the State Parties, and **we urge the Committee to request an urgent review of all current development proposals within the World Heritage Site and surrounding Buffer Zone, and request that all current as well as further/future developments are immediately suspended pending submission and agreement of the detailed ‘blueprint’ and ESIA documents requested by the Committee.**

We further believe therefore that the requested suspension on all new tourism developments and activities within the WHS should be maintained until an adequate (and IUCN/UNESCO approved) management plan for the Victoria Falls and Zambezi National Parks is in place and a new Joint Integrated Management Plan for the Site agreed, including addressing the management of the transport corridor and other areas within the WHS and surrounding Buffer Zone which are outside of National Park control and ignored in current reports.

The Committee must act now to influence these developments and put a stop to the continued degradation and fragmentation of the Site. A clear response to the two already constructed and operational developments is also needed from the Committee.

Further recommendations to the Committee are outlined in the Conclusion (5.0.0).

## 2.0.0 INTRODUCTION

The Victoria Falls World Heritage Site (WHS) is shared by the State Parties of Zambia and Zimbabwe, and while the area covered by the WHS lies largely within land protected under National Park status within each country, there is a complex history to the evolution of these protected areas, which are divided by transport infrastructure and increasingly further fragmented by an ever increasing number of tourism developments, either entirely or partially within the area of the WHS or immediately adjoining.

While the State Parties claim that the site lies totally within the boundaries of the protected National Park areas, this is not exactly true, with the transport corridor dissecting the site being outside of National Park management (see Section 3.1.3). On the northern, Zambian, bank a hydro-electric facility (originally constructed in the 1930s and significantly expanded in the late 1960s and early 1970s) also occupies part of the site.



*Victoria Falls (from UNESCO, 2023b)*

The history of the World Heritage Site is similarly complex, with many issues and problems surrounding the management and reporting of the site, especially in relation to the lack of detailed maps and discrepancies over the boundaries of management zones and the actual site itself. Indeed there appears to be a continuing pattern of manipulation in agreed management planning and zonation of the Site to allow tourism developments in areas where no new developments have previous been allowed.

### **2.0.1        *Scope of Report***

This report is intended to inform and update members of the World Heritage Committee, in advance of the 45th Session of the World Heritage Committee, to be held in September 2023, of developments on the ground and issues and problems relating to the management and conservation of the site that have arisen since February 2022 when the joint World Heritage Centre/IUCN Reactive Monitoring mission visited the site.

Since the time of the mission visit a wave of tourism development proposals have emerged on the southern side of the site, with some developments advancing from construction to completion during this time - for example the highly controversial development of a riverside restaurant (4.2.14) constructed immediately above the Falls and opened in mid-2023.

Analysis of the State of Conservation Reports submitted to the World Heritage Committee by the State Parties show detailed reporting on the northern, Zambian, side of the site, and it is clear that this State Party plays a key role in the preparation of the State of Conservation reports. There is noticeably less detailed reporting and information on the southern, Zimbabwean, side of the site, and it is also clearly apparent that while Zambian authorities have generally complied in the disclosure of potential development threats and notifying the World Heritage Committee accordingly (including the controversial Mosi-oa-Tunya Resort development, although information disclosed was limited and the development went ahead apparently ignoring comments from the Committee), the notification and disclosure of developments on the Zimbabwean side has, in contrast, been consistently lacking (the new Palm River Hotel development being a rare exception).

Indeed significant commercial concessions have been granted, and numerous lodges developed, within the WHS with hardly a mention in the State of Conservation Reports - for example, the Victoria Falls River Lodge (see Section 4.1.3, opened in 2012), the Wild Horizons Old Drift Lodge (4.1.4, opened in 2018), and the Wild Horizons Estate (4.3.3, opened in 2008) and associated lodge developments (the Elephant Camp, opened 2010, the Elephant Camp West, opened 2015, and the Wallow Lodge, opened

2021). In addition the Victoria Falls River Lodge has significantly expanded its facilities, doubling its original capacity of 26 guests with the development of the Kandahar Island Tree Lodges (opened 2017), the Riverside Villa Lodge (opened in June 2022) and the development of the Malachite Suites (currently under construction). It is estimated that lodges within the southern (Zimbabwean) section of the WHS have a capacity of over 100 tourist bed-nights - with no reporting or monitoring of visitor levels presented in State of Conservation reports.

This State of Development report therefore focuses primarily on the Zimbabwean side of the World Heritage Site. Future reports will, if needed, expand in scope to cover the Zambian side of the Site. Certainly the conservation and management of the Site on both sides of the river requires detailed review.

It should be noted that there is no current management plan for Victoria Falls and Zambezi National Parks (the last plan covering the period 2005 to 2008) although work on developing a new management plan was started in 2022. The process was delayed many years by lack of funding, with the current process being funded by a grant from the International Fund for Animal Welfare - a strange circumstance and surely an embarrassment for a Site which generates the Park Authority an estimated US\$10 million dollars annually in visitor entry and activity fees (see Section 6.0.7). It should also be questioned why so little of the income generated by the Site is fed back into its conservation and management, especially when income from tourism to the Site provides the National Park Authority an estimated 50% of its annual operational budget. Surely such a valuable asset deserves adequate levels of funding and research to preserve its integrity and future viability.

There is also no current Joint Integrated Management Plan for the World Heritage Site, the latest being the 2016-2021 plan. This document, however, remains the accepted management plan for the site until a new revised document is submitted by the State Parties and agreed by UNESCO.

In order to focus and assess the threat from tourism developments, the report does not cover the impacts of the proposed Batoka Gorge Hydro-Electric Scheme, of which the World Heritage Committee have been previously notified.

The report references reports presented by the State Parties to the World Heritage Committee and which are available to download from the UNESCO [website](#). Further references are available to download from the Keep Victoria Falls Wild [website](#). The report also references international and national news reports and other media sources which are linked to online sources.

The satellite images used in this document were sourced from Google Maps in January and August 2023, with co-ordinates given and linked to the relevant online image.

Management maps have been adapted from State Party reports to concentrate on the detail of the management zonation by cutting the wider Zambezi National Park from maps to concentrate on the area of the WHS.

Further photographs, information and references are available on the [Keep Victoria Falls Wild website](#), with individual developments listed in this document linked to the website for ease of reference, together with operator websites and online references.

## 2.1.0 A Brief History of the Victoria Falls

**1900s** - The immediate area around the Falls on the south bank, including the Falls Rainforest and an area extending upstream to the Big Tree and Palm Tree Ferry crossing points, was fenced as part of a conservation plan in 1904 and known as the Victoria Falls Park. An area of 5km around the Falls was designated a protected area known as the Victoria Falls Reserve from the early 1900s. In 1903 a curator was jointly appointed by the administrations north and south of the river and who was based in the

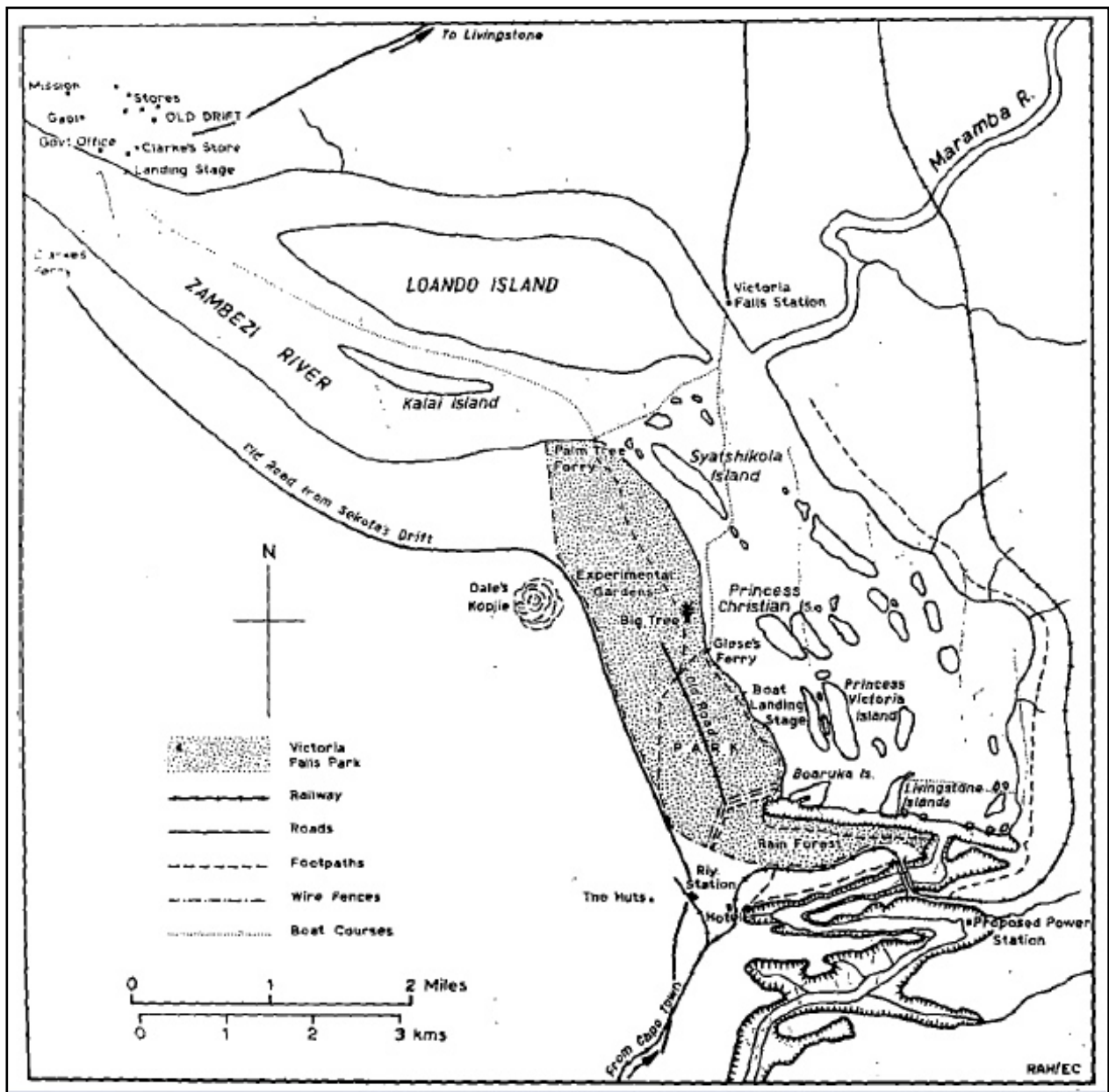


Figure 2: Map showing original boundary of the Victoria Falls Park (from Heath, 1977)

new town of Livingstone on the north bank. The area of the south bank Victoria Falls Park was formalised in 1906, falling under responsibility of the Lands Department.

The railway (from Bulawayo) reached the south bank in April 1904. The Victoria Falls Hotel opened in June 1904 on land allocated as part of the Railway Reserve, initially offering with 12 single and four double rooms, although quickly expanded. The Victoria Falls Bridge was constructed over 1904-5 and officially opened in September 1905. The line of the railway originally ran round in front of the Hotel, before being re-aligned after a landslide in 1909.

**1910s** - In 1916 land for the Police Camp and a shooting range were officially surveyed and allocated. The Victoria Falls Hotel was substantially redeveloped between 1915-7, with construction of a permanent brick building. The original iron and wood railway building continued to be used for several decades after.

**1920s** - Local rail trolley system developed by the Railway Company in 1920, running down from the Hotel to the Falls, Bridge and Boat Landing Stage (above the Falls, along Zambezi Drive), with the operation of the service managed by the Hotel.

In 1923 Southern Rhodesian Ministry of Lands assumed the responsibility for the administration of the Victoria Falls Park and a south bank curator appointed in 1928. The Victoria Falls Reserve Preservation Act (1928) established the Victoria Falls Reserve, covering 20,200 acres (8,175 hectares) including the Falls and immediate surrounds.

During the period 1925 to 1928 a dirt road was constructed between Bulawayo and Victoria Falls, providing access to the area for the growing number of regional tourists travelling by motor-car. The Sprayview aerodrome was developed on the south bank in 1928. The Victoria Falls Hotel significantly expanded in late 1920s with addition of the 'hammerhead' blocks and Court and West Wings, the hotel offering six private suites and 105 bedrooms accommodating 160 guests.

**1930s** - The upstream Victoria Falls Game Reserve was established by Proclamation No.8 of 1930 under the Game and Fish Preservation Act (1929), covering a calculated area of 112,050 acres (45,345 hectares). During the 1930s the north bank Zambezi Saw Mills expanded operations south of the river. About 48 km upstream of the Falls a pontoon crossing point was established and a 2-ft gauge line constructed on the south bank to access forest reserves on the south bank (Roberts, 2023).

By 1934 a nine-hole golf course had been established to the north of the small settlement and this was gradually expanded over the years. A camping area was also set up in the 1930s near the Big tree.

The Victoria Falls Special Area, a zone extending upstream and downstream of the Falls, was proclaimed a National Monument by Government Notice No.318 on the 14th May 1937, under the Southern Rhodesia Monuments and Relics Act (1936) which repealed the 1928 Victoria Falls Reserve Preservation Act. Government Notice No.317 approved the bylaws which were to be enforced within the protected area, which now fell under the control of the Commission for the Preservation of Natural and Historical Monuments and Relics. The Victoria Falls 'Big Tree' was proclaimed a National Monument on 10th March 1939 (later de-proclaimed).

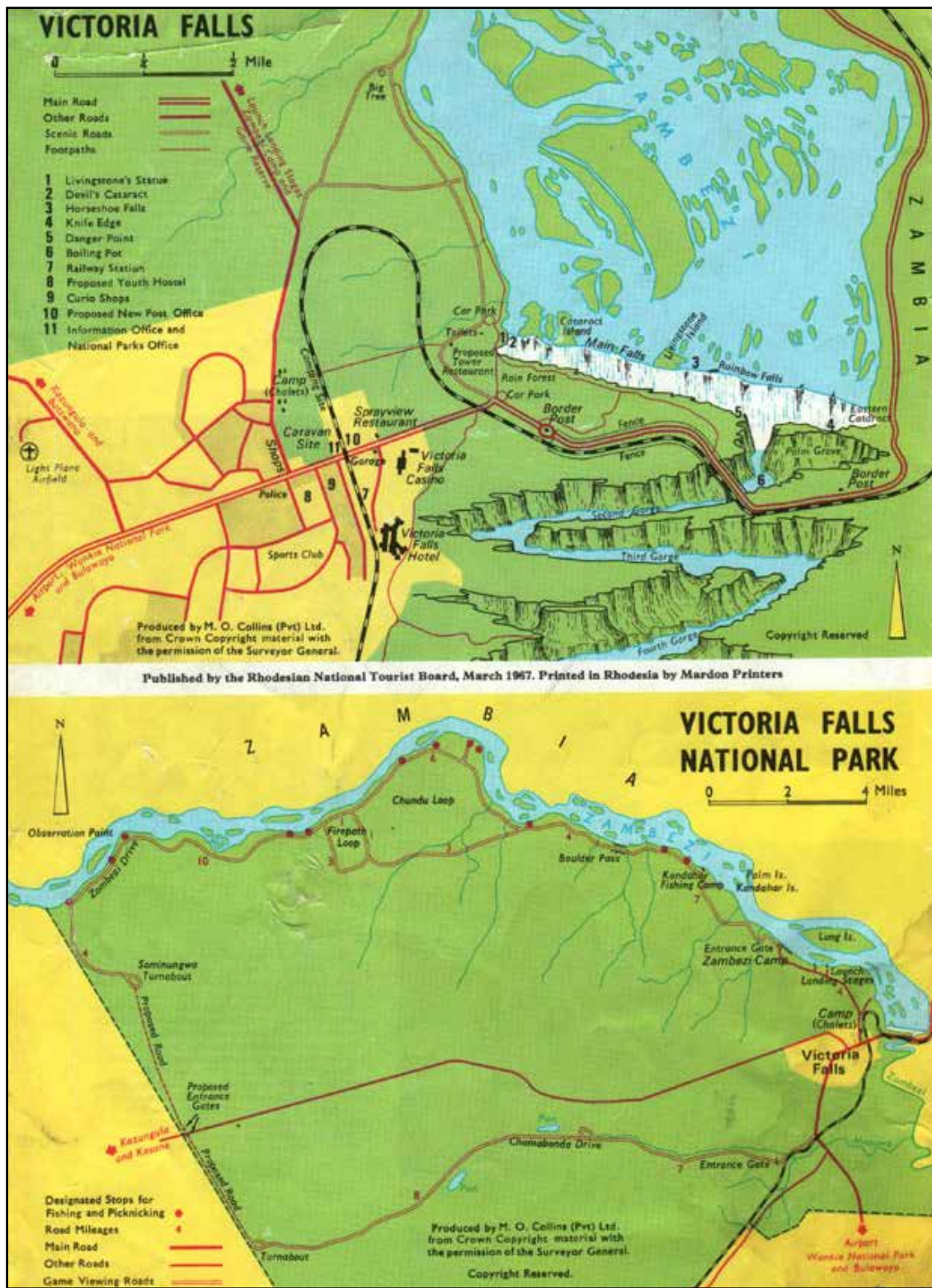
**1940s** - Victoria Falls Hotel again expanded with additional 24 rooms accommodating a further 54 visitors, the hotel now offering a total of 128 rooms with 209 beds. The centrally located Victoria Falls Rest Camp was established in the 1940s.

**1950s** - The Victoria Falls National Park established by Proclamation 25 (1952) under the National Parks Act (1949), amalgamating the Victoria Falls Reserve and the upstream Game Reserve into the wider National Park. The protected area originally covered some 112,050 acres (45,345 hectares, expanded to 125,104 acres (50,628 ha) by 1960 and 141,600 acres (57,303 ha) by 1969), with the town of Victoria Falls an excluded enclave, surrounded by the National Park. Management of the Victoria Falls Reserve (including the Victoria Falls Rest Camp), was transferred over from the Commission for the Preservation of Natural and Historical Monuments and Relics to the National Park Advisory Board (N.P.A.B.) the previous year (1951). In 1951 the town's population was recorded as 756 residents.

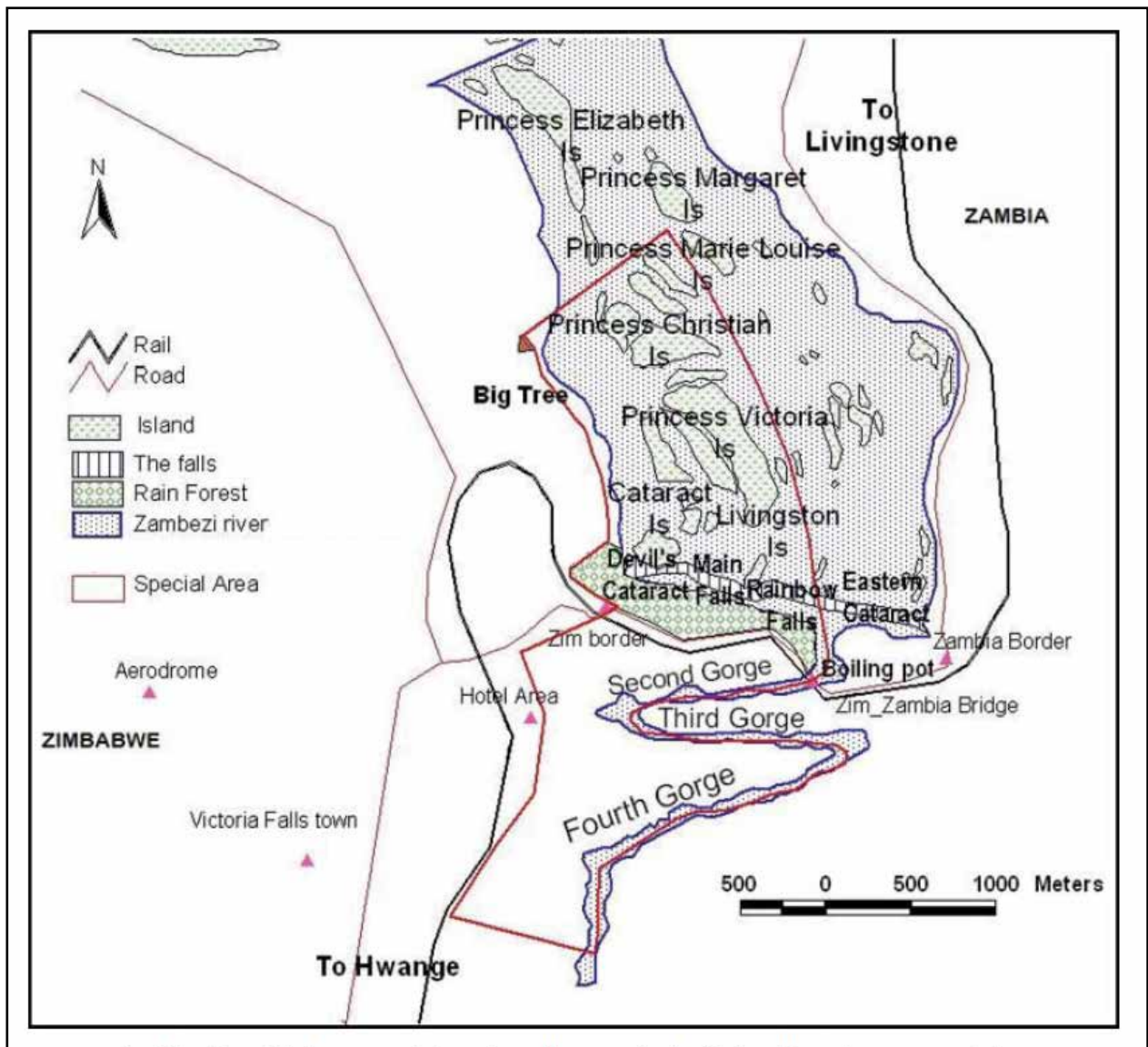
By 1955 the Victoria Falls Hotel and National Park camps offered an estimated total of 200 rooms and 377 beds across the resort (Roberts, 2023).

**1960s** - During the 1960s significant developments were made to the upstream area of the National Park. Game viewing roads were improved, including the development of Chamabonda Vlei drive in the southern part of the park, and overnight fishing camps established along the riverside road in 1962. It is also during this period that the Victoria Falls visitor park was fenced and an entrance gate established with an interpretative centre. Within the rainforest area concrete footpaths and toilets facilities were developed (Plan Afric, 2001, p.17). In 1962 over 30,000 tourists viewed the Falls (Matetsi Report, 1970, p.38). The National Park upstream chalets and lodges were opened in 1967.

Land was opened up adjoining the Victoria Falls Hotel for a hotel and casino, opened in 1966 (later known as the Makasa Sun). A new out-of-town Airport was opened in 1967, some 22 km south of the town, and the town centre expanded with the development of a modern Post Office, banks and offices, opened in 1968. The Sprayview Motel opened in 1969.



In *Figure 3: Original boundaries of the wider Victoria Falls National Park (from 1967 tourism brochure)*



*Figure 4: Map showing revised boundary of the Victoria Falls National Monument Special Area (from Makuvaza, 2012)*

1967 the Victoria Falls Town Management Board established. The Local Board (as it became known) had increased responsibilities for a wide range of services, although largely controlled by reference to central government, which retained control of all State Land within the Council area (Plan Afric, 2001).

In the late 1960s increasing development pressures, including a proposal to build an observation tower and restaurant overlooking the western end of the Falls.

*“The National Parks Board was keen to see considerable development in the area at*

*this time. They approved the construction of an Observation Tower with a restaurant close to the river that would have been the tallest building in Rhodesia. There were also plans to redevelop the Country Club complex at Dales Kopje site, with a high rise hotel. These and other proposals had led several agencies, including the Town Planning Department, to express growing concern over what was perceived to be the commercialisation of the Falls area and possible damage to the ecology. As a consequence it was agreed to place the area under stricter planning controls and to prepare a statutory plan under town planning legislation.” (VFCM, 2001)*

The 1962 national census recorded the population of Victoria Falls town as 1,601. By 1969 the population had grown to 3,450. By 1969 the town's three hotels offered an estimated 262 rooms and 534 beds. The National Park camps offered an additional estimated 85 rooms and 295 beds, giving the resort an estimated total of 347 rooms and 829 beds (Roberts, 2023).

Estimated visitors to the Falls rose from 70,000 in 1966 to 77,000 in 1967, 88,000 in 1968 and 100,000 in 1969 (Ministry of Lands, 1970).

**1970s** - Increasing development pressures on the south bank resulted in the decision to reduce to size of the Special Area identified under the Southern Rhodesia Monuments and Relics Act (1936) to concentrate protection on the core area around the Falls.

*“In order to preserve the beauty of the natural and cultural surroundings of the site, the Commission [for the Preservation of Natural and Historical Monuments and Relics] made a decision in 1968 to reduce the size of the original boundaries of the Special Area. Accordingly, in order to change the boundaries of the national monument, the original site was de-proclaimed as a national monument, cancelling the previous Government Notices No.318 of 1937, No.922 of 1947 and No.453 of 1970. A smaller area was re-proclaimed [under of the Monuments and Relics Act] as a national monument by Government Notice 640 of 1970.” (Makuvaza, 2012)*

In proclaiming the new boundaries of the Special Area it was stressed that no buildings other than those already agreed could be erected and that the area must remain undeveloped except for work to prevent soil erosion and the destruction of indigenous trees and other vegetation (Makuvaza, 2012).

The National Museums and Monuments Act 1972 amalgamated the Commission for the Preservation of Natural and Historical Monuments and Relics with the National Museums of Rhodesia, to establish the National Museums and Monuments of Rhodesia (NMMR, later to become National Museums and Monuments of Zimbabwe). The National Park Zambezi Camp lodges were developed in 1971.



*Figure 5: Map showing land use designation as per the 1975 Outline Plan  
(reproduced from the 2000 Victoria Falls Combination Master Plan)*

In 1972 the Town Management Board was upgraded into a Town Council under the Urban Councils Act. Water Treatment Works constructed along Park Way in 1972. In October 1972 a Victoria Falls Planning Scheme Area was gazetted by Government Notice 1622. The key task of the Planning Authority was to produce an Outline Plan for the management of the Falls environment, including Council and National Park controlled land, with the aims of preserving the natural environment of the Falls and to enhance the tourist potential of the area without detracting from the natural attractions.

The Outline Plan with modifications was approved by the President under Executive Council Minute No 252/75 dated 2nd June 1975. Under the agreed plan areas designated as public and private 'open space' in the vicinity of the Falls and the Zambezi River are restricted permanently against building development, with the exception of buildings which are essential for the administration of these areas. Another notable feature of the plan was the creation of an open space 'buffer zone' of approximately 200 metres either side of the main road into the town (Figure 5, previous page).

Many new developments took place in the early 1970s, prior to the approval of the new Outline Plan. The riverside A'Zambezi Hotel was completed in 1971. Within the growing town the Rainbow Hotel opened in 1972 and a new shopping complex was opened by 1974. The Country Club and golf course was expanded with the development of the Elephant Hills Hotel complex, opened in 1974. The Victoria Falls Rest Camp and upstream Zambezi Camp and Caravan Site were taken under the Council's management in the same year.

Under the Parks and Wildlife Act (1975) the wider Victoria Falls National Park was subdivided into two sections (covering a total of 56,300 hectares), separated by an extended development zone surrounding the growing town. In 1979 the larger upstream section was renamed the Zambezi National Park, leaving the smaller Victoria Falls National Park surrounding the Falls and river corridor. The Act detailed the new boundaries of the Victoria Falls National Park, implemented in 1983, subdivided into two separate sections by the road and rail transport corridor which crosses over the Victoria Falls Bridge (see Appendix 6.0.3).

The main area of the Falls and visitor park is known as 'Victoria Falls B' and includes the immediate area of the Falls rainforest and includes the river corridor extending upstream six kilometres to the boundary of the Zambezi National Park, including a narrow strip of riverine fringe. The land area of this unit is stated to be 436 hectares. Downstream of the Falls and Bridge, a larger protected area covers the gorges stretching some 12 kilometres downstream (known as 'Victoria Falls A,' total 1,904 ha).

With a total area of 2,340 hectares (23.4 km<sup>2</sup>) the Victoria Falls National Park is one of the smallest National Parks in the world. The upstream Zambezi National Park extends over 56,010 hectares (just over 560 km<sup>2</sup>). The redrawing of the park boundaries degazetted a significant area surrounding the expanding town of Victoria Falls from the protection of the National Park and opened up land surrounding the town for development. The division of the Park was not enforced until 1983.

By the beginning of 1977 the town's six main hotels offered an estimated total of 453 rooms and 952 beds. Together with accommodation facilities offer by National Parks and

Council camps and lodges the resort now offered an estimated 578 rooms and 1,367 beds (Roberts, 2023).

**1980s** - By 1982 the population of Victoria Falls Town had grown to 8,126. In 1986 the area of the Falls visitor park was re-fenced (Plan Afric, 2001, p.42). The area of the Victoria Falls National Park, including a small area (741 ha) of the Zambezi National Park, declared a part of the Victoria Falls World Heritage Site in 1989.

**1990s** - By 1990 International visitors to Falls paid US\$10 entry fee. The Ilala Lodge opened in 1991 (on site of the old Sprayview Restaurant, demolished in 1970). The 1992 population census showed that Victoria Falls Town had grown to 16,826.

The Victoria Falls Safari Lodge complex opened on the western edge of the growing town in December 1994. By 1996 the town's eight main hotels now offered a total of 795 rooms and 1,559 beds. Self-catering lodges and camps offered an additional 191 rooms and 553 beds, giving a total of 986 rooms and 2,112 beds (I.U.C.N, 1996).

The Zimbabwe Department of National Parks and Wildlife Management became a independent self-funding authority, the Zimbabwe Parks and Wildlife Management Authority (also known as 'ZimParks') under the Parks and Wildlife Act of 1996 (ZPWMA, 1996). Tourism revenues generated by visitors to the Falls provide a significant percentage of the Authority's annual income, with funds supporting the Authority's work across the country.

The site of the Makasa Sun Hotel was redeveloped as The Kingdom at Victoria Falls, officially opened in July 1999. In 1999 Victoria Falls town Council replaced by a Municipality authority. The new status allowed for greater autonomy, especially in the case of State Land within the Municipal area (Plan Afric, 2001).

**2000s** - By 2001 International visitors to Falls paid US\$20 entry fee. A new 'elephant-proof' fence was erected around the Victoria Falls visitor park. In 2001 the town's eight main hotels offered 1,048 rooms and 2,258 beds (Plan Afric, 2001, p.40). Smaller accommodation providers were estimated increase this total to 1,306 rooms and 3,333 beds (Roberts, 2023). By 2002 the town's population had grown to 31,519 residents.

The Wild Horizons Gorge Activity Centre, located on the edge of the downstream gorges below the Falls, opened in the early 2000s with gorge swing, zip-line and abseiling infrastructure and small thatched wooden reception building. Later also expanded to include gorge 'tree canopy' zip-line.

In 2006 a large percentage of 'Victoria Falls A' allocated as private concession to Wild

Horizons, known as the Wild Horizons Estate. The area was fenced in 2007, becoming home to the Wild Horizons Elephant Sanctuary. In 2010 the Elephant Camp opened, offering 12 luxury tented units. A new extension, the Elephant Camp West, opened in April 2015.

**2010s** - Entry fee for international visitors to Falls increased at some point during decade to US\$30 entry fee. In 2010 government departments clashed over the management of the Victoria Falls visitor park (4.2.16) after the opening of a new development, the Shearwater Rainforest Cafe, within the reception facilities at the Park entry gate. The National Museums and Monuments of Zimbabwe (successor to the Commission for the Preservation of Natural and Historical Monuments and Relics) originally raised the issue of their historic legal right to the management of the Victoria Falls Special Area in 1999, with a subsequent legal arbitration by the Attorney General in 2000 confirming the NMMZ's right to administer the site.

*“As the matter unfolded, no political decision was made to allow the NMMZ to take over the administration of the Special Area from the ZPWMA. The matter was taken to the President’s Office where a mediator was appointed. The mediation process was carried out and it was recommended that the NMMZ and the ZPWMA should co-own and administer the Special Area together for an agreed period until the NMMZ completely took over its administration. The mediation recommendations have never been implemented and the ZPWMA has continued to own and manage the Special Area while the NMMZ has continued to pursue strategies to ensure that its mandate of administering the monument is implemented.” (Makuvaza, 2012)*

The issue is still unresolved, with the National Park Authority continuing to retain its management of the site to the exclusion of NMMZ, despite the site being listed as a National Monument.

Victoria Falls town's total population was estimated at 33,660 in 2012. Within the ZNP a new riverside concession, the Victoria Falls River Lodge, opened in 2012 (4.1.3). The lodge is within the boundaries of the World Heritage Site (and the HESZ). An extension, the Victoria Falls Island Treehouse Lodge opened in August 2017 on Kandahar Island (again within the area of the WHS HESZ).

In May 2013, Zimbabwe ratified the Ramsar Convention on wetlands and designated seven wetlands, including the Victoria Falls, as Wetlands of International Importance under the Convention. The Convention aims to protect wetlands of international significance on the basis of their importance to migratory birdlife. Zambia is also a member of the Convention but has not listed the Falls as a Ramsar site (although it is a recognised Important Bird Area).

The Lookout Restaurant was opened overlooking the gorges below the Falls in 2014, developed as part of the Wild Horizons Gorge Activity Centre (4.3.1). The wood and thatch structure burnt down in late 2018, replaced by significantly expanded permanent structure in 2019, seating up to 200 guests.

Ilala Lodge began a significant extension in November 2014 with the development of a new three-storey wing (raising the profile of the previously two-storey building). The new wing opened in October 2015 (the Hotel expanded again in 2019 with opening of 16 new deluxe guest rooms).

The Shearwater Explorers Village opened in 2017, a new \$1.2 million development on a site adjoining the Elephant Walk complex, initially offering 32 beds and camping facilities, soon-after expanded to 64 beds. In 2017 it was recorded that the town's 53 tourism accommodation providers offered a total number of 1,832 rooms and 4,423 beds. Accommodation providers included the ten main hotels, offering 1,233 rooms and 2,659 beds; 11 safari camps/lodges offering 131 rooms and 294 beds; 23 guest houses and bed and breakfast providers with 23 rooms and 348 beds; 4 self-catering operations offering 65 rooms and 230 beds; and five backpackers with 65 rooms and 498 beds (Africa Albida Tourism, 2017).

In 2018 Wild Horizons opened the riverside Old Drift Lodge (4.1.4), a new concession within the ZNP and area of the WHS. In 2019 Ilala group started of construction work on a new luxury 4-star hotel, the Palm River Lodge (4.2.6), a new development on the old upstream Zambezi Camp and Caravan Site. Accommodating 73 deluxe rooms, a luxury presidential suite, two honeymoon suites and two private villas, the \$15 million development opened in late 2021.

Tourism capacity on the south bank was recorded by independent consultants at 4,868 rooms in 2019, with the 12 main hotels providing 2,679 of this total and indicating 2,189 additional rooms provided by smaller operators over the resort (AEC, 2019).

**2020s** - In December 2020 the Victoria Falls Municipality was given city status under Statutory Instrument 285 (2020). In late 2022 the Park authority announced increased visitor admission fees for the Falls, with international visitors paying \$50, to be introduced in April 2023 (see 3.3.0).

In December 2022 African Sun Limited announced that the Company shall be ceasing operations at the Kingdom at Victoria Falls with effect from 5th January 2023.

According to the 2022 Population Census the town had a population of 35,199.

## 2.2.0 A Brief History of the World Heritage Site

The area of the Victoria Falls WHS, covering some 6,860 hectares and including the river corridor upstream and downstream of the waterfall on both sides of the river, was designated by UNESCO as a World Heritage Site on 15th December 1989. The area first proposed by Zambia and Zimbabwe (the 'State Parties') for inscription originally included a much larger area, incorporating the whole of the Mosi-oa-Tunya and Zambezi National Parks on the north and south banks respectively.

*"The Committee commended the Governments of Zambia and Zimbabwe for demonstrating their commitment to co-operate in management of the site through the joint nomination. The Committee agreed to the joint inscription of the property on the basis that both Zambia and Zimbabwe had already agreed to reduce the limits of the nominated property to include only the Victoria Falls National Park, the northern half of Mosi-oa-Tunya National Park and a small portion of the riverine strip of Zambezi National Park in order to better concentrate on core features of the Falls area and the downstream gorges. The Committee requested the Secretariat to encourage Zambia and Zimbabwe to continue to consult together on this matter in cooperation with IUCN to reach agreement on final boundaries."* ([World Heritage Committee, 1989](#))

The area finally agreed for the boundary of the Victoria Falls/Mosi-oa-Tunya World Heritage Site lies largely within the southern (not northern) section of the Mosi-oa-Tunya National Park in Zambia and the whole of the Victoria Falls National Park and a small section of the Zambezi National Park in Zimbabwe. The site covers the upstream river corridor from above Palm and Kandahar Islands downstream to the Falls, and includes the gorges extending for some 16 kilometres below the Falls.

*"The Mosi-oa-Tunya/Victoria Falls is the world's greatest sheet of falling water and significant worldwide for its exceptional geological and geomorphological features and active land formation processes with outstanding beauty attributed to the falls i.e. the spray, mist and rainbows. This transboundary property extends over 6,860 ha and comprises 3,779 ha of the Mosi-oa-Tunya National Park (Zambia), 2,340 ha of Victoria Falls National Park (Zimbabwe), 741 ha of the riverine strip of Zambezi National Park (Zimbabwe). A riverine strip of the Zambezi National Park extending 9 km west along the right bank of the Zambezi and islands in the river are all within the Park as far as Palm and Kandahar Islands... The Mosi-oa-Tunya National Park boundary follows the left bank between the Sinde River and the Songwe Gorge, bounded in the North by Dambwa Forest Reserve and the Maramba Township. On the right bank, the Victoria Falls National Park is bounded by the river from 6 km above to 12 km below the Falls."* (UNESCO, 2023a)

The World Heritage Site was inscribed for both geological and ecological values under natural criterion N (ii) and N (iii), since revised to criteria (vii) and (viii) (See Appendix 6.0.2).

### **2.2.1      *Legacy Development (Zambia)***

In October 2006 it was announced that the Zambian Wildlife Authority (ZAWA) had awarded a concession to South Africa's Legacy Group Holdings for a major new tourism development within the Mosi-oa-Tunya National Park. The proposed \$200 million Mosi-oa-Tunya Hotel and Country Club Estate Project planned to develop a tourist resort on a 550 acre riverside concession in the National Park bordering either side of the Maramba River, including an area within the World Heritage Site. The plans included two five-star hotels, an 18-hole golf course, conference centre and a marina on the Zambezi, all a short distance above the Falls. The plans raised serious protests in among conservationists and led to the World Heritage Site status being questioned.

*"We have benefited so much from the booming tourism here but we may lose out, as UNESCO (the United Nation's cultural agency) has already indicated to us plans of withdrawing the status of Victoria Falls as a World Heritage Site, should the construction of a Legacy Hotel be allowed to go on in the park," Nicholas Katanekwa, chair of the Livingstone Tourism Association, told the U.N. media." ([VFBnB, Nov 2006](#))*

The plans stimulated a UNESCO monitoring mission to investigate the proposed development and which visited the site in November 2006.

*"The mission found that continuing developmental pressures within and adjacent to the property are adversely impacting on its values and integrity, mainly as a result of failure to implement recommendations made in the past Committee decisions for effective management..."*

*"The mission raised serious concerns with Zambia about the Mosi-oa-Tunya Hotel and Country Club Estate project. The project is anticipated to not only destroy the riparian vegetation, but also interfere with the catchment function and wild animal movement, and contribute to the pollution load of the river, thus, adversely impacting on the outstanding universal value and integrity of the property." ([World Heritage Committee, 2007](#)).*

The 2006 mission report recommended that *"the World Heritage Committee should consider inscribing the site on the World Heritage in Danger List, if the project is approved for implementation"* (UNESCO, 2007, p.2).

A moratorium on development within and surrounding the World Heritage Site was subsequently requested by UNESCO, pending agreement and implementation of a joint management plan for the site.

*“All issues related to development of infrastructure, tourism facilities and services, eradication of invasive species, control of pollution and extraction of water from the Zambezi should be fully considered and addressed in the Joint Integrated Management Plan... Pending action by the two States Parties on these points, there should be a complete moratorium on the construction and development of all tourism infrastructure, facilities or services within the World Heritage property.” (UNESCO, 2007, p.2).*

After widespread negative public reaction and strong local opposition to the Mosi-oa-Tunya Hotel and Country Club Estate proposals, including the Zambia Environmental Agency ruling in 2007 that a golf course was not an acceptable development within the National Park, the project was abandoned by the developers.

The UNESCO imposed moratorium on development within the World Heritage Site was lifted in 2008 in response to the successful adoption of the 2007-2012 Joint Integrated Management Plan (State Parties, 2007).

*“As the Joint Ministerial Committee has been established and the joint management plan approved, the moratorium on development has now been lifted. Development of tourism facilities will be restricted to the Low Ecologically Sensitive Zone after going through an Environmental Impact Assessment.” ([World Heritage Committee, 2008](#))*

## **2.2.2      *Helicopter Impacts***

In 2009 news reports highlighted concerns over noise pollution from helicopter flights over the Falls, stirred by proposals to issue further licenses to new operators, develop new helipad sites and increase the total number allowed to fly at any one time from five to up to 20. At the time eight helicopters were in operation at the Falls, five from Zambia, with Batoka Skies managing three helicopters and United Air Charters two, and the Zambezi Helicopter Company (part of the Shearwater portfolio of companies) operating three helicopters from the Elephant Hills helipad in Zimbabwe.

Guests at the Victoria Falls Safari Lodge, Elephant Hills, Kingdom and Falls Hotel often recorded the noise intrusions as ‘a nuisance’ and several major hotels formerly complained to the UNESCO World Heritage Commission regarding the high levels of disturbance already caused by excessive noise pollution levels over the town. Karl

Snater, General Manager of the Victoria Falls Hotel, recorded:

*“On behalf of the Victoria Falls Hotel, I would like to register a complaint against the helicopters and the noise they produce which has a negative impact on the environment and likewise destroys the atmosphere in our hotel and grounds. Daily we have to endure the noise and constant irritation from these aircraft which fly directly over and above the Hotel. If one considers that current hotel occupancies are running at approximately 20% of capacity surely when normal higher occupancies return the environment cannot sustain the impact of the increased flights, increased operators and increased frequency of the helicopters.”* ([VFBnB, June 2009](#))

A World Heritage Committee Reactive Monitoring Mission to the site in November 2006 confirmed the high aviation noise impacts, whilst also highlighting wider concerns over the volume of visitors to the resort and impacts on wildlife:

*“The World Heritage Centre and I.U.C.N. observed during the mission that high visitor rates are causing noise pollution from helicopters, microlight aircraft, and boats. In addition, aquatic wildlife is constantly disturbed by riparian activities.”* ([World Heritage Commission, 2007](#))

UNESCO approved plans to relocate operations from the Elephant Hills helipad and develop new facilities away from the main tourism areas - including adoption of new flight corridors to minimise disturbance over the town.

*“The States Parties also report that the completion of the Chamabondo helipad in 2010 will lead to a significant reduction in noise pollution by removing the take off site to a location 13km from the property.”* ([World Heritage Committee, 2010](#))

In 2012 a new operator, Bonisair, launched tourist flights with two helicopters operating from the newly developed Chamabondo helipad, located to the south of the town, with flight paths bypassing the town and approaching the Falls from the downstream gorges. A third company, Chikopokopo Helicopters, started operations in 2015. A fourth company, MJ Air, launched in April 2022.

The opening of new helicopter pads at Chamabondo has done nothing to address the issues of noise pollution over the Falls or town and has merely resulted in the establishment of further helicopter companies, an increase in the number of helicopters operating at the site and the opening up of a whole new noise pollution issue with the new approach corridor over the gorges below the Falls. The original operator remains based at the Elephant Hills helipad (4.2.9).

### 2.2.3 *‘Battle for the Rainforest’*

The Zimbabwe Parks and Wildlife Management Authority partnered with local activity provider Shearwater Adventures, trading through the Zambezi Helicopter Company, in a much needed, yet controversial, redevelopment of the Falls Park visitor reception facilities (4.2.16) in 2016. In 2006 the UNESCO Monitoring Mission Report described the rainforest visitor centre as *“very basic and consists of disfigured and vandalized exhibits”* (UNESCO, 2007, p.7).

The development included the conversion of the information centre into a modern commercial store selling high-value tourism souvenirs and the construction the Rainforest Cafe and supporting facilities. An outdoor interpretation and information area was developed, with detailed displays on the natural history and formation of the Falls, as well as upgrading of toilets facilities.

The project divided opinion and attracted a substantial amount negative publicity and media coverage. Stakeholders in the town's tourism sector argued that there had been no formal Environmental Impact Assessment process, with no public notification or consultation ahead of the development. Even government departments clashed, the development reigniting a long-running dispute over the management of the Rainforest. The National Museums and Monuments of Zimbabwe having raised the issue of the management of the Victoria Falls Special Area in 1999, with a subsequent legal arbitration by the Attorney General in 2000 confirming the NMMZ's right to administer the site

*“As the matter unfolded, no political decision was made to allow the NMMZ to take over the administration of the Special Area from the ZPWMA. The matter was taken to the President's Office where a mediator was appointed. The mediation process was carried out and it was recommended that the NMMZ and the ZPWMA should co-own and administer the Special Area together for an agreed period until the NMMZ completely took over its administration. The mediation recommendations have never been implemented and the ZPWMA has continued to own and manage the Special Area while the NMMZ has continued to pursue strategies to ensure that its mandate of administering the monument is implemented.”* (Makuvaza, 2012)

Forced to act by the new restaurant development, NMMZ argued that its construction was not in line with laws governing the management of National Monuments and that the building negatively impacted on the integrity of the site. With the support of Zimbabwe Republic Police, NMMZ exercised legal powers to take control of the Victoria Falls visitor facilities, reclaiming their historic management of the Victoria Falls Special Area and closing the restaurant.

After a short period of impasse, and a government ruling, the Rainforest returned to the control of the Parks and Wildlife Management Authority and the restaurant facilities reopened. Negotiations between NMMZ and ZPWMA over the joint management of the site are still unresolved over ten years later, with both institutions legally authorised to manage the site through different Statutory Instruments.

Additional plans for a proposed \$6 million development of the 'V.I.P. Entrance' beside the Devil's Cataract, including restaurant, shopping and conference facilities overlooking the edge of the Falls, appear to have been quietly suspended ([VFBnB, Nov 2010](#)).

#### **2.2.4      *Mosi-oa-Tunya Resort (Zambia)***

In 2018 Zambia resurrected the Mosi-oa-Tunya Resort development adjoining the Maramba river, presenting a new proposal to residents and stakeholders in Livingstone. The new development was disclosed in the 2016 State of Conservation Report as being within the WHS 'development zone,' but exact location not disclosed.

*"The State Party also proposes to construct a hotel in the development zone of the World Heritage Property. The developments are still at proposal stage."* (State Parties, 2016, p13/19)

In reply the World Heritage Committee Decision 2017 (41 COM 7B.22) recorded:

*"Also noting with concern the State Party of Zambia's intention to partner with private investors to construct a hotel and recreational facilities inside the property, further requests the States Parties to clarify the exact locations of all developments... and to submit to the World Heritage Centre for review by IUCN, an ESIA for each of these projects, including a specific assessment of the impacts on OUV, in line with IUCN's Advice Note, before taking any decision that may be difficult to reverse, in accordance with Paragraph 172 of the Operational Guidelines."* ([World Heritage Committee, 2017](#))

The State Parties replied to the Committee's 2017 decision in their 2018 State of Conservation Report, declaring that there were no developments on the ground and committing to update the Committee 'in line with the operational guidelines.'

*"The States Parties took note of the concern raised relating to the construction of a hotel, [and] recreational facilities inside the property... The States Parties therefore, would like to report that there are no developments on the ground and will update the committee in line with the operational guidelines."* (State Parties, 2018, p.5/21)

Further details of the development were detailed later in the same document.

*“The State Party of Zambia received a proposal for the construction of Mosi-Oa-Tunya Livingstone Resort Hotel and golf course. The construction of the resort is proposed to be constructed in the buffer zone of the property adjacent to the Maramba River, along the Mosi-oa-Tunya road. The resort plans to construct a 300 bed space facility and 18 hole golf course. The proprietor has been advised to undertake an Environmental Impact Assessment.”* (State Parties, 2018, p.11/21)

In reply the World Heritage Committee Decision 2019 (43 COM 7B.34) recorded its increasing concern:

*“Notes with concern the ever-growing development pressure within and around the property, and urges the States Parties to abandon the proposals, which are clearly incompatible with the conservation of the property’s Outstanding Universal Value (OUV) and the approved Joint Integrated Management Plan 2016-2021, such as a cable car within the property or a tourism resort along with a golf course within the buffer zone inside the Mosi-oa-Tunya National Park;*

*“Also urges the States Parties to provide information on the exact locations and full details of all developments still under consideration, and to submit to the World Heritage Centre for review by IUCN, an Environmental Impact Assessment (EIA) for each of these projects, including a specific assessment of the impacts on OUV in accordance with Paragraph 172 of the Operational Guidelines and in line with IUCN’s World Heritage Advice Note on Environmental Assessment, before taking any decision that may be difficult to reverse.”* ([World Heritage Committee, 2019](#))

In November 2019, three years after initially requesting details, the World Heritage Committee had to request further information on the status of the project.

*“On 22 November 2019, the World Heritage Centre further requested the State Party to provide comments regarding the Mosi-oa-Tunya Livingstone Resort Project and recalling the Committee Decision 43 COM 7B.34 urging the State Party to abandon the proposal.”* ([World Heritage Committee, 2021](#))

UNESCO were notified of revised plans in 2020 State of Conservation report, although construction at this stage had already begun - President Edgar Lungu performed an unveiling and ground-breaking ceremony at the site on 3rd July 2020 with construction commencing immediately after ([VFBNB, Aug 2020](#)).

*“The development of the tourism resort within the buffer zone inside the Mosi-Oa-*

*Tunya National Park was scaled down to exclude the golf course and, in consultation with the WHC, works have been initiated.” (State Parties, 2020, p.5/37)*

Further details were included in the same document, but whilst stating that the 18 hole golf course had been abandoned, neither statements disclosed that a ‘chip and putt’ course now planned instead.

*“Mosi-oa-Tunya Livingstone Resort Hotel - The construction of the Mosi-oa-Tunya Livingstone Resort Hotel has commenced. The Hotel is located in the buffer zone of the property, adjacent to the Maramba River, along the Mosi-oa-Tunya road. The resort plans to construct a 300 bed space facility and has excluded the initially planned 18- hole golf course. An Environmental Impact Assessment for the project was undertaken.” (State Parties, 2020, p.20/37)*

The World Heritage Committee, in its July 2021 Decision Report (44 COM 7B.177) concluded:

*“[The Committee] Notes its utmost concern over the increasing tourism infrastructure development pressure within and around the property, including the start of the construction of the Mosi-oa-Tunya Livingstone Resort Hotel within the buffer zone of the property, contrary to its request to abandon the proposal, [and] urges the States Parties to halt further activities until further consultation with the World Heritage Centre and IUCN has taken place, all relevant Environmental and Social Impact Assessments (ESIAs) have been submitted to the World Heritage Centre and reviewed by IUCN, and the potential impacts of the infrastructure developments on the Outstanding Universal Value (OUV) of the property have been adequately assessed.” ([World Heritage Committee, 2021](#))*

In their 2021 State of Conservation Report the State Parties finally reported to UNESCO that work had commenced at the site:

*“The construction of the Mosi-oa-Tunya Livingstone Resort Hotel within the buffer zone of the property in Zambia has commenced. The 300-bed capacity resort, located adjacent to the Maramba River, was scaled down and will not include a golf course as initially planned.” (State Parties, 2022, p.12/26)*

In April 2021 Radisson Hotel Group announced it was to manage the new hotel under the name Radisson Blu Mosi-oa-Tunya Resort, promoting its proximity to the UNESCO World Heritage Site and due to open by the end of 2022 ([VFBnB, April 2021](#)). The hotel opened in a low key ceremony in December 2022 ([VFBnB, Dec 2022](#)). Over 12,500 people signed an [online petition](#) voicing opposition to the development.

### 2.2.5 *Boundary Issues*

A key landmark in the management of the Victoria Falls/Mosi-oa-Tunya World Heritage Site was the adoption of the first five-year Joint Integrated Management Plan (JIMP), approved by Zambian and Zimbabwean State Parties in November 2007. The plan agreed a unified vision for the management of the site, giving both countries a platform to inform and comment on developments either side of the river:

*“The Victoria Falls World Heritage site joint management plan was approved by both States Parties in November 2007. In Zambia, the joint management plan is supported through the Mosi-oa-Tunya National Park general management plan. In Zimbabwe, the joint management plan is mainly supported by Victoria Falls / Zambezi National Park management plan. Efforts are still underway to secure adequate funding for its effective implementation.” (World Heritage Committee, 2008)*

The 2007-12 Joint Integrated Management Plan presented two maps of the WHS - the

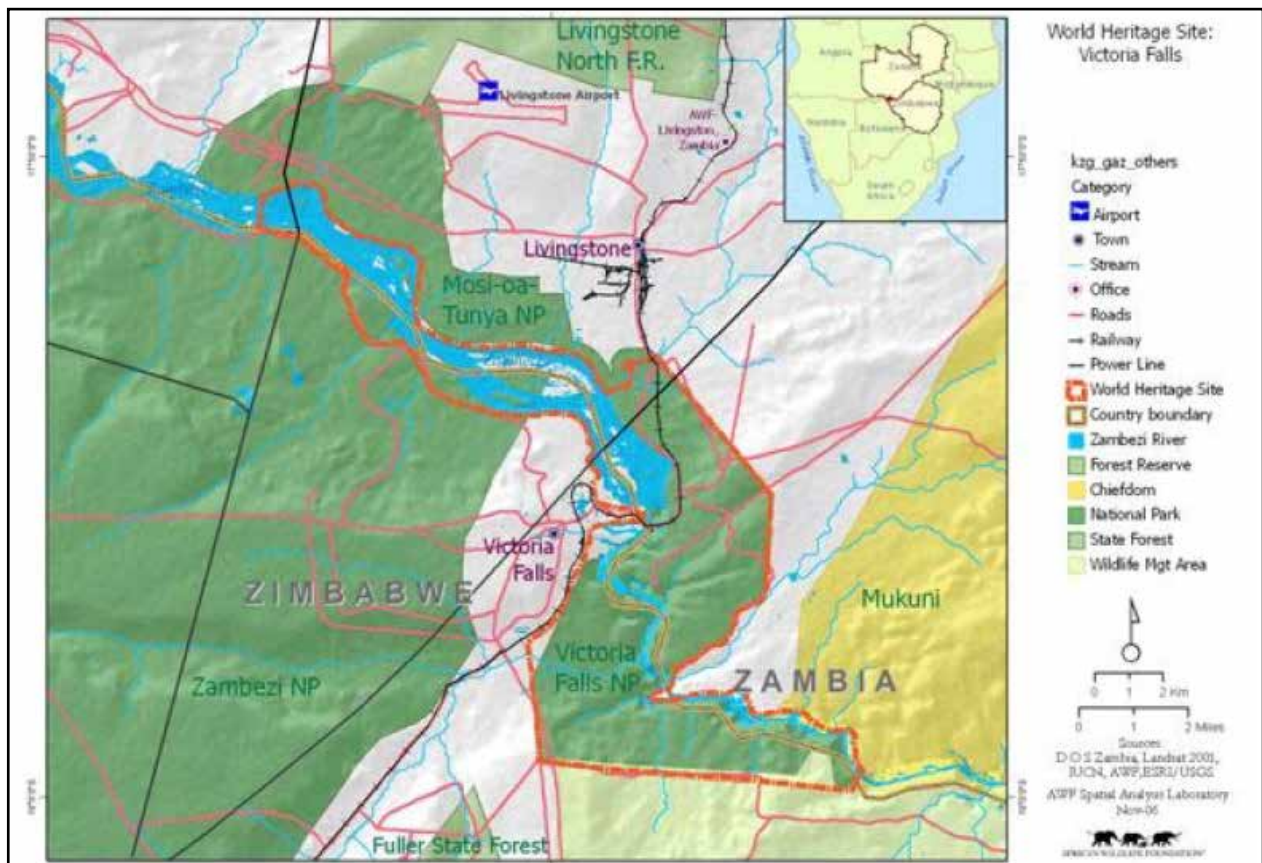
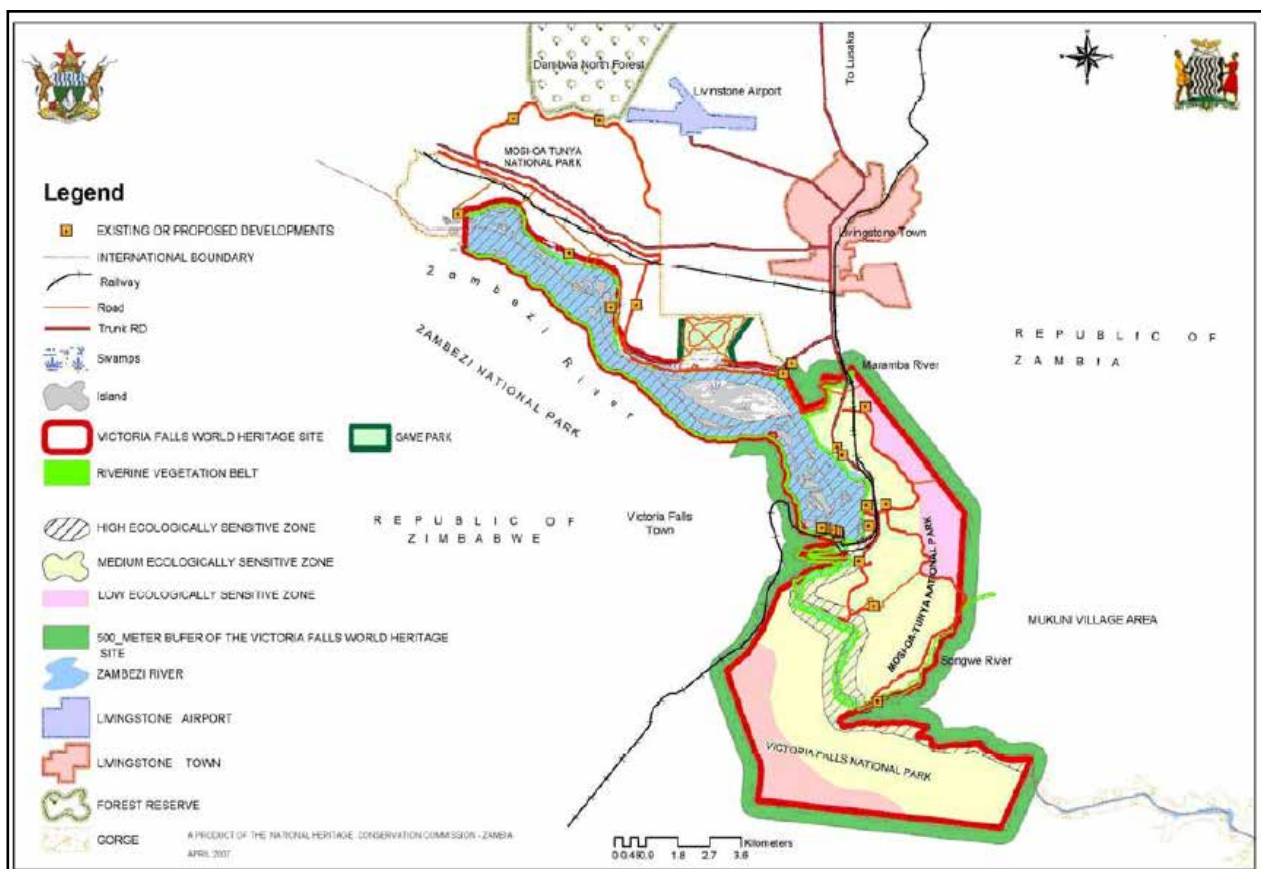


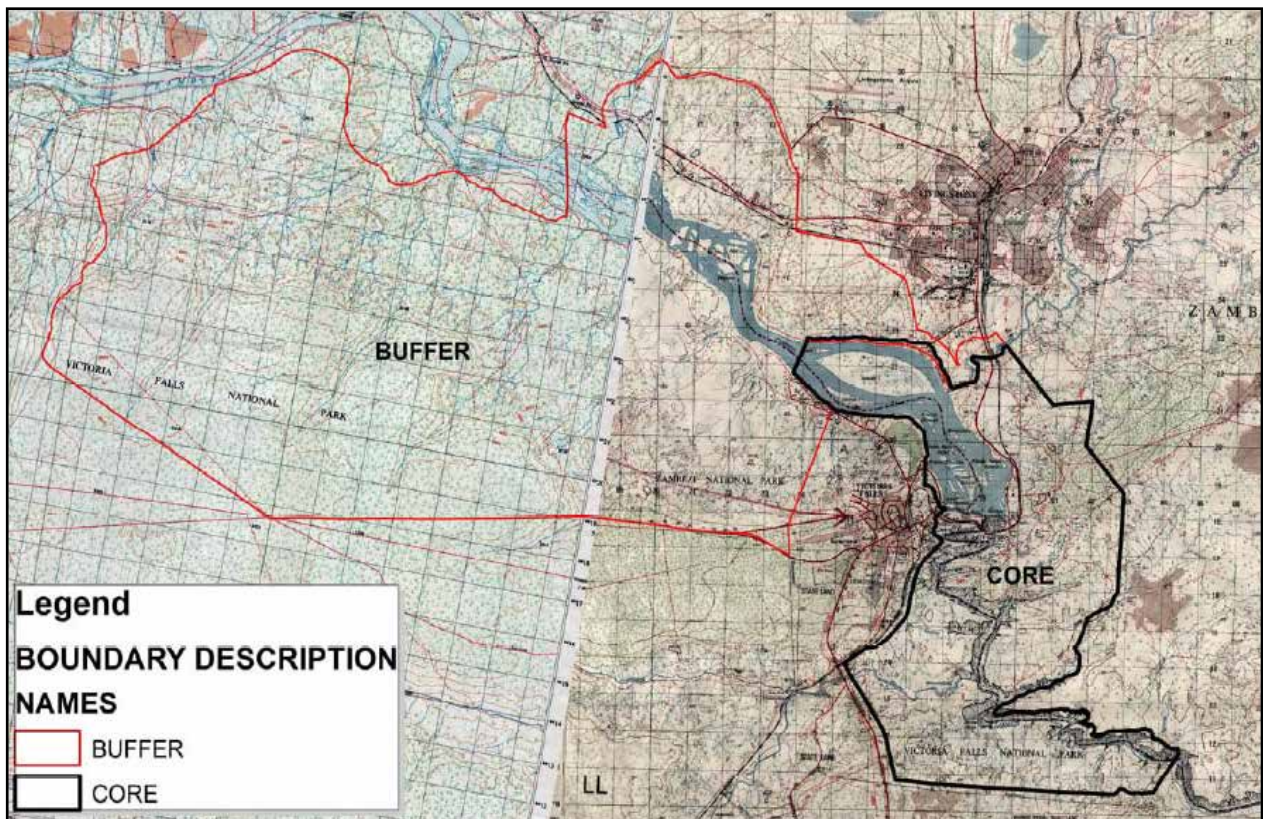
Figure 6: Map of the Victoria Falls World Heritage Site produced by the African Wildlife Foundation (dated 2006), submitted as part of the 2007-2012 JIMP (p.15).

first produced by the African Wildlife Foundation and dated 2006 (State Parties, 2007, p.15; Figure 6, previous page) and another map showing a different boundary - removing the land area of the upstream Zambezi National Park (741 ha) from the area of the World Heritage Site and also removing the 500m Buffer Zone from the remaining river corridor (State Parties, 2007, p.38; Figure 7, below). This map, despite these errors, has been subsequently re-presented in the 2021-2030 Strategic Environmental and Social Impact Assessment (State Parties, 2021, p.2).

In 2016 Zambia and Zimbabwe submitted a new five-year Joint Integrated Management Plan for the conservation and management of the site (State Parties, 2016). The plans again included two differing maps showing yet further reductions in the boundaries for the World Heritage Site, both of which significantly reduced the upstream river corridor (State Parties, 2016, p.15; this report Figure 8, page 34 and p.27; Figure 13, p.46). The document made no supporting reference or justification for these amendments, while also reducing the buffer zone surrounding the site from 500m to 50m, along with other unexplained changes.



*Figure 7: Map of the Victoria Falls World Heritage Site showing reduced upper riverside corridor, submitted as part of the 2007-2012 JIMP (p.38).*



*Figure 8: Map of the Victoria Falls World Heritage Site showing proposed reduced upper river corridor; submitted as part of the 2016-2021 JIMP (p.15).  
[Not the map is composed of two sections which have not even been aligned properly]*

## **2.2.6 Monitoring Mission**

UNESCO initially accepted the 2016 JIMP before raising the issue of the border changes in 2019, after the State Parties had submitted further details - and apparently suggested yet another reduction in the upstream river corridor - now attempting to exclude Siloka (also known as Long or Loanda) Island from the World Heritage Site, and resulting in a request for a UNESCO Reactive Monitoring Mission to visit the site.

*“The States Parties also re-submitted the boundary clarification and retrospective inventory of the property to replace the 2016 submission...”*

*“The States Parties are proposing to reduce the property’s boundaries, mainly by removing the northernmost part, including the Siloka Island and its immediate waters of the Zambezi River. This would reduce the property from 6,860 ha (approved via Decision 36 COM 8E) to approximately 6,562 ha. While purporting to respond to the recommendation of the Bureau of the Committee at the time of inscription in 1989, this is a notable reduction in the area compared to how the property has been*

*managed since inscription and is presented in the approved Management Plan for 2016-2021. The visual setting of this property is central to its OUV and any reduction to the existing boundaries could significantly weaken the property's integrity by possibly allowing further developments in the High Ecologically Sensitive Zone. It would also be important to understand the rationale and motivations to reduce the boundaries. Given the visual and experiential sensitivities of the property, such a change cannot be approved within the process of the boundary clarification and retrospective inventory of the property but should be considered through a request for boundary modification as per the Operational Guidelines.*

*"In light of the ever-growing tourism development pressure in and around the property, continued ambiguity in assessing development proposals and a proposal to reduce the property's boundaries, it is recommended that the Committee request the States Parties to invite a joint World Heritage Centre/IUCN Reactive Monitoring mission to the property. The mission should assess the potential threat posed to the property's OUV by growing tourism development pressure in and around the property, review the regulations to control this pressure and make recommendations to the Committee on the proposed boundary modification." ([World Heritage Committee, 2019](#))*

At the same time the Committee reminded the State Parties of the need to reject unsuitable developments and conduct Environmental Impact Assessments for all proposals affecting the site:

*"Proposals that could have a major negative impact on the property or are incompatible with the approved Joint Integrated Management Plan should be unequivocally abandoned from the outset, such as the planned cable car, resort and golf course by the Maramba River. Strict and clear regulations are critical to control the development pressure and mitigate any negative impacts both within the property and in its sensitive buffer zone. All proposals with potential impact on the property's OUV should be subject to Environmental Impact Assessments (EIAs), including a specific assessment of the impacts on OUV, in accordance with the IUCN Advice Note, and submitted to the World Heritage Centre for review." ([World Heritage Committee, 2019](#))*

While rejecting the unilateral changes to the WHS boundary presented in the report, the Committee emphasised that the State Parties should continue to manage the site according to the 2016 JIMP document.

*"Also requests the States Parties, pending the consideration of any boundary modification recommendations stemming from the Reactive Monitoring mission, to*

*continue to manage the property in accordance with the Statement of OUV and Joint Integrated Management Plan 2016-2021.” ([World Heritage Committee, 2019](#))*

The World Heritage Committee continued to warn the State Parties of unsustainable development and a direct threat of the site being placed on the World Heritage ‘List of Sites in Danger’ in their 2021 Decision Report.

*“The property continues to face considerable development pressure, particularly from a number of tourism infrastructure proposals, and their potential cumulative impacts raise increasingly high concerns... In the absence of assurance that the potential impact of each project individually and cumulatively, has been comprehensively assessed in relation to the protection of the property’s OUV and that there will be no negative impacts on the OUV, it is recommended that the Committee urgently request the States Parties to halt further activities until further consultation with the World Heritage Centre and IUCN has taken place, and the potential impacts assessed in relation to the OUV... Until such comprehensive assessments have taken place, especially at the cumulative scale, and recalling the Committee’s request to the States Parties to abandon any project that is incompatible with the OUV of the property, a decision to proceed with any large infrastructure projects within the property and its buffer zone would be of the utmost concern, and would likely lead to the property meeting the conditions for inscription on the List of World Heritage in Danger, in accordance with Paragraph 180 of the Operational Guidelines.” ([World Heritage Committee, 2021](#))*

The UNESCO Reactive Monitoring Mission visit, originally requested by UNESCO in 2019, was delayed by the global pandemic and only took place in February 2022. The finalised Mission Report, initially due to be presented at the postponed 45th session of the World Heritage Committee in June 2022 (now due to be held in September 2023), was released in June 2023 and warns:

*“The property is facing increasing threats from individual and cumulative infrastructure developments, whose footprints are inside the property, its buffer zone or in its wider setting... If the proposed and future developments proceed without the appropriate level of consideration for the environment in which the property is located and for which it is inscribed, as well the cumulative impacts from the different individual developments, the OUV [Outstanding Universal Values] could be considered to be in danger in the near future.” (UNESCO, 2023b, p.5)*

Since the site visit, however, a wave of further development proposals have emerged on the Zimbabwean side of the river.

## **3.0.0 STATE OF DEVELOPMENT OVERVIEW**

### **3.1.0 Conservation and Management**

#### **3.1.1 Conservation Priorities**

The riverine forest fringe is a protected feature of the WHS and noted for its importance to wildlife and wider scenic value. The vulnerability of this habitat is also recognised in the 2016-2021 Joint Integrated Management Plan (JIMP):

*“The Zambezi River, in common with all rivers in tropical Africa, has a distinct fringing vegetation of gallery or riparian woodland. The Riverine Forest is found along the banks of the Zambezi, Songwe and Maramba Rivers and on some islands. On the riverbanks it is with a width rarely more than 20-100m wide from the high water mark (Fanshawe, 1975, Meynell et al., 1996). At its best development, riparian forest is a three storeyed forest with a closed evergreen canopy attaining 21m in height. Some common tree species that occur here are Diospyros mespiliformis, Trichilia emetica, Syzyguim guineense ssp barotsense, Syzyguim cordatum, Mimusops zeyheri, Hyphaene coriacea, Hyphaene petersiana and Pheonix reclinata. Also common are Phragmites mauritianus and Cyperus papyrus. This habitat houses the highest concentration of animals and is the most sought and threatened by human developments.” (State Parties, 2016, p.18-9)*

These wooded riverine fringes are the remnants of once wider forests which were historically supported across the region by a wetter climate and which now survive only in these riverine habitats. In the current drier climatic conditions now prevailing over the region the woodland does not naturally regenerate, giving way instead to mixed bush and scrub.

*“When grossly disturbed, riverine forest cannot regenerate easily and gives way to xeric scrub. The rain forest and other parts of the riparian forest are vulnerable to disturbance by trampling which allows intrusion of ruderal species such as Lantana camara, Similarly where the spray from the Falls over the Eastern Cataract has been reduced during low flows, the growth of moisture dependent plants is inhibited and Lantana invades; this is particularly prevalent in the Zambian rain forest.” (IUCN, 1996)*

Yet despite the vulnerability to this habitat being widely recognised in management documents, tourism developments continue to impact and threaten the river corridor, especially in the upstream section of the site, the draft report of the Reactive Monitoring Mission concluding:

*“For the area upstream from the Falls, the mission observed that the rationale for the 1989 recommendation to focus on the riverine strip of the National Parks remains justified, with most pressure actually felt by the NP areas near the river that are most relevant to the integrity of the site. While MoTNP and ZNP have been identified as buffer zones, the tourism developments have shown that the status of National Park has not provided the envisaged protection.” (UNESCO, 2023b, p.22)*

The draft VF/ZMP National Park Management Plan identifies the forested riverine fringe as being particularly at risk from tourism developments, the river, islands and gorges, together with the springs and drainage lines which flow into the river, being under very high threat from development (ZPWMA, Nov 2022, p.19).

### **3.1.2        *Concerns over Concessions***

Zimbabwe's National Parks were originally designated as 'no permanent development' zones, with adjoining Safari Areas set aside for either consumptive tourism (hunting) or commercial concessions and leases such as tourism camps and lodges.

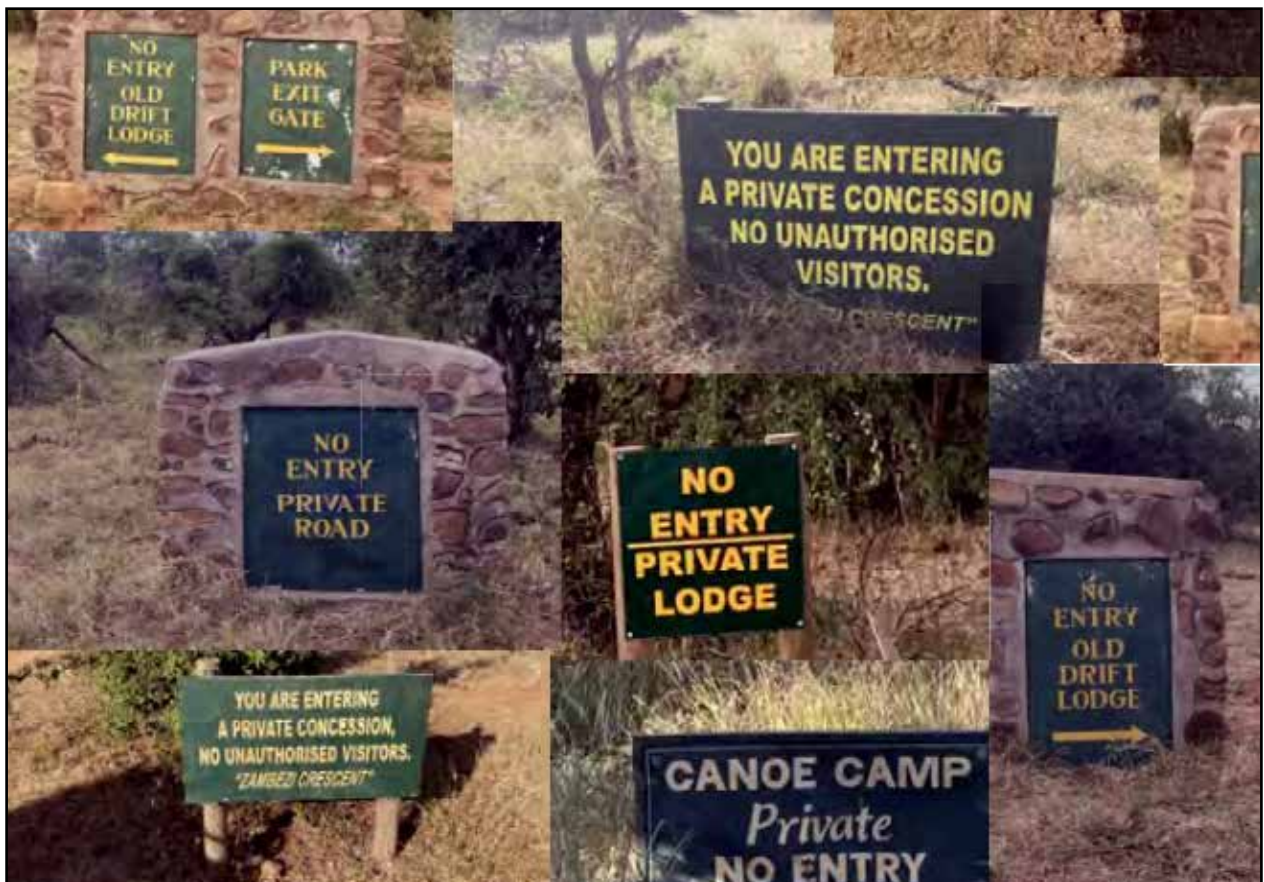
Overnight facilities for visitors to the Zambezi National Park, developed during the 1960s, originally included three dedicated Fishing Camps (Kandahar, Siansimba, and Mpala Jena) and four 'minimal development' picnic camps (Chundu 1, Chundu 2, Chomunzi and Saminungu), all suitable for groups up to twelve people. The sites were available to be booked by anyone visiting the Park, either independently or with organised tour operators and guides - usually small independent companies based locally in Victoria Falls. Over the last decade, however, there has been a steady trend in the licensing of these public campsites as private concessions, with tourism companies developing exclusive luxury safari lodges. Ten years ago there were no private concessions within the Park.

Following the opening of the Victoria Falls River Lodge in 2012 - the first riverside concession within the Zambezi National Park - there has been a wave of commercial concessions developed along the riverside fringe within the Park, including Pioneers Camp (opened in July 2013, relaunched as Mpala Jena Camp in February 2019), Zambezi Sands River Camp (opened in October 2014 - located at the old Chomunzi Camp), the Victoria Falls Island Treehouse Lodge (opened August 2017 - located on Kandahar Island, part of the Victoria Falls River Lodge development), Chundu Island Lodge (opened in November 2017), the Old Drift Lodge (opened May 2018) and Tsowa Safari Island (opened in August 2019).

Speaking in February 2021 in relation to negative public reaction to the development of the Siansimba Camp Site, Dr Fulton Mangwanya, Director-General of the Zimbabwe

National Park and Wildlife Authority, outlined plans to ‘upgrade’ four sites in the Park, including Kandahar Camp (the last remaining overnight campsite available within the Park and despite being located within the ‘Highly Ecologically Sensitive Zone’ (HESZ) of the World Heritage Site, a zone which permits no new development - see Section 3.1.4).

*“What we are doing in Victoria Falls - I have had some complaints - we have got about twenty-five picnic sites along Zambezi River. I am planning to upgrade four of these sites to start with and these are Siansimba, and Kandahar, site four and site ten, so that the public can go and actually enjoy it, because it’s supposed to be like that. You know, according to our constitution the public are supposed to enjoy some of these facilities that we have, so I am going to do that by the end of the year, I’ll have renovated some of these places, revamped them so that they come and see. And wherever there are some leases, the leases are not privatised for Christ’s sake - public is allowed to go in and enjoy seeing animals and enjoy seeing the park even if there are some leases. So I think there is a misconception that I’d like to correct.”*  
([VFBnB, Feb 2021b](#))



*Figure 9: Examples of No Entry signage from Zambezi National Park private concessions (from ZPWMA, May 2022)*

But the truth of the matter is that public visitors to the National Park will not be allowed access to the river in areas which are developed as private commercial safari camps - as evidenced by the spate of 'no entry' signs blocking access to the river (Figure 9).

The upstream Sian Simba River Lodge opened in August 2022. Despite the E.S.I.A. stakeholder disclosure clearly stating that *"all structures at the camp will be semi-permanent in the forms of tents,"* the main lodge building has been constructed in brick and cement and the grounds landscaped with pathways, lawns and brick retaining walls.

The current wave of proposed tourism developments on riverside sites within the Zambezi National Park include plans to develop Kandahar Camp, Chundu Camp, Picnic Sites No.4, No.10, No.14 (with associated island development, known as the Victoria Dream development) and Nos.21-25 (ZPWMA, May 2022).

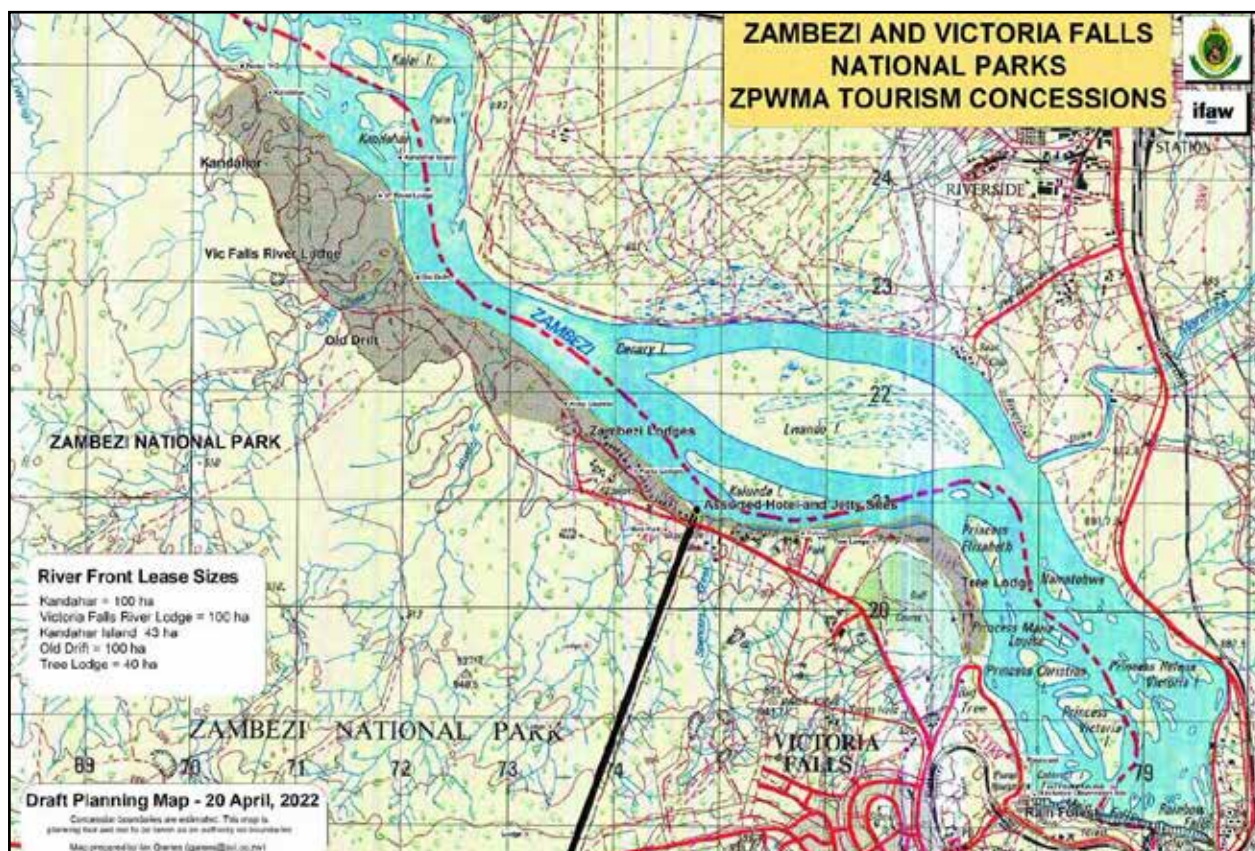


Figure 10: Riverside concessions leased to private operators (shaded area), extending from Kandahar Camp downstream to Zambezi Drive (from ZPWMA, May 2022)

[Note the background map on which these concession have been illustrated is old and shows the old road layout approaching Big Tree and the Elephant Hills Resort]

## Proposed Tourism Infrastructure within and around Mosi-Oa-Tunya/Victoria Falls World Heritage Site

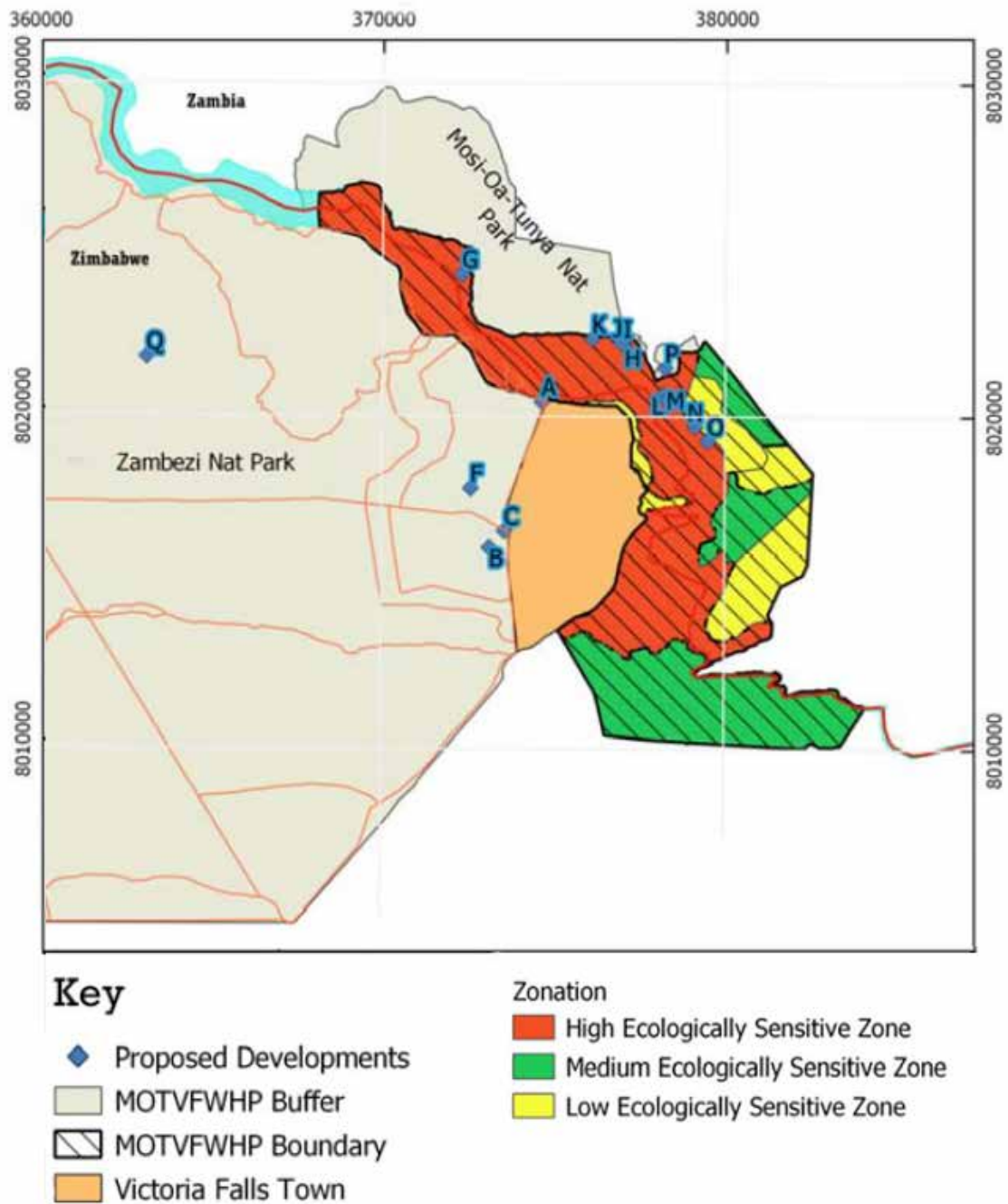


Figure 11: Map showing management zones and proposed tourism developments within WHS, (Adapted from State Parties, 2021, Appendix 2a).

Away from the river there are also a number of commercial concessions being considered within the Zambezi National Park, including a captive bird park (4.1.6) and half a dozen lodge developments, including one with a proposed conference centre facility and 'solar farm.'

The 2021 State of Conservation Report (the latest available report at the time of writing) presented a map of proposed developments (State Parties, 2021, Appendix 2a, p.2; Figure 11, previous page), indicated only one development within the southern (Zimbabwean) area of the WHS (the proposed 'Bird Park' development, marked 'A' on the map). No supporting details of the proposed development were given in the main document.

During 2022 a wave of further development proposals in the river corridor upstream of the Falls and within the southern side of the WHS have become known, none of which were disclosed in the 2021 report. The developments include the allocation of the Zambezi National Park Kandahar Camp (4.1.2) as a private concession (confirmed by National Parks in media reports in February 2021); the proposed Victoria Falls Resort development (4.2.5), announced by the town municipality in June 2022; the proposed riverside 'tree lodge' development (4.2.10), only revealed to local residents when heavy machinery arrived on site in December 2020; and the Zambezi Drive riverside restaurant development (4.2.14), again only revealed to residents when work started clearing vegetation on the site in April 2022. Planned riverside concessions, together with existing developments, will cover an almost continuous section of the river from Kandahar Camp downstream to the Falls (Figure 10, p.40).

In addition, in April 2022 Victoria Falls River Lodge (Zambezi Crescent) started promoting commercial tours Cataract Island (4.2.15). The same operator had previously attempted to launch tours to this island in 2016, resulting in widespread criticism, an [online petition](#) with over 17,500 signatories, and a UNESCO request for a full Environmental and Social Impact Assessment (ESIA) for the activity ([World Heritage Committee, 2017](#)). There is no evidence that an ESIA has yet been conducted.

In May 2022 National Parks hosted a stakeholder planning consultation meeting as part of a IFAW funded process to develop a new Management Plan for the Zambezi and Victoria Falls National Parks. Participants raised concerns over the public disclosure, bidding process and allocation of commercial leases and concessions by National Parks and the poor standard of independent ESIA surveys and reports, where conducted. Park representatives declined the opportunity to present further information on the wave of new tourism development proposals currently threatening the Falls and surrounding areas, indicating that *"lease allocations will be discussed at a different forum"* (ZPWMA, May 2022).

The development of the riverside restaurant, immediately above the Devil's Cataract and main Victoria Falls visitor park, together with the launch of tours to Cataract Island and allocation of riverside private concessions within the ZNP resulted in a group of local residents raising a legal challenge against the allocation of these concessions. Despite this construction has continued at the riverside restaurant site, with concrete and brick foundations and piers shown in recent photographs.

News of these developments, together with the release of the draft UNESCO Reactive Monitoring Mission Report, led to widespread negative national, regional and international media coverage, raising concerns over tourism development pressures and the future viability of the WHS (Appendix 6.0.1). A new [online petition](#) was launched by local residents against the new developments (currently over 20.500 signatories) together with a [Facebook page](#) and website campaigning against the developments under the 'Keep Victoria Falls Wild' banner ([www.keepvictoriafallswild.com](http://www.keepvictoriafallswild.com)).

At the end of November 2022 a draft management plan for the Zambezi and Victoria Falls National Parks was circulated, including a map of all known concessions/leases within the two national parks (ZPWMA, Nov 2022; Figure 12, below).

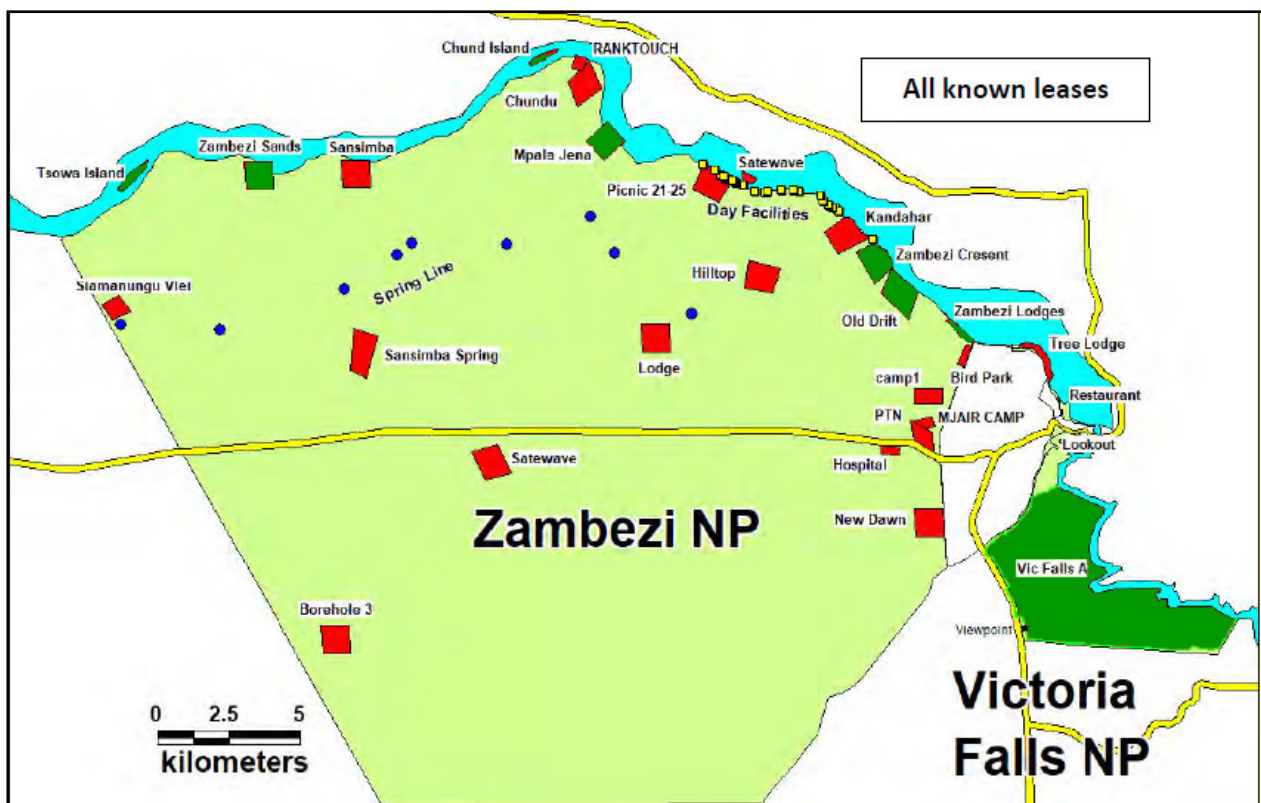


Figure 12: Map showing known National Park leases, amended to show existing developments in green, new/undeveloped concessions in red (ZPWMA 2022, Appendix, p.2).

### 3.1.3 *New Boundary Issues*

The draft management plan also raised further concerns over the legal and physical boundaries of the VFNP, in particular the area covering the main part of the Falls and upstream river corridor (see Appendix 6.0.3 for description of boundaries).

*“Although described in the [Parks and Wildlife] Act, the boundaries are based on four different sources (1:50,000 maps, 1:5,000 maps, beacons and plans filed in the Surveyor Generals office in Bulawayo) which can lead to confusion. In an area under intense development pressure it is vital that these boundaries are clearly defined both on the ground and on maps. The official description divides the park into Victoria Falls A (the downstream part) and Victoria Falls B (the upstream part) and puts the combined areas at 23.4 km<sup>2</sup>. The available GIS map data estimates 30.5 km<sup>2</sup>. The park contains approximately 11 km<sup>2</sup> of Zambezi River and islands, the Victoria Falls, the rainforest... The boundary of Victoria Falls A is clear and marked by the main Bulawayo Road and the railway reserve to the west, by the international boundary to the east and a fence to the south. **However, the boundary of Victoria Fall B is less clear in parts, both on the maps and on the ground.**” (ZPWMA, November 2022, p.11)*

As these boundaries also relate to those defining the WHS and protecting the fragile riverine vegetation there is an urgent need to clarify and confirm the legal and physical boundaries of the Park. The draft management plan also highlights the poor quality, and accuracy, of maps provided in the Joint Integrated Management Plan and other management documents.

*“The maps presented in the JIMP are of poor quality and can lead to confusion so, for the avoidance of doubt, the written description is attached to this document. However, the written description also is confusing and attempts to map it out on imagery led to different boundaries based on interpretation.” (ZPWMA, November 2022, p.21)*

It should also be noted that the 2021-30 Strategic Environmental and Social Impact Assessment states that the area of the WHS is entirely protected under National Park status:

*“The area enclosed by the World Heritage Site falls within the boundaries of the three national parks: Zambezi National Park, Victoria Falls National Park in Zimbabwe and Mosi-Oa-Tunya National Park in Zambia. It is therefore entirely in public ownership and protected under the Zambia National Heritage Conservation Commission Act No. 173 of 1989 and the Zimbabwe Parks and Wildlife Act (Chapter 20:14) of 1975.” (State Parties, 2021, p.22)*

This statement ignores the road and rail transport corridor which transects the WHS below the Falls and which on the southern side of the site includes the border crossing facilities on the approach to the Victoria Falls Bridge. This corridor is believed to be part of the Railway Reserve identified as Deka-Falls Railway Strip 6, including the Victoria Falls Customs Post Reservation, and is controlled by National Railways of Zimbabwe. The status of this corridor (and similar infrastructure on the north bank, including the Victoria Falls Hydroelectric Power Station) in relation to the WHS needs to be clarified, including the obligations Victoria Falls County Council and NRZ as key landholders.

In recent years there have been a series of new commercial developments surrounding the visitor car park facilities and during 2023 bush and scrub has been cleared on either side of the road approaching the Falls visitor park in preparation for a new development known as 'The Flyover.' In August 2023 it was reported that further concessions have been identified and awarded (see Road and Rail transport Corridor, 4.2.17).

### **3.1.4        *Zoning Issues***

Together with question marks over the actual boundary of the site, the two Joint Integrated Management Plans for the site present varying maps and descriptions of the management zonation for the property, with particular inconsistencies in relation to the zoning of the upstream riverine fringe.

The text of the 2007-12 JIMP clearly identifies the riparian vegetation as within the 'Highly Ecologically Sensitive Zone' or HESZ (State Parties, 2007, p.39). The supporting map (State Parties 2007, p.38; Figure 7, p.33) is unclear in showing the zonation of the property in the upstream river corridor (the scale of the map is insufficient to show the area clearly).

The 2016-21 JIMP detailed revised management zones for the property, using a 1989 instruction as justification for the changes (which also included an attempt at reducing the overall boundary of the WHS):

*"Modifications to these zones have been made in line with the 1989 World Heritage Bureau recommendations as well as the prevailing inconsistent historic land use. Future modifications can only be made if only they contribute to the enhancement of the OUV."* (State Parties, 2016, p.26)

The text description again indicates that the riverine vegetation is included in the HESZ (Block 6) and described as:

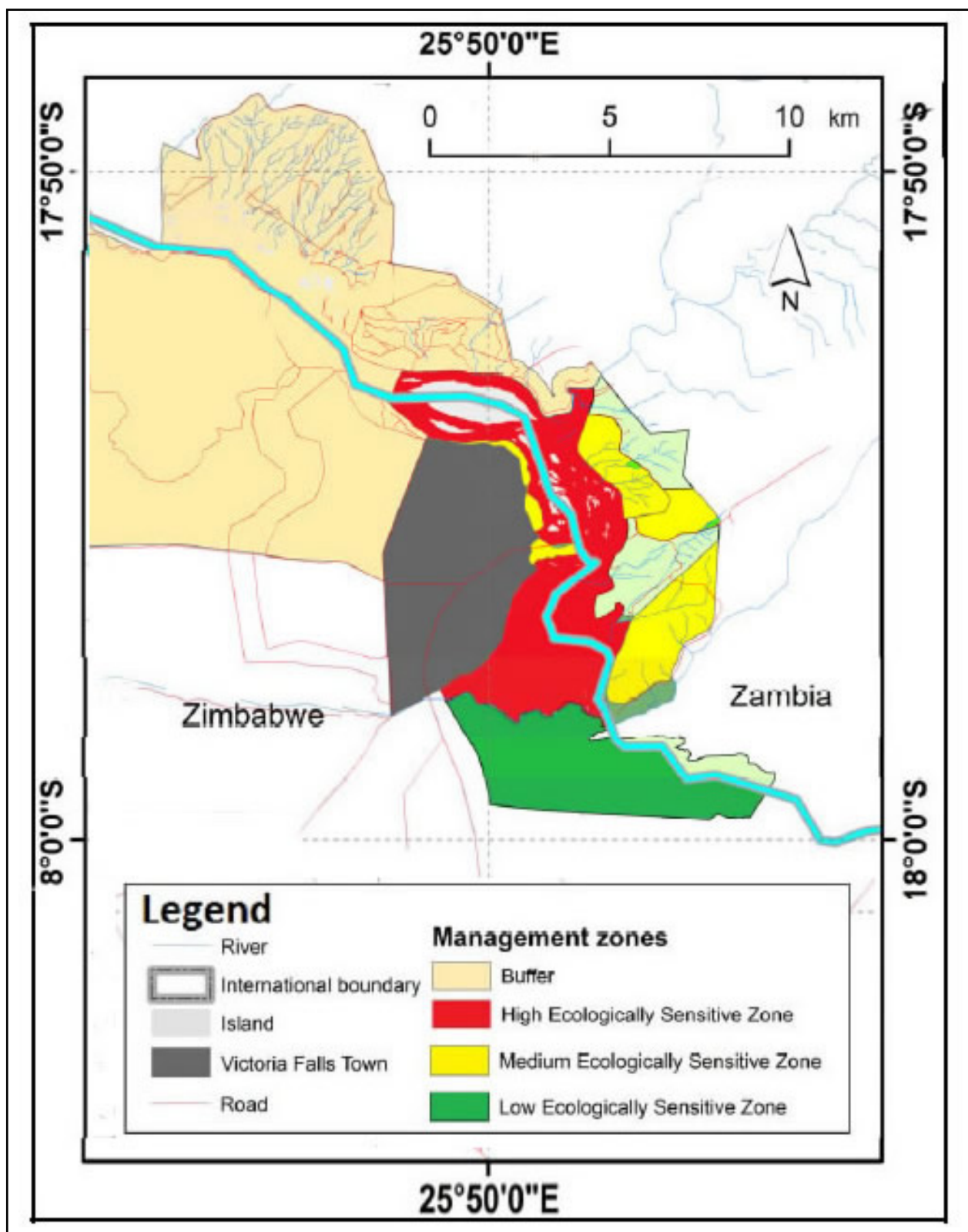


Figure 13: Map showing management zonation (Adapted from State Parties 2016, p.27/90).

*“...following the Victoria Falls Rainforest, thence **up the Zambezi River covering the riverine vegetation strip** to where it joins the Zambezi National Park boundary.”*  
(State Parties, 2016, p.29)

The 2016-21 JIMP identifies the boundary with the ‘Medium Ecologically Sensitive Zone’ or MESZ (Block 7) as extending along Zambezi Drive road (see Appendix 6.0.4).

*“The zone covers the Victoria Falls border and the Rainforest car park area and continues **from the Victoria Falls Rainforest VIP entrance gate, thence along the Zambezi Drive Road** to beacon R11, thence westwards following the boundary beacons to where it joints Zambezi National Park boundary”* (State Parties, 2016, p.29).

These text descriptions clearly indicate that the HESZ (Block 6) immediately above the Falls includes the entire area of the land between Zambezi Drive road and the riverbank - covering the area commonly known as the riverine fringe or strip. This interpretation is also consistent with conservation priorities identified for the site and the historical management of this area which has been protected as part of a strict ‘no new infrastructure’ zone since its management was taken over by National Parks in the early 1950s. It follows that the land from the road away from the river is considered to be within the MESZ (Block 7), a management zone which is described in the 2016-21 JIMP as including the road and rail transport corridor which dissects the site below the Falls (note issues relating to this area highlighted in Section 3.1.3).

The supporting map presented in the 2016-21 JIMP (State Parties, 2016, p.27; Figure 13, opposite) has perhaps been the source of some confusion by not clearly showing the line of the riverbank immediately above the Falls (again the scale of the map is insufficient to show the required detail of the zonation in this area). It does, however, correctly show the river and riverside fringe within the red HESZ and the yellow MESZ with the dividing line between the two lying along the road known as ‘Zambezi Drive’ running upstream from the Falls (the middle of the three yellow areas marked on the Zimbabwe side - the lower area is the transport corridor down to the bridge, and the upper the riverside fringe surrounding the Elephant Hills Golf Course - note that this area should, according to the text description, be completely within the red HESZ).

The 2016-21 JIMP also presented revised guidelines for permitted activities and developments allowed within the management zones. The original 2007-12 JIMP prohibited all new infrastructure developments (with the exception of existing facilities) the both the High and Medium management zones (State Parties, 2007, p.39-41). The 2016-21 JIMP, while still prohibiting all new infrastructure development within the HESZ, permits the development only of ‘semi-permanent facilities’ within the MESZ.

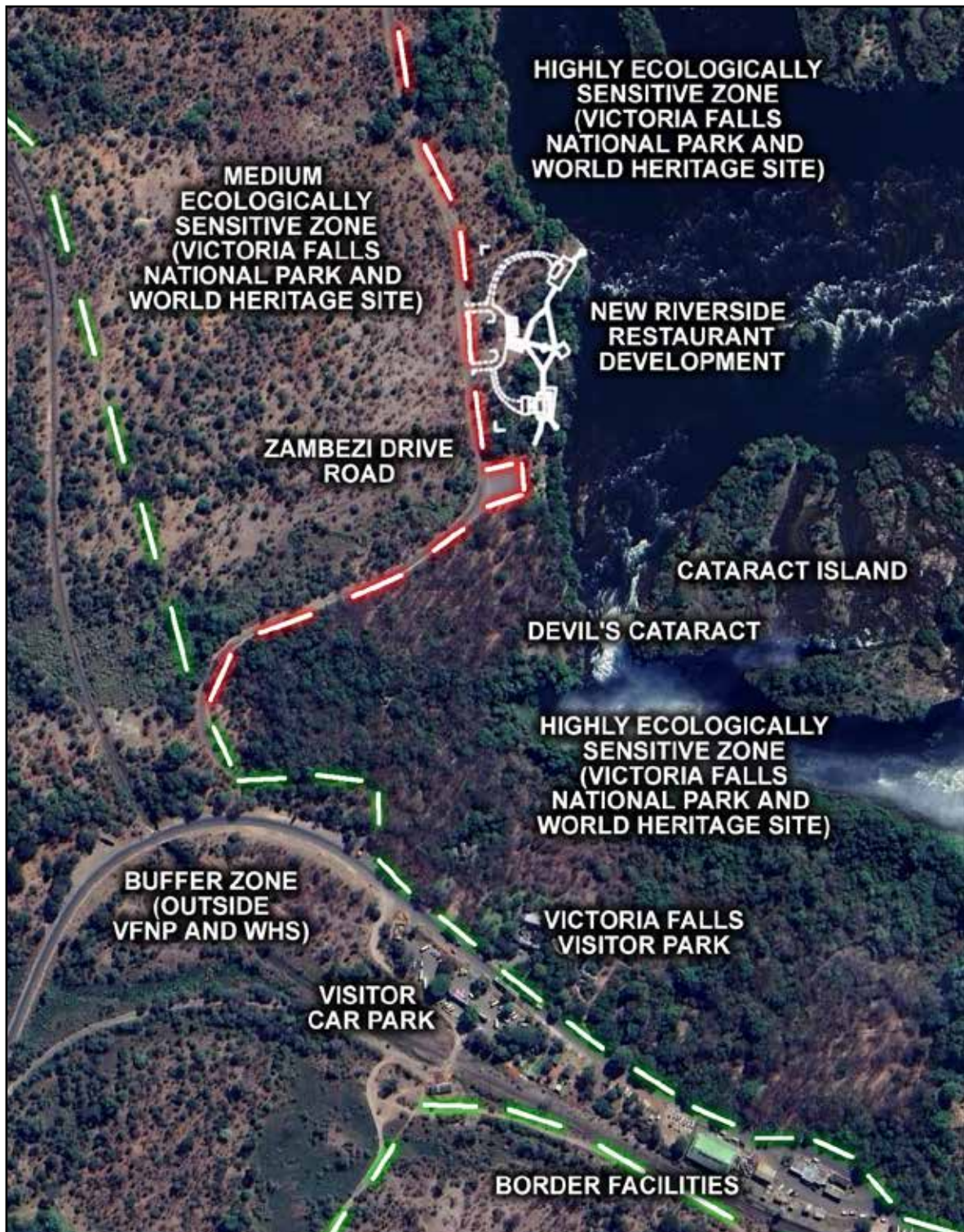


Figure 14: Map showing boundary line of Victoria Falls National Park Area B (green line) and line of management zonation with site of riverside restaurant development (background satellite image from Google Maps).



*Figure 15: Map approximate lines of VFNP and WHS (green line) and management zones (background satellite image from Google Maps).*

The developers of the riverside restaurant are claiming that their development is within the yellow MESZ and therefore an allowable development. They refer to the 2016 JIMP map in support of their claim. They have clearly therefore misread the map and supporting text description (they have also misunderstood the meaning of 'semi-permanent'). The site of their development is within the red HESZ. How ZimParks have been convinced of the same mistake is less clear.

We believe that for this section of the riverine fringe to be in anything other than the HESZ would be a significant shortcoming in the administration and management of the site. For it to be within the MESZ - the same zone as the rail and road transport corridor and visitor car parking area - would be a serious neglect of Parks core conservation aims and its international obligations under the 1972 World Heritage Convention and 1996 Parks Act.

The mistaken belief that the riverine fringe upstream of the Falls is within the 'MESZ' is of particular concern in relation to three developments along this stretch of the river - the riverside restaurant (4.2.14 - opened in mid-2023), the new National Park 'Rock Pool' bar (constructed in early 2022 and operating from events from late 2022) and the proposed 'tree lodge' development (4.2.10 - again with preparatory work already underway on the ground). As it is beyond doubt that the area of the VFNP upstream river corridor and riverine fringe is within the HESZ which prohibits all new infrastructure construction there must be an immediate review of all development proposals within this area.

The Committee should note that the map presented in the 2021 State of Conservation Report (State Parties, 2021, Appendix 2a, p.2; Figure 11, page 41) appears to show different boundaries to the MESZ in the area of the riverine fringe upstream of the Falls, with the two previous separate blocks merged to form one larger area. From the outline silhouette of this area it is likely that it has been expanded to include the area of the riverine fringe between Zambezi Drive and the riverbank. Note also the riverside fringe surrounding the Elephant Hills Golf Course is again indicated as being within the MESZ, when text of the 2016 JIMP clearly indicates it is within the HESZ.

There is no supporting text description or explanation of any these changes, although it can be expected that the State Parties will attempt to modify the text of the management zones in future documents to reflect these changes and accommodate the above mentioned tourism developments within the MESZ, despite the statement that "*Future modifications can only be made if only they contribute to the enhancement of the OUV*" (State Parties, 2016, p.26).

It should also be noted no management zonation is detailed for the upstream land area of the ZNP which is included in the WHS in either of the JIMP documents - a significant omission which subsequently allowed the development of two lodges along this section of riverine fringe, the Victoria Falls River Lodge (opened in 2012) and the Old Drift Lodge (opened in 2018).

While the river corridor upstream to Kandahar Island is identified as being within the HESZ (State Parties 2007, p.39) this still did not prevent the development of lodge units on the island (opened in 2017, part of the Victoria Falls River Lodge development). The revised zonation map subsequently presented in the 2021 State of Conservation Report shows the whole of the ZNP area of the WHS within the HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41) - raising questions over the recent allocation of Kandahar Camp for development as a lodge concession in an area where no new infrastructure or facilities are allowed.

### **3.0.6      *Conflicting Priorities***

Since the re-designation of the National Park Authority as a self-funding authority in the 1990s there has been an necessary shift toward income generation to cover nationwide operations in a difficult operating environment with unique economic challenges. There are concerns that the pressure to raise revenue is compromising the conservation priorities for the site and resulting in negative impacts .

In media reports in September 2018 ZimParks spokesperson Mr Tinashe Farawo expanded on the Park Authority's plans to increase income generation by offering tourism activities:

*“There are tourism products that we are now adding in Victoria Falls in an effort to generate more revenue,’ ZimParks spokesperson Mr Tinashe Farawo told The Herald. ‘We have already introduced bush dinners at the Livingstone statue, we are also increasing the time for night viewing at the majestic Victoria Falls. People can now view the falls up to 10 p.m. from 7 p.m. which was in place previously. We are also introducing night driving in Zambezi National Park which is in Victoria Falls. We have also introduced a picnic site on the Zambezi River. We are looking at introducing a massage spar for beauty therapy and are in the process of acquiring beauty therapy equipment and also hiring cosmetologists so that we can increase value for money around the Victoria Falls so that our tourists can have more activities to partake in.”* ([VFBnB, Sept 2018](#))

The statement also appears to mark a shift in Parks policy regarding evening river cruises and events, which were previously limited to day-light hours only (as well as allowing night-time game drives within the ZNP). Evening dinner cruises are now offered on the river, returning well after sunset. Riverside sites are also increasingly used for evening events, such as the Pure Africa site (4.2.8), Park's 'Rock Pool' bar development, launched in December 2022 (4.2.13), and no doubt the riverside restaurant development immediately above the Falls opened in June 2023 (4.2.14). These significant changes in the management of the WHS appear not been reported to UNESCO.

## **3.2.0      Monitoring and Reporting**

### **3.2.1      *Visitor Statistics***

Visitor numbers to the Victoria Falls World Heritage Site as presented in the State of Conservation Reports appear to vary with figures for the south bank Rainforest presented in Zimbabwe Tourism Authority annual reports. The State of Conservation reports present a combined total of visitors to the Falls on both sides of the river.

### Visitors to the Victoria Falls Zambia and Zimbabwe

Year	Reported Total*	Zambia**	Zim (calc)***
2010	232,000	138,148	94,252
2011	215,000	133,053	82,327
2012	195,000	151,005	43,995
2013	252,800	152,952	99,848
2014	353,025	153,790	199,235
2015	544,104	141,929	402,175
2016	417,372	167,710	249,662
2017	467,408	149,630	317,778
2018	463,578	218,152	245,426
2019	493,698	188,749	304,949
2020	198,023	85,414	112,609
2021			
2022			

*Table A: Total visitors to the Victoria Falls as reported in State of Conservation Reports (\*), confirmed Zambian totals (\*\* from 2021-30 SESIA) and calculated Zimbabwe totals (\*\*\*).*

Figures for Zambia are published in 2021-2030 SESIA, allowing figures for the southern Zimbabwean side to be calculated (Table A, overleaf).

Figures published by the Zimbabwe Tourism Authority appear to vary significantly from the figures calculated from the State of Conservation Reports, giving substantially different combined totals (Table B, page 51). Note there were no figures presented for 2016 in the ZTA reports - figures from a tourism report produced by Africa Albida Tourism in conjunction with ZTA have been used for this year (Africa Albida Tourism, 2017).

The draft Zambezi/Victoria Falls National Park Management Plan identifies tourism development and impacts as the most significant threat to the future integrity of the site, not only in terms of physical development and fragmentation of the Site but also in the numbers of visitors to the Site during peak periods.

*“Tourism developments and activities - As an iconic tourism destination there is immense pressure for development to cater for increasing demand. Although there*

### Visitors to the Victoria Falls Zambia and Zimbabwe

Year	Zambia*	Zim (ZTA)**	Revised Totals
2010	138,148	141,113	278,261
2011	133,053	200,125	333,178
2012	151,005	197,776	348,781
2013	152,952	196,041	348,993
2014	153,790	241,351	395,141
2015	141,929	260,575	402,504
2016	167,710		-
2017	149,630	241,804	391,434
2018	218,152	338,472	556,624
2019	188,749	397,436	586,185
2020	85,414	64,087	149,501
2021		70,602	
2022			

*Table B: Recalculated total visitors to the Victoria Falls using figures for Zambia reported in 2021-30 SESIA (\*) and figures for Zimbabwe as presented in Zimbabwe Tourism Authority annual reports (\*\*).*

*is a Joint Integrated Management Plan for the WHS the two Zimbabwean parks do not have approved management plans which means that the development of tourism has proceeded in an ad hoc manner without a long-term vision... Management of increasing numbers of visitors will be a problem for the ZPWMA in the future. The pressure for boat, helicopter and vehicle access is expected to increase and the management of the rainforest for pedestrian traffic will also present a challenge.” (ZPWMA, November 2022, p.17)*

The reporting of visitor numbers to the site, presented in the regular State of Conservation Reports and key to monitoring tourism visitor impacts, is however limited to the number of visitors to the fenced Falls visitor park (or Rainforest, VFNP Area B) and does not include visitors to the Wild Horizons Estate (VFNP Area A), or visitors to the Zambezi National Park section of the WHS. Overnight visitors staying in accommodation within the WHS should also be reported, again including the Wild Horizons Estate and

### Total visitors to the Victoria Falls National Park, Zimbabwe

Year	National	International	Totals
2010 *			141,113
2011	56,035	144,090	200,125
2012	60,796	136,980	197,776
2013	51,361	144,680	196,041
2014	67,510	173,841	241,351
2015	78,460	182,115	260,575
2016 **	65,913	199,475	265,388
2017	57,008	184,796	241,804
2018	75,091	263,381	338,472
2019	86,704	310,732	397,436
2020	29,607	34,480	64,087
2021	48,600	22,002	70,602
2022			

\* No breakdown for 2010 in published reports.

\*\* No figures for 2016 in published reports - figures from Africa Abida Tourism, 2017, Victoria Falls - Africa's Livings Sole. A tourism survey of the Victoria Falls region. Africa Albida Tourism/Zimbabwe Tourism Authority.

*Table C: Visitor breakdown for Victoria Falls National Park (figures from ZTA Annual Reports)*

the Victoria Falls River Lodge and Old Drift Lodge (both located within the ZNP section of the World Heritage Site), as well as accommodation facilities managed by Parks (Zambezi Lodges).

Monitoring and reporting of tourism levels should also include information on additional activities such as river cruises, bush dinner and other events, canoeing, rafting, helicopter flights or any other activity which utilises the area of the WHS.

Comparison of the number of companies and boats or helicopters known to be operating records a significant increase in passenger capacities. In 1996 it was recorded that there were 20 commercial river cruise boats operating on the south bank, with a capacity of 411 passengers (IUCN, 1996). In 2016 it was reported that this had increased to 36

### Total visitors to the Zambezi National Park, Zimbabwe

Year	National	International	Totals
2010 *			56,224
2011	8,756	24,920	33,675
2012	20,769	50,211	70,980
2013	28,932	74,905	103,837
2014	35,670	88,819	124,489
2015	34,531	79,032	113,563
2016 **			
2017	61,552	113,545	175,097
2018	95,816	164,191	260,007
2019	77,062	153,489	230,551
2020	22,605	16,522	39,127
2021	36,846	6,810	43,656
2022			

\* No breakdown for 2010 in published reports.

\*\* No figures for 2016 in published reports

*Table D: Visitor breakdown for Victoria Falls National Park (figures from ZTA Annual Reports)*

boats with a capacity of 1,513 passengers (Africa Albida Tourism, 2017). In 2022 it was estimated that there were 60 commercial boats operating from the south bank (ZPWMA, May 2022). Similarly in 1996 there was only one helicopter company operating two helicopters (IUCN, 1996). By 2016 three companies were operating eight helicopters on the south bank (with a seat capacity of 34) and two companies operating five helicopters (with a seat capacity of 34) on the north bank (Africa Albida Tourism, 2017). A fourth helicopter company started operations on the south bank in 2022.

The State Parties should therefore be urged to include information on all tourism activities within the WHS, preferably broken down by month to show seasonal variations and pressures, to give a fuller indication of tourism utilization of the Site (this information is known to be rigorously recorded by National Parks for the collection of Park fees). Comparable historical information should also be provided.

### Total visitors to the Zambezi and Victoria Falls National Parks (2010-2021)

Year	Zambezi	Victoria Falls	Totals
2010	56,224	141,113	197,337
2011	33,675	200,125	233,800
2012	70,980	197,776	268,756
2013	103,837	196,041	299,878
2014	124,489	241,351	365,840
2015	113,563	260,575	374,138
2016 *	-	265,388	-
2017	175,097	241,804	416,901
2018	260,007	338,472	598,479
2019	230,551	397,436	627,987
2020	39,127	64,087	103,214
2021	43,656	70,602	114,258
2022			

\* No figures for 2016 in published reports, VFNP figure from Africa Abida Tourism, 2017, Victoria Falls - Africa's Living Stone. A tourism survey of the Victoria Falls region. Africa Abida Tourism/Zimbabwe Tourism Authority.

*Table E: Visitor totals for Zambezi and Victoria Falls National Parks (2010-21)  
(figures from ZTA Annual Reports, see Appendix 6.0.6 for 1998-2009 data)*

### 3.2.2 Carrying Capacity

In 1990 Heath (1990) revised his estimate of the annual carrying capacity of the Falls visitor park to 100,000-125,000, noting that 'further pressure on the Victoria Falls area could be environmentally detrimental.' Heath's higher estimate equates to an average of 342 visitors a day (just over 10,000 a month).

The 2010 State of Conservation Report presented by the State Parties attempted to address issues of the carrying capacity for the Falls visitor parks (on either side of the river) estimating 6,000 daily visitors as a maximum, based on assumptions such as a one-hour duration for each visit.

*“The State Parties’ report touches very briefly on the estimated carrying capacity of the property (up to 6,000 visitors per day), and consider that the property is not exceeding this capacity on an annual basis. Twenty boats and nine helicopters are said to be operating in the property since 2007. The States Parties report that the flights over the property conform to joint rules established in 1996...*

*“The World Heritage Centre and IUCN consider that the effective management of tourism and on site visitors in this iconic World Heritage property is of the utmost importance. Whilst an annual estimate of carrying capacity is one possible gauge of the issue, the requirements to assure a high quality, safe and satisfying visitor experience require considerable planning beyond simply considering the numbers of visitors coming to the property.”* ([World Heritage Committee, 2010](#))

Assuming an average visit time of one hour the 3,000 a day figure would equate to 250 visitors at any one time if equally distributed across the day. It is unclear if this, therefore, is the maximum number of visitors allowed into the park at any one time. As visitor numbers are reported to UNESCO on a combined (Zambia and Zimbabwe) annual bases monitoring of this carry capacity is not possible.

Figures relating to the carrying capacity of activities such as river cruises and helicopters also need to be established, monitored and reported within the State of Conservation Reports.

The 2021-2030 Strategic Environmental and Social Impact Assessment presents various visitor level scenarios based on predicted growth patterns (State Parties, 2021).

### **3.3.0 Estimating Economic Value**

A 2019 report estimated that the south bank Victoria Falls Visitor Park generated an annual income of over \$5.5 million from Park entry fees alone (Anchor Environmental Consultants, 2019; see also Appendix 6.0.7, Table H). The estimate was based on just over 263,000 visitors in total, on par with the average figures recorded over 2014 to 2018 (269,518). The estimate was calculated by splitting international and regional visitor total, for which no separate breakdown was available, on an arbitrary 50:50 split.

The estimates did not include National Park fees collected from additional activities such as river cruises, helicopter flights, rafting or horse-rides, for which Park fees of between US\$10-\$20 per person are charged for international visitors (lower rates for regional and national visitors). However the report does go on to estimate annual activity volumes from which we calculate additional Park fees of US\$2.4 million, and giving a total figure of over US\$8 million (Appendix 6.0.7, Table H).

The figures calculated local fees at \$8 per visitor, when the actual fee was \$7. Figures for the numbers of international and regional visitors to the Falls for 2015 and 2016 were presented in the Africa Albida Tourism report (AAT, 2018) and indicated that a 80:20 split between international and regional visitors would be more accurate reflection of actual visitors patterns. Using a 80:20 split with average annual ZTA visitor figures for 2014-8 we calculate visitor entry fee income of US\$6.1 million. If we assume 65% of international and regional visitors to the Falls undertake a river cruise, that 30% undertake a helicopter flight and 15% another activity this would generate additional park activity fees (a model which reflects activity participation figures recorded above) of US\$2.5 million. International and regional visitors to the ZNP, calculated on the same ratio, estimates an income from visitor fees of US\$1.6 million, bringing the estimated total to over US\$10.2 million (Appendix 6.0.7, Table I).

Using the same model against 2019 ZTA visitor figures, the last year not significantly impacted by the pandemic, indicates an estimated annual visitor income for the Falls Park of over \$9.3 million and for the ZNP of US\$2.2 million. Estimated additional activity fees, adjusted slightly to reflect known figures (helicopter passengers down to 20% of total international visitors), would generate an additional US\$3.4 million, giving an annual total of over US\$14.9 million (Appendix 6.0.7, Table J), against an estimated ZimParks national annual operational budget of \$30 million ([VFBnB, Oct 2019](#)).

In late 2022 National Parks announced a significant increase in visitor fees, to be introduced April 2023.

*“The new fees schedule proposed by ZimParks will see locals paying US\$10 to enter through the ordinary gate up from US\$7 per person while SADC and international clients will pay US\$30 and US\$50, up from US\$20 and US\$30 respectively. To enter through the VIP gate, locals will pay US\$30 per person, US\$75 for SADC and US\$150 for international clients. Locals who want to tour the rainforest under the moonlight will be expected to part with US\$15 per person while SADC clients will pay US\$70 and US\$100 for international clients. Visiting the Zambezi River will now cost US\$5 for locals while SADC clients will pay US\$12 and those from the international world paying US\$15. Children above five years of age will pay half the adult fees. Vehicles will be charged between US\$5 for small cars and US\$20 for buses and lorries while foreign-registered vehicles will pay US\$30 each.”* ([VFBnB, Jan 2023a](#))

The current fee structure results in tourists paying multiple Parks fees during the course of a typical visit to the Falls. Under the new fees an international tourist visiting the Falls Rainforest, undertaking a helicopter flight and then a sunset river cruise, would pay three different Park entry fees (\$50 rainforest entry fee, \$15 helicopter fee, \$10 river cruise

fee) totalling \$75 - even if all undertaken on the same day. Tourists participating in horse-rides appear to be over-charged against other activity fees, paying \$20.

Using 2019 ZTA visitor figures and activity estimates the new fee structure would generate the Park Authority an estimated US\$15.1 million in VFNP visitor fees, giving a total estimated Parks income from visitor and activity fees of over US\$20.7 million (Appendix 6.0.7, Table K).

It should be noted that the figures for ZNP visitor fees presumably include overnight guests to concession Lodges who are believed to pay 50% of the entry fee (ZPWMA, May 2022). The ZNP figures also include visitors who access the park through the Chamabonda Vlei gate, and who do not enter the area of the WHS. Balancing this the estimates do not include income generated from vehicle entry fees, estimated at US\$100,000 annually (ZPWMA, May 2022).

The estimates of activity participation levels are thought to be conservative - for example recent media reports suggest that 90% of visitors to the Falls participated in a river cruise ([VFBnB, Jan 2023b](#)). Reported figures for helicopter passenger levels recorded 60,000 passengers in 2018 (AEC, 2019) and 64,000 in 2019 (ZPWMA, May 2022), generating US\$900,000 and US\$960,000 in park fees respectively.

The figures indicate the importance of the international market in generating significant income for Parks. The sensitivity of this market to negative publicity has also be shown in highly fluctuating international visitor levels over recent decades. With international visitor figures yet to recover to pre-pandemic levels it remains to be seen if the announced visitor fees increases, negative publicity regarding tourism development pressures and concerns over the future of the WHS, compounded by global inflationary issues and rising costs of living, will impact on this recovery.

<b>Estimated Parks annual visitor and activity fees income (US\$)</b>				
	<b>VFNP</b>	<b>ZNP</b>	<b>Activities</b>	<b>Estimated Total</b>
2014-8 average	6,101,777	1,604,113	2,509,020	10,214,910
2019	9,307,424	2,210,242	3,418,052	14,935,718
2019 (new fees)	15,160,712	2,210,242	3,418,052	20,789,006

*Table F: Summary of estimated annual Parks visitor and activity fee income.*

A survey conducted for the 2001 VFCMP indicated an average expenditure per visitor of \$564 including accommodation, food and beverages, activities, shopping for curios, and local transport (Plan Afric, 2001, p.138). It is unclear if the survey was conducted across international, regional and national visitors to the Falls but is assumed to cover international visitors only.

The 2019 BGHES ESIA report estimated that 97.5% of visitors to the Falls stayed overnight in the area and the average length of stay was 2.6 days (AEC, 2019, p.38).

### ***3.3.1 The Value of Concessions***

Concerns have been raised over the under-estimating the commercial value of tourism concessions and under-charging for concession visitors (half price for ZNP concessions, US\$3 for Gorge Activity Centre and nil for Wild Horizons Estate).

Concession leases across the wider of ZNP and VFNP area (including Units 6 and 7 (Matetsi)) were estimated to generate US\$3 million in 2022 (ZPWMA, May 2022, p.46).

The Wild Horizons Estate (4.3.3) lease was estimated to generate US\$160,000 annually and the terms include visitor entry fees (ZPWMA, May 2022, p.43). News reports in March 2023 indicated an annual lease fee of just over US\$140,000 for the Victoria Falls Rainforest Cafe ([Zimlive.com, March 2023](https://www.zimlive.com/news/2023/03/23/victoria-falls-rainforest-cafe-lease-fee/)). This would appear to indicate a total income for existing concessions within the WHS of less than US\$0.5 million. The financial value of these concessions is effectively halved by payment being allowed through the RTG\$ exchange system.

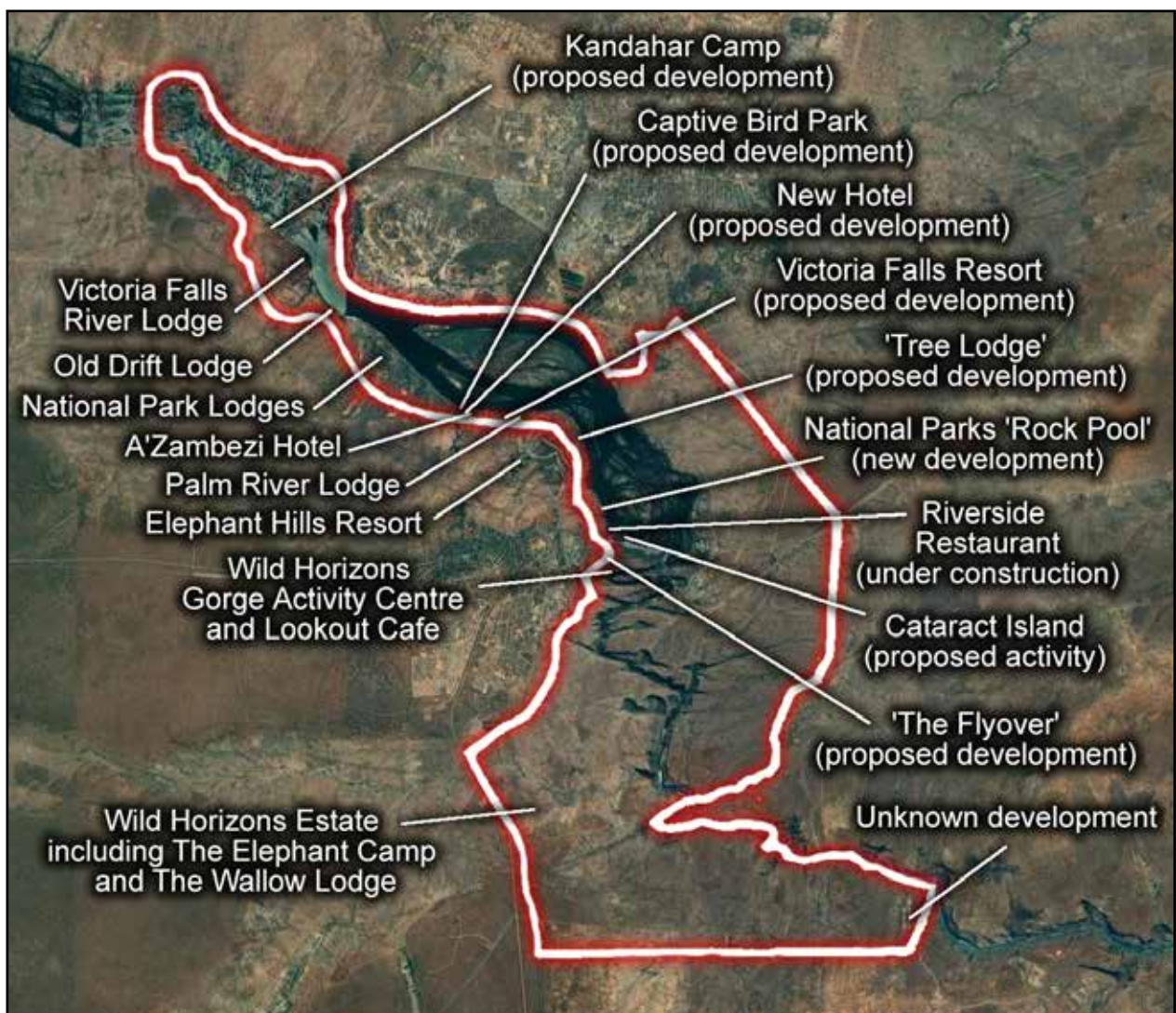
Questions have also been raised over the size of concession areas, especially relating to the riverside concessions within the ZNP and significant area of the river now inaccessible to visitors (3.1.2). The Victoria Falls River Lodge (4.1.3) concession covers 100 ha together with Kandahar Island which covers an additional 43 ha. The Old Drift Lodge (4.1.4) and Kandahar Camp (4.1.2) concessions, located immediately adjacent to the Victoria Falls River Lodge are both 100 ha. New concessions also appear to be signed for increased periods of 25 years, rather than the traditional five, making the calculation of the concessions value over the period of the lease more difficult to predict.

Concerns over the valuation of concession leases is highlighted in the example of the Zambezi National Park visitor accommodation (4.1.5) which was reportedly leased in 2017 to a tourism operator for \$60,000 per annum when the lodges which were previously generating an annual income for National Parks of about \$300,000 ([VFBnB, April 2017](https://www.vfbb.org/2017/04/20/zambezi-national-park-visitor-accommodation/)).

## 4.0.0 DEVELOPMENT BY DEVELOPMENT

The Victoria Falls World Heritage Site is divided by the Zambezi river, the deepwater channel of which for the most part forms the international boundary between Zambia to the north and Zimbabwe to the south upstream (the boundary immediately above the Falls is described in Appendix 6.0.5). Site can also be divided into two distinct geographical/ecological zones, separated by the Falls themselves, the wide and shallow upper river corridor and narrow and deep downstream gorges.

The site is further dissected by a rail and road transport corridor which crosses the river immediately below the Falls.



*Sketch outline of World Heritage Site boundary superimposed over satellite image and showing the location of existing and proposed developments in the south bank upper river corridor*

Due to the wave of tourism development proposals currently threatening the southern side of the site, this report focusses solely on the Zimbabwean side of the World Heritage Site.

The upstream river corridor includes some 15 km of river upstream of the Falls, including about 6 kilometres of river corridor and narrow strip of riverside fringe immediately above the Falls (included in the upstream extension of the Victoria Falls National Park 'Area B') and a further 9 kilometres of river corridor and riverside fringe (included within the Zambezi National Park).

Tourism developments are listed from the upstream extremity of the WHS running downstream towards the Victoria Falls and divided into three sections, those within the upstream Zambezi National Park, the Victoria Falls National Park upstream section (Area B, including the Falls) and the downstream section of the same Park (Area A).

The report only includes developments within, or at least partly within, the boundaries of the WHS and does not include the Elephant Experience and Crocodile Farm, located within the 500m Buffer Zone close to the Victoria Falls Boat Club (4.2.1) and A'Zambezi River Lodge (4.2.4).

The report also does not include the 'front edge' of the urban development from the growing settlement of Victoria Falls, including the Victoria Falls Hotel, the Kingdom at Victoria Falls, Ilala Lodge and the recently developed Shearwater Explorers Village, all of which are again within, or partly within, the 500m Buffer Zone which surrounds the site.

## 4.1.0      **Zambezi National Park Section**

- 4.1.1      Zambezi National Park Riverside Drive / Picnic Spots
- 4.1.2      Kandahar Camp (**Proposed Development**)
- 4.1.3      Victoria Falls River Lodge
- 4.1.4      Old Drift Lodge
- 4.1.5      Zambezi National Park Facilities
- 4.1.6      Captive Bird Park (**Proposed Development**)



*Upstream River Corridor - Zambezi National Park Section  
showing existing and proposed developments, approximate line of WHS boundary shown in red*

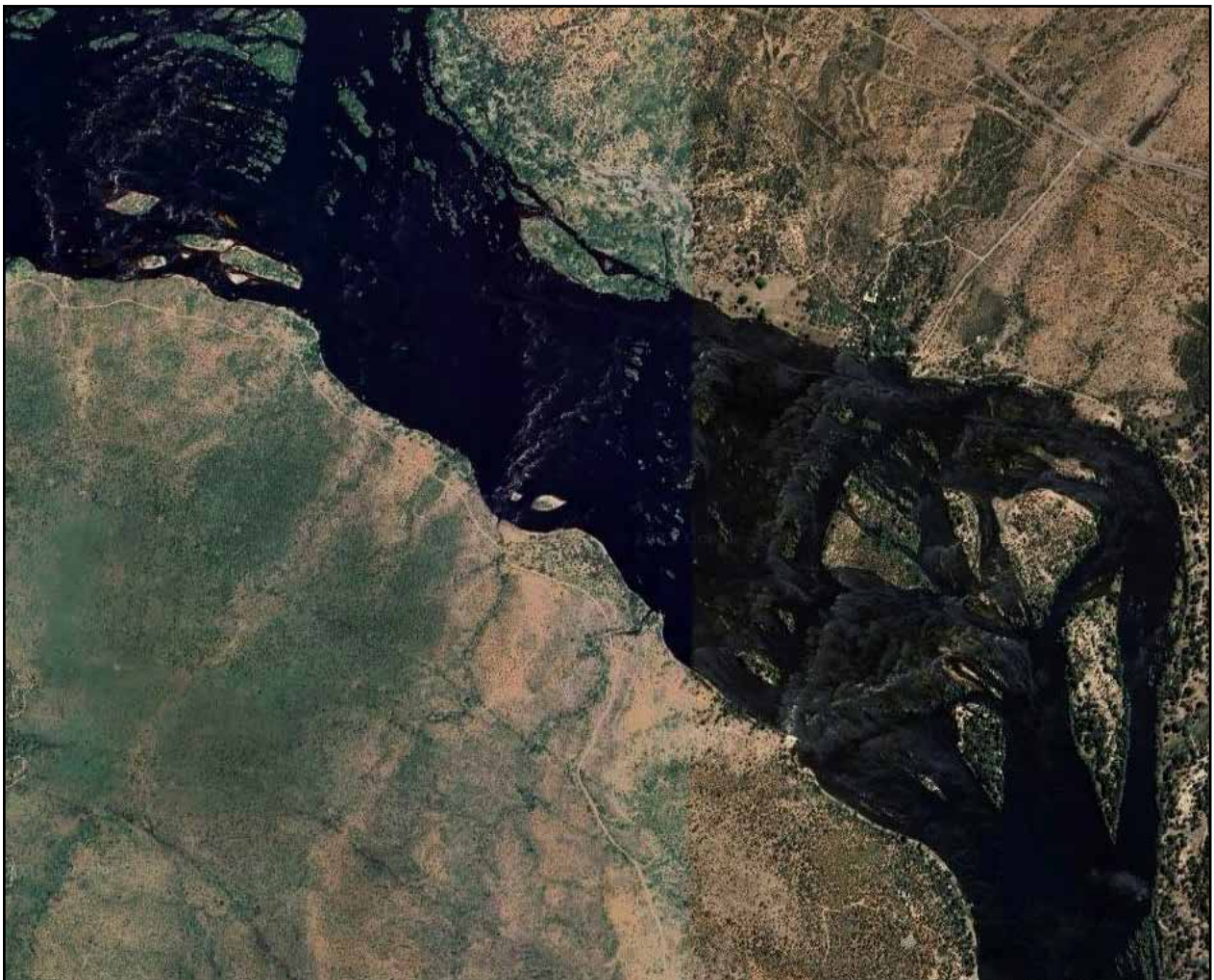
#### **4.1.1**      *Riverside Drive / Picnic Spots*

**Location:** Within ZNP and VF/MoT WHS HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 39).

**Current Status:** No development plans currently known in this section.

**History:** Riverside road extending upstream into Zambezi National Park, with associated views points and picnic spots. World Heritage Site covers several kilometres of river and riverside upstream of Kandahar Camp (4.1.2), between 6 and 9 kilometres upstream from Park Entrance Gate (4.1.5).

**Google Maps:** [-17.859536, 25.773917](#)



*Upstream Picnic Sites, Zambezi National Park (Aug 2023)*

#### **4.1.2**      *Kandahar Fishing Camp*

**Location:** Within ZNP and VF/MoT WHS HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41).

**Current Status:** Allocated as exclusive 100 ha concession to South African company. No details of public tender process, if conducted. No information on status of EIA. No reference in State of Conservation Reports. No work on ground.

**History:** Located about 12 kilometres upstream of the Falls, one of the original ‘minimal infrastructure’ fishing camps established as part of the core facilities (along with picnic sites) of the National Park Riverside Drive when Zambezi National Park developed in 1950s. Historically available to book for overnight camping by private individuals and independent safari companies/operators (see 2.1.0).

Plans to develop site as a private safari concession disclosed in 2021 at time of Siansimba River Lodge EIA process - but no reference to the awarding of this concession or development proposal in the 2021 State of Conservation Report. Confirmed allocated to a South African company at National Park planning meeting



*Area of Kandahar Camp Concession, Zambezi National Park (Aug 2023)*

held in May 2022 (ZPWMA, May 2022). The document also identifies the area as an elephant movement corridor (and river crossing point).

A revised zonation map presented in the 2021 State of Conservation Report shows the whole of the ZNP area of the WHS within the HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 39) - raising questions over the allocation this area for development as a lodge concession in an area where no new infrastructure or facilities are allowed (see Section 3.1.4).

Satellite images show that shrub and tree cover in this area is thin and thus highly vulnerable to disturbance and subsequent degeneration. On this basis alone it is unsuitable for allocation as a development concession.

Together with the existing adjoining riverside concessions (Victoria Falls River Lodge and Old Drift Lodge) and the downstream National Park accommodation and offices, block access to the first 3-4 kilometres of riverside in the ZNP. (Developments continue downstream within VFNP, together blocking access to and impacting the natural ecology of 6-7 kilometres of river front within the WHS)

**Google Maps:** [-17.864605, 25.779811](#)

**Keep Victoria Falls Wild:** [Kandahar Camp Concession](#)

### **4.1.3**      *Victoria Falls River Lodge (including Kandahar Island)*

**Location:** Within ZNP and VF/MoT WHS HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41). Approx. 13 kilometres above Falls.



*Victoria Falls River Lodge (Jan 2023)*

*Victoria Falls River Lodge (Aug 2023)*

**Current Status:** New Riverside Villa developed and opened in 2022. Series of six new suites currently under construction (the Malachite Suites). Solar facility developed during 2023.

**History:** Riverside and island development opened in April 2012, the first private concession (100 ha) within the riverside section of the Zambezi National Park. Initially comprising 13 Luxury Tented Suites (total 26 beds) spaced out along extensive section of riverfront including riverside jetty and associated boat cruises.



*Kandahar Island (Aug 2023)*

*“Victoria Falls River Lodge is the first private game lodge to be built in the Zambezi National Park. Situated on the banks of the Zambezi River, the Zambezi Crescent Collection’s pioneer lodge is so close to the famous Victoria Falls that one can see the spray in the distance.” (Operator Publicity blurb)*

The lodge has expanded significantly since opening with the development of five Island Tree House Suites, each accommodating two people (total 10 beds), opened on a separate 43 ha concession covering Kandahar Island (within WHS river corridor) in August 2017. A sixth island tree house was added in 2019 and a new Riverside Villa, sleeping up to six adults and 2 children opened in 2022 (located on southern/ downstream end of concession site, close to the neighbouring Old Drift Lodge concession). In 2023 the operators announced the development of the Malachite Suites, six new tented suits opened in mid-2023. Also during 2023 a

solar facility was developed on the concession.

There appears to have been no specific disclosure of the initial development, or subsequent expansion phases, in State of Conservation Reports or the Joint Integrated Management Plans. Located within the section of Zambezi National Park identified as being within original World Heritage Site listing (and detailed as covering 741 hectares). This area was removed from maps of the site presented in the 2007-12 Joint Integrated Management Plan prior to development of the concession (and the upstream river corridor further reduced in the 2016-21 document). While it may have been argued that the site was thought to be outside of the WHS at the time of development, the riverside location would still have been covered within the 500m Buffer Zone and should have been fully disclosed to UNESCO.

Developed/Managed/Operated by: Adage Success (Pvt) Ltd trading as Dove and Hawk Safaris trading as Zambezi Crescent ([company website](#)).

See also National Park Zambezi Camp (4.1.5) and Cataract Island Tours (4.2.15).

**Google Maps -**      **Victoria Falls River Lodge:** [-17.872825, 25.790274](#)  
**Kandahar Island:** [-17.867991, 25.791083](#)

**Operator Website:** [Victoria Falls River Lodge](#)

**Keep Victoria Falls Wild:** [Victoria Falls River Lodge](#)



*New Riverside Villa development (Aug 2023)*

#### **4.1.4      *Old Drift Lodge***

**Location:** Within ZNP and VF/MoT WHS HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41). Approx. 7 kilometres above Falls.

**Current Status:** In December 2022 announced development of three new ‘star bed’ extensions to their luxury suites.

**History:** Local tourism operator Wild Horizons opened the Old Drift Lodge on a 100 ha concession in May 2018. The \$4 million safari camp development includes 10 double tented suites (20 beds) and 4 family suites (16 beds).

As with the neighbouring Victoria Falls River Lodge (opened 2012) the site is located within the boundaries of the Victoria Falls World Heritage Site but there appears to have been no specific disclosure of the development in State of Conservation Reports or the Joint Integrated Management Plans.

*“Wild Horizons is an eco-tourism operator”* (from operator [website](#))



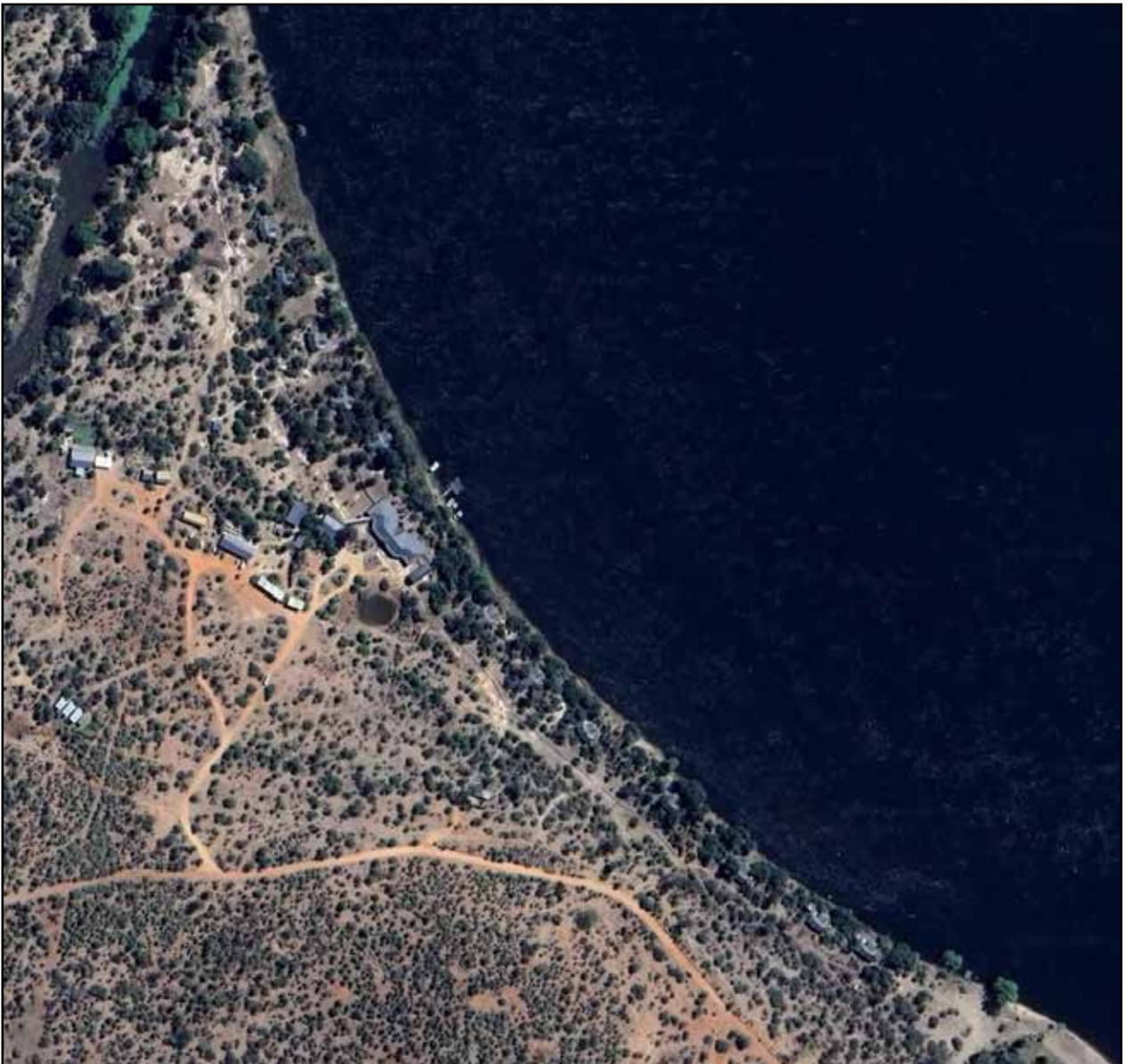
*Wild Horizons Old Drift Lodge (Jan 2023)*

Developed/Managed/Operated by: Wild Horizons (see also Wild Horizons Gorge Activity Centre and Lookout Cafe (4.3.1) and Wild Horizons Estate (4.3.3).

**Google Maps:** [-17.880303, 25.792432](#)

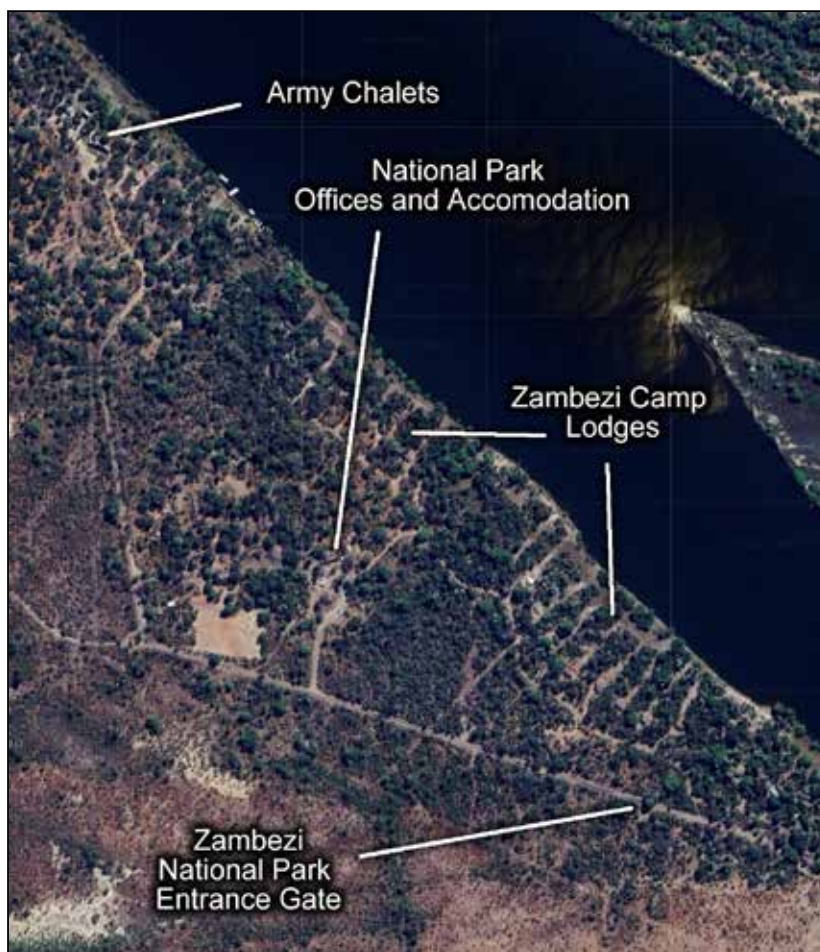
**Operator Website:** [Old Drift Lodge](#)

**Keep Victoria Falls Wild:** [Old Drift Lodge](#)



*Wild Horizons Old Drift Lodge (Aug 2023)*

#### 4.1.5 *National Park Zambezi Camp Lodges*



*Zambezi National Park facilities and chalets (Jan 2023)*

**Location:** Within ZNP and VF/MoT WHS HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41).

**Current Status:** Visitor accommodation facilities appear to have been leased as concessions to private tourism operators, including the redevelopment of buildings previously used as an Army camp and the 20 riverside chalets previously managed by National Parks.

**History:** Part of the original Zambezi National Park staff and visitor infrastructure developed during 1960s/70s, including 20 riverside self-catering chalets, set back a respectable distance from the river-front.

#### *National Park Offices and Accommodation*

**History:** National Park administration offices. Staff accommodation includes 58 housing units, ranging from single rooms (18), double rooms (8), 5-room of various types (30) and semi-detached units (2) (Plan Afric, 2001). The 2022 draft management plan recorded four senior staff houses and 21 junior staff houses and an urgent need of investment and upgrade.

*“Almost all of these houses are old and in poor condition. They require serious renovation to be properly suitable for human habitation.” (ZPWMA, 2022)*



*Zambezi National Park chalets (Aug 2023)*

### *Army Chalets*

Believed to have been leased to tourism operator as private concession.

#### **Current Status:**

Redevelopment, undertaken during 2022/3, thought to be complete.

**History:** Run-down buildings used as Army camp during 1970s/80s - rumours of being redeveloped as tourism private concession (February 2023). Reference to allocation of riverside jetty site (ZPWMA, May 2022, p.48)

**Google maps:** [-17.890175, 25.806681](#)

### *Zambezi Camp Lodges*

**Current Status:** Redevelopment of existing visitor accommodation infrastructure. Ongoing (August 2023) in partnership with Zambezi Crescent, who appear to also be taking over the management of the lodges.

**History:** Developed as part of Park infrastructure in 1960s, comprising 20 riverside self-catering family lodges (estimated total 95 beds).

In April 2017 news reports claimed that ‘massive corruption’ in ZimParks had been exposed in relation to an agreement made to subcontract the management of 19 of the 20 National Parks visitor lodges to a private tourism operator ([VFBnB, April 2017](#)). Reports identified former Parks Board Chairperson George Pangeti as acting on behalf of the tourism operator, Adage Success (Pvt) Ltd (Zambezi Crescent, operators of the Victoria Falls River Lodge, 4.1.3).

In January 2018 it was reported that the Procurement Regulatory Authority of Zimbabwe (PRAZ), formerly the State Procurement Board (SPB), had cancelled an agreement

made in January 2017 between the National Park Authority and Adage Success (Pvt) Ltd relating to the redevelopment and management of the lodges ([VFBnB, Jan 2018](#)).

Despite this setback the developer, Adage Success (Pvt) Ltd, appear to have subsequently signed a new agreement with National Parks, announced in mid-2021. There has been no public disclosure of the redevelopment, which appears from satellite images to include the construction of new lodge buildings much closer to the river-front.

*“Government also approved a joint venture between the Zimbabwe Parks and Wildlife Management Authority (ZimParks) and Zambezi Crescent (Pvt) Ltd. The two entities are in partnership for the revamping and upgrading of all of ZimParks’ lodges at Zambezi Camp to an agreed market-related status at a total cost of US\$3,009,000. This amount will be contributed by Zambezi Crescent (Pvt) Ltd while ZimParks will provide exclusive rights to the use of the lodges at the camp and their surroundings. The project will be implemented as a joint venture over 25 years with the parties sharing profits on a 50/50 basis, according to Minister Mutsvangwa. She said the joint venture is set to significantly improve the performance of the Zambezi Camp Lodges which are strategically located along the banks of the Zambezi, but have been performing poorly over the years.” ([VFBnB, June 2021](#))*

**Google maps:** [-17.896301, 25.813719](#)

**Keep Victoria Falls Wild:** [National Park Zambezi Camp](#)



*Zambezi National Park chalets with redevelopment ongoing -  
note repositioned chalets on river-front (Aug 2023)*

#### 4.1.6 Bird Park (Proposed Development)

**Location:** Within ZNP, outside of WHS. Buffer Zone development away from riverside along outer border of ZNP (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 41).

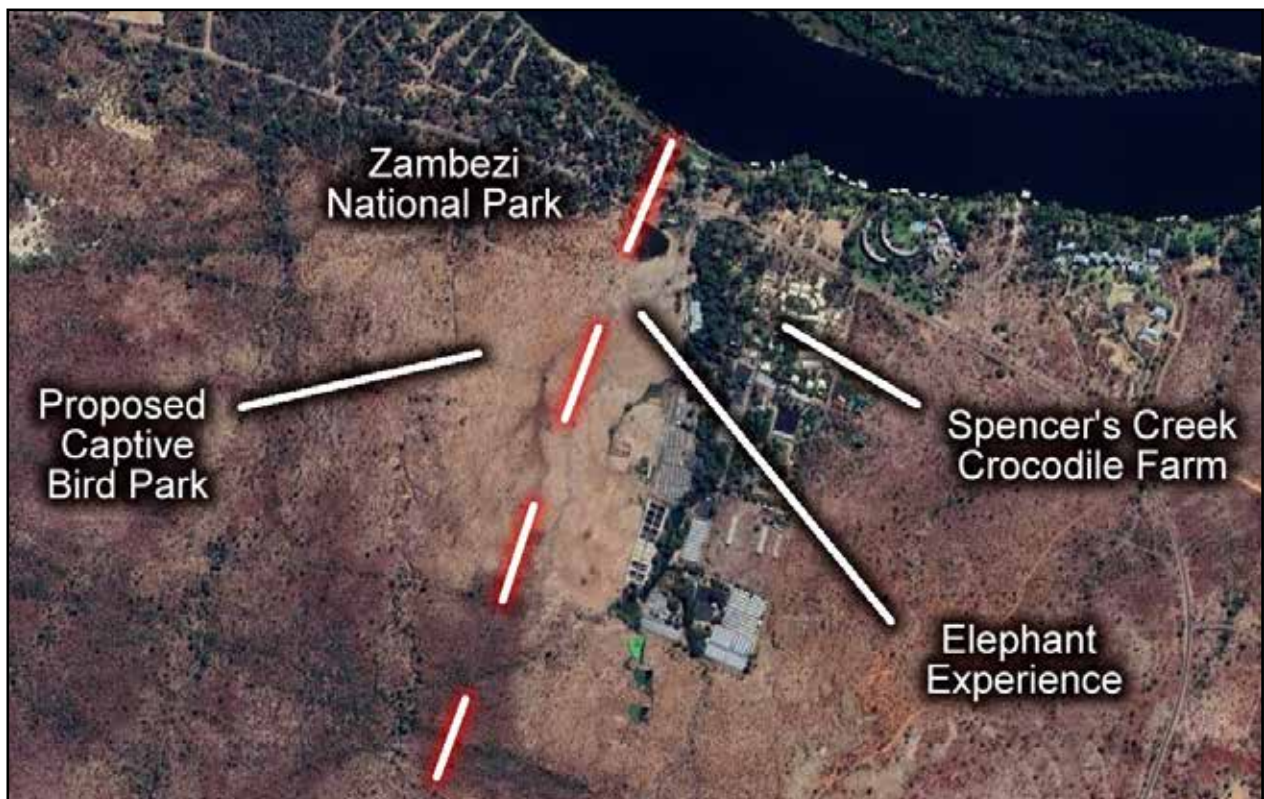
**Current Status:** New Development Proposal - disclosed in 2020 State of Conservation Report. No information on EIA process. No development on ground.

*“Bird Park - South Sea. Permanent enclosures. Restaurant/café will be constructed Project [at] scoping stage.” (State Parties, 2020)*

Listed in Appendix 2a but not referred to in main text of report. Location Identified on map of known leases published in 2022 draft management plan (ZPWMA, 2022, p.53; Figure 12 p.43).

**Google Maps:** [-17.901781, 25.815791](https://www.google.com/maps/place/-17.901781,25.815791)

**Keep Victoria Falls Wild:** [Captive Bird Park](#)



*Site of proposed captive bird park*

## **4.2.0      Victoria Falls National Park (Area B)**

- 4.2.1      Victoria Falls Boat Club
- 4.2.2      River Cruise Operator Jetty Sites
- 4.2.3      New Hotel **(Withdrawn Development)**
- 4.2.4      A'Zambezi River Lodge
- 4.2.5      Victoria Falls Resort **(Proposed Development)**
- 4.2.6      Palm River Hotel (Recent Development)
- 4.2.7      Vacant Development Plot
- 4.2.8      Pure Africa Jetties
- 4.2.9      Elephant Hills Resort & Golf Course
- 4.2.10     Riverside Tree Lodge **(Proposed Development)**
- 4.2.11     Big Tree Curio Market
- 4.2.12     Bush Event Site
- 4.2.13     National Parks Facility **(New Development)**
- 4.2.14     Riverside Restaurant **(Under Development)**
- 4.2.15     Cataract Island **(New Activity)**
- 4.2.16     Victoria Falls Visitor Park
- 4.2.17     Road and Rail Transport Corridor **(New and Proposed Developments)**



*Upstream River Corridor - Victoria Falls National Park Section  
showing proposed developments and approximate line of WHS boundary*

#### **4.2.1**      *Victoria Falls Boat Club*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Existing developments.

**History:** Private mooring for members/local residents. Restaurant/Bar. Developed in 1950s/60s.

Need clarification and regular reporting on number of private boat licences, boat and engine specifications, restrictions and river usage guidelines (engine size, speed limits).

**Google Maps:** [-17.899540, 25.818629](#)



*Victoria Falls Boat Club (Aug 2023)*

### 4.2.2 *River Cruise Operator Jetty Sites*

**Location:** Riverside fringe within upstream extension of VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016). Despite being within VFNP jetty sites are leased/controlled by City Council.

**Current Status:** Unclear how many commercial and private boat licenses operating on river. Unclear what restrictions in place to protect and conserve islands and banks from erosion, or what monitoring and implementation of these restrictions is enforced.

**History:** Jetty sites established as part of mid-1970s development plans, leased by Council to local river cruise operators. Sites stretch downstream from Boat Club to Elephant Hills Resort. Shift in recent years from sunset 'booze cruises' to luxury dining experiences - resulting in large increase in number and size of boats operating on the upstream river section. Historically boats limited to daylight hours - dining cruises now operate into late evening. Also trend in developing riverside events and restaurants/bars (see Zambezi House and Pure Africa Eatery) and other facilities.

Concern over conservation impacts and disturbance to wildlife - especially ground breeding water-birds on islands (African skimmer, rock pratincole among others). Physical impact of wash affecting sand banks and islands. Concerns over increasing number of commercial vessels and increased size of individual boats. Also concerns over implementation of suitable speed limits (limited by engine size rather than enforceable speed limit). Note also severe bank erosion being experienced on northern bank. Also concerns with provision of toilet facilities and disposal of human waste and other pollution issues as well as disturbance to wildlife.



*Private Operator Riverside Jetty Sites (Jan 2023)*

No monitoring data on number of trips or passengers reported by Parks. State Parties need to be encouraged to produce comparable data on number of licenses issued each year, length of vessels, size of engines and passenger capacities. Information should also be provided on total numbers of tourist passengers undertaking cruises, preferably by month to indicate seasonal variation. Issues with many different operators all running boats with low numbers of passengers - need to be encouraged to reduce the number of boats operating on river at any one time.

Need agreed guidance/limits on speed, best practice protocols/procedures (closeness to wildlife/banks of river/islands), monitoring impacts of vegetation/bank erosion, impacts from pollution etc.

*“Zambezi Cruise - Boats Date: 2/9/19 - Issue: Concern regarding the sewage from the cruise boats on the Zambezi dumping directly into the river.*

*“Action Taken: Greenline Africa Trust assured VFEW that they are working on this issue along with Pure Africa to create a River Charter document to address river issues caused by cruise boats.” (Victoria Falls Enviro Watch, 2023)*

In 1996 it was recorded that there were 20 commercial river cruise boats operating on the south bank, with a capacity of 411 passengers (IUCN, 1996). In 2016 it was reported that this had increased to 36 boats with a capacity of 1,513 passengers (Africa Albida Tourism, 2017).

Historically maximum number of boats on river at an one time limited to 22 (Plan Afric, 2001, p.141). It is unclear if this limit is still being enforced.

Among the commercial operators utilising jetty sites along this section include Shearwater Adventures who operate at least three boats; a 24-seater ('The Dragon Fly'), a 50-seater ('Riversong') and another with unknown seating capacity ('Sundancer' - 60 seats?).

Wild Horizons operate four boats from jetty sites located off council stand 1392A; a 28-seater ('Zambezi Royal'), 30-seater ('Malachite,' two decks, launched April 2019), 60-seater and 80-seater.

Victoria Falls River Safaris / Bushtracks Africa operate two medium sized boats for luxury dining experience; 'The Darter' and 'The Victoria' (unknown passenger capacity, twin engines). Into Africa Bush Cuisine, operate three vessels of varying sizes for breakfast, lunch and dinner cruises.

See also Palm River Hotel (3.2.6, part of the Ilala Group) who operate the Ra-Ikane fleet - three small sized river cruise boats and Pure Africa (3.2.8) who operate three boats; the 150-seat 'Zambezi Explorer,' the 70-seat 'Ma Robert' and 34-seat 'Zambezi Reflections.'

**Google Maps:** [-17.899791, 25.819734](#) downstream to [-17.900173, 25.832378](#)

**Keep Victoria Falls Wild:** [Commercial River Jetty Sites](#)

### *Zambezi House Restaurant*

**Location:** Council controlled plot outside of National Park? Within WHS Buffer Zone.

**History:** Existing development, opened 2017.

**Google Maps:** [-17.900163, 25.820308](#)

**Operator Website:** [Zambezi House](#)

**Keep Victoria Falls Wild:** [Zambezi House](#)



*Section of Zambezi Riverside from Boat Club to A'Zambezi Lodge (Aug 2023)*

### ***4.2.3 New Hotel (Withdrawn Development)***

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** New riverside hotel development proposed in opportunistic and illegitimate attempt to evict current and long-term lease holder, Wild Horizons from site, located between Boat Club and A'Zambezi Hotel. Council eventually decided to uphold original lease agreements, valid until 2029. Concerns must remain over future development pressures on all these Council controlled plots.

**History:** Revealed in February 2023 with media reporting over dispute with Wild Horizons ([VFBnB, Feb 2023a](#)). Plans for \$50m hotel development revealed in further media reports ([VFBnB, Feb 2023b](#)). City Council announced u-turn in early April ([VFBnB, April 2023a](#)), confirmed at the end of the month ([VFBnB, April 2023b](#)).

**Google Maps:** [-17.900248, 25.821127](#)

**Keep Victoria Falls Wild:** [New Hotel Development](#)



*New Hotel development plot (Aug 2023)*

#### 4.2.4 *A'Zambezi River Lodge*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Existing 4-star riverside hotel development. No recent developments.

**History:** Originally opened in 1971 with 65 double and 15 family rooms, 5 km from Falls. Expanded 2011. The upgraded four-star and 91-room (182 beds) A'Zambezi River Lodge reopened in May 2011 following a \$4.5 million renovation programme, including development of a 100-seat Conference Centre.

Operated by: Rainbow Tourism Group.

**Google Maps:** [-17.900782, 25.822288](#)

**Operator Website:** -

**Keep Victoria Falls Wild:** [A'Zambezi River Lodge](#)



*A'Zambezi Lodge (Aug 2023)*

#### 4.2.5 *Victoria Falls Resort (Proposed Development)*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** New development announced December 2020, further details released June 2022. No information on EIA process. No development on ground.

**History:** One of original council plots identified in 1970s development plan (sandwiched between existing A'Zambezi Lodge and new Palm River Lodge). Riverside jetties currently leased by National Parks to local operator. Latest development proposal first publicised in December 2020:

*“The proposed hotel will spot 200 keys with 120 standard rooms, 48 deluxe rooms, 30 suites, and two presidential, making it an upper upscale scale brand in the same benchmark with Victoria Falls Hotel, Illala Lodge, A'Zambezi River Lodge, Africa Albida Lodges (Safari Lodge, Safari Club, Safari Suites). The land is aptly situated on the Zambezi River frontage, making it a premium destination for tourists. The river fronting location could be an exclusive offering in Victoria Falls as opposed to many competitors that do not benefit from river views, access to the river offers the potential for other revenues streams (cruises and water activities).” ([VFBnB, Dec 2020](#))*



*Vacant Development Plot (Aug 2023)*

In late June 2022 a ‘massive’ new riverside hotel and conference centre development, the Victoria Falls Resort, was announced by Victoria Falls Council:

*“Chronicle understands that the new hotel which will have more than 100 rooms and with a US\$50 million investment, will soon be constructed on the Zambezi River banks between A’Zambezi River Hotel and Palm River Lodge. The project is a partnership between the Victoria Falls City Council and project promoter Lamcent Capital, a Harare equity investment company. A multinational hospitality company that manages and franchises a broad portfolio of hotels and resorts is understood to be part of the deal to manage the facility on a build-operate and transfer arrangement.”* ([VFBnB, June 2022b](#))

No reference to development in recent State of Conservation Reports or JIMP.

**Google Maps:** [-17.901292, 25.824073](#)

**Keep Victoria Falls Wild:** [Victoria Falls Resort](#)



*Victoria Falls Resort Concept Plan*

#### 4.2.6 *Palm River Hotel (Recent Development)*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** New 4-star hotel development along river fringe, opened December 2021.

**History:** Riverside plot upstream from Elephant Hills Resort. Site of old National Park Caravan and Camping site - originally developed in 1950s. Closed and derelict since late 1970s. Site leased by operators of Victoria Falls Restcamp for many years but not developed. Site now developed by local Ilala Lodge group. Notified in 2018 State of Conservation Report. No public details on EIA process.



*Palm River Hotel (Jan 2023)*

*“A proposal was received to construct a Hotel on the Caravan stand located along Park way Drive next to A ‘Zambezi River Lodge. Currently the proposal is undergoing EIA.” (State Parties, 2018, p.12/21)*

Ground breaking ceremony held January 2019 ([VFBnB, Jan 2019](#)). Construction confirmed in 2020 State of Conservation Report:

*“Construction of a Hotel - (next to A Zambezi, Caravan Park) A proposal was received to construct a hotel on the caravan stand located along Park Way drive next to A ‘Zambezi River Lodge. Construction of the project has started.” (State Parties, 2020, p.20/37)*

The 2021 State of Conservation report confirmed:

*“Construction of a Hotel - (former Caravan Park): A new Hotel was constructed on Council land where the former Caravan Park next to A ‘Zambezi River Lodge. Permit to construct were issued to the developer after meeting all the requirements. Among such include the Environment Impact Assessment and building permits from all relevant authorities.” (State Parties, 2022, p.13/26)*

Accommodating 73 deluxe rooms, two honeymoon suites and a luxury presidential suite (152 beds). Palm River Villa includes a twin deluxe room, a honeymoon suite and an executive suite (6 beds).

Developed/operated by: Ilala group also operate the Ra-Ikane fleet - three small sized river cruise boats - from this site.

**Google Maps:** [-17.901714, 25.825766](#)

**Operator Website:** [Palm River Hotel](#)

**Keep Victoria Falls Wild:** [Palm River Hotel](#)

#### 4.2.7 *Vacant Development Plot*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Unknown

**History:** One of original council plots identified in 1970s development plan (sandwiched between existing A'Zambezi Lodge and new Palm River Lodge).

Several rumours of hotel developments on this plot over years. No plans announced.

**Google Maps:** [-17.902722, 25.828747](#)

**Keep Victoria Falls Wild:** -



*Vacant Development Plot (Aug 2023)*

#### 4.2.8 *Pure Africa Restaurant and Jetty Site*

**Location:** Predominantly Council controlled plot outside of VFNP and WHS, but including narrow riverside strip which is within the VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Existing riverside development. Landscaped lawns. Recent riverside restaurant development, 'The Eatery' including new buildings. Outdoor events location (evenings), with entertainments and music. Held large New Year 'Rock the River' event with live music/bands at end of 2022 ([www.rocktheriver.live](http://www.rocktheriver.live)).

**History:** One of original commercial jetty sites identified in 1970s development plan, operated for many years by Dabula Safaris. Since 2013 site managed by Pure Africa. Operate three boats; the 'Zambezi Explorer' (three decks, 150 passengers, launched 2013, largest boat on south bank), the 'Ma Robert' (double decker, 70 passengers) and 'Zambezi Reflections' (single deck, 34 passengers).

**Google Maps:** [-17.900670, 25.830378](#)

**Operator Website:** [Pure Africa](#)

**Keep Victoria Falls Wild:** [Pure Africa](#)



*Pure Africa site (left) together with other associated commercial jetty sites (Aug 2023)*

#### 4.2.9 *Elephant Hills Resort & Golf Course*

**Location:** Council controlled plot outside of VFNP and WHS. Site partly located within VF/MoT WHS Buffer Zone.

**Current Status:** Existing development.

**History:** 4 star hotel along river above Falls. Golf course partly located within WHS River Corridor Buffer Zone (main hotel complex located 600m from river, so outside WHS Buffer Zone). The Elephant Hills Country Club opened in 1974 with 20 rooms - destroyed during the independence struggles by a fire in November 1977. The Elephant Hills Intercontinental Resort and Conference Centre rose from the ashes of the old Country Club in 1991. Was for many years unfenced - now fenced.

Currently 276 Luxury Rooms, 11 Executive Suites, 1 Deluxe Suite, 1 Presidential Suite (578 beds?). Operated by African Sun hotel group.

Redevelopment of golf course - new proposal notified in 2018 (State Parties, 2018, p.12/21), repeated in 2020.



*Elephant Hills Hotel and Golf Course (Jan 2023)*

*“Upgrading of the Golf Course - To promote sport tourism, there are plans to upgrade and rehabilitate the existing golf course at Elephant Hills golf course to international standards. These works have however not commenced yet.” (State Parties, 2020, p.20/37)*

The golf course has several nature trails and important habitat areas, increased tree growth due to watering, small ponds and scrub areas which attract many bird species as well as antelope etc.

### *Shearwater Helipad*

Elephant Hills Helipad operated by Zambezi Helicopter Company (part of Shearwater group). Noise pollution issues highlighted in 2006 Monitoring Mission Report (see 2.2.2). Proposal for site to be relocated and subsequent development of Chamabondo helipads.

*“A new helipad has been completed away from the falls so that helicopter operators can be relocated and noise pollution reduced.” (World Heritage Commission, 2012)*

The new helipads actually result in longer flight times, increased air and noise pollution (new flight path over town and gorges).

*“This proposal to relocate the Helipad which lies next to the Elephant Hills Hotel is as per recommendation in the Joint Integrated Management Plan of 2007, where it was indicated that clients and tourists residing in the Elephant Hills Hotel were uncomfortable with the noise emanating from the helipad site. This, however, has not yet been done.” (State Parties, 2020, p.20/21)*

Appendix 2a records:

*“Relocate the Helipad which lies next to the Elephant Hills Hotel to the Municipality area.” (State Parties, 2020, Appendix, p.3/16)*

**Google Maps:** [-17.911691, 25.828699](#)

**Operator Website:** [Elephant Hills Resort](#)

**Keep Victoria Falls Wild:** [Elephant Hills Resort](#)

#### 4.2.10

#### *Riverside Tree Lodge (Proposed Development)*

**Location:** Riverside fringe within upstream extension of VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016). It should be noted that while the text description of the management zones presented in the 2016-21 JIMP is clear that this area is within the HESZ (State Parties, 2016, p.28-9), the supporting map (State Parties, 2016, p.24; Figure 13, p. 46) incorrectly shows the riverine strip running round the boundary of the Elephant Hills Golf Course as being within the MESZ (see Sections 3.1.4 and 6.0.4).

**Current Status:** Proposed lodge development within 40 ha concession stretched over 1.5km of river-frontage.

**History:** The site of the development first disclosed to local residents when heavy machinery and materials appeared along Zambezi Drive (close to the Big Tree) in December 2020. A Zimbabwe National Park manager indicated at the time that a thorough ESIA had been completed for a “24 bed semi-permanent tented tree lodge,” although it is unclear how this could have happened without any public disclosure or stakeholder consultation.

*“I met with the Area manager of national parks Victoria Falls this morning to ask about the development in front of the Golf course. He has confirmed that the development is a 24 bed semi-permanent tented tree lodge. He confirms that thorough EIA’s have been done that address the concerns of the animal corridors. The lodge is unfenced and will allow animals to continue to traverse through that area”* (Facebook, December 2020)

A river-side access road, connecting Zambezi Drive upstream to the commercial jetty sites, was cut through the site in 2021 ([VFBnB, Feb 2021a](#)).

Over 2022 work appears to have continued developing this road with the construction of culverts and crossings over several small streams (and clearly visible on Google satellite images - as is the JCB, which remains parked up on Zambezi Drive, close to the Big Tree and has apparently not moved since January 2023).

In September 2022 the development proposals were announced to the tourism industry as part of the ‘Six Senses’ portfolio.

*“Slated to open in 2025, Six Senses has entered into its first sub-Saharan African project with Six Senses Victoria Falls and plans to offer wildlife lovers stilted eco-lodges on the edge of the Zambezi. The riverside game reserve and wellness resort will fall within Zimbabwe’s Victoria Falls National Park, a UNESCO Protected*

Area. The partially concealed, tree-level lodges at Six Senses Victoria Falls will be ecological, tactile, and understated to provide a bird's eye platform for what's most important, an authentic connection with the verdant nature and wildlife all around. The resort is part of The House of Chinhara initiative to recover the majesty of Zimbabwean tourism by elevating the available accommodation count and quality for visitors to the Victoria Falls National Park, as well as providing host accommodation facilities and hospitality training opportunities...

"With its trademark ethos of conscious travel, Six Senses is working with the development team... on a modular scheme consisting of a series of stilted wooden structures. This will match the weightless aesthetic with mighty engineering innovation to ensure the lightest possible footprint while still withstanding a heavy knock from a passing elephant. Fabricated off-site to minimise construction impacts, the arrangement of lodges and villas will be connected by raised walkways and bridges. From the main welcome pavilion, guests will transfer to the lounge lobby,

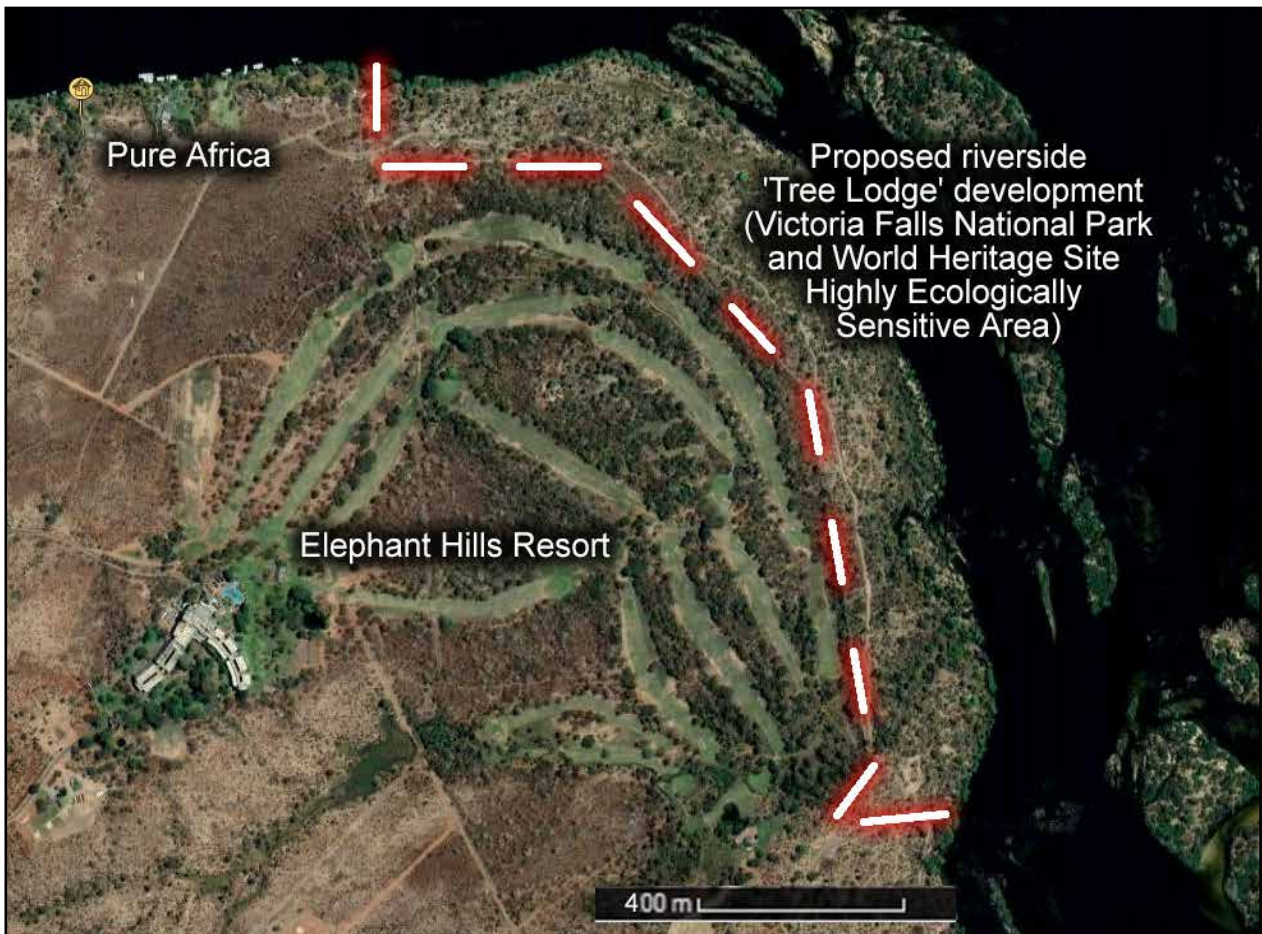


Image showing boundary of VFNP and WHS and area of riverside 'tree lodge' development (satellite image from 2022)

*where amenities will include a raised restaurant and lounge, specialty dining and braai bar, and sunset look-out bar. The Six Senses Spa and wellness facilities will include four treatment rooms, a gym, a yoga deck, outdoor hot pools, a panoramic sauna, and an integrated retail and concept store. The jungle gym is literal and therefore accompanied by a ranger. In addition to the 22 lodges with private terraces, there will be 15 deluxe lodges with suspended pools. Some of these lodges can be inter-connected. Plans are afoot for 17 individual pool villas, nine of which offer multi-bedroom accommodation.” ([hoteldesigns.net](https://hoteldesigns.net), Oct 2022)*

The development has been heavily promoted within tourism sector media, including [hoteldesigns.com](https://hoteldesigns.com) (October 2022) and [forbes.com](https://forbes.com) (December 2022).

The developments as currently proposed by House of Chinhara, are described on the RareEarth Sanctuaries website:

*“The Palazzo - A 100-room, 5 star+ boutique luxury resort managed by Vignette Hotels (part of the IHG Group), with global branded retail and state-of-the-art conferencing facilities can accommodate up to 300 delegates. This site comprises 1.15 hectares in the center of the urban hub of Victoria Falls town along Livingstone Avenue, the main road leading from Bulawayo through to the Zambian border.*

*“The Sanctuary - Princess Islands Riverside Tree Top Lodge - The RareEARTH*



*JCB and road materials arrive (February 2021 - still present on Satellite images, Aug 2023)*



*One of the new culvert on new access road through site (January 2023)*

*Sanctuary is managed by the magnificent Six Senses Hotels (part of the spectacular IHG Group) and is designed as a 57-room 5 star+ luxury lodge and spa, plus 6 luxury houseboats, one of which will be a floating spa-boat, a traditional wooden gulet, revamped for the ultimate African Spa-Experience.*

*“This site comprises a roughly 40-hectare parcel of land within the boundaries of the Victoria Falls National Park. Specifically, this site lies between the Elephant Hills golf*



*Riverside ‘Tree Lodge’ Development, Concept Image*

*course and the banks of the Zambezi River, overlooking the Princess Islands. From the site, the water spray of Victoria Falls is clearly visible. The land stretches adjacent to the river and teems with notable wildlife such as elephants, lions, buffalos, leopards, white rhino and sable antelope. The Urban Hotel property is owned outright by the project owner and the Riverside property is subject to a 25-year renewable lease.” ([RareEarth Sanctuaries website](#))*

This section of the Victoria Falls National Park riverside fringe previously had limited access. Largely protected by the surrounding Elephant Hills Resort (which is fenced) it has become an important elephant movement corridor and day-time refuge with favoured shelter spots under the shade of the tall riverside trees.

Recent years have seen an increase in fatal incidents with dangerous local wildlife on both sides of the river, with growing human populations and expanding tourism developments infringing into wildlife movement corridors and displacing animals from their traditional haunts. In May 2022 two Victoria Falls residents lost their lives as a result of elephant encounters ([VFBnB, May 2022](#)).

**Google Maps:** [-17.901293, 25.833789](#) downstream to [-17.910685, 25.842190](#)

**Operator Website:** [Rare Earth Sanctuaries](#) / [Six Senses Victoria Falls](#)

**Keep Victoria Falls Wild:** [Riverside ‘Tree Lodge’](#)



*Riverside ‘Tree Lodge’ Development, Concept Image*

#### 4.2.11 *Big Tree (Recent Developments)*

**Location:** Council controlled plot outside of National Park. The boundary of the VFNP Area B runs along the road (Zambezi Drive) and is also the boundary of the WHS. Lay-by parking area on opposite side of road (Council controlled) and therefore within Buffer Zone.

**Current Status:** Recent development of curio market, impacting surrounding bush. Media reports in March 2023 identified Across Zimbabwe Pvt Ltd as being involved in the formalisation of this market area (see also 4.2.17 - Flyover and Visitor Car Park). Mr Muleya, director of Across Zimbabwe indicated “*we have 120 curio vendors operating under Across Zimbabwe at the Big Tree where we are working on repairing the shade*” ([VFBnB, March 2023](#)).

**History:** Originally a parking/pull-off area for tourist coaches and minibuses visiting the Big Tree. Informal curio vendors gathered here, looking for a chance to sell their wood and stone carvings. In recent years formal curio market has developed, growing to over 70 members before the outbreak of the pandemic and is now left with about 30 members ([VFBnB, June 2022a](#)). At a recent National Park planning meeting, held with local stakeholders at the Victoria Falls on 9th May 2022, concerns were raised over the inappropriate development of this curio market - especially as there are no toilet facilities, leading to obvious implications (ZPWMA, May 2022).

**Google Maps:** [-17.912298, 25.841225](#)

**Keep Victoria Falls Wild:** [Big Tree Curio Market](#)



*Big Tree Curio area (Jan 2023)*

*Big Tree Curio area (Aug 2023)*

#### 4.2.12 *Bush Event Site*

**Location:** Riverside fringe within upstream extension of VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Increasing ground and vegetation impacts.

**History:** Bush dinner site leased by National Parks to local operator Into Africa Bush Dinners (since early 2000s). Breakfast, lunch and evening dinner events catering for up to 300 people. Also sites on Princess Elizabeth Island (breakfast/lunch events up to 200 people) and Hippo Creek, within ZNP (evening dinners up to 500).

**Google Maps:** [-17.910707, 25.843184](#)

**Operator Website:** [Into Africa Bush Cuisine](#)

**Keep Victoria Falls Wild:** [Bush Event Site](#)



*Zambezi Drive Riverside Bush Dinner Site (Jan 2023)*

#### 4.2.13 *National Parks ‘Rock Pool’ (New Development/Activity)*

**Location:** Riverside fringe within upstream extension of VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Development of new permanent structure in early 2022. Launched as the ‘Rock Pool’ bar in December 2022. Latest satellite images from August 2023 show development of ancillary buildings and landscaping of surround ground.

**History:** This area within the ‘no new construction’ zone of the Victoria Falls Special Area and protected as such since National Parks to over management of site in early 1950s. Previously used as an occasional ‘bush dinner’ events site. In 2018 National Parks experimented with a formal recreational area, raising concerns among local residents.

*“Zimbabwe Parks and Wildlife Management Authority (ZPWMA) opened up a new activity whereby residents of Victoria Falls were, for a small fee [\$2], being allowed to swim in the Zambezi river, in a rock pool just above the Falls. On the weekends, especially, huge crowds gathered. VFEW’s main concern was that an enormous amount of litter was being left behind, which has an obvious impact on the environment. It was also seen as being potentially dangerous, due to crocodiles in the river. It was also unsightly for tourists to the Falls, as the masses of people were very clearly visible from the viewpoints inside the rainforest.” (Victoria Falls Enviro Watch, 2023)*

The formalisation of access to this area of the river was also criticised by local residents



*Rock Pool development (Jan 2023)*

*Rock Pool development (Aug 2023)*

on the basis of lack of consultation, defilement of a culturally important site and claims that it was encouraging immoral and anti-social behaviour ([Sunday News, Oct 2018](#)). The development appears to have been championed by Mr Mathew Muleya (who is also a National Parks ranger, councillor for Hwange Rural District Council Ward 19 and Zanu PF Chairman for Matabeleland north - see also the 'Flyover' and 'Visitor Car Park' developments under 4.2.17).

Vague reference to formalising the use of sites along Zambezi Drive in 2018 and 2020 State of Conservation Reports.

*“The project seeks to regularize and formalize the use of an area popular with the local community while addressing the environmental issues relating to the site, including littering and uncontrolled access.”* (State Parties, 2020, p.19/37)

In December 2022 National Parks launched the 'Rock Pool' on social media, offering bar, picnic and braai (barbecue) facilities. Complaints were raised by residents over the number of people (up to 200) and vehicles gathered along Zambezi Drive, with a loud-speaker system and bar operating until 11:00 in the evening. Late night special events were promoted over holiday weekends through 2023. As with the development of the Big Tree Curio area concerns over disposal of waste as well as noise pollution and disturbance.

**Google Maps:** [-17.917311, 25.846278](#)

**Keep Victoria Falls Wild:** [Rock Pool](#)



*Zambezi Drive - new infrastructure, constructed early 2022 (May 2023)*

#### **4.2.14      *Riverside Restaurant (New Development)***

**Location:** Riverside fringe within upstream extension of VFNP (Area B), Victoria Falls National Monument and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** Construction completed, restaurant opened in mid-2023.

**History:** This area traditionally within the ‘no new construction’ zone of the Victoria Falls Special Area and National Monument. No reference to this development proposal in the 2021 State of Conservation Report.

In April 2022 work started clearing bush, scrub and trees from an area just above the Devil’s Cataract and outside the fenced Victoria Falls visitor park (but still within the wider Victoria Falls National Park and upstream river extension, and within core area of World Heritage Site) for a rumoured restaurant development.

The construction has caused huge local controversy and widespread negative social media reaction, stimulated the establishment of an [online petition](#) (against the over-development of the Falls, including the launch of Cataract Island tours and which has reached close to 20,500 signatures by the end of August 2023), and a legal challenge against the development by concerned local residents. Despite this work on the site continued.



*Site of Riverside Restaurant, Zambezi Drive (April 2022)*

In early June 2022 Victoria Falls Investments released an undated statement:

*“Victoria Falls Investments has obtained a lease from Zimbabwe Parks and Wildlife Management Authority to build and operate an upmarket restaurant on the banks of the Zambezi River. This new restaurant will add a unique and memorable experience to all tourists who visit the City of Victoria Falls. Victoria Falls Investments has noted various comments and statements circulating online regarding our development and we would like to ensure that the correct information and facts are known to all stakeholders of Victoria Falls.*

*“• The site located within UNESCO deemed Orange Zone of the World Heritage plan and is fully compliant with all UNESCO zone regulations. The Orange zone, according the World Heritage Plan , allows for the development of ‘semi-permanent structures such as restaurants, lodges, jetty sites, etc.’ within its boundaries. Thus there are no breaches of the UNESCO World Heritage plans and thus no threat to the World Heritage status of the Victoria Falls.*

*“• Full EIA completed by a renowned company ([Environmental Guardians Services](#)) and approved through Environmental Management Agency (EMA).*

*“• Fully compliant with Zimbabwe Parks and Wildlife Management Authority requirements including the preservation of the natural state and resources of the leased area.*



*Site of Riverside Restaurant, Zambezi Drive (October 2022)*

*“As part of the agreement with ZPWMA, Victoria Falls Investments have established a protected game corridor within the leased area thereby allowing wildlife full access to the river. This will be maintained by VFI, who will keep it in pristine condition, and ensure security.*

*“Design features only semi-permanent (removeable) structures as per regulations.*

*“The lease area is found at the old ‘water pump station’ location at the river’s edge and does not include any plans to develop or build on any of the islands.*

*“Structures will not be seen from the Victoria Falls viewing points and will blend into the natural surroundings of the river bank, being offset from the river.*

*“Victoria Falls Investments is a local Victoria Falls based company (owned and operated by long-standing Victoria Falls residents). We have a full understanding of the natural environment and wildlife in the area, and have taken (and will continue to take) all these factors into consideration.*

*“The development will be unique and upmarket attraction that will enhance the city’s current offerings and our aim is to spark renewed interest in the appeal of the city on the international and local tourism markets alike.”*

*“Victoria Falls Investments is open to any interested parties who would like to arrange a site visit.” ([Victoria Falls Investments, June 2022](#))*



*Site of Riverside Restaurant, Zambezi Drive (October 2022)*

While claiming that a full EIA has been completed for the proposal, there has been no public disclosure or stakeholder consultation and the final EIA document has not been made public.

We believe the assertion by the developers that this site is within the 'Orange' management zone is incorrect. While there is no 'Orange' zone, their supporting comments indicate they are referring to the Medium Ecologically Sensitive Zone (MESZ), marked in yellow (see Section 3.1.4 for further details). The 2016-2021 JIMP (still the current management document agreed by UNESCO) clearly specifies that the riverine fringe is covered within the Highly Ecologically Sensitive Zone (Block 6):

***“...following the Victoria Falls Rainforest, thence up the Zambezi River covering the riverine vegetation strip to where it joins the Zambezi National Park boundary.”***  
(State Parties, 2016, p.29/90)

The document also identifies the boundary with the 'Medium Ecologically Sensitive Zone (MESZ)' (Block 7) as extending along Zambezi Drive road (see Appendix 6.0.4 for full text).



*Plan of Riverside Restaurant overlaid over satellite image of site location (enlarged),  
Zambezi Drive*

*“The zone covers the Victoria Falls border and the Rainforest car park area and continues **from the Victoria Falls Rainforest VIP entrance gate, thence along the Zambezi Drive Road...**” (State Parties, 2016, p.29/90)*

The supporting map (State Parties, 2016, p.27; Figure 13, p.46) reflects this text description, showing a yellow MESZ to the west of Zambezi Drive road and the red HESZ covering the riverine fringe/strip and river itself (see Section 3.1.4 for further details).

At the end of July 2022 it was reported in the Zimbabwe Independent that a group of concerned local residents had presented a legal appeal against the issuing of permits by the National Park Authority for the Cataract Island Tours and Riverside Restaurant developments ([VFBnB, July 2022](#)).

In a subsequent follow-up article it was reported that the Environmental Management



*Riverside Restaurant construction (January 2023)*



*Riverside Restaurant under construction, Zambezi Drive (Aug 2023)*

Agency had confirmed the issuing of an EIA certificate of approval for the proposal.

*“EMA spokesperson Amkela Sidange told the Independent that Scanner Investments had been issued with an Environmental Impact Assessment (EIA) certificate after weighing submissions made by key stakeholders including the Unesco local office.*

*“Scanner has an EIA certificate whose approval came with recommendations from landowners and relevant stakeholders who include the local Unesco office,’ she said this week, explaining that she was not aware of the nature of the commercial project the firm intended to set up in the delicate areas of the falls.” (VFBnB, Aug 2022a)*

It is unknown what information on the proposal was disclosed to the UNESCO regional office (in Harare) or what comments were made - Guy Broucke has not replied to enquiries trying to verify any ‘recommendation’ made in relation to this development. Nor is it clear which local stakeholders were consulted as there was been no public disclosure on this development (we know that the developers privately discussed their proposal with select contacts in the Falls, but there was no wider disclosure).

We believe that the EMA issued EIA certificate of approval was given on the basis of the false claim that the site of the development is within the MESZ, and not the HESZ. If so, the certificate should be withdrawn.

Photographs from October 2022 showed that despite the concerns over the future of the World Heritage Site and the ongoing legal challenge against the development,

construction still continued at the actual site.

Photographs from January 2023 showed concrete and brick piers - in a management zone which by their account (being in the MESZ) allows only 'semi-permanent (removable)' infrastructure. In fact no infrastructure is allowed as it is within the HESZ. The completed development opened in mid-2023. The legal challenge against this development continues, as does UNESCO's silence.

**Google Maps:** [-17.920659, 25.847136](#)

**Keep Victoria Falls Wild:** [Riverside Restaurant](#)



*Riverside Restaurant interior (Aug 2023)*



*Riverside Restaurant riverside viewing deck (Aug 2023)*

#### 4.2.15 *Cataract Island Tours (New Activity)*

**Location:** Island in river on edge of Victoria Falls, within upstream extension of VFNP (Area B) and VF/MoT WHS HESZ (State Parties, 2016).

**Current Status:** New activity was launched without public or local stakeholder disclosure and consultation, with no Environmental Impact Assessment (EIA) process (specifically requested by UNESCO in 2017), and it would appear, without duly notifying UNESCO or waiting the Committee's comments on the proposals - despite committing to do so in 2018. The operator has limited the online promotion of this activity due to the negative social media reaction, although is believed to still be offering the activity.

**History:** This area traditionally within the 'no new construction' zone of the Victoria Falls Special Area and National Monument. No reference to this development proposal in the 2021 State of Conservation Report.

In 2011 local tourism operator Wild Horizons proposed operating tours to Cataract Island from the south bank, having signed a lease agreement with National Parks.

*"After engagement with various stakeholders by the operator there was a general consensus that this area is part of a World Heritage Site and it was felt that it should be left in it's pristine state. Wild Horizons then stepped back from the proposed development on the proviso that the island would remain in it's natural state."* (Friends of Victoria Falls, minutes of meeting, Nov 2016)

In 2016 Zambezi Crescent attempted to launch the activity, again without due disclosure or consultation, resulting in widespread negative reaction and an online petition protesting against the development, signed by over 17,750 people.

It also resulted in a letter to the State Parties requesting further details of the proposal:

*"The World Heritage Centre sent two letters (dated 23 November 2016 and 25 January 2017) to the States Parties to request information on the proposed hotel and recreational facilities in Livingstone, [and] use of the Cataract Island for tourism."* ([World Heritage Committee, 2017](#))

This was followed by a specific request from the World Heritage Committee for details for the Cataract Island proposal, specifically requesting an Environmental and Social Impact Assessment (ESIA) for the proposal.

*"Also noting with concern the State Party of Zambia's intention to partner with private*

*investors to construct a hotel and recreational facilities inside the property, further requests the States Parties to clarify the exact locations of all developments and the plans to utilize Cataract Island for tourism, and to submit to the World Heritage Centre for review by IUCN, an ESIA for each of these projects, including a specific assessment of the impacts on OUV.” ([World Heritage Committee, 2017](#))*

In reply, in the 2018 State of Conservation Report the State Parties confirmed that there had been no developments on the ground and specifically committed to duly update the Committee on all future developments involving Cataract Island.

*“The States Parties took note of the concern raised relating to the construction of a hotel, recreational facilities inside the property and utilisation of the Cataract Island for tourism. The States Parties therefore, would like to report that there are no developments on the ground and will update the committee in line with the operational guidelines.” (State Parties, 2018)*

In April 2022 Zambezi Crescent, operators of the Victoria Falls River Lodge, launched a new website, [www.cataractpool.com](http://www.cataractpool.com) promoting tours to Cataract Island. A promotional launch email was also sent to tourism agents:

*“A fully guided experience including a short boat trip across the calm waters of the channel to Cataract Island. Once disembarked, a guided tour of the Island follows, including time to explore the new section of Victoria Falls that is busy forming. Enjoy plenty of free time for optional swimming in the warm, clear pools on the face of the falls, or to explore some of the most spectacular scenery that nature has to offer.”*  
(Cataract Pools publicity information)

The launch of this activity, on the last remaining untouched area of the Victoria Falls rainforest ecozone, caused huge local controversy and widespread negative social media reaction, stimulating the establishment of an [online petition](#) (against the over-development of the Falls, including the development of the Zambezi Drive Riverside Restaurant development, 4.1.14, and which has reached over 20,500 signatures by August 2023), and a legal challenge against the over-development of the Falls raised by concerned local residents ([VFBnB, Aug 2022c](#)).

Documents published in advance of the 45th Session of the World Heritage Committee, to be held in September 2023, indicate that the World Heritage Centre wrote to the State Party of Zimbabwe in March 2023 requesting comment, believed to be in relation to this and the riverside restaurant development (4.2.14).

*“In a letter dated 14 March 2023, the World Heritage Centre transmitted to the State*

*Party of Zimbabwe, for comments, third-party information reporting the issuing of a permit for two commercial sites for tourism developments within areas of the property that are recognized as highly sensitive zones according to the JIMP. No response has been received from the State Party at the time of writing this report.” ([World Heritage Committee, 2023a, p.17](#))*

**Google Maps:** [-17.922364, 25.848638](#)

**Keep Victoria Falls Wild:** [Cataract Island Tours](#)



*Cataract Island (Aug 2023). Note restaurant development (4.2.14) in top left*

#### 4.2.16

#### *Victoria Falls Visitor Park*

**Location:** Fenced sub-section of VFNP, within upstream extension of VFNP (Area B) and VF/MoT WHS Core Area and identified within 'High ESZ' (State Parties, 2016).

**Current Status:** Local reports of new museum development within Visitor Park.

**History:** First fenced in 1960s, new elephant-proof fenced erected late 1990s (entry fee for international visitors at time \$10). Within this area are National Parks offices/entrance gate, visitor information and shop, toilets developed in 1960s. Within the fenced area of the park are concrete walkways and the statue to David Livingstone (unveiled in 1934).

In 2010 the Park Authority partnered with local activity provider Shearwater Adventures, trading through the Zambezi Helicopter Company, in a much needed, yet controversial, redevelopment of the Falls Park visitor reception facilities in 2010. The development included the conversion of the information centre into a shop selling tourism souvenirs and the construction of a visitor restaurant and supporting facilities. An outdoor interpretation and information display area was also developed (see 2.2.3).

**Google Maps:** [-17.924824, 25.847361](#)

**Keep Victoria Falls Wild: -**



*Victoria Falls visitor park or 'Rainforest' (annotated with line of fence)*

#### 4.2.17 *Road and Rail Transport Corridor*

**Location:** Outside of VFNP but within WHS MESZ (State Parties 2016). Land use outside VFNP controlled by Victoria Falls City Council (VFCC) with railway transport corridor controlled by National Railways Zimbabwe (NRZ). Further clarification of VFCC and NRZ controlled land in this area needed - maps presented to UNESCO are of insufficient scale to show detail.

**Current Status:** Various recent and new developments in process with further rumours of developments. No official disclosure of any of these developments.

**History:** Road and rail approach to immigration/border facilities and bridge. Car parking areas, informal trading kiosks and new commercial buildings.

##### *Railway Corridor (New Developments)*

**Location:** Narrow strip of land running either side of railway line which loops down to the Bridge. Under jurisdiction of NRZ.

**Current Status:** In August 2023 reported that officials had undertaken a site visit with the aim of allocating land for development. Rumours that land offered as concessions towards Big Tree and the Falls.



*The 'railway loop' down to the Bridge (Aug 2023)*



*Area of the 'Flyover' development (Aug 2023)*

### *The Flyover (New Development)*

**Location:** Either side of road on approach to Victoria falls visitor park. Council controlled.

**Current Status:** In January 2023 grass/scrub layer cleared in previously natural light-wooded area on both sides of road approaching Victoria Falls visitor park. Local reports indicated that the land, controlled by NRZ as part of the road and rail transport corridor, had been leased to a private company for an unknown development (see notes under Visitor Car Park below).

**History:** Previously natural bush and scrub.

**Google Maps:** [-17.924252, 25.845076](#)

**Keep Victoria Falls Wild:** [The Flyover](#)

### *Visitor Car Park (Recent Developments)*

**Current Status:** On 31st March 2023 it was announced that from 1st April a US\$5 parking fee would be introduced at the Victoria Falls visitor car park after the National Railways of Zimbabwe (NRZ) confirmed it had leased the property to a private company ([VFBnB, March 2023](#)).

Across Zimbabwe Private Limited, formed in 2016, has apparently signed a five-year lease to operate the car park and a nearby 'recreational park' (believed to be the Flyover



*Area of the Victoria Falls visitor car park (Jan 2023)*

development). In an interview with the Chronicle, Across Zimbabwe Pvt Ltd director Mr Mathew Muleya (who is also a National Parks ranger, councillor for Hwange Rural District Council Ward 19 and Zanu PF Chairman for Matabeleland north - see also the National Park's 'Rock Pool' development - 4.2.13) confirmed the introduction of fees. *"We have been leased the Victoria Falls Rainforest car park by NRZ and from April 1, 2023 the car park will be a pre-paid parking zone charged US\$5 per vehicle for the whole day."* Mr Muleya also indicated involvement with the recently formalised Big Tree curio market area. In addition the Chronicle reported that two tour operators and a property developer have also been offered land near the gorges.

**History:** The visitor car park was originally developed in the late 1960s. The facility was significantly redeveloped in the early 2000s with the surfacing of the parking area and creation of formal parking bays, pavements as well as the construction of formal market facilities for local independent artists and traders. The redevelopment was sponsored by the local tourism industry and the operators of the Victoria Falls Hotel.

**Google Maps:** [-17.925125, 25.846608](#)

**Keep Victoria Falls Wild:** [Visitor Car Park](#)



*Area of the Victoria Falls visitor car park (Aug 2023)*

### *Commercial Developments (Recent Developments)*

**Current Status:** New structures constructed over 2022 and 2023.

**History:** Restaurant developments adjoining visitor car park opened in 2020 and 2021.

**Google Maps:** New development: [-17.924814, 25.846128](#)  
Malonga Village: [-17.925458, 25.847146](#)  
Fish and Chips: [-17.925563, 25.847235](#)

**Keep Victoria Falls Wild:** [Commercial Developments](#)

### *Zimbabwe Border Facilities*

**Current Status:** Development of a 'one-stop' border first proposed in 2017. Current status of proposal unknown.

**History:** Border/immigration facilities, built early 1960s (after Zambian independence).

**Google Maps:** [-17.926284, 25.848542](#)

**Keep Victoria Falls Wild:** [Border Facilities](#)



*Zimbabwe border facilities (Jan 2023)*

### *Gorge Developments (Recent Developments)*

**Current Status:** In late March the Chronicle reported that two big tour operators and a property developer have also been offered land near the gorges. NRZ spokesperson Mr Andrew Kunambura commented: *“As railways the thrust is to grow the real estates’ portfolio and in this regard we have been leasing out land that has been lying idle for a long time. We have seen people applying to lease land and as a result they are developing it into eco-tourism and some are developing tourism tents for their clients.”* ([VFBnB, March 2023](#)).

It is thought these proposed developments are in the section of the railway corridor approaching the bridge and may well include a proposal for a gorge-side restaurant overlooking the Bridge and gorges. (See also New Hotel proposal, 4.3.2.)

To date no further details have been disclosed relating to the other tourism developments. Further clarification of NRZ controlled land in this area needed - maps are of insufficient scale to show detail. Further clarification also needed on transport corridor status within the area of the WHS.

**History:** Part of NRZ controlled transport corridor.

**Google Maps:** [-17.927600, 25.856084](#)

### **4.3.0 Victoria Falls National Park (Area A)**

- 4.3.1 Wild Horizons Gorge Activity Centre and Lookout Cafe
- 4.3.2 New Hotel (Proposed Development)
- 4.3.3 Wild Horizons Estate
- 4.3.4 Solar Facility



*Victorias Falls downstream gorges*

### 4.3.1 *Wild Horizons Gorge Activity Centre and Lookout Cafe*

**Location:** Part of VFNP (Area A). Within WHS. The text of the 2016-21 JIMP is unclear in detailing if this area is within the 'Highly ESZ' or 'Medium ESZ.' Maps also unclear.

**Current Status:** No new development proposals known.

**History:** Originally developed on a previously undeveloped site in late 1990s as gorge activity area, with gorge swing, zip-line and abseiling. Later also expanded to include gorge 'canopy' zip-line. Small thatched wooden reception building, In 2014 Gorge Activity Centre reception building expanded into restaurant/cafe with the clearance of a large car parking area, extensive areas of planted watered lawns and even a series of terraced dining lawns.

*"In December 2014 Wild Horizons opened the new Lookout Café, part of a redevelopment of their gorge activity centre, perched overlooking the second and third gorges below the Falls. The development included a rebuild and expansion of the existing thatched structure, landscaped terraced gardens and the clearance of a large area of natural bush for customer car parking. The gorge activity centre was originally developed in 2001 with the construction of a small thatched building and installation of high-wire infrastructure across the gorges, offering a bungee swing, zip-line and abseiling activities. The centre expanded its activities with the introduction*



*Wild Horizons Gorge Activity Centre and Lookout Cafe (Jan 2023)*

*of zip-line ‘canopy tour’ in the bend of the second and third gorges in mid-2013.”*  
(Roberts, 2021)

In late 2018 completely gutted by fire. Rebuilt as much larger, more permanent concrete and stone structure opened in January 2020. It is not known if a new EISA was commissioned relating to the re-development, which is a significant expansion in the development’s footprint and permanence. The new structure, perched on the edge of the gorge, is prominent in views from the Bridge and no doubt also the Victoria Falls Hotel.

Visitors undertaking gorge activities pay a US\$3 Park’s fee (in contrast other activities, eg rafting, river cruises and jet-boat charged US\$10, helicopter flights US\$15 and horse-back safaris US\$20).

Visitors to the restaurant do not pay a Park’s fee.

**Google Maps:** [-17.929060, 25.846771](#)

**Operator Website:** [The Lookout Cafe](#)

**Keep Victoria Falls Wild:** [Wild Horizons Lookout Cafe](#)



*Wild Horizons Lookout Cafe and associated infrastructure (Aug 2023)*

### 4.3.2 *New Hotel (Proposed Development)*

**Location:** Council controlled land “behind Victoria Falls Hotel, between the railway line and Zambezi River gorges.” This area is identified on maps presented to UNESCO as with the HESZ. Further clarification of VFNP and WHS boundary in this area needed - maps are of insufficient scale to show detail.

#### **Current Status:**

At the end of May it was reported that the City Council had partnered with CBZ Bank and a Swiss developer to build a 7-star hotel on land identified “behind Victoria Falls Hotel, between the railway line and Zambezi River gorges.” ([VFBnB, May 2023](#))

*“Cllr Dlamini said besides creating employment for locals, the project will change the face of the city... ‘There is a piece of land that has been identified for this hotel and plans are underway. Once approved by Cabinet they will come to council. Designs have been done and have been shown to us as we wait for approval by the department of planning,’ said Cllr Dlamini.”* ([VFBnB, May 2023](#))

**Google Maps:** [-17.934664, 25.842540](#)

**Keep Victoria Falls Wild:** [New Hotel](#)



*Gorges below Victoria Falls, Victoria Falls Hotel centre left (Aug 2023)*

### 4.3.3 *Wild Horizons Estate*

**Location:** Part of VFNP (Area A), within WHS, partly MESZ and partly within LESZ (State Parties, 2016). Most recent State of Conservation report shows within HESZ and LESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, p. 41).

**Current Status:** In February 2023 announced development of new 'star bed' extensions to Elephant Camp luxury suites.

**History:** Part of tourism concession, known as the Wild Horizons Estate. The area was fenced in 2007, becoming home to the Wild Horizons Elephant Sanctuary. In 2010 the Elephant Camp opened, offering 12 luxury tented units. An extension, the Elephant Camp West, opened in April 2015, consisting of four tented suites overlooking the gorges below the Falls. The Wallow Lodge opened in 2021 with 16 suites.

**Google Maps:** [-17.969641, 25.844096](#)

**Keep Victoria Falls Wild:** [Wild Horizons Estate](#)



*Area of the Wild Horizons Estate (Jan 2023)*



*Wild Horizons Estate 'The Wallow' Lodge development (Aug 2023)*



*Wild Horizons Estate Elephant Camp development (Aug 2023)*

#### 4.3.4 *Solar Facility*

**Location:** Site appears to be within boundaries of the WHS LESZ (State Parties, 2016), although appears to be outside of Wild Horizons fenced area.

**Google Maps:** [-17.989423, 25.905465](#)

**Keep Victoria Falls Wild:** [Solar Farm Development](#)



*Solar Park development (Aug 2023)*

## 5.0.0 CONCLUSIONS

This report raises serious concerns over the management of the Victoria Falls WHS, with conservation priorities ignored (3.1.1), concerns over the rapidly increasing number of tourism concessions within the area of the WHS (3.1.2), new concerns over the identification of the Site's boundary (3.1.3), significant and serious concerns over the boundary of management zones within the Site (3.1.4) with implications for recent developments within the HESZ which have falsely been claimed to be outside this zone, including a new National Park development (4.2.13) and a commercial restaurant immediately above the Falls (4.2.14). While we can understand how a private developer may have misinterpreted the 2016-21 JIMP document, we fail to understand how the Zimbabwe National Park Authority have misinterpreted their own management document in their support of these developments.

Within the boundaries of the WHS the report identifies two proposed developments within the ZNP, one of which (4.1.2) is located within the HESZ (which prohibits all new development), and four potential new hotel/lodge developments proposed within the VFNP (4.2.3, 4.2.5, 4.2.10 and 4.3.2), one of which has subsequently been withdrawn (4.2.3). Two new tourism facilities have been developed on the ground (4.2.13 and 4.2.14) and one new tourism activity - tours to one of the most ecologically sensitive areas of the site, Cataract Island (4.2.15) - all again within the HESZ which supposedly prohibits all new infrastructure developments. In addition we raise concerns over the expansion of existing developments within the ZNP (4.1.3 and 4.1.5) and VFNP (4.2.8, 4.3.1 and 4.3.3), and highlight development pressures within the road and rail transport corridor which dissects the Site (4.2.17).

The report also identifies one case where the Victoria Falls City Council attempted to illegitimately terminate a long-standing tourism lease in order to allow the plot to be redeveloped as a tourism hotel (4.2.3) and one case of a National Park concession agreement being cancelled due to reported corruption, although the same tourism operator has subsequently signed a new agreement and work is ongoing on the redevelopment (4.1.5). A group of local residents are currently progressing a legal challenge against new tourism developments in the VFNP HESZ including the construction of a riverside restaurant immediately above the Falls (4.2.14) and the launch of tours to Cataract Island (4.2.15). It should also be noted that individuals involved in some of the developments identified in this report have also been accused of intimidating and threatening behaviour.

We also raise serious concerns over the management reporting on the Site, especially in relation to the reporting of visitors to the Site, with figures from Zimbabwe appearing to be at variance with those published in the Zimbabwe Tourism Authority's Annual Reports,

and lack of reporting on tourism activity levels at the site (numbers tourists undertaking boat cruises, helicopter flights or any of the other activities which utilise the Site). We believe the monitoring and reporting of these visitors is key to understanding the tourism pressures which affect the Site and should be a core part of the State Parties regular reporting on the Site.

### **5.0.1      *Response to World Heritage Committee Draft Decision***

As this report was being finalised UNESCO published the draft agenda and documents ahead of the 45th Session of the World Heritage Committee, to be held in September 2023. Among the reports is an update on the State of Conservation for the Victoria Falls World Heritage Site and draft decision (WHC.23.45.COM.7BAdd, pages 16-19).

The update includes the following information relating to the development of new tourism facilities within the Highly Ecologically Sensitive Zone of the Site, and which prevents all new infrastructure developments in these areas.

*“In a letter dated 14 March 2023, the World Heritage Centre transmitted to the State Party of Zimbabwe, for comments, third-party information reporting the issuing of a permit for two commercial sites for tourism developments within areas of the property that are recognized as highly sensitive zones according to the JIMP. No response has been received from the State Party at the time of writing this report.”* ([World Heritage Committee, 2023a, p.17](#))

The Committee appear to have missed an opportunity to ensure a response to this issue in time for their 45th Session.

The update continues:

*“The property continues to face serious threats from individual and cumulative infrastructure developments within the property, its buffer zone and its wider setting... Contrary to the Committee’s request to the State Party of Zambia to halt the Mosi-oa-Tunya Livingstone Resort Hotel development, construction has continued, and the 2022 Reactive Monitoring mission identified numerous shortfalls and non-compliance with World Heritage status, the JIMP, and the State Party’s own legal regulations. Other proposed developments in the property and its buffer zone have not been assessed as to their cumulative impacts on the OUV, in response to which the mission has recommended the States Parties produce a blueprint to guide strategic level planning. It should be submitted to the World Heritage Centre, together with the individual ESIs of the developments proposed for approval, prior to authorizing any further projects.”* ([World Heritage Committee, 2023a, p.17-8](#))

The update concludes by requesting a revised State of Conservation Report to be presented to the Committee by 1st February 2024 in advance of the Committee's 46th Session to be held later that year.

Despite the numerous issues raised in the report on the February 2022 monitoring mission (UNESCO, 2023) and another conference report identifying tourism infrastructure pressures at the Victoria Falls as an example of development negatively affecting the conservation of World Heritage Sites, the World Heritage Committee has decided not to discuss the Site at its forthcoming 45th Session.

*“Infrastructure development in and around World Heritage properties continues to exert increasing pressure on their OUV... Expansion of tourism infrastructure.(e.g., Mosi-oa-Tunya/Victoria Falls (Zambia/Zimbabwe).“ ([World Heritage Committee, 2023b, p.24](#))*

We believe the combined mismanagement and increasing tourism development pressures outlined in this report raise serious concerns over the future viability of the World Heritage Site with serious negative impacts on the Site's Outstanding Universal Values already caused by recent developments along Zambezi Drive (4.2.13 and 4.2.14). While by the Committee's own admission the monitoring mission *“identified numerous shortfalls and non-compliance with World Heritage status”* (World Heritage Committee, 2023) it appears that the Committee is now itself in danger of not acting sufficiently to address these concerns.

The management of Site is in urgent need of detailed review and increasing scrutiny is needed to monitor and mitigate the negative impacts and pressures on the Site, and in which the Zimbabwe Parks and Wildlife Management Authority appear themselves to be complicit. Failure to react strongly to the current wave of developments which threaten the Site will be seen as a green light to the State Parties to continue the commercial development, and ecological degradation, of the Site.

### **5.0.2      *Recommendations to the Committee***

We believe the Committee's draft decisions (World Heritage Committee, 2023; this report, Appendix 6.0.8) are inadequate to address the serious and urgent problems facing the Site from already authorised developments, especially on the southern Zimbabwean side of the property. The wording of decision point 5 is particularly concerning:

*“5. Reiterates its concern over the increasing pressure from tourism infrastructure*

*within and around the property, exacerbated by the absence of strategic planning and also requests the States Parties to produce a blueprint for infrastructure development in and around the property that ensures the protection of the property's OUV, and to not approve any further developments until the blueprint is finalized and submitted to the World Heritage Centre, together with an impact assessment for each proposed project in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to taking any decision that is difficult to reverse.” ([World Heritage Committee, 2023a, p.19](#))*

The wording of the current draft request for the ‘blueprint’ overview “*together with the individual ESIAs of the developments proposed for approval, prior to authorizing any further projects*” appears to do nothing in terms of addressing the current wave of unsuitable developments within the WHS HESZ and identified in this report, which have already been authorised an agreed between the Zimbabwean National Park Authority and private tourism operators.

After the delays faced by the monitoring mission to the Site, originally requested in 2019 and only undertaken in February 2022, and the subsequent delays in the dates for the 45th Session, there is an urgent and pressing need for the Committee to further investigate and consider its response to the State Parties, and **we urge the Committee to request an urgent review of all current development proposals within the World Heritage Site and surrounding Buffer Zone, and request that all current as well as further/future developments are immediately suspended pending submission and agreement of the detailed ‘blueprint’ and ESIA documents requested by the Committee.**

We further believe that the requested suspension on all new tourism developments and activities within the WHS should be maintained until an adequate (and IUCN/UNESCO approved) management plan for the Victoria Falls and Zambezi National Parks is in place and a new Joint Integrated Management Plan for the Site agreed, including addressing the management of the transport corridor and other areas within the WHS and surrounding Buffer Zone which are outside of National Park control an ignored in current reports.

We also advise the Committee to be extremely cautious in accepting any new maps or management descriptions of the Site without detailed review of the information they present. There is a history of manipulating information presented in these reports to make it appear as if tourism developments are within allowable management zones when they are in fact within strict no new development zones. For example the Committee should note that the map presented in the most recent 2021 State of Conservation report (State Parties, 2022, Appendix 2a, p.2; this report, Figure 11, page

41) does not show the correct management zonation in regard to the upstream riverine fringe, as detailed and agreed in the 2016-21 JIMP (see Section 3.1.4). The Committee should also consider requesting larger scale maps which can actually show the detail of the management zonation (as well as perhaps cutting the wider Zambezi National Park from maps to concentrate on the area of the WHS).

We also strongly urge the Committee to request that the State of Conservation reports include annual visitors statistics to the Site reported separately for each side of the river and on a monthly basis so that the Committee can understand the variation in visitors received on each side of the river and the huge seasonal variation in visitor numbers to the Site.

We also similarly urge the Committee to request that the State Parties State of Conservation reports include annual activity numbers for activities which involve the World Heritage Site, such as river cruises, helicopter and other flights, rafting etc, again divided by each State Party and presented on a month by month basis so that the Committee can understand the varying tourism activity pressures on the Site.

In addition the Committee should also request that the State Parties State of Conservation reports include annual figures on the number of tourism bed-nights accommodated in tourism facilities within the WHS, broken down by accommodation provider and month, so that the Committee can better understand the utilisation levels and seasonal variation in tourist accommodation provided within the Site.

We also believe that there is a need for the tourism operators with concessions within the WHS and Buffer Zone to each nominate a senior member of staff as their UNESCO contact and that a platform is encouraged for an exchange of information and best practice.

Further specific recommendations are made under each section of this report.

## 6.0.0

## APPENDIX

### 6.0.1

### *Media Coverage*

[Is the World Heritage Committee kicking the can down the road while looking the other way?](#) victoriafallsbitsandblogs.com, 31st August 2023.

[Tourism Development Pressures Threaten Victoria Falls World Heritage Site \(Zimbabwe\)](#). victoriafallsbitsandblogs.com, 14th February 2023.

[Zimbabwe–Zambia: Is Victoria Falls under threat from development projects?](#), theafricareport.com, 26th September 2022.

[Victoria Falls heritage status under threat from power plant, hotel, golf course plans. Unesco warns](#), dailymaverick.co.za, 11th August 2022.

[Residents present legal case against tourism development proposals at Victoria Falls](#), victoriafallsbitsandblogs.com, 9th August 2022.

[Zambian dilemma over Victoria Falls heritage status](#), cajnewsafrica.com, 28th July 2022.

[Conservationists' concern at overdevelopment at Vic Falls](#), tourismupdate.co.za, 22nd July 2022.

[UNESCO warns Victoria Falls could lose heritage status if hotel, golf course is built](#), lusakatimes.com, 21st July 2022.

[Golf and hotel could cost Victoria Falls heritage status](#), thetimes.co.uk, 17th July 2022.

[Cataract Island Tours Threaten Victoria Falls World Heritage Status](#), victoriafallsbitsandblogs.com, 8th June 2022.

[Africa's Thunder at risk as tourism threatens Victoria Falls](#), thesundaypost.com, 6th June 2022.

[Victoria Falls tourism plans 'put natural wonder at risk'](#), thetimes.co.uk, 13th May 2022.

[Vic Falls risks being stripped of Unesco World Heritage Status](#), thenewshawks.com, 13th May 2022.

[Developments In Victoria Falls Raise Major Concerns](#), zamsoc.org, 4th May 2022.

[Fears Grow Over Falls World Heritage Status](#), victoriafallsbitsandblogs.com, 20th April 2022.

[Vic Falls world heritage status not under threat](#), dailynews.co.zw, 17th April 2022.

[Growing concerns that Victoria Falls might be delisted as a World Heritage Site](#), capetownnet.com, 23rd March 2022.

[Victoria Falls World Heritage Status Hangs in Balance](#), allafrica.com, 23rd March 2022.

## 6.0.2 *UNESCO OUV*

From UNESCO website (accessed January 2023)

*“Criterion (vii): The Mosi-oa-Tunya/Victoria Falls is the largest curtain of falling water in the world; it is 1708 m wide and with up to 500 million litres per minute descending at 61 m (Devil’s Cataract), 83 m (Main Falls), 99 m (Rainbow Falls), 98 m (Eastern Cataract). Eight spectacular gorges of igneous origin (i.e. comprising basalts) and several islands in the core zone serve as breeding sites for four endangered and migratory bird species, such as the Taita Falcon and Black Eagle. The riverine ‘rainforest’ within the waterfall splash zone is a fragile ecosystem of discontinuous forest on sandy alluvium, dependent upon maintenance of abundant water and high humidity resulting from the spray plume of about 500 m (at maximum height) that can be seen from a distance of 50 km and 30 km from Bulawayo and Lusaka roads respectively. A direct frontage viewing of the Falls is possible from both Zambia and Zimbabwe.*

*“Criterion (viii): The Mosi-oa-Tunya/Victoria Falls and associated eight steep sided gorges have been formed through the changing waterfall positions over a geological time scale. The gorges are an outstanding example of river capture and the erosive forces of the water still continue to sculpture the hard basalts. These gorges take a zigzag course of a distance of about 150 km along the Zambezi River below the Falls. Seven previous waterfalls occupied the seven gorges below the present Falls, and the Devil’s Cataract in Zimbabwe is the starting point for cutting back to a new waterfall. In addition, an aerial view of the Falls shows possible future waterfall positions. Upstream are a spectacular series of riverine islands formed during the ongoing geological and geomorphological processes. The property is characterized by banded basalt of ancient lava flow, Kalahari sandstones and chalcedony out of which stone artefacts of Homo habilis dating three million years, stone tools of the middle Stone Age and weapons, adornments and digging tools of the late Stone Age that indicate occupation by hunter-gatherers.” ([UNESCO, 2023a](#))*

### **6.0.3            *Text Description of Victoria Falls and Zambezi National Park Boundaries***

Text descriptions of the Victoria Falls and Zambezi National Parks from 1996 Parks and Wildlife Act.

*“Item 8: Victoria Falls ‘A’ Area: 1,904 hectares*

*“The area of land bounded by a line drawn from a point on the Zambezi River at map reference 35KLL842115 on the 1:50,000 map Victoria Falls 1725D4 and on a straight line drawn between beacons M44 and M43 of Victoria Falls Reserve (as shown on General Plan CG152, filed in the office of the Surveyor -General, Bulawayo) and generally westwards along the boundaries of that Reserve, through beacons M43, M17 and towards M23 to the Bulawayo-Victoria Falls road; thence proceeding generally north-westwards along that road to Deka-Falls Railway Strip 4; thence north-eastwards and northwards along the eastern boundary of that railway strip to the southern boundary of Railway Reserve Victoria Falls A; thence eastwards and generally northwards along its southern, south-eastern and eastern boundaries to a point 29 metres south of beacon NO2; thence north-westwards direct to a point 20 metres north of beacon NO2 on that boundary and northwards along that boundary to beacon NP (as shown on Diagram S.G. No.3333/58, filed in the office of the Surveyor -General, Bulawayo); thence north-eastwards direct to beacon BR55 on the southern boundary of Deka-Falls Railway Strip 6 (as shown on Diagram S.G. No. 358/35, filed in the office of the Surveyor-General, Bulawayo); thence eastwards along the southern boundaries of that property to the Zimbabwe-Zambia international boundary and down the Zambezi River, following that international boundary, to the starting-point.*

*“Victoria Falls ‘B’ Area: 436 hectares*

*“The area of land bounded by a line drawn from the easternmost point of Deka-Falls Railway Strip 6, on the Zimbabwe-Zambia international boundary, generally westwards along the north-eastern and northern boundaries of that property to the north-eastern boundary of Victoria Falls Customs Post Reservation; thence proceeding north-westwards along the north-eastern and northern boundaries of that reservation and the northern boundaries of the Road Reservation, so as to exclude them, to the Zambezi Drive; thence north-eastwards and north-westwards along that drive, so as to exclude it, to a point at map reference 77671824 on the 1:5,000 map Victoria Falls LL7618; thence north-westwards direct to a point on the eastern boundary of Deka-Falls Railway Strip 5B at map reference 77591840 on that map and generally north-westwards along that boundary to a point at map reference*

77271880 on that map; thence north-westwards to a point on the Zambezi Drive at map reference 77111891 on that map; thence generally north-eastwards along that drive, so as to exclude it, to a point at map reference 77271941 on that map; thence north-eastwards direct to beacon R9 (as shown on plan BM49, filed in the office of the Surveyor-General, Bulawayo); thence generally north-westwards along a series of straight lines through beacons R8, R7, R6, R5, R4, R3 and R2 to R1; thence north-westwards towards beacon BL7 to a stream at map reference 75922066 on the 1:5,000 map Victoria Falls LL7220; thence generally northwards down that stream to the south bank of the Zambezi River; thence generally westwards along that south bank to the prolongation of a straight line drawn from beacon BL1 through beacon BL2 (as shown on plan BM, filed in the office of the Surveyor-General, Bulawayo) to that south bank; thence continuing north-eastwards along that prolongation to its intersection by the Zimbabwe-Zambia international boundary and generally eastwards and south-eastwards along that international boundary to the starting-point. Map references quoted in these descriptions are given to the nearest hundred metres on the 1: 50 000 map and to the nearest ten metres on the 1:5,000 maps.

*“Item 9: Zambezi Area: 56,010 hectares*

*“The area of land bounded by a line drawn from the point where the prolongation of a straight line drawn from beacon BL1 through beacon BL2 meets the Zimbabwe-Zambia international boundary and southwards along that prolongation to beacon BL2; thence proceeding generally southwards along a series of straight lines through beacons BL1, W1 and W3 (as shown on plan BM49, filed in the office of the Surveyor -General, Bulawayo); thence southwards direct to the intersection of the north-western boundary of Deka-Falls Railway Strip 4 by the Chamabonda River and south-westwards along the north-western boundary of Deka-Falls Railway Strip 4 to its intersection by a gamefence at map reference 35KLL711093 on the 1:50,000 map Victoria Falls Airport 1825B2; thence south-westwards along that game-fence to a point at map reference LL697086 on that map; thence southwards along that game-fence to its intersection by the north-western boundary of Deka-Falls Railway Strip 3 at map reference LL697078 on that map; thence south-westwards along the north-western boundary of Deka-Falls Railway Strip 3 to a point on that railway strip at map reference 35KLL676051 on the 1:50,000 map Myila 1825B1; thence westwards along a cut line to a point at map reference LL544049 on that map; thence north-westwards along that cut line direct to the eastern beacon of the former property Westwood Ranch; thence north-westwards along its north-eastern boundary and its prolongation north-westwards to its intersection by the Zimbabwe-Zambia international boundary and general ly eastwards and south-eastwards along that international boundary to the starting-point. Map references quoted in this description are given to the nearest hundred metres.” (ZPWMA, 1996)*

#### **6.0.4      *Text Description of WHS Management Zone Boundaries***

Management zonation for the southern half of the WHS, as described in the 2016-21 JIMP (State Parties, 2016, p.28-9) with additional explaining notes. The description is clear that the boundary of the HESZ runs upstream along Zambezi Drive road until meeting the boundary of the Elephant Hills Golf Course, following that boundary (marked by the 'R' series of boundary markers referred to in 6.0.3) upstream along the line of the boundary of the VFNP and continuing up to its conjunction with the boundary of the Zambezi National Park at the Boat Club. It should be noted that the supporting map incorrectly shows the riverine strip running round the Elephant Hills Golf Course as being within the MESZ, whereas the text description is clear that the boundary of the zone follows the line of VFNP and Elephant Hills (see Section 3.1.4).

##### *“(i) Highly Ecologically Sensitive Zone (Block 6)*

*Starting from a point UTM X 378914 Y 8013226 where the Masuwe River joins the Zambezi River, the boundary follows the Masuwe River towards Victoria Falls/ Bulawayo Road to point UTM X375298 Y 8013294, thence northwards along the Road to Deka-Falls Railway Strip 4, thence northwards along the eastern boundary of that Railway strip to the southern boundary of Railway Reserve Victoria Falls A following the Victoria falls Municipality Town boundary up to a point it joins the Railway Strip 6, thence eastwards to the Victoria Falls Bridge, thence north-westwards following the [boundary of the] Victoria Falls Rainforest, thence up the Zambezi River [along the line of Zambezi Drive road, to Beacon R11 and see (ii)] covering the riverine vegetation strip [upstream] to where it joins the Zambezi National Park boundary.*

##### *(ii) Medium Ecologically Sensitive Zone (Block 7)*

*The zone covers the Victoria Falls border and the Rainforest car park area and continues from the Victoria Falls Rainforest VIP entrance gate, thence along the Zambezi Drive Road to beacon R11, thence westwards following the boundary beacons [marking the boundary of the Elephant Hills Golf Course] to where it joints Zambezi National Park boundary.*

##### *(iii) Low Ecologically Sensitive Zone (Block 8)*

*The zone covers the Southern part of Victoria Falls National Park A, area bounded by a line drawn from a point on the Zambezi River at map reference 35KLL842115 on the 1:50000 map Victoria Falls 1725D4 and on a straight line drawn between beacons M44 and M43 of the Victoria Falls Reserve (as shown on the General Plan*



*Approximate line of boundary of VFNP Area B Zambezi Drive Section*

CG152 , and generally westwards along the boundaries of that Reserve, through beacons M43, M17 and towards M23 to the Bulawayo-Victoria Falls Road, thence proceeding generally north-westwards along that road to Masuwe Bridge, thence downstream the Masuwe River to the Masuwe/Zambezi confluence, thence southeast along the international boundary to the starting point.” (State Parties, 2016, p.28-9)

The Buffer Zone is detailed as:

“The area starts from the international boundary of Zimbabwe and Zambia on a straight line through beacon BL2 and BL1 proceeding generally southwards along a straight line through beacon W1, thence 800 metres on a straight line southwards towards beacon W3, thence 16km westwards along the Victoria/Falls Kazungula Road, thence 7,6km northwest along the 16km Road following that road northeast wards to its intersection by the Zimbabwe-Zambia international boundary at UTM

*X35K5039 Y 8027011, thence downstream the Zambezi River to the starting point.”*  
(State Parties, 2016, p.29)

The description of the Buffer Zone appears to correspond to the area of the ZNP indicated on the supporting map (State Parties, 2016, p.27), but takes no account of the area covered by Victoria Falls city council and railway reserve which adjoins a significant portion of the site along the VFNP upstream river corridor above the Falls and the road and rail transport corridor bordering the southern half of the site.

### 6.0.5 *Text Description of International Boundary*

International boundary specified by Northern Rhodesia and Southern Rhodesia (Boundaries) Order in Council No. 2083 (1963).

*“The Order in Council, in effect, delimits the boundary by the medium filum (median line) of the Zambezi, the medium filum between a specific shore and enumerated islands or the medium filum between specified islands.”* (U.S. Department of State, 1964)

The Act details the international border with Zambia in relation to Lake Kariba as well as making changes to the line of the border immediately above the Falls:

*“[From Lake Kariba upstream] ...thence along the medium filum of the Zambezi river to Mapeta island (18° 03' 26° 44'), thence along the medium filum between Mapeta island and the mainland of Northern Rhodesia, thence along the medium filum of the Zambezi river to its intersection with the middle of the main gorge to the south of Rainbow Falls and Livingstone island (17° 55' 25° 51'), thence following a line along the middle of this gorge round to the west of Livingstone island, thence along the middle of the channel between Livingstone island and the un-named island nearest to and to the west of Livingstone island, thence along the middle of the channel between Livingstone island and Princess Victoria island (17° 55' 25° 51'), thence following the middle of the channel having on its west Princess Victoria island, Princess Christian island (17° 55' 25° 51'), Princess Marie Louise island (17° 55' 25° 51') and Princess Elizabeth island (17° 54' 25° 51') and on its east, Princess Helena Victoria island (17° 55' 25° 52') and Princess Margaret island (17° 54' 25° 51'), to King George VI island (17° 54' 25° 50') thence along the middle of the channel to the south of this island and an un-named group of islands to the north of Princess Elizabeth island (17° 53' 25° 49') to the medium filum between King George VI island and the mainland of Southern Rhodesia, thence along this medium filum and the media fila between the island named Queen Elizabeth island, King George VI island, Canary island (17° 53' 25° 49') and the mainland of Southern Rhodesia to the medium filum of the Zambezi river, thence along this medium filum to Kandahar island (17° 52' 25° 48'), thence along the medium filum between this island and Palm island (17° 52' 25° 48'), thence along the medium filum of the Zambezi river to its intersection with the boundary of Bechuanaland Protectorate.*

*“The boundary described above is shown on Maps deposited in the offices of the Surveyor-General, Northern Rhodesia, and the Surveyor-General, Southern Rhodesia, signed by them and dated 19th December 1963.”* (U.S. Department of State, 1964)

*“In the area of Victoria Falls, Livingstone Island now belongs to Northern Rhodesia while Princess Victoria, Princess Christian, and Princess Marie Louise islands adhere to Southern Rhodesia. The boundary crosses the Falls to the west of Livingstone Island. Immediately above the Falls, Livingstone, Princess Helena Victoria, Princess Margaret, King George VI, Queen Elizabeth, Canary and Palm islands fall within Northern Rhodesia while Princess Victoria, Princess Christian, Princess Marie Louise, Princess Elizabeth and Kandahar islands are included within Southern Rhodesia. West of the islands, the boundary again joins the median line of the river.”*  
(U.S. Department of State, 1964)

## 6.0.6 *Visitors to Zambezi and Victoria Falls National Parks (1998-2009)*

From figures presented in Zimbabwe Tourism Authority Annual Reports.

**Total visitors to the Zambezi and Victoria Falls National Parks (1998-2009)**

<b>Year</b>	<b>Zambezi</b>	<b>Victoria Falls</b>	<b>Totals</b>
1998*	36,080	313,043	349,123
1999	29,166	216,227	245,393
2000	14,916	147,786	162,702
2001	18,482	47,525	66,007
2002	17,070	88,098	105,168
2003	20,481	93,991	114,472
2004	57,802	128,963	186,765
2005**	-	161,834	-
2006**	-	134,010	-
2007	55,050	194,575	250,225
2008	83,766	244,182	327,948
2009	47,450	116,223	163,673

\* 1998 figures from Nelson, 2000

\*\* No figures for ZNP visitors in ZTA reports for 2005 and 2006

Figures from Zimbabwe Tourism Authority Annual Reports -  
<https://zimbabwetourism.net/download-category/tourism-trends-and-statistics/>

*Table G: Visitor totals for Zambezi and Victoria Falls National Parks (1998-2009)  
(figures from ZTA Annual Reports)*

### 6.0.7 *Estimated Annual Income*

<b>Estimated Parks annual income, VFNP visitor fees (from AEC, 2019)</b>			
	<b>Entry Fee (US\$)</b>	<b>Estimated Visitors</b>	<b>Estimated Income (US\$)</b>
International (50%)	30	102,493	3,074,800
Regional (50%)	20	102,439	2,049,867
Local	8	85,895	471,160
<b>TOTAL</b>		<b>263,882</b>	<b>5,595,827</b>
<b>Estimated Parks annual income, core activities Park fees (from AEC, 2019)</b>			
	<b>Activity Fee (US\$)</b>	<b>Estimated Annual Totals</b>	<b>Estimated Income (US\$)</b>
Helicopter Flight	15	60,000	900,000
Upper River Cruise	10	130,000	1,300,000
Lower River Rafting etc	10	11,500	115,000
Gorge Activity Centre	3	3,000	9,000
Canoeing	10	4,000	40,000
Angling	10	3,000	30,000
Walking/Birdwatching	10	800	8,000
Horse-Riding Safari	20	600	12,000
Game Drive (ZNP)	15	2,500	37,000
<b>TOTAL</b>		<b>215,400</b>	<b>2,451,500</b>
<b>TOTAL ESTIMATED ANNUAL PARK INCOME</b>			<b>8,047,327</b>

*Table H: Estimated annual income, Park visitor and activity fees (AEC, 2019)*

**Estimated Parks annual average income, VFNP visitor fees 2014-8**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	30	160,577	4,817,318
Regional (20%)	20	40,144	802,886
Local	7	68,796	481,572
<b>TOTAL</b>		<b>269,518</b>	<b>6,101,777</b>

**Estimated Parks annual average income, ZNP visitor fees 2014-8  
(international and regional visitors only - does not include vehicle or overnight fees)**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	15	89,117	1,336,761
Regional (20%)	12	22,279	267,352
<b>TOTAL</b>		<b>111,397</b>	<b>1,604,113</b>

**Estimated Parks annual average income, core activity fees 2014-8  
(international and regional visitors only)**

	<b>Entry Fee (US\$)</b>	<b>Estimated Participation</b>	<b>Estimated Income (US\$)</b>
River Cruise (65%)	10	130,469	1,304,690
Helicopter Flight (30%)	15	60,216	903,247
Other Activity (15%)	10	30,108	301,082
<b>TOTAL</b>		<b>220,794</b>	<b>2,509,020</b>

<b>TOTAL ESTIMATED VISITOR AND ACTIVITY FEES</b>	<b>10,214,910</b>
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*Table I: Estimated average annual income, Park visitor and activity fees, 2014-8*

**Estimated Parks annual income, VFNP visitor fees 2019**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	30	248,568	7,457,568
Regional (20%)	20	62,146	1,242,928
Local	7	86,704	606,928
<b>TOTAL</b>		<b>397,436</b>	<b>9,307,424</b>

**Estimated Parks annual income, ZNP visitor fees 2019  
(international and regional visitors only - does not include vehicle or overnight fees)**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	15	122,791	1,841,868
Regional (20%)	12	30,698	368,374
<b>TOTAL</b>		<b>153,489</b>	<b>2,210,242</b>

**Estimated Parks annual income, core activity fees 2019  
(international and regional visitors only)**

	<b>Entry Fee (US\$)</b>	<b>Estimated Participation</b>	<b>Estimated Income (US\$)</b>
River Cruise (65%)	10	201,976	2,019,758
Helicopter Flight (20%)	15	62,146	932,196
Other Activity (15%)	10	46,610	466,098
<b>TOTAL</b>		<b>310,732</b>	<b>3,418,052</b>

<b>TOTAL ESTIMATED VISITOR AND ACTIVITY FEES</b>	<b>14,935,718</b>
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*Table J: Estimated average annual income, Park visitor and activity fees, 2019*

**Estimated Parks annual income, VFNP  
(2019 visitor levels, 2023 fees)**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	50	248,586	12,429,280
Regional (20%)	30	62,146	1,864,392
Local	10	86,704	867,040
<b>TOTAL</b>		<b>397,436</b>	<b>15,160,712</b>

**Estimated Parks annual income, ZNP  
(2019 visitor fees, 2023 fees, international and regional visitors only -  
does not include vehicle or overnight fees)**

	<b>Entry Fee (US\$)</b>	<b>Visitor Numbers (ZTA)</b>	<b>Estimated Income (US\$)</b>
International (80%)	15	122,791	1,841,898
Regional (20%)	12	30,698	368,374
<b>TOTAL</b>		<b>153,489</b>	<b>2,210,242</b>

**Estimated Parks annual income, core activities  
(2019 visitor levels, 2023 fees - international and regional visitors only)**

	<b>Entry Fee (US\$)</b>	<b>Estimated Participation</b>	<b>Estimated Income (US\$)</b>
River Cruise (65%)	10	201,976	2,019,758
Helicopter Flight (20%)	15	62,146	978,806
Other Activity (15%)	10	46,610	466,098
<b>TOTAL</b>		<b>310,732</b>	<b>3,418,052</b>

<b>TOTAL ESTIMATED VISITOR AND ACTIVITY FEES</b>	<b>20,789,006</b>
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*Table K: Estimated average annual income, 2019 visitor levels and 2023 fees*

## **6.0.8            *World Heritage Committee Draft Decision (45th Session, Sept 2023)***

The following is the text of the Draft Decision to be agreed at the 45th Session of the World Heritage Committee. We believe the Committee's draft decisions are inadequate to address the serious and urgent problems facing the Site from already proposed developments, especially on the southern Zimbabwean side of the property.

### **"Draft Decision: 45 COM 7B.10**

*The World Heritage Committee,*

- 1. Having examined Document WHC/23/45.COM/7B.Add,*
- 2. Recalling Decisions 36 COM 7B.7, 38 COM 7B.7 and 44 COM 7B.177 adopted at its 36th (Saint-Petersburg, 2012), 38th (Doha, 2014) and extended 44th (Fuzhou/online, 2021) sessions respectively,*
- 3. Welcomes the continued cooperation between the two States Parties in strengthening the joint management of the transboundary property, and the continued efforts to undertake monitoring and control of invasive alien plant species;*
- 4. Notes again with increasing concern the inevitable negative impacts of the proposed Batoka Gorge Hydro Electric Scheme (BGHES) on the Outstanding Universal Value (OUV) of the property due to inundation of a significant portion of the gorges within the property, and requests the States Parties to implement the 2022 Reactive Monitoring mission recommendation to revise the Environmental and Social Impact Assessment (ESIA) in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context to assess alternative project designs that will not impact the OUV, to undertake a comprehensive ecological assessment of the gorge ecosystem that takes into account the correct property boundaries, and submit the revised ESIA to the World Heritage Centre for review by IUCN before making any decisions that may be difficult to reverse in accordance with Paragraph 172 of the Operational Guidelines;*
- 5. Reiterates its concern over the increasing pressure from tourism infrastructure within and around the property, exacerbated by the absence of strategic planning and also requests the States Parties to produce a blueprint for infrastructure development in and around the property that ensures the protection of the property's OUV, and to not approve any further developments until the blueprint is finalized and submitted to the World Heritage Centre, together with an impact assessment for each proposed*

*project in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to taking any decision that is difficult to reverse ;*

*6. Notes with utmost concern that the construction of the Mosi-oa-Tunya Livingstone Resort Hotel has continued despite the Committee's request to halt further activities and urgently requests the State Party of Zambia to implement the 2022 Reactive Monitoring mission recommendation to suspend construction and operation of the Resort Hotel until it complies with all the legal conditions of approval issued by the Zambian Environmental Management Authority, the ESIA has been revised in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context and a comprehensive Environmental and Social Management Plan has been developed and submitted together with impact assessments to the World Heritage Centre;*

*7. Further requests the States Parties to submit a request for a boundary modification in accordance with the Operational Guidelines to set the precise boundaries of the property and its buffer zone, aligned with past Committee Decisions and the property's Statement of OUV and including details of the internal zonation system and its rationale to protect the property and its OUV;*

*8. Notes that the first phase of the Strategic Environmental Assessment (SEA) on the cumulative development and environmental pressure on the property has been undertaken, requests furthermore the States Parties to seek early inputs and technical guidance from IUCN in undertaking the second phase of the SEA and encourage the States Parties to submit an International Assistance request to that effect;*

*9. Reiterates its request to the States Parties to summarize how the findings of the analysis undertaken on the water flow, rainfall and upstream activity has informed management, and the measures subsequently taken to ensure water abstraction from the Zambezi River continues to be adapted in the face of climate change;*

*10. Requests moreover the States Parties to implement all other recommendations from the 2022 joint World Heritage Centre/IUCN Reactive Monitoring mission, including to:*

*a) Ensure that tourism infrastructure development within the property and its buffer zone is consistent with the aim to enhance the protection of the OUV of the property and in line with the Joint Integrated Management Plan,*

*b) Develop a blueprint for infrastructure development in and around the property,*

*c) Harmonize the roles and responsibilities of the National Heritage Conservation Commission and the Department of National Parks and Wildlife for the management of the property in Zambia;*

*11. Finally requests the States Parties to submit to the World Heritage Centre, by **1 February 2024**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 46th session in 2024.” ([World Heritage Committee, 2023a, p.18-9](#))*

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