Podgorica 07.07.2016

Critical Analysis of the Environmental Impact Assessment (EIA) for Porto Skadar Lake (by Eco Aqua Consulting)

Overview

Neither the strategic assessment, nor the detailed evaluation of the impact adequately deal with the fact that the planned resort will be the size of the largest urban complex on the shores of Lake Skadar. Note, that this is a village in the heart of a National Park. It is worrying that the EIA seems to have dealt very minimally with any assessment of local biodiversity and the ecosystem of Skadar Lake as a whole, although this lake is supposedly under the highest degree of protection.

The report does not acknowledge all the consequences of the existence of such a settlement.
This primarily refers to an absence of municipal infrastructure in the first place, the sewerage network and the consequences of any breakdown of the proposed routes for the disposal of urban waste water. Furthermore, this represents the intensification of tourism to Skadar Lake, to a capacity that exceeds the existing capacity by several hundred percent. The assessment neither recognises nor analyses the construction of a marina and the development of yachting tourism as a form of pressure on the environment. The question is how will all this intensive tourism affect the ecosystem.

Specific Issues

We will outline our chief concerns with the validity and credibility of the assessment.

Authors not qualified to comment on biological or environmental impact

In making a detailed assessment of the environmental impact (the core purpose of this report), not a single biologist was included or consulted, judging from the listed authors. The closest to a professional biologist included in the report is a certain Mrs. Natasa Rakocevic, a graduate engineer of agriculture. Her qualifications do not effectively correspond to the work needed to be carried out.

The assessment generalises the biodiversity of the lake, and strains credibility. It seems that the authors and reviewers of the study, the Agency for Environmental Protection, wish solely to gloss over any negative environmental impacts of this project - one that would be expected to have considerable impact.

Permit granted too early

A very significant violation has been made during the process, as the building permit for the entire (or part of) the complex has been granted before completion of the plan which governs the very provision of such permits (the National Park special purpose spatial plan). This will lead to the classic problem of planning authorities ‘retrofitting’ the plan to the new facilities, which were not actually considered in the spirit of the plan.

Wastewater issues

Regarding wastewater for the entire complex, there are two systems mentioned:

1. A central system for restaurants, lobbies, spa and service blocks, which will drain into the lake.
2. A group of ‘individual’ ‘phytopurification’ systems.

The thought of ‘phytopurification’ being used here is pure science fiction, for the following reasons:

1. According to the impact assessment, there are no plans for a central wastewater collection plant and it is not clear where will this water drain.

2. The authors refer to the disposal of sludge, which is the final product of wastewater treatment. They suggest solar drying but do not specify a location. There are no facilities for solar drying of sewage sludge in Montenegro. So, again, a wonderful story, but completely realistic. The EIA does not provide alternatives for this situation, which is unacceptable.

3. For a total of 53 villas and other facilities that are used for housing or rental, it is planned that each will have individual wastewater facilities. This is unrealistic. The second phase of treatment plans to have, as the author refers to them, wet fields or "phytopurification". Again, it is not clear where they will reside. If the plan is to use natural gravitational water drainage from the primary shut-off device to the "phytopurification device", then it means that they can only be positioned along the shore of the lake, beneath the villas. With this proposal, no one is considering two very common occurrences.

a. The first is that when the lake level rises during the spring floods the "phytopurification" units will be submerged and all wastewater will go directly into the lake.

b. The second problem will happen in the autumn/winter period (between October and April), when plants are in a resting phase. At this stage, they cannot perform “phytopurification” unless planners’ / project funders will plant cane, warns, reeds or water lily that currently do not exist there.

4. What is the most probable is that this futuristic system will not become a reality, and that the wastewater will exude after primary treatment in a closed installation, directly into the lake.

5. The EIA makes no mention of detergents which are an integral part of commercial wastewater and how they will be prevented from flowing into Skadar Lake National Park. There is no plant that can purify detergents - and the proposed treatment technologies will not completely remove the load of phosphorus and nitrogen in this wastewater. If this assessment had included a biologist and not an agricultural engineer, this would have been noted and flagged.

Vague and non-definitive language

Throughout its assessment, the EIA regularly uses vague, non-specific terms such as ‘certain changes’ and ‘some influence’ without ever defining either exact impacts, or the area of those impacts (whether it covers part of or all of the National Park). Furthermore, when discussing how the functioning of the Lake Skadar Ecosystem may change as a result of these interventions, the report uses the terms ‘possibly’ and ‘if’ far too often, without defining the possibilities or conditions to which they refer.

Animal Life impact assessment not credible

Part of the assessment on zooplankton states that there will be no changes even in the vicinity of the planned complex. This is patently untrue, because if there is local eutrophication, it's impossible that the largest settlement on the lake will not cause changes in zooplankton. But as we have already stated, the educational background of the authors does not allow an accurate understanding or assessment of these processes.

The authors claims regarding water snakes are also incorrect. They mention: "Some of them, such as Natrix tessellata, will even make use of anthropogenic habitats and in these places, will increase in number, after completion of construction. It is widely known that water snakes on Skadar lake have a high number of in coastal human settlements (for example, in Vranjina village)." This clearly comes from someone who is ignorant of this subject, and not informed about what they’re discussing.

Conclusion

To conclude, this EIA and the way it is written is an embarrassment to the purpose and spirit these assessments are supposed to provide - namely to assess the impact on the environment in the heart of the National Park. This study is biased in the way it treats environmental problems that could occur after the construction of such a large settlement. It satisfies form, but is completely lacking in substance. Moreover, for such a grandiose project such as Porto Skadar Lake, the contracting company in charge of EIA has not hired even one qualified biologist. The previous standard was that for a valid Environmental Impact Assessment, two biologists be hired, one for botany and the other for the animal components of the ecosystem.

It is important to emphasise that for such a sensitive project such as this, blame lies with the Environmental Protection Agency of Montenegro which should be expected to analyse this EIA in detail. This undoubtedly leads to the conclusion that the main purpose of this EIA and the way it was written is to satisfy the administrative process and wishes of the private investor. By foregoing detail, this EIA is neglecting the public interest reflected in preserving nature in an established National Park. We are sure that a professionally completed EIA would look completely different.

Dr. Danilo Mrdak
Assistant Professor
Vice-Dean for Sciences and International Cooperation
Department of Biology
Faculty of Sciences and Mathematics
University of Montenegro
G.Washington Street, P. box 5455
81 000 Podgorica
Montenegro