

Bansko skiing zone - a calamity for Bulgarian nature

(Implications and recommendations for EBRD's involvement)
Environment Association “Za Zemiata /For the Earth/”, Bulgaria

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1. Background and history

Pirin National Park is a Bulgarian National Park¹, inscribed on UNESCO's World Heritage List because of its primeval alpine landscape, old-growth forests and endemic species. The site has also been accorded the highest conservation status by Bulgarian environmental legislation².

Pirin National Park spans a territory of more than 40 000 ha, including two natural reserves – “Baiuvi Dupki” and “Iulen” - 11 nature-wonder sites and 113 caves. In Pirin National Park the third highest peak in the Balkans is located (Vihren, 2915 meters). More than 186 lakes and 35 big water circuses are located in the park. A spectacular biodiversity with 1089 plant (1/3 of all flora species in Bulgaria) and 172 animal species (114 of which endangered) are hosted in the National Park, including endemic species such as the Macedonian Pine, which is protected by the Bern convention.

As a site with outstanding environmental qualities, the National Park attracted the interests of investors in winter ski tourism looking for quick and high economic profits. In 2000, the Bulgarian company Iulen started an initiative for the three-fold extension of

¹ www.pirin-np.com

² <http://whc.unesco.org>

the old and illegally constructed skiing-zone in the park. After a two-year period of administrative arrangements, and with the financial support of the Bulgarian First Investment Bank, the company obtained all permits and financing needed for the new skiing zone.

However, an analysis of all of the Environmental Impact Assessment (EIA) reports, showed a poor estimation of all of the habitats and species protected under the Bulgarian Nature Protection Act and the Bern Convention such as the spruce forests and the Macedonian pine forests. The EIA reports were heavily criticised by the Bulgarian Academy of Science, National Museum of Natural History and biodiversity protection NGOs. The concerns expressed in the statements made by the Academy and the NGOs were ignored and the concerned scientific institutes and NGOs were never consulted officially.

By April 2002 the Ministry of Environment and Waters gave final approval to the construction of five new ski slopes, seven ski-lifts and one cabin cableway within Pirin National Park. By May 2002 more than seventy appeals altogether were placed before the Supreme Administrative Court by the names of physical persons, both for administrative and biodiversity conservation legislation violations.

2. EBRD involvement

With its 20 percent stake, the EBRD is the second largest shareholder (PSD 3410)³ in the main project sponsor, that is the Bulgarian First Investment Bank (FIB). The Bulgarian bank has received EUR 13 million in loans from the EBRD (PSD 6925)⁴.

At the EBRD's annual meeting in 2004, Bulgarian civil society monitors of the Pirin case introduced the EBRD to the legal, social and environmental problematic issues surrounding the Bansko project and FIB. The Bulgarian NGOs Za Zemiata and CEIE, with the support of CEE Bankwatch Network, demanded that EBRD step out of FIB and publicly announce their decision.

At the 2004 AGM, EBRD staff informed Bulgarian NGO representatives that the Bank actually had plans to disinvest from FIB, for reasons other than the Pirin project. One year later (as of April 2005), neither EBRD disinvestment from FIB nor stronger measures which could enhance FIB's accountability have been taken by the EBRD.

3. Controversies with First Investment Bank's “Bansko Skiing Zone” project

3.1. Legal violations

Initiation of construction works in a National Park

³ <http://www.ebrd.com/projects/psd/index.htm>

⁴ <http://www.ebrd.com/projects/psd/index.htm>

The environmental approval for the Bansko Skiing Zone project was given in violation of art. 21 of the Bulgarian Protected Areas Act, which explicitly forbids the construction of new sport facilities, clear cuttings and any activities which can lead to negative impacts on the biodiversity on the territory of Bulgaria's National Parks. The project also contradicted the two main objectives of the management of the park, which refer to the conservation of ecosystems and biodiversity.

The agreed ski facilities and construction sites have lead to the destruction of animal and plant species protected under the Bulgarian Biodiversity Act. Furthermore the project has lead to the destruction of specimens and habitats of species protected under the Convention on the conservation of wild European fauna and flora and natural habitats (the Bern convention, in force in Bulgaria since 1991) and the Convention concerning the World Cultural and Natural Heritage of UNESCO.

Appeals against the environmental approvals, issued by the Bulgarian Environmental Ministry, were lodged by NGOs and individuals in the Supreme Administrative Court of Bulgaria; the appeals were subsequently rejected. The act was a clear sign of the weak implementation of legal nature-protection standards in Bulgaria and the inadequate appreciation of the domestic juridical authorities of the enforcement of nature-protection legislation.

Legal violations after the commencement of construction works

The Ministry of Environment and Waters (MEW), as the senior decision-maker and manager of the National Park, gave the desired (by the project initiator - the Bulgarian company "Iulen") territory in Pirin under concession. Nevertheless MEW gave the concession in breaching of Bulgaria's nature-protection legislation. This was only the opening act in a chain of crimes which followed after the project was initiated.

The concession contract, the Environmental Approval decisions and Bulgarian legislation have all been breached since the very beginning of the construction works. The most notable crimes were: the tripling of the ski slopes' width (from



the legal restriction of 30 metres to a width of 140 meters); and the unlawful use of equipment and explosives for large-scale excavation and earth removal works. The most recent violations include the expansion of the concession territory, going 55 ha (with loggings) above the legally allowed amounts in the direction of and in dangerous proximity to IULEN nature reserve. *See maps.*

Water-catchments and an artificial lake (which did not even get a water-use permit) were constructed without an EIA. Similarly, a ski slope and a lift “Zhelezni Most – Platoto” were constructed without official authorisation (EIA) by MEW. In addition, all EIA decisions have been seriously violated in more than one count. (See Appendix 3: Response from the MEW to an information request from Za Zemiata regarding violations in the construction of the skiing zone)

In conclusion, references from MEW, photo and map materials, and documented reports from civil society inspections of the area demonstrate that the concessioner has deliberately violated its concession contracts and the legislation of Bulgaria. No efforts to stop or restrict legal breaches committed by IULEN and contracted firms under the auspices of the main project sponsor - FIB – were made, although the latter was well-informed about project developments and their contradiction with the obtained permissions.

3.2. Other environmental and social problems

3.2.1. LOGGING OF PRIMEVAL FORESTS

For the construction of all ski facilities within the Bansko Skiing Zone, permissions were given to log 100 ha in total of centuries old pine and spruce forests. Clear cutting in ordinary forests is allowed for up to 25 ha, according to Bulgarian legislation. In one of the highly protected nature sites, clear cutting activities between 200 and 300 ha were carried out illegally. (See Appendix 4: an article from the Bulgarian Forest Institute for more information on the forest issue).



3.2.2. WATER POLLUTION AND SHORTAGE

The Bansko Skiing Zone redirects some of the waters needed for the town of Bansko. The clearing of the steep mountain slopes restricted the ability of the soil to retain the water from the melting snows and rainfalls.

The rivers of Ikrishte, Damianitsa and Bynderitsa fall within the scope of the skiing zone. Ikrishte river is highly polluted by the earth masses dug and disposed into it. The water of the Damianitsa and Bynderitsa rivers provide water for the artificial snow machines and for the buildings located in the zone. The town of Bansko, which has always had problems with water shortages, is currently suffering even greater declines in drinkable water. The waste waters from the skiing zone buildings and the ski slopes treatment are freely disposed in the rivers or end up in the underground waters in the park, endangering the quality of Bansko's drinkable water.



According to unofficial reports, chemicals are used during the creation and treatment of the artificial snow for the ski slopes, despite an explicit ban on the use of chemical substances laid down in the environmental approvals.

3.2.3. LANDSCAPE AND EROSION

The new ski slopes are subject to severe erosion and destroy the unique landscape of Pirin mountain. During the construction works, the explicit ban on the uprooting of tree trunks was violated from the very beginning, which lead to regular erosion processes along all the newly-built ski slopes. The shallow soil coverage on the steep slopes started to be stripped away after each rainfall.



The large-scale excavation works and steepness of the ski slopes of up to 20-50 percent at times caused severe land slides. It is unlikely that this process can be stopped considering that the high altitude weather conditions at the skiing zone predispose severe wind and rain soil erosion. The entire soil layer is expected to gradually be stripped away,

causing danger to humans, animals and plants.

On September 26, 2004, cars driving along the road beneath the newly built ski slope “Torodka – Bunderishka poliana” were dragged down from the land and mud slide, coming from the ski slope.)



Until now, no anti-erosion measures in the skiing zone have been undertaken. No assessment of the unrepairable damage on the mountain slopes and overall landscape in Bunderishka valley has been made.⁵

3.2.4. Biodiversity loss

The construction of the Bansko Skiing Zone is causing and facilitating the loss of typical, rare and endangered species living in the Pirin mountain. The logging and construction works, the large scale excavation activities, erosion, noise and water pollution constantly impact the habitats of all animal species residing in the Bunderitsa valley.

During the construction works, forest communities of predominantly Macedonian pine and spruce, protected by Bulgarian legislation and the Bern convention, were destroyed. The process led to severe fragmentation of the remaining old-growth forest, endangering future subsistence.⁶

3.2.5. Human rights and rights to justice

During a visit to the project site in June 2003, the NGO coalition observed a number of violations committed by Iulen, the project-implementing agency financed by the EBRD's financial intermediary. The NGO observers immediately telephoned the MEW to ask for a police investigation of the case. Shortly after the call was made, representatives of the project investor appeared at the site, demanded a confiscation of film materials recorded by the NGO representatives, and threatened the observers with physical violence.

In February 2001, after the MEW decision on the “Territorial and Management Plan for the Bansko Skiing Zone” came into force, six environmental NGOs lodged an appeal with the Supreme Administrative Court against the decision taken. In May 2002, more than 52 appeals were lodged with the Supreme Administrative Court for administrative and biodiversity conservation legislation violations in the Bansko Skiing Zone project. All appeals were rejected in November and December 2002.

⁵ “Landscape impact assessment of the Bansko Skiing Zone”, a report prepared by Za Zemiata and independent landscape experts, April 2005)

⁶ “Biodiversity impact assessment of the Bansko Skiing Zone”, a report prepared by For the Earth and independent biodiversity experts, April 2005

According to the Aarhus Convention (now ratified by the Bulgarian Parliament) and the basic principle of administrative law in Bulgarian legislation, an administrative decision cannot be implemented while it is being appealed in court and the project cannot start. Nevertheless, the skiing zone construction started during the summer of 2002.

3.3. Violations of the EBRD's Environmental Procedures

Contrary to the findings of the EBRD's Environmental Specialists, who visited Bulgaria to investigate the case, EBRD's Environmental Procedures, as of 1996, were indeed violated in the FIB case.

As stated on page29 of the “Environmental procedures, European Bank for Reconstruction and Development” (as of September 1996), “The Bank will adopt the same principles of environmental appraisal on its intermediated financing as it adopts when it directly funds operations. It will ensure that its financial intermediaries have the capability and commitment to ... monitor the environmental components of their activities.”⁷

In a response to an information request from Za Zemiata, the MEW gave a description of the violations on the Environmental Approvals for the Bansko Skiing Center made by the parties implementing the project. (Unfortunately Za Zemiata was denied access by MEW to the very documents where the specific penalties are described.) The letter certifies that no additional EIA has been issued, which implies that the ski slope and facilities “Zhelezni Most – Planoto”, the mini dam on the Bunderishka meadow, together with the two water catchments in the area, have been built illegally.

The letter describes only part of the crimes committed during the implementation of the project and identified by independent civil society observers. Thus poor monitoring took place not only on the side of MEW. There was no effective enforcement of the Environmental Approval and concession contract conditions for the ski-facilities development on the side of FIB. FIB, although it is so obliged, according to the EBRD's Environmental Procedures, to monitor the environmental components of the project development, did not prevent the violations from taking place, despite its close links to the implementing company. (A simple illustration of the statement is that Mr. Boyan Marianov is the executive director of IULEN, the implementing company, and simultaneously a stakeholder in First Financial Brokerage House, which has a 13.9 percent stake in FIB, the project sponsor⁸.

Thus although “all necessary permits and approvals for the project were in place”, as the EBRD’s environmental specialists state, the actual implementation of the project was in violation with most of these and all of the Environmental Approvals overruled existing environmental laws in Bulgaria⁹.

⁷ www.ebrd.com

⁸ www.fibank.bg

⁹ “Bansko Skiing Zone- Breaking the law, violations with environmental laws”, a report prepared by Za Zemiata and independent experts, May 2005)

4. Recent implications of the Bansko Skiing Zone project

4.1. Economic implications for the Bansko region and the EBRD

The investor promised “bread for Bansko”, “European” standards in terms of ski facilities, economic development and the well-being of the Bansko region. In reality the company has gradually become a regional monopoly in offering ski services. IULEN bought the biggest hotels and a large amount of real estate in the Bansko region, and thus offered the greatest share of accommodation, giving the company the opportunity to independently set the prices of accommodation.

IULEN has monopolised entrance to the park, setting the price for the cable-way independently, and as the owner of all ski facilities and slopes IULEN has charged optimum prices for their use. In addition, the company expelled all independent small-scale businesses (ski-schools and services), who thrived on the skiing zone before its large-scale extension. The project has provided minimal employment possibilities for the local population, both in the construction and tourist service work.¹⁰

Thus the regional economic impact in terms of quality and equity is highly dubious. The income from the destruction of the National Park was collected by firm-monopolist. At the same time the small-scale business in the sphere, which employs the largest share of the population, had difficulties surviving.

In conclusion, it is the citizens of Bansko who bear the potential water shortages and pollution, the deforestation impacts and biodiversity loss and whose economic position is undermined by the IULEN market monopoly in the area. The project has lead to large-scale profits for IULEN and FIB respectively, but at the same time has deepened economic inequality in the Bansko region. It has enhanced the short-term private interest of a company-monopolist to the detriment of public interest – the sustainable and long-term utilisation of the unique nature resources of the country.

4.2. Expansion of the Bansko Skiing Zone concept

An alarming current development with this case is the double extension of the already expanded skiing zone, a decision which was taken by the city council of Bansko on March 22, 2005. The proposal includes 112 ha of new ski facilities and slopes and is in violation with the Bulgarian government’s recently approved Management Plan of Pirin National Park, according to which no further construction of ski facilities should take place in the park. The proposal also violates Bulgarian legislation.

Projects for skiing zones in other parts of Bulgaria have been developed recently. The “Super Borovets” and “Panichishte” projects in Rila National Park, which involve the construction of new ski slopes and facilities, each of them spreading over larger areas than the Bansko Skiing Zone, are on course to receive their Environmental Approvals

¹⁰ 60 interviews with citizens of Bansko, conducted by Za Zemiata

from MEW. Similar projects for large-scale ski resort construction exist for Chepelare, Smolyan, Siutka, Kom and Uzana, located in the mountains of “Rhodopes” and “Stara Planina”.

Thus the Bansko Skiing Zone ‘spill over’ effect is marked. Tempted by the high economic returns of IULEN, projects in all of Bulgaria’s other high mountaineous regions are springing up.

The weak enforcement of environmental legislation and the position of MEW, the ‘legal’ accessory tool used by investors in the Bansko Skiing Zone project, will be utilised by others, speeding up the logging and nature destruction processes and creating the biggest environmental catastrophe in Bulgarian history.

5. Conclusions about the role of EBRD. Recommendations

In conclusion, if the EBRD commits to promoting competition, privatisation and entrepreneurship as part of its mission, the Bansko Skiing Zone project and FIB cannot continue to be a part of the EBRD's investment portfolio. The EBRD should ask itself whether high economic returns, as in the case of FIB and Bansko, should be the dominating evaluation criteria in the investment decision-making of a public financial institution. After all, it also states that “Respect for the environment is part of the strong corporate governance attached to all EBRD investments.”¹¹

If the principle of social and environmental equity is not meaningfully taken into consideration by the EBRD during its evaluation and monitoring of investment decisions, the EBRD will simply enhance inequality and social and environmental destruction, rather than environmental sensitivity and democratic governance.

The controversies and negative implications of the Bansko Skiing Zone project and the key role of FIB in the process show that its investment in FIB was a bad decision on the part of the EBRD. Not only, were the EBRD's environmental procedures violated, but the support for institutions such as FIB contradicts the EBRD's mission statement of enhancing respect for the environment and nurturing a new private sector in a democratic environment. First Investment Bank is a prime example of an undemocratic and unaccountable institution, the kind of institution which the EBRD has no business supporting.

Thus, we ask the EBRD:

I. with regard to the FIB case, to:

- i. Critically evaluate its involvement in FIB and publicly step out of the Bulgarian bank, as was disclosed to NGOs in April 2004.**
- ii. Activate the Compliance Officer at EBRD to investigate the violations of the EBRD's environmental procedures and the extent to which the project fits the**

¹¹ www.ebrd.org

sustainability mandate of EBRD.

II. With regard to investing in financial intermediaries in general to:

Strengthen its policy on screening and monitoring financial intermediaries's performance and:

4. prior to investment decisions, open the investment screening procedures for public and civil society scrutiny and participation
5. following investment decisions are made, undertake regular independent evaluations (including non-governmental or civil society representatives) on the performance of financial intermediaries, and make the findings public. Evaluation should be based on social, economic and environmental criteria, developed jointly with civil society stakeholders.
6. following investment decisions, demand progress reports on environmental, social and economic performance from all financial intermediaries, which should be made available to the public.

6.Appendixes

List of appendixes:

Appendix 1.

Map of Ascertained violations of the boundaries of Bansko Ski Area

Appendix 2.

Map of Ascertained violations of the EIA of Bansko Ski Area

Appendix 3.

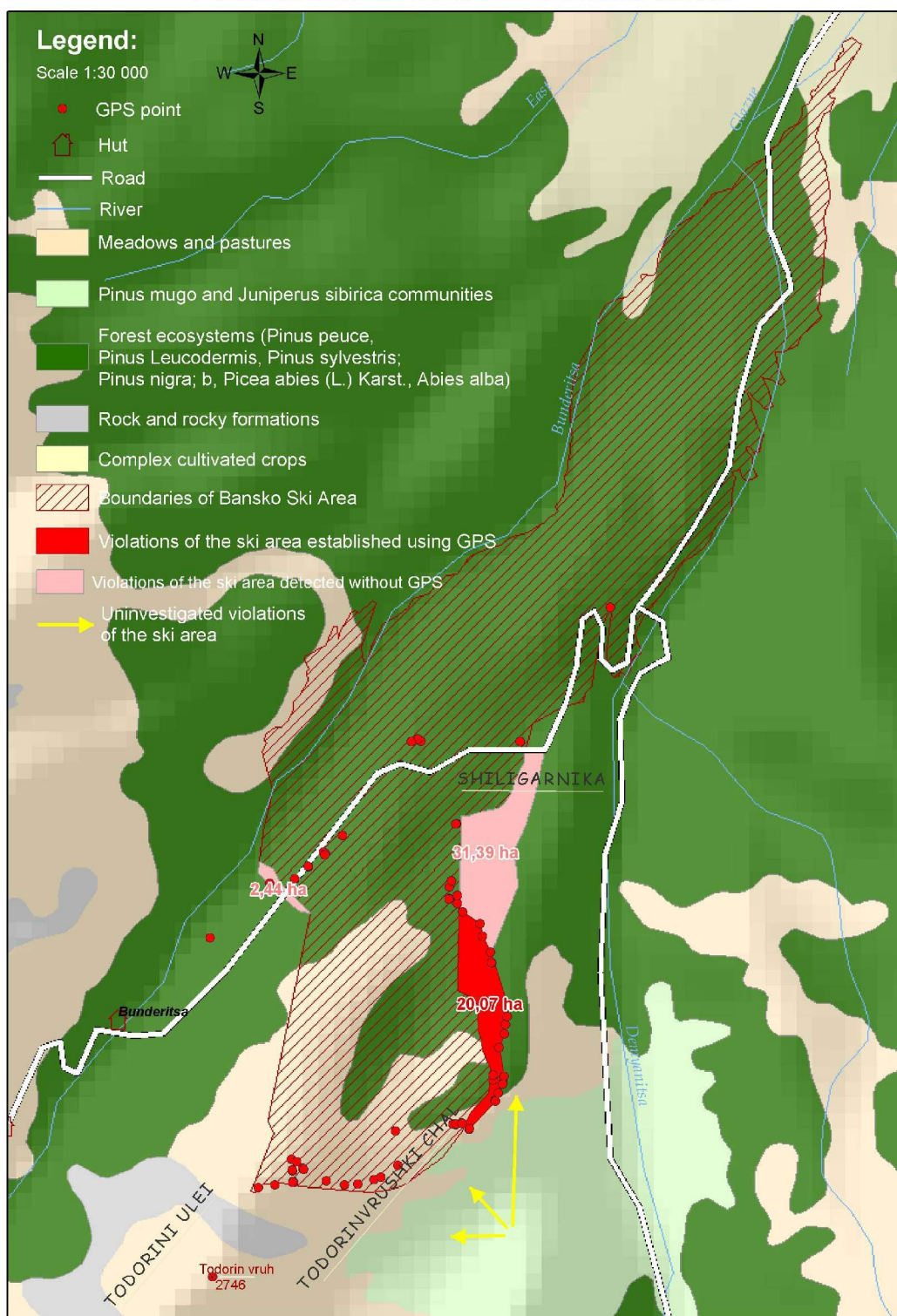
Response from the MEW to an information request from Za Zemiata regarding violations in the construction of the skiing zone

Appendix 4.

An article from the Bulgarian Forest Institute for more information on the forest issue

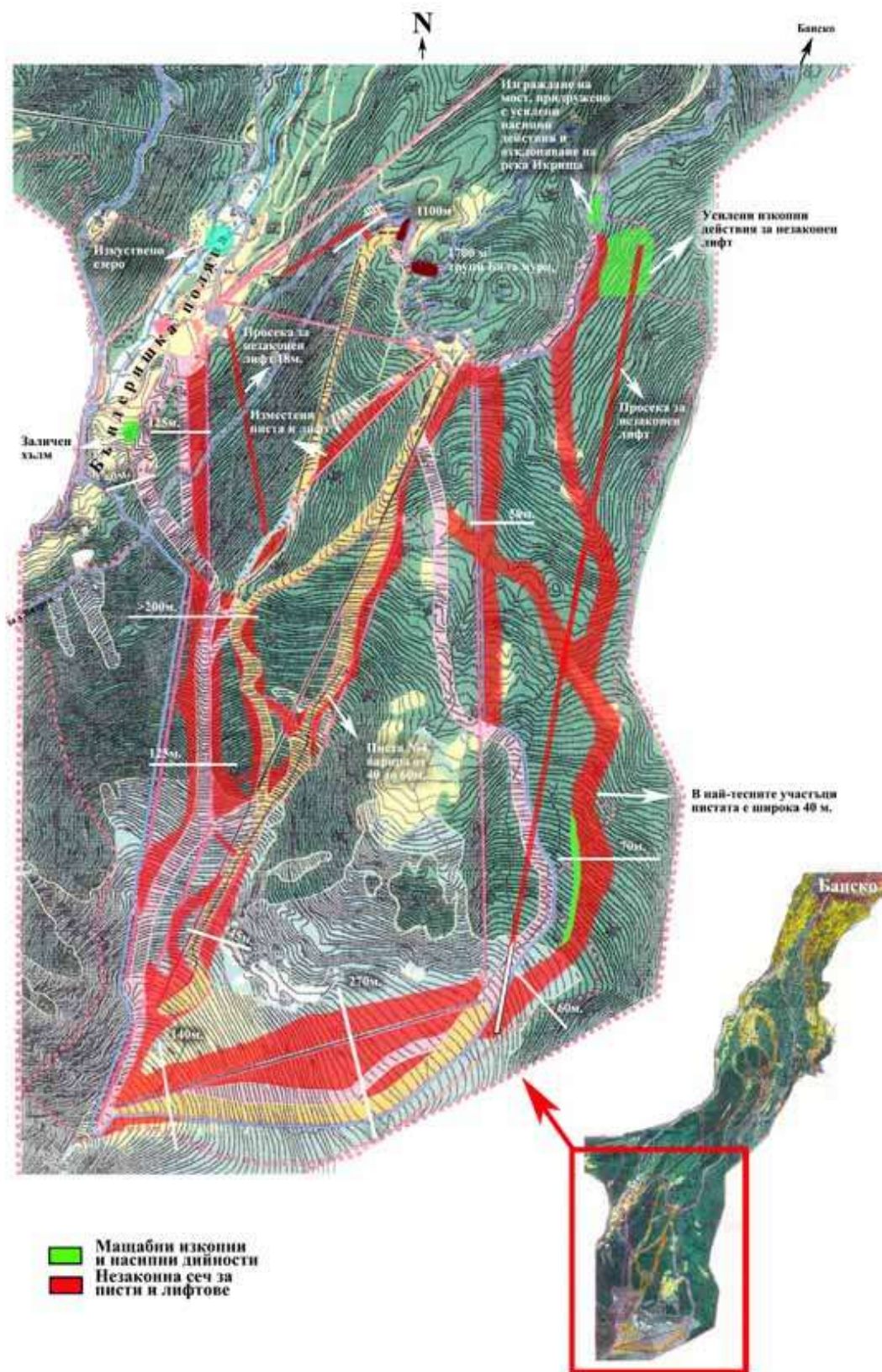
Appendix 1. Map of Ascertained violations of the boundaries of Bansko Ski Area

Ascertained violations of the boundaries of Bansko Ski Area



The map is produced by comparing GPS field measurements done by experts of Green Balkans and Za Zemiata with the boundaries of the ski-area provided by the MOEW. Season 2004 - 2005. 'Green Balkans' Federation of Nature Conservation NGOs and Environmental Association 'Za Zemiata' (For the Earth) ©

Appendix 2. Map of Ascertained violations of the EIA of Bansko Ski Area



Appendix 3. Response from the MEW to an information

Reference, granted by the Ministry of Environment and Waters in response of Zazemiata's Request of access of public information /FOA request/ № 2468/09.12.04 and MEW's Decision to grant access to the required public information № 89/03.01.05

Dear Ms. Iotsova,

On the grounds of art 26, par 1 from the Law for the Protection of the Environment and in relation to art 27 from the Access to Public Information Law, regarding your request for access to information we **provide you with the following reference:**

Regarding point II from your request: entrance number: FOA request – 2081/28.10.2004r.:

No decisions for assessment of the necessity for conducting EIA¹² on the Bansko Ski Zone Territory have been issued;

Regarding point III from your request:

No decisions for assessment of the necessity for conducting EIA, nor decisions on EIA for: "Water catchment – Bunderishka Meadow", "Dam in the Bunderishka Meadow area", and "Water catchment along the road to Bunderitsa Hut" have been issued.

Regarding points IV,V,VII from your request:

The subject of the concession is maintainance, construction and utilisation of the existing and newly-built tracks and facilities for ski-sport within the boundaries of the concession territory.

Construction of objects and facilities was implemented according to the current "Detailed Territorial Development Plan" of "Ski Zone with a Center Bansko", included in the concession contract and the yearly investment programmes approved by the Minister of environment and waters.

During the daily controls conducted by Pirin National Park, a number of violations, related to the construction of the ski tracks and related facilities were found.

On September 2nd and 6th 2002, deviations from the preliminary approved and concured activities were identified, which resulted in giving two charges for administrative violations. During the construction of the obejcts: Cabin Cableway "Bansko – Bynderishka Polyana"and "Childen ski-track" fines of two and six thousand leva were imposed on the concessioner, which are paid.

On June 9th 2003, two violations, made by the firm executing the construction of "Saddle Cableway "Bunderishka Polyana – Todorka Peak" " were found. The issued pentalties were respectively for five thousand and two and a half thousand leva. The sums have been transferred to the bank account of Pirin National Park.

On July 17th 2003, two charges for violations in the object: ski-track "Bynderitsa" were given. The penalties were fines for four thousand leva each.

On August 7th 2003, a charge for conducting a violation was given to a contracted

¹² Environmental Impact Assessment

from the concessioner construction firm. The imposed administrative punishment - “a fine” - was for five thousand leva. The Agency for State Receipts was authorized to collect the fine.

On October 6th 2003, two violations on different spots along the “Skiing road Shiligarnika – Chalin Valog” were found. Two charges for respectively five and eight thousand leva were given to the two contracted by the concessioner persons. The charge was sent to the Agency for State Receipts.

Due to the fact that for the third time a violation had been noted, made by one and the same firm, the director of Pirin National Park has demanded its oustering.

In 2004 until the current moment three violations were found, representing implementation of unauthorized activities (untimely coordination of the working process with the park administration). On July 29th and 30th and August 3rd 2004, charges for administrative violations were given, on the basis of which three fine penalties for 9 000, 7 000 and 5 000 leva were issued. The sums were transferred to the account of Pirin National Park. The contracted firm was dismissed from works and their contact ceased due to the violations made.

As a result of all authorised penalties, fines for 49 500 leva were gathered. According to the Tax Procedures Index the Agency for State Receipts was authorised to gather fine penalties for 21 000 leva. 325 cubic meters of timber were confiscated, which with decree № 54 from March 29th 2004 and with the help of the Agency for State Receipt was sold at an auction. The logged trees were on random spots along the respective objects. Thus there are no significant changes in the areas of the logged-tree corridors.

Up to now no violation on the borders of the concession territory has been found on our side.

Appendix 4. An article from the Bulgarian Forest Institute for more information on the forest issue

Bansko ski runs consume nature

Article from Alexander H. Alexandrov, - Director of the Forest Institute at the Bulgarian Academy of Science, published in Duma Newspaper on March 22, 2005.

The Bansko case is a little bit more peculiar and deserves special attention. In 2004 the Forest Institute at the Bulgarian Academy of Science conducted research on virgin forests in the Pirin National Park on expedition basis. The working group identified flagrant environmental violations. The construction of an indecently large number of ski runs and facilities, inconsistent with landscape, have caused felling of valuable populations of spruce (*Picea excelsa* Link), white fir (*Pinus peuce*), Bosnian pine (*Pinus heldraichii*) and pine-scrub (*Pinus mugo*), and have destroyed the natural environment at many sites. Ski runs cut through the forests in long distances and high upland – from mountain tops down to Bansko. This felling has destroyed Pirin's nature and even the large timber production performed 3-4 decades ago appears insignificant compared to what have happened recently and will happen in near future. The existing ski runs are 11 km long starting from 1150 m above sea level to 2 600 m above sea level, and the ski facilities are 8 km long. But those built under the project go twice over their total, which results in clear cuts and urbanisation, destroyed nature and large profits for some in the business. Ski runs cut through forest vegetation to an extent which has strongly reduced their resistance to winds.

Upon snow melt or after continuous rainfalls, the earth of spruce forests, which has a generally shallow root system, diminishes its clutching capacity making trees vulnerable to wind throw, and the substrate to landslide. The stripes of spruce forests, extremely prone to snow falls and wind throws, are rather threatened standing in between close openings. Erosion processes along the ski runs in the vicinity of Bansko are progressing and gullies are already appearing. Forest plantations on large slopes and long distances were cut in service of the elite ski sport, and in order to acquire the desired slant, gullies were dug into some sections of the traces, thus favoring erosion and torrents. Torrents flooding and pouring over Bansko or part of it are just a matter of time. Such nature disaster could be a catastrophe and then losses will be counted in death toll, destroyed buildings, communication and other damages. Some partial attempts to tame erosion on ski runs using biological methods in the mid-mountain parts have insignificant effect, being almost inapplicable and unfruitful in the highlands. Besides, the steep ski runs in some parts create favorable conditions for avalanches and their destructive action will inevitably be proved. The combination of irrational anthropogenic intervention in North-east Pirin will cause local ecological disaster, leading to waste of landscape and dissipation of numerous nature resources. The destruction of Pirin National Park nature in the area of Bansko is a result of cupidity, absurdity and incompetence, and the striking fact here is that exactly the authority responsible for nature protection (MOEW) destroys it systematically and in large scales. And who is to bear the responsibility for this crime – those permitting the cuts and construction of so many ski runs and facilities, or the assigners and assignees? This is subject to the Prosecutor's Office and the Court, assisted by civil society structures if there are any. The research of the Forest Institute coincides to

a great extent with the results of the project work on “Civil society acting against violations and poaching in forests” implemented by the Green Balkans NGO. The violations in protected areas and around them are dangerous precedent. Bulgaria will benefit if it conserves its residues of preserved wildlife, and will lose if it urbanises it unscrupulously.
