



NEVLADINA ORGANIZACIJA
„CARP PROTECT TEAM“
TIM ZA OČUVANJE ŠARANA PODGORICA

Ul. Tripa Kokolja 1, 81000 Podgorica • Tel. 067/206 676,069/591 012 • E-mail: nvocarprespect@gmail.com
PIB 11018122 • Žiro račun: CKB banka 51000000009429992

Podgorica, Montenegro
31/01/2017

Opinion on the status of fish stocks and the general level of its protection in the National Park Skadar Lake

To Whom It May Concern,

On behalf of our members and long standing activists we would like to draw public attention to the state of fish stocks and illegal activities within the National Park Skadar Lake. Our presence on the lake is a constant in the past decade and is motivated by the protection of carp and other fish species. Our organization has grown, and in the last year was officially registered as NGO Carp Protect Team, which has twenty active members and fifty volunteers and we can proudly say that we know the lake well. Our activity consists of monitoring and prevention of illegal fishing activities.

Since 2009 we constantly point out to the state services responsible for protection of the National Park Skadar Lake the concrete cases of illegal activities. Protection service is poorly staffed, poorly equipped, poorly trained and poorly paid and thus not motivated to implement rules and laws governing legal fishing, nevertheless combating illegal activities. Not infrequently, they themselves, rangers on the lake, are being caught in illegal fishing. Laws that govern sustainable use of fish stocks and regulate the size, amount and method of fishing and its sale is not monitored and not sanctioned by the competent services. Using dynamite, electricity in breeding grounds for fish and in non fishing season is wide spread occurrence, this has now led to systemic depletion of fishing stocks.

Decline in fish size has now become evident year after year. The survival of some fish species will soon be called into question.

We can safely say that the situation has culminated in 2016 when we managed to confiscate 12 generators of electricity and 800 illegal fishing nets. Many poachers which were caught and against which we filed criminal charges have not been punished by the competent authorities, only to be seen on the lake shortly after continuing with illegal activities. This represents a huge and unsustainable problem.

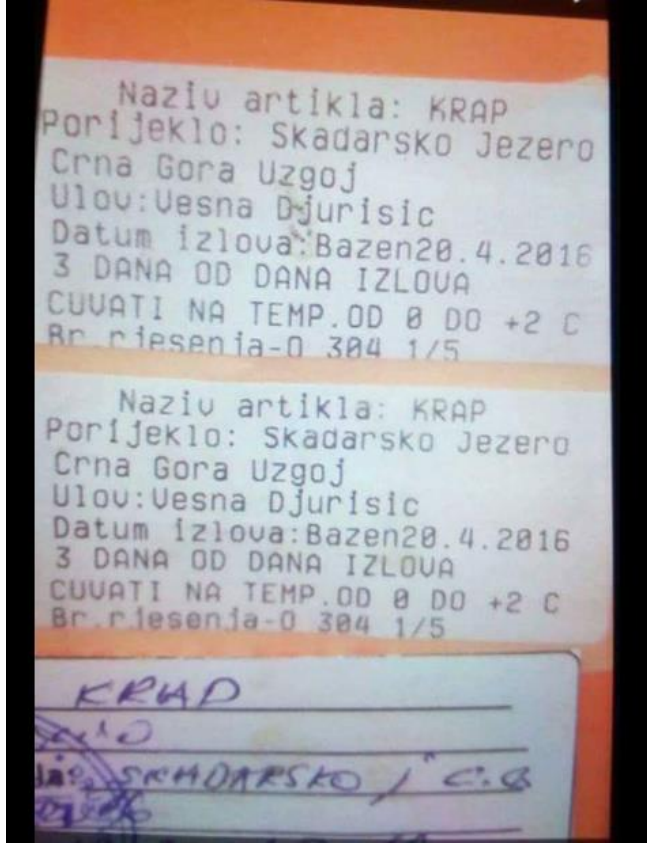
The fact that illegally caught fish during the fishing ban is now legally sold in supermarket chains in Montenegro demonstrates the scale of the problem.

Our research found samples of freshly caught fish, date caught (20.04.2016) in one of the supermarkets, allegedly coming from commercial breeding ponds on the lake. Fishing ban on the lake starts 15th of March and runs until 1st of June. The Law on Freshwater Fishing clearly states that no fish could be sold in the supermarkets 24 hours after the announcement of the ban. At the same time there are no commercial breeding carp ponds in NP Skadar Lake. In matter of fact we have a written confirmation from Montenegrin Ministry of agriculture that they have not issued one single commercial carp farm licence in the whole of the country. Pictures in the appendix show the fish in the mentioned supermarket with signs of outer damage, which usually is not seen in artificially bred fish.

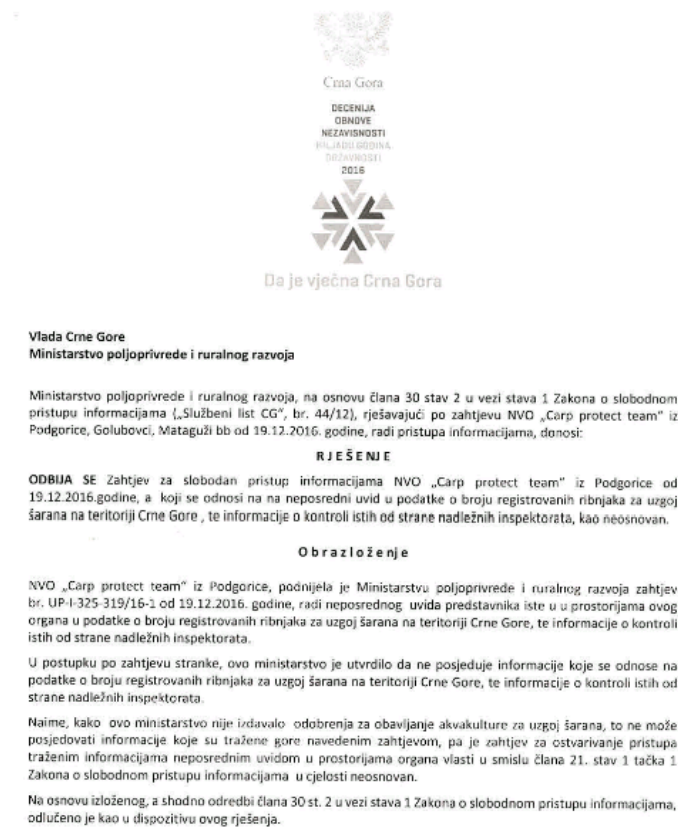
Our work will continue in the future to fight for the preservation of fish species in the National Park Skadar Lake but we express our great concern for the lack of rule of law, monitoring and effective combating of illegal fishing from the responsible Institutions. We fear if this something is not changed soon, fish as a part of the lake ecosystem is facing collapse and this would also have a serious affect on sustainable fishing on the lake.

Our NGO Carp Protect Team is open to dialogue and cooperation in order to improve the existing situation. Please do not hesitate to contact us.

APPENDIX



Confirmation of the origin of fish and the date of the sale



Confirmation of no carp farm licence issued by Ministry of Agriculture



Allegedly farmed carp sold during the fishing ban in the supermarket