

H.E. Mr Priit Pallum
Ambassador Extraordinary and
Plenipotentiary
Permanent Delegate of the Republic of
Estonia to UNESCO
Ambassade de la République d'Estonie
17 rue de la Baume
75008 Paris

25 March 2024

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/ENA/24/14743

Dear Ambassador,

I gratefully acknowledge receipt of the letter from the Ministry of Culture dated 15 February 2024 regarding the proposal for the extension of the Estonia Theatre within the World Heritage property '**Historic Centre (Old Town) of Tallinn**'.

Please be assured that I have taken note of the intentions of the Estonian National Opera to build an extension to the historic building, which is not considered suitable for the needs of a modern opera and ballet theatre. I also note that the Parliament decided to fund the extension in 2021, but that this decision can only be made in accordance with the full requirements of existing legislation, as the Parliament's decision does not take precedence over the law. While I understand that the local and national heritage protection authorities and experts have determined that the proposed project does not comply with the principles of heritage protection in the Tallinn Old Town Conservation Area and that it would have a significant impact on the Estonia Theatre, also as an attribute of the property's Outstanding Universal Value (OUV), I also acknowledge the joint committee established by the City of Tallinn and the Estonian National Opera in 2022 to further deliberate on the future of this development. In addition, I note that this committee has not yet reached a consensus and that the debate is still ongoing also with regard to the special conditions for heritage conservation as provided for in the Heritage Conservation Act, the Statutes of Tallinn Heritage Conservation area and the Planning Act.

Please note that the documentation provided, together with the non-binding visualisation of the project proposal, has been transmitted to ICOMOS International for review and comment. I very much welcome this early notification to the World Heritage Centre in accordance with paragraph 172 of the Operational Guidelines.

As you know, according to paragraph 118bis of the Operational Guidelines for the Implementation of the World Heritage Convention, Impact Assessments are a prerequisite for development projects and activities that are planned for implementation within or around a World Heritage property. I therefore welcome the planned Heritage Impact Assessment (HIA) and would strongly encourage your competent authorities to ensure that it is carried out based on the *Guidance and Toolkit for Impact Assessments in a World Heritage Context*¹, in order to focus appropriately on potential impacts on the property's Outstanding Universal Value and the attributes that underpin it, and to identify

¹ Available at <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>.

appropriate alternatives where necessary. Please note that this toolkit replaces all previous ones and is intended to support project development from an early stage, helping to find the best possible solutions to meet both conservation priorities and development needs. I thus look forward to receiving detailed documentation on the project and the associated HIA from your competent authorities as soon as it is completed, for review by ICOMOS International.

As mentioned during a recent meeting between Margit Siim, Coordinator of Culture Programme at the Estonian National Commission for UNESCO, and my colleagues from the Europe and North America Unit at the UNESCO World Heritage Centre, the Centre remains available for any further assistance or guidance that may be deemed necessary in this process.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely,



Lazare Eloundou Assomo
Director

cc: Estonian National Commission for UNESCO
National Focal Points for the implementation of the Convention
ICOMOS International