



GREEN HOME
act green



SCADAR LAKE NATIONAL PARK

MSc. Azra Vuković

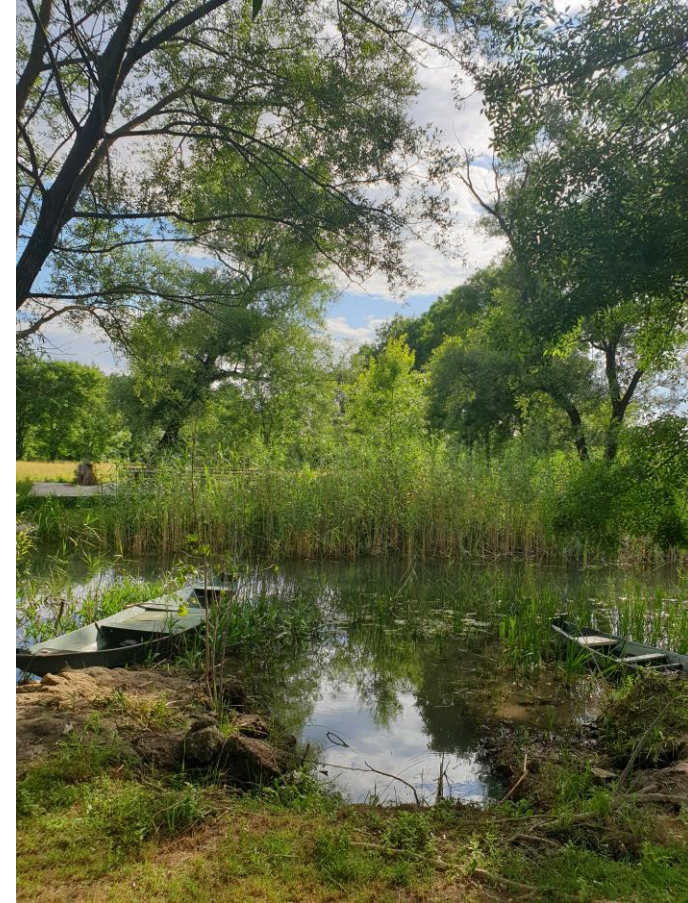
NGO Green Home

Citizens Group of Virpazar

30.11.2023.

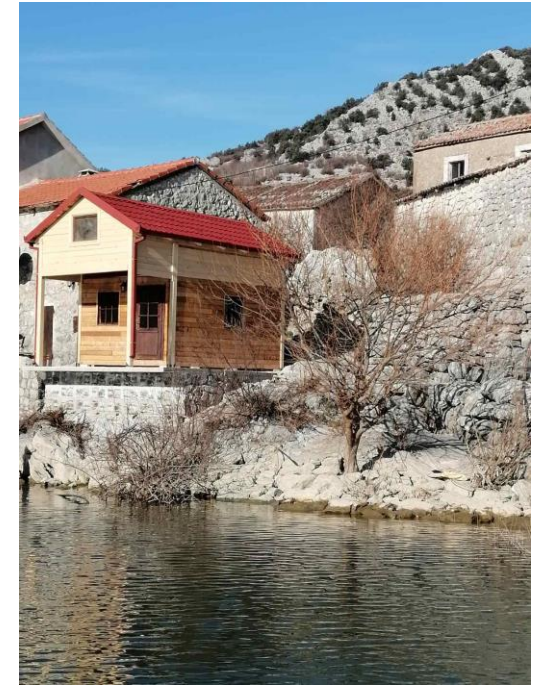
Open File No. 2016/4: Montenegro: Development of a commercial project in Skadar Lake National Park and candidate Emerald site

- A formal Case File was opened in 2016;
- Bern Convention On-the-Spot Appraisal Mission and Ramsar Advisory Mission were implemented jointly in 11-14 June 2018;



Threats

- Illegal construction of buildings
- Poaching
- Illegal gravel extraction
- Invasive species
- Not effective waste management
- Fires



KEY FINDINGS

- **No meaningful progress** from Montenegrin government on recommendations 201.
- After 3 years of operation without **management plan**, it was adopted on **03.08.2023**.



Comment

- Decisions regarding the case of SLS Mihailovici and revocation of associated building permits is a political decision that will need to be made on the level of the Government.



Status of recommendations implementation

Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
<p>Halt any further development on the mainland as well as the shore zone and water body of the Mihailovići location unless a detailed habitat map on a 1:10,000 scale for Mihailovići, Poseljanski Zaliv Bay, Biški rep, the mouth of Crnojevića river, the mouth of Bazagurska matica and the islands Liponjak and Galići has been provided. The habitat map, ideally based on earth observation images, shall clearly classify any habitat type pursuant to the EUNIS habitat classification and EU Habitat Directive. The detailed habitat map provides the basis for any environmental impact assessment.</p>	<p>Further development on the mainland was stopped. Detailed habitat map on 1:10,000 scale for Mihailovići, Poseljanski zaliv Bay, Biški rep, the mouth of Crnojevića river, the mouth of Bazagurska matia and the islands Liponjak and Galići was not provided until now.</p> <p>Habitat types pursuant to the EUNIS habitat classification and EU Habitat Directive were classified in the frame of the GIZ project “Natura 2000 Habitat Mapping of the Skadar Lake National Park” implemented in 2019.</p>

Status of recommendations implementation

Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
<p>Establish and run a monitoring system on species strictly protected according to Appendices I and II of the Bern Convention resp. Natura 2000 species and habitats by the National Environmental Protection Agency at first at least in the area mentioned under (1). The monitoring system must include the otter (<i>Lutra lutra</i>).</p>	<p>Management plan for national park Skadar lake for the period from 2021 – 2025 was adopted on 03.08.2023.</p> <p>However, it does not apply special obligation to monitor otter (<i>Lutra lutra</i>).</p>

Status of recommendations implementation

Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
<p>Provide the Convention's secretariats with georeferenced and digitalized borders of and respective updated data forms on both the corresponding Candidate Emerald Site and Ramsar Site.</p>	<p>Not implemented according to the available information.</p>

Status of recommendations implementation

Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
<p>The new Special Purpose Plan for Skadar Lake National Park needs to follow the approach of the 2001 Special Plan for Skadar Lake National Park and reconfirm the designation of the broader area of the mouth of Crnojevića river and the Liponjak and Galići islands a Zone I of strict protection .</p>	<p>Since August 2018, when Draft on Special Purpose Spatial Plan for Skadar Lake National Park until 2025 was presented to the public (not applied recommendation of designation of Zone I of the broader area of the mouth of Crnojevića river and Liponjak and Galići islands), there were no new activities in this regard.</p>

Status of recommendations implementation

Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
The use of speedboats has to be limited to police, border police, ranger service and other authorities with competences on the lake. Those have to follow speed restrictions except in case of emergency.	Law on National parks in article 16 defines prohibitions in national parks. It is prohibited to use vessels with an engine power over 10 horsepower without approval, except for the needs of state administration bodies.
The use of personal water crafts (water scooters) and any other water activities which may harm the floating vegetation must be prohibited.	No implementation. Proposal for the Law on Amendments to the Law on Safety of Maritime Navigation ⁵ - 26.05.2023:
Regulations on boating, such as speed limit (a 4-knot speed restriction on the lake area in question), and distance from Zone I of strict protection and form the shore have to be stipulated.	A legal entity will be fined from EUR 1,500 to EUR 20,000 for a misdemeanour in Lake Skadar uses a water jet-powered vessel and a floating object with an engine of more than 7.25 kW, without a permit issued in accordance with the law governing national parks;

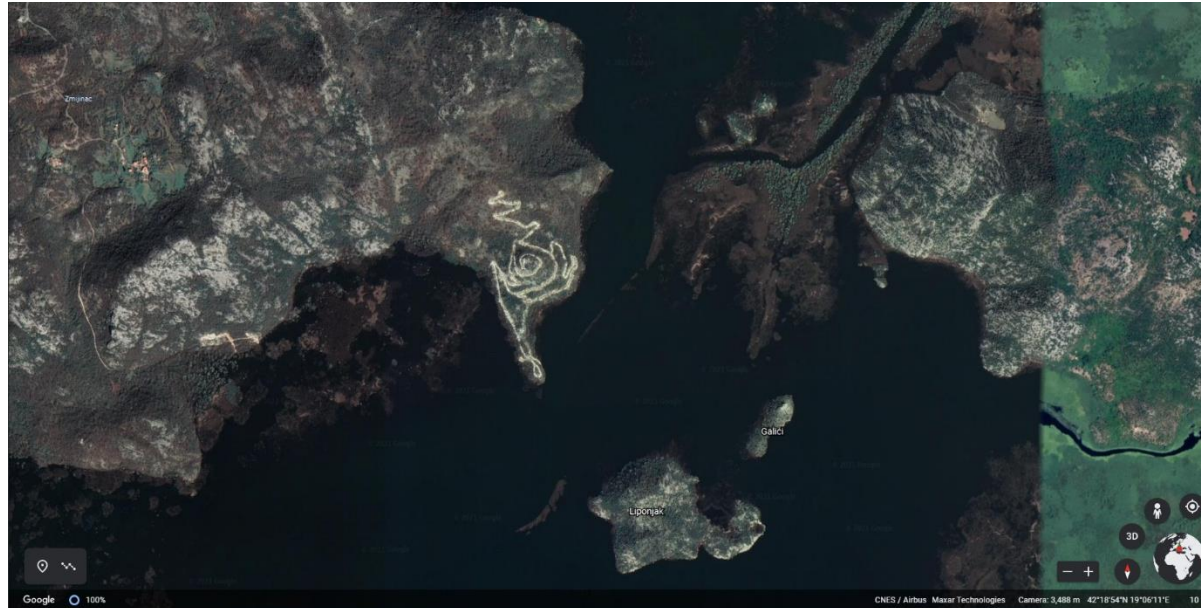
Case of hotel “Vir” in Virpazar – a negative example of building practices and lack of rule of law

- Hotel Vir (previously “13 Jul”) was built in 1981, architecturally inspired by traditional house building in the region of Crmnica.
- The proposal for its reconstruction has been twice rejected by the main Architect of Montenegro, only to be approved in February this year directly by Mr Ratko Mitrovic, Minister of Ecology, Spatial Planning and Urbanism.
- Note that this is a Minister who has been known to be involved in illegal building practices himself.



Reiterating our key positions:

1. **Abandoning SLS Mihalovici entirely** (validity expired in 2020) and, in the light of current evidence, **revoking all building permits for Porto Skadar Lake and White Village**. This will ensure that most of the Recommendations 201 are respected. It will send a strong message that sustainable development and conservation takes priority over private sector profit.



2. **As the highest priority, the development and delivery of a new spatial plan for the National Park**, as previously committed by the Montenegrin authorities. Ensuring that the new Spatial Plan is rezoned according to Recommendations 201, the Shore Functionality Index study and recent biodiversity mapping.

- a. Zone I and II with their buffer zones are treated as nature reserves and fully protected from ANY AND ALL developments.
- b. Any further new tourist developments should be sustainable, based in areas that are already currently occupied, be of small scale, and be eco and village tourism based. This as per 3.4.2 Recommendations for Montenegro (page 66 of SFI Study).
- c. Existing road infrastructure is maintained and not upgraded. We think that the new motorway route (Bar-Boljare) over Rijeka Crnojevica should be abandoned, and a more sustainable/less damaging alternative is found.
- d. Waterways follow Recommendations 201. Exceptions to the recent law limiting boat engine sizes to be abandoned and law to be enforced.

3. **Protection as a priority.** Finally, initiate and establish efficient and effective methods of monitoring implementation of existing laws, executed in a manner that is visible on the lake.



Thank you!



Azra Vuković
NGO Green Home, Citizen's Group Virpazar
+38268526061
azra.vukovic@greenhome.co.me