

The Board of the International Council on Monuments and Sites (ICOMOS)

Dr. Mechtild Rössler,
Director, UNESCO World Heritage Centre
UNESCO

Mrs. Marija Nemunienė,
Chair, Lithuanian ICOMOS National Committee

Ms. Liana Ruokytė-Jonsson,
Minister of Culture of the Republic of Lithuania

Mr. Kęstutis Navickas,
Minister of the Environment of the Republic of Lithuania

Mr. Ramūnas Karbauskis,
Chair, Cultural Committee, Seimas of the Republic of Lithuania

Mrs. Evelina Karalevičienė,
Chair, Lithuanian State Commission for Cultural Heritage

Ms. Asta Junevičienė,
Secretary-General, Lithuanian National Committee for UNESCO

Mr. Evaldas Pašilis,
Prosecutor General of the Republic of Lithuania

PETITION

To assess potentially unethical actions by members of the ICOMOS Lithuanian National Committee arising from the submission of an assessment of the potential impact of planned construction for the Missionary Complex on the outstanding universal value of the Vilnius Historic Centre, a UNESCO World Heritage Site

14 September 2017, Vilnius

The public organisations, which we represent, are public organisations concerned with the protection of the unique and valued European cultural heritage of Vilnius, Lithuania's capital city, and its sustainable use for the needs of a contemporary society.

We believe the preservation of the Vilnius Historic Centre and its protected zones (Site No. 541) is being threatened by the construction of multi-unit apartment buildings on the territory of the former Vilnius Missionary Monastery and Church of the Ascension Complex (located at Subačiaus g. 20, Vilnius, hereinafter – the Missionary Complex), which is why we and the representatives of several other non-governmental organisations sent an appeal to the UNESCO World Heritage Committee on 24 May 2017 seeking immediate assistance to prevent the destruction of the outstanding universal value of the Vilnius Historic Centre, a protected UNESCO World Heritage Site.

We wish to provide additional and specific information in support of one of the claims made in that appeal, namely that members of the ICOMOS Lithuanian National Committee (hereinafter – the ICOMOS LNC), in preparing an assessment on the potential impact on the Vilnius Historic Centre of the construction project that was paid for by, and was favourable to, the project’s developer, acted out of a clear personal interest.

We also ask the International Council on Monuments and Sites to assess whether the members of the ICOMOS LNC who organised (and undertook this assessment and later submitted it to Lithuanian institutions responsible for the preservation of the Vilnius Old Town) violated ethical requirements guiding the activities of ICOMOS members, in particular the principle that ICOMOS members “must avoid, or as appropriate properly disclose, any real or apparent conflict of interest that could compromise the independent, impartial and objective nature of their work,” and that they “must avoid being judges in their own cause: when they are involved in work concerning a specific site and also participating in advisory or decision-making bodies of local or national authorities, they must not take part in any decisions relating to that site.” (ICOMOS Ethical Principles, Article 5, items a-1 and a-2).

In the following paragraphs, we outline the circumstances as they have become known to us and the issues arising from them. Some of this information is known to us from documents, the copies of which we also provide with emphasis added to the pertinent sections and facts. We also rely on statements made by ICOMOS member Jūratė Markevičienė to the ICOMOS LNC and Lithuanian government institutions responsible for cultural heritage (Annexes 1-4), as well as other unofficial testimony from ICOMOS LNC members with whom our organisation has consulted.

1. The contract concluded with the Project Developer on behalf of the ICOMOS LNC was deficient

In January 2016, the ICOMOS LNC received a request by UAB Misionierių namai, the entity overseeing the multi-unit apartment residence construction project at the Missionary Complex (hereinafter – the Project), to conduct an impact assessment of the proposed construction on a world heritage site and concluded an agreement with this private sponsoring entity (Annex No. 5).

We believe that such a practice, when a world heritage site impact assessment is requested and paid for by the actual developer interested in obtaining a favourable conclusion, is essentially flawed, because it permits the developer to establish the terms of the assessment and forces participating experts with an interest in being compensated for their services into a conflict of interest.

According to our information, the contract on the Project’s assessment, signed by the Project Developer and ICOMOS LNC Chairperson Marija Nemunienė, established terms and conditions that limited the number of experts allowed to perform the assessment: according to the contract, only those ICOMOS LNC members certified by the Cultural Heritage Department under the Ministry of Culture as specialists in the expert appraisal of immovable property cultural value or holding a territorial planning specialist certificate issued by the Ministry of the Environment of the Republic of Lithuania, would be permitted to perform the assessment. Moreover, the contract established an extremely brief period of time for the completion of such an important assessment: barely one month—in practice, even shorter. Such a condition benefited those ICOMOS LNC members who had already had the opportunity to familiarise themselves with the issues related to the Project.

We believe that contract terms and conditions limiting the number of ICOMOS LNC members able to conduct the assessment led to the delegation of this task to persons with clear conflicts of interest.

2. Expert impartiality was not assured

A meeting of the ICOMOS LNC on 27 January 2017, including the participation of LNC chairwoman M. Nemunienė and four LNC members, established a working group consisting of Gintautas Zabiela, Irena Kliobavičiūtė and Daina Ferguson. We note that the ICOMOS LNC Expert Analysis Guidelines (Annex 6), which seek to further implement the general ICOMOS principles, establish that ICOMOS LNC members assigned to expert working groups must sign a declaration on possible conflicts of public and private interest. Such a declaration attached to an ICOMOS contract with an expert analyst is an integral part of such an agreement. Further, such a declaration is to be submitted for each individual expert analysis. Potential conflicts of public and private interests are determined in accordance with requirements set out in the ICOMOS Ethical Principles and article 2.2 of the Republic of Lithuania Law on Adjustment of Public and Private Interests in the Civil Service.

We have reason to believe that such declarations were not signed or submitted when the task of assessing the impact on the World Heritage Site was assigned to Mr. Zabiela, Ms. Kliobavičiūtė, and Ms. Ferguson, and thus the impartiality of these experts was not assured, though a specific procedure for obtaining such a confirmation is foreseen in the ICOMOS LNC Expert Analysis Guidelines.

3. Regarding the conflict of interest of Ms. Kliobavičiūtė and Ms. Ferguson in the performance of the World Heritage Site impact assessment and potential violations of ICOMOS Ethical Principles

ICOMOS LNC members Mr. Zabiela, Ms. Kliobavičiūtė and Ms. Ferguson prepared the 4 February 2016 document entitled “Assessment of the Possible Impact on the Unique Universal Value of the Historic Centre of Vilnius, a UNESCO World Heritage Site, of Project Proposals (Drafts) for a Multi-Unit Residential Building at Subačiaus g. 20 and 22, Vilnius, and Findings for the Next Planning Phase” (hereinafter - the Assessment), which reached a favourable conclusion for the project’s private sponsor, namely that “the proposed works do not violate the outstanding universal value of Vilnius” (Annex No. 7). The document failed to provide any assessment of the Special Plan for the Missionary Complex (Annex No. 8) approved by Order No. JV-558 of 31 August 2015 of the Minister of Culture of the Republic of Lithuania, despite the fact that this document in particular, which divided the previously unified territory of the site, was used as the basis for the Project. The Assessment also stipulates that the special plan is “the main piece of legislation defining cultural heritage requirements valid for the territory in question.”

In our opinion, two of the three authors of the Assessment (Ms. Kliobavičiūtė and Ms. Ferguson), could not have performed this task in an impartial and objective manner due to a clear conflict of interest resulting from a direct relationship with the Project under review and with its director, Robertas Zilinskas. Ms. Kliobavičiūtė, Ms. Ferguson and Mr. Zilinskas have a close association with the firm UAB Senojo miesto architektai: Ms. Kliobavičiūtė and Ms. Ferguson are employed (or were recently employed) by this firm, while Mr. Zilinskas and his companies (known until 2 August 2011 as the private R. Zilinskas company, and thereafter as UAB Atodangos) are (or until recently were) regular partners of UAB Senojo miesto architektai (Annex No. 9).

UAB Senojo miesto architektai commissioned and conducted studies at the Missionary Complex and on its territory in 2007-2008 and/or thereafter that were then used in the preparation of the Project. For example, in 2008 UAB Senojo miesto architektai commissioned polychromatic studies (overseen by Audronė Kaušiniene);

Annex No. 10) of the façades of a building located at Subačiaus g. 20 in Vilnius, exploratory archaeological studies of a plot of land at Subačiaus g. 26, Vilnius (the prior address of the plot where the Project is being developed), led by archaeologist Tauras Poška (Annex No. 11), and a historical overview of the former Missionary Hospital Complex at Subačiaus g. 24, 26 and 28 (by historian Laima Vileikienė; Annex No. 12). These three studies are stipulated in the Assessment as the basis for the assessed Project (Annex No. 13), without indicating that they were commissioned by UAB Senojo miesto architektai, which employs (or employed) Ms. Kliobavičiūtė and Ms. Ferguson, who performed the Assessment.

Ms. Kliobavičiūtė was a member of an expert working group established by the Minister of Culture of the Republic of Lithuania (Order No. JŲV-386 of 29 May 2014) to assess the special plan concept prepared at the time for the Missionary Complex. A meeting of the expert group on 4 June 2014, in which Ms. Kliobavičiūtė participated, decided that the aforementioned concept should not include a delineation of the permissible construction boundary and that protection zones need not be established. This latter proposal, to exclude the establishment of protected zones, was proposed specifically by Ms. Kliobavičiūtė. The following is an excerpt from her statement recorded in the meeting minutes: “Ms. Kliobavičiūtė directed attention to the protected zones proposed in the project concept and their regulation. The establishment of such zones for a site within the Vilnius Old Town is redundant and introduces confusion. Heritage management requirements on territory falling within the protected area are currently established under the regulations for the protection of the Vilnius Old Town, and in future shall be established in a Vilnius Old Town Management Plan currently being drafted. The definition of protected zones in the project is therefore unnecessary. A photograph dated 1861 was presented showing previously existing individual, small-scale buildings adjacent to the Missionary Monastery and Church Complex and the Infant Jesus Home. A majority of meeting participants agreed that the definition of protected zones in the Project was unnecessary.” (Annex No. 14).

The findings of a report presented on 4 May 2017 by a provisional commission established by the Cultural Heritage Department under the Ministry of Culture (Order No. J-85 of 12 April 2017) to assess the special plan for the Missionary Complex stated that, with its decision, the aforementioned expert working group “contradicted its defined task to protect the valuable aspects of the Vilnius Old Town, while simultaneously creating the circumstances by which [such aspects] could be violated.” (Annex No. 15). The developers of the Missionary Complex special plan specifically referenced the opinion of this expert working group, of which Ms. Kliobavičiūtė was a member, in reaching its conclusions. We present the following citations from the explanatory letter attached to the special plan:

“Several variations of protected zones and heritage preservation requirements were prepared. The planned visual protected zone fell within the boundaries of Vilnius Old Town and its protected zone. An expert working group was established by Order No. JŲV-386 of 29 May 2014 of the Minister of Culture to assess the special immovable property cultural heritage preservation plan and heritage management project concept for the monastery building complex (unique cultural heritage registry code 761) at Subačiaus g. 24, 26 and 28. In the opinion of the experts, requirements for the visual protection of the Missionary Complex should be incorporated into the special plan for the Vilnius Old Town then being drafted. The following is an excerpt from the findings of the expert working group: ‘A permissible construction boundary should not be defined in the immovable property cultural heritage protection special plan-heritage management project concept for the monastery building complex (unique cultural heritage registry code 761) at Subačiaus g. 24, 26, 28, and protected zones should also not be established.’; ‘The Special Plan concept has been adjusted in accordance with a letter dated 17 June 2014, No. S2-1553, by Romas Jarockis, Deputy Minister of Culture of the Republic of Lithuania, which requests that the findings adopted at a meeting of the expert working group be used as guidance.’; ‘4.1.2. Protected zone

boundaries. A protected zone in the special plan for the Missionary Monastery Building Complex and Infant Jesus Children's Home shall not be established. During consideration of the concept, it was decided that (based on a communication dated 17 June 2014, No. S2-1553, by Romas Jarockis, Deputy Minister of Culture of the Republic of Lithuania and the minutes of a 4 June 2014 meeting of the expert working group established under Order No. JV-386 of 29 May 2014 of the Minister of Culture) the visual protection of the Missionary Monastery Building Complex and the Infant Jesus Children's Home must be assured in other documents, i.e. in the special plan for the Vilnius Old Town (unique code 16073) now being finalised.” (Annex No. 16, pages 16 and 17) The special plan for the Vilnius Old Town referenced in the citations as being “drafted” or “being finalised” has yet to be completed, therefore the Missionary Complex remains without protected zones of any kind—physical or visual.

The cited documents show that the opinion of Ms. Kliobavičiūtė and her colleagues from the aforementioned expert working group had a real impact on the planning process for the Missionary territory, and we are compelled to agree with the findings of the provisional commission of the Cultural Heritage Department under the Ministry of Culture that, from a cultural preservation perspective, such impact was negative.

Somewhat later that same year, on 2 October 2014, Ms. Kliobavičiūtė participated in selecting the UAB Misionierių sodai initiative as the winner of an architectural competition organised by the Union of Lithuanian Architects, entitled “Architectural Proposals (Conceptual Project) for the Missionary Gardens, a Residential Building with Automobile Parking Facility Project at Subačiaus g. 26, 28, Vilnius”, as a member of the competition’s adjudication commission (Annex No. 17).

This adjudication commission presented recommendations for the further development of the winning Project, signed by Ms. Kliobavičiūtė and other commission members, such as: “We recommend: a replacement search for ridge altitudes; continuing the search for façade aesthetics and materiality; altering building volumes, reducing them in height to the slope and increasing [them] in the middle of the [residential area]” (Annex No. 18). This was also stipulated in the Assessment performed by Ms. Kliobavičiūtė, Ms. Ferguson and Mr. Zabiela, without mentioning the names of Ms. Kliobavičiūtė and the other members of the commission, and only noting that the recommendations had been provided by a “competent commission.” (Annex No. 7, page 1).

Ms. Kliobavičiūtė also participated and made statements during a meeting of the Vilnius Municipal Immovable Property Cultural Heritage Council considering project proposals for multi-unit residences at the Missionary Complex, presented by the Project Manager R. Zilinskas, and provided commentary to him (Annex No. 19). Prior to the Vilnius Municipal Cultural Heritage Assessment Council, led by R. Zilinskas, its member Ms. Kliobavičiūtė participated in a meeting on 23 April 2010 which approved, by decision No. VI-RM-160, the valuable features of part of the Missionary Complex-Baby Jesus Home (Annex No. 20).

Ms. Kliobavičiūtė and Mr. Zilinskas share a long collaborative association preparing various documents regulating the protection of the Vilnius Old Town as well as other individual heritage management projects. Ms. Kliobavičiūtė was the project manager for the preparation of the Vilnius Old Town Regulations in 2003, authored in part by Mr. Zilinskas. Decisions related to the Missionary Complex Special Plan and Project are based on these Regulations. Moreover, Ms. Kliobavičiūtė and Mr. Zilinskas have collaborated with others (such as project manager V. Brezgyš) in activities in the Vilnius Old Town and, since 2014, a project concept (management plan) for Vilnius Old Town heritage management to regulate its protected areas. In addition, Ms. Kliobavičiūtė and

Mr. Zilinskas have served together as colleagues on the Vilnius City Immovable Property Cultural Heritage Assessment Council convened for four-year terms by the Vilnius City Municipal Council, serving on the

two councils appointed by decisions of the City Council of 19 January 2005 and 11 April 2012. The close professional collaboration between Mr. Zilinskas and Ms. Kliobavičiūtė is also evidenced by their participation, as co-authors, in such projects prepared by UAB Senojo miesto architektai as the adaptation for *in situ* exploitation of the remnants of the Radvila Manor and Dubingiai castle site and preparations for the installation of a carillon in the southern tower of the Order of Preachers (Dominican) Vilnius Saints Philip and Jacob the Apostles Church.

The circumstances outlined above establish a basis to question the impartiality of Ms. Kliobavičiūtė and Ms. Ferguson in the completion of the Project Assessment.

We also believe they both had a clear conflict of interest given that the Project is based on studies commissioned by UAB Senojo miesto architektai, where they themselves are employed, and because the Project Manager is a regular partner of UAB Senojo miesto architektai and a long-time colleague of and co-author with Ms. Kliobavičiūtė. In other words, they were asked to assess the work of their close colleague and the contribution to the Project of their own firm.

In the case of Ms. Kliobavičiūtė, the conflict of interest is underscored by her direct relationship to the Project: she participated as an expert in the preparation process of the special plan for the Missionary Complex that paved the way for the Project and, as a member of the working group that adopted the aforementioned decision and its negative impact on heritage preservation, she took part in the selection of the Project to win an architectural competition and in the further development of project proposals. In other words, in her assessment of the Project, she was also being asked to assess her own contribution to decisions directly concerning the Project itself.

We believe that Ms. Kliobavičiūtė and Ms. Ferguson, in conducting the Assessment, violated ICOMOS prohibitions against undertaking activities when a conflict of interest exists. Such prohibitions were established to ensure the transparency and impartiality of an organisation tasked with performing world heritage impact assessments in accordance with the mandate conferred upon it as an advisor to UNESCO on world heritage preservation matters in keeping with the Convention Concerning the Protection of the World Cultural and Natural Heritage:

- the ICOMOS Statute states that all ICOMOS members must adhere to all ICOMOS regulations, while National Committee statutes and activities must conform to the ICOMOS Statute, ICOMOS Rules of Procedure and ICOMOS Ethical Principles.
- ICOMOS Ethical Principles stipulate that ICOMOS members “must avoid, or as appropriate properly disclose, any real or apparent conflict of interest that could compromise the independent, impartial and objective nature of their work”, and must also “avoid being judges in their own cause: when they are involved in work concerning a specific site and also participating in advisory or decision-making bodies of local or national authorities, they must not take part in any decisions relating to that site.” (Articles 5.1 and 5.2).
- In regard to world heritage, the Ethical Principles stipulate that “ICOMOS members involved in work concerning the Convention for the Protection of the World Cultural and Natural Heritage (1972) must comply with the attached ‘Policy for the Implementation of the ICOMOS World Heritage Mandate’ and its updates (Article 6(e)).

- The Policy for the Implementation of the ICOMOS World Heritage Mandate (adopted in 2012) states that:
 - “Whilst as a standard practice ICOMOS consults the national committees concerned with a property that is being evaluated, in all other steps of the process it draws only on experts from countries other than the State Parties concerned.”
 - “ICOMOS does not use in its evaluation of a property or for State of Conservation reports relating to it, or assessment of threats to it, experts who have been involved with the preparation of its nomination file, the development of the management system or plan or any other study, or with the preparation of a state of conservation report submitted by the State Party.”
 - “Experts are all made aware of the ICOMOS Ethical Commitment Statement and are required to abide by its principles.”
 - “[I]n cases where it is believed to have compromised the credibility of ICOMOS as an objective and unbiased adviser to the World Heritage Committee and UNESCO, the individual concerned shall automatically be debarred from further participation in ICOMOS work associated with World Heritage matters and other areas of its work where it is important that the organisation project an image of impartiality.”
 - “A copy of this policy must be provided to every other individual formally involved with ICOMOS World Heritage work all of whom must indicate in advance that they understand and will abide by its terms.”

4. Regarding the impartiality and quality of the world heritage impact assessment and the possible violation of ICOMOS LNC Expert Analysis Guidelines resulting from the failure to assess the special plan for the Missionary Complex

The ICOMOS LNC Expert Analysis Guidelines stipulate that analysis must assess the entirety of a project, consisting of the project itself (in textual and graphic form), pre-existing requirements for the project established by government institutions, studies conducted prior to the project, impact assessments of proposed approaches, etc. Projects are to be assessed according to the extent they assure the preservation and exposition of the cultural heritage (items 6.2 and 6.3).

We believe that the cited provisions should have been followed in any impartial and proper world heritage impact assessment as well as in the assessment of the main document used as the basis for the Project: the Missionary Complex special plan. Unfortunately, this was not the case.

We believe that one of the contributing factors in this regard is the fact that Ms. Nemunienė, the chairwoman of the ICOMOS LNC who also organised the Assessment and submitted it to relevant institutions on behalf of ICOMOS LNC, is the daughter of Giedrė Miknevičienė, the author of the Missionary Complex special plan proposal. Both are also employed by the firm that prepared this plan—UAB Projektavimo ir restauravimo institutas.

5. Regarding the failure to ensure impartiality and the proper conduct of the world heritage impact assessment and the possible violation of ICOMOS LNC Expert Analysis Guidelines as a result of the submission of the Assessment conducted by Mr. Zabiela, Ms. Kliobavičiūtė and Ms. Ferguson to the accountable Lithuanian institutions without the knowledge of other members of the ICOMOS LNC and without providing them an opportunity to submit their own critical commentary and without regard to such commentary

The Assessment was received by UAB Misionierių namai and the Vilnius Municipality on 1 April 2016 (Annexes No. 5 and 21), and was transmitted on 18 May 2016 by ICOMOS LNC chairwoman Ms. Nemunienė to other institutions: the Cultural Heritage Department under the Ministry of Culture, the Lithuanian National UNESCO Commission Secretariat, the Department of Protected Territories and Cultural Heritage Preservation of the Ministry of Culture of the Republic of Lithuania, and once again to the Urban Development Department of the Vilnius City Municipality (Annex No. 22).

As stipulated by Ms. Markevičienė (Annexes No. 1 and 2), this was done without the knowledge of other ICOMOS members and without providing them the time to review the Assessment or submit commentary and circumventing the mandatory ICOMOS LNC procedures for internal review. The ICOMOS LNC Expert Analysis Guidelines require that working groups submit a prepared expert analysis proposal for consideration by all ICOMOS members and that such a proposal may only be publicised after the completion of internal review: "[A]fter preparation of an expert analysis proposal, the working group shall submit a digital copy thereof to all ICOMOS LNC members for their consideration. Such a review shall be conducted internally and all material pertaining to the expert analysis proposal and its review shall be confidential; ICOMOS members shall not have the right to provide the expert analysis proposal to third persons or otherwise publicise, publish or distribute it or its contents." (Item 4.3).

However, as stipulated by Ms. Markevičienė, Ms. Nemunienė only distributed the Assessment by electronic mail to other ICOMOS LNC members on the evening of 27 April 2016, i.e. almost one month after it had been provided to the private sponsor and the Vilnius City Municipality.

Though the electronic mail communication did not establish a deadline for the submission of comments and suggestions, the ICOMOS LNC Expert Analysis Guidelines state that such a period of time must be at least ten and no more than thirty calendar days (Item 4.4). Ms. Markevičienė submitted her proposals (Annex No. 3) on 27 May 2016, supported by five additional ICOMOS members, but the working group neither replied to them nor took them into consideration. "It only became clear much later, from other documents, that the chairwoman of the ICOMOS LNC and the working group entirely circumvented the mandatory ICOMOS LNC internal review procedures and that the assessment by Mr. Zabiela, Ms. Kliobavičiūtė, and Ms. Ferguson was provided to the sponsor and governmental institutions before it was even sent to ICOMOS LNC members."

As a result, there was a failure to properly conduct and ensure the objectivity of a world heritage assessment, resulting in a violation of the principle contained in the ICOMOS LNC Expert Analysis Guidelines that, "in the pursuit of analytical objectivity, comprehensiveness, scientific accuracy and the use of the professional knowledge shared by the ICOMOS LNC, each ICOMOS member shall have the right to review an expert analysis draft and submit detailed commentary and suggestions" and to effectively participate in the assessment process (Items 4.1 through 4.8).

Being convinced that the quality of world heritage impact assessments undertaken by ICOMOS should not introduce any uncertainty and that the conflicts of interests of the experts providing an assessment in this specific instance should not cause any harm to the most unique landscape and architectural sites existing in the UNESCO-protected Vilnius Old Town or to the outstanding universal value of a world heritage site, we request that the Board of the International Committee on Monuments and Sites (ICOMOS) examine the circumstances outlined above and provide its assessment concerning any potential violations of ICOMOS Ethical Principles.

Respectfully,


Asta Baškauskaitė
Elder, Vilnius Old Town municipality
Chairwoman, Vilnius Eldership Council
Member, Supervisory Commission for the Preservation and Sustainable Use of the Outstanding Value of the Vilnius Historic Centre


Genė Valeinienė
Council Member, Vilnius Old Town Community Association




Sakalas Gorodeckis
Chairman, Association of Vilnius Communities


Danutė Jokubėnienė
Chairwoman, Žvėrynas Community Association




Živilė Cibutavičienė
Chairwoman, Rasų Colony Community Association


Lina Leparskienė and Rasa Kalinauskaitė
Members, Lithuanian Movement for Environmental and Cultural Heritage Preservation

ANNEXES:

1. Statement by ICOMOS member Jūratė Markevičienė to the ICOMOS Lithuanian National Committee regarding the necessity to officially notify interested government bodies that the document prepared by G. Zabiela, I. Kliobavičiūtė, and D. Ferguson, entitled "Presentation of an Assessment of the Possible Impact on the Unique Universal Value of the Historic Centre of Vilnius, a UNESCO World Heritage Site, of Project Proposals (Drafts) for a Multi-Unit Residential Building at Subačiaus g. 20 and 22, Vilnius, and Findings for the Next Planning Phase" is not and cannot be considered an official or legitimate ICOMOS LNC world heritage impact assessment;

2. Statement dated 25 April 2017 by ICOMOS member Jūrate Markevičienė to Liana Ruokytė-Jonsson, Minister of Culture of the Republic of Lithuania, Kęstutis Navickas, Minister of the Environment of the Republic of Lithuania, Rėda Brandišauskienė, Deputy Minister of the Environment of the Republic of Lithuania, Asta Junevičienė, Secretary-General of the UNESCO Lithuanian National Committee, and Evelina Karalevičienė, Chairwoman of the State Commission for Cultural Heritage regarding the legal status of a document entitled "Presentation of an Assessment of the Possible Impact on the Unique Universal Value of the Historic Centre of Vilnius, a UNESCO World Heritage Site, of Project Proposals (Drafts) for a Multi-Unit Residential Building at Subačiaus g. 20 and 22, Vilnius, and Findings for the Next Planning Phase", prepared in 2016 by ICOMOS members Gintautas Zabiela, Irena Kliobavičiūtė and Daina Ferguson, commissioned by UAB Misionierių namai and provided to institutions on behalf of the ICOMOS LNC;
3. Comments and proposals prepared on 27 May 2016 by ICOMOS member Jūratė Markevičienė regarding a document prepared by an ICOMOS LNC working group (Gintautas Zabiela, Irena Kliobavičiūtė and Daina Ferguson) entitled "Assessment of the Possible Impact on the Unique Universal Value of the Historic Centre of Vilnius, a UNESCO World Heritage Site, of Project Proposals (Drafts) and Findings for the Next Planning Phase";
4. Comments by ICOMOS member Jūratė Markevičienė concerning the quality of scientific studies and data performed for the Missionary Complex, made from 24 February 2017 to 25 April 2017;
5. Document by UAB Misionierių sodai, dated 5 April 2017, "Regarding the reconstruction, construction and maintenance work of buildings located at Subačiaus g. 20, Vilnius" (with emphasis added indicating the dates of the signing of an ICOMOS LNC contract with UAB Misionierių sodai and the submission of the ICOMOS LNC Assessment to UAB Misionierių sodai: "Contract with ICOMOS LNC signed June 2016"; "Project proposal assessment submitted on 1 April 2016 for a multi-unit residential building at Subačiaus g. 20, 22, Vilnius, entitled 'Regarding the Possible Impact on the Outstanding Universal Value of the Vilnius Historic Centre, a UNESCO World Heritage Site' (Dr. Gintautas Zabiela, immovable property cultural heritage protection specialists Daina Ferguson, Irena Kliobavičiūtė), stipulating that planned technical project provisions do not violate the outstanding universal value of Vilnius");
6. ICOMOS LNC Expert Analysis Guidelines;
7. Document entitled "Presentation of an Assessment of the Possible Impact on the Unique Universal Value of the Historic Centre of Vilnius, a UNESCO World Heritage Site, of Project Proposals (Drafts) for a Multi-Unit Residential Building at Subačiaus g. 20 and 22, Vilnius, and Findings for the Next Planning Phase", prepared on 4 February 2016 by G. Zabiela, I. Kliobavičiūtė, and D. Ferguson, accessible online at: http://icomos.lt/files/3414/8967/2621/Vertinimas_Subaciaus_g._Vilniuje.pdf;
8. Document entitled "Special Plan, Territorial Boundary Plan and Heritage Management Project for the Monastery Building Complex (unique Cultural Heritage Registry Code 761, formerly designated under code G360K) located at Subačiaus g. 24, 26, 28, Vilnius", approved by Order No. JV-558 of 31 August 2015 of the Minister of Culture of the Republic of Lithuania, accessible online on the website of the Cultural Heritage Department under the Ministry of Culture, <http://kpd.lt/news/1948/389/Vilniaus-misionieriu-vienuolyno-statiniu-ansamblis-Unikalus-kodas-761/d,pagrindinis.html>
9. Information publically available on the website www.spec.lt about employees of UAB Senojo miesto architektai, including Ms. Kliobavičiūtė and Ms. Ferguson, and the firm's partnership with R. Zilinskas' company (available online: <https://www.spec.lt/imone/senojo-miesto-architektai-uab>);

10. Title page from an exploratory, polychromatic study of building façades at Subačiaus g. 20, Vilnius (overseen by A. Kaušiniénė), performed by the Restoration Design Firm Archeodomus for UAB Senojo miesto architektai in 2008, indicating that the construction firm UAB Corpmanagement (note: publically available information shows this to have been the name of the Project developer UAB Misionierių namai prior to 2013) and its English translation;
11. Title page and page one of an Introduction of an exploratory archaeological study of Subačiaus g. 26, performed in 2008 by archaeologist Tauras Poška for UAB Senojo miesto architektai; the Introduction page states that these "exploratory archaeological studies of a plot at Subačiaus g. 26 are a preparatory phase for a detailed plan of the plot.";
12. Title page of an historical overview of the former Missionary Hospital Complex at Subačiaus g. 24, 26, 28, conducted in 2008 by historian Laima Vileikienė for UAB Senojo miesto architektai;
13. Pages 2, 10, and 17 of the Assessment with emphasis added indicating studies commissioned by UAB Senojo miesto architektai;
14. Minutes from a 4 June 2014 meeting of an expert working group (established by Order No. JV-386 of 29 May 2014 of the Minister of Culture of the Republic of Lithuania) to assess the immovable property cultural heritage preservation special plan and heritage management concept for a complex of monastery buildings (unique cultural heritage registry code 761) located at Subačiaus g. 24, 26, 28, and notification No. S1-222 of 21 July 2017 of the Ministry of Culture of the Republic of Lithuania stating that the meeting minutes had been provided to Mr. Naglis Puteikis, Member of the Seimas (Parliament) of the Republic of Lithuania, with emphasis added;
15. Findings of the commission (registered as document No. RG-22 of 4 May 2017) established by Order No. J-85, "Regarding the establishment of a temporary commission" of 12 April 2017 of the Director of the Cultural Heritage Department under the Ministry of Culture, and notification No. S1-176, dated 27 June 2017, from the Ministry of Culture of the Republic of Lithuania submitting these findings to Mr. Naglis Puteikis, Member of the Seimas (Parliament) of the Republic of Lithuania, with emphasis added;
16. Explanatory letter (with emphasis added) for the special plan (approved by Order No. JV-558 of 31 August 2015 by the Minister of Culture of the Republic of Lithuania) for the cultural preservation of immovable property at the monastery building complex (unique cultural preservation registry code 761, formerly designated as G360K); available online: <http://www.kpd.lt/uploads/Specialieji%20planai/Patvirtinti/761/Aiskinamasis%20rastas%20761,%2033915.pdf>;
17. Publicly available information, such as the attached information released by the internet publication sa.lt on 9 October 2014 (available online: <http://sa.lt/misionieriu-sodai-paskelbti-gyvenamojo-namo-vilniaus-subaciaus-gatveje-architekturinio-idejiniu-konkurso-nugaletojai/>);
18. Annex No. 2 of the Meeting Minutes (No. 2) of the Adjudication Commission for an architectural competition of architectural proposals for the Misionierių sodai residential building and underground parking facility at Subačiaus g. 26, 28, Vilnius;
19. Minutes from a meeting of the Vilnius City Municipal Council for Immoveable Property Cultural Heritage of 14 October 2015; highlighted statements by Ms. Kliobavičiūtė addressed to Mr. Zilinskas, Project Manager;

20. Resolution of the Vilnius City Municipal Council for an Immovable Property Cultural Heritage Assessment regarding the Infant Jesus Children's Home at Subačiaus g. 28, 23 April 2010;

21. Letter from the Vilnius City Municipal Administration Urban Development Department to the Lithuanian Society of Art Historians "Regarding the maintenance and construction works of the buildings located at Subačiaus. g. 20", dated 10 April 2017; emphasis added to the acknowledgement of receipt of the assessment by the Vilnius City Municipality on 1 April 2016;

22. Letter from ICOMOS LNC chairwoman Ms. Nemunienė "Regarding the assessment of project proposals for a multi-unit residential building at Subačiaus g. 20, 22, Vilnius", dated 18 May 2016.