

This document presents an analysis of claims made by the Montenegro Resort Company (MRC), represented by Lionel Sonigo (Director) and Ivan Zindović (General Manager), which has been granted permission to build the Porto Skadar Lake (PSL) resort near the village of Mihailovići, "nestled in the heart of Skadar Lake National Park".

It is based on several years' of announcements regarding the so-called "Eco-Resort" Porto Skadar Lake by MRC and statements made by Mr. Sonigo and g. Zindović in the local media and their main website presentation. Our findings cast serious doubt on their and their company's credibility, and as a result, we urge the Government to suspend the building permit with immediate effect while a full investigation can be carried out.

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Page 1 – SUMMARY

Pages 2-7 – CLAIM DETAILS

Pages 8-13 – APPENDIX WITH SUPPORTING EVIDENCE

- **CLAIM #1** – *MRC claims to have UN Green Globe certification.* Green Globe confirmed in writing it has never heard of MRC or the PSL project.
- **CLAIM #2** – *MRC has claimed that PSL investors will be in a unique position; owning properties in a national park that will soon fall under UNESCO protection.* UNESCO has confirmed that this is not true.
- **CLAIM #3** – *MRC claims they have made a full Environmental Impact Assessment.* The document submitted has been discredited - not even one biologist was consulted.
- **CLAIM #4** – *Lionel Sonigo claims that building in national parks is quite common in his native France and that a project like PSL would be welcomed.* This is only partly true according to the Legal Framework for French Protected Areas.
- **CLAIM #5** – *MRC claims to be using experienced "eco" architects.* The company in question, Francois Leclercq, is not known for building eco-complexes.
- **CLAIM #6** – *MRC claimed they will be using local construction firms.* There is no proof that MRC is using local construction company.
- **CLAIM #7** – *MRC Director Lionel Sonigo claims he has experience building and running eco resorts.* To our knowledge Mr. Sonigos experience is mostly in retail buseness making these claims to be false.
- **CLAIM #8** – *MRC claims the project will cost between €75-115m.* There is no proof that MRC has the finances to complete the project - no POF (Proof of Funds) document has been released.
- **CLAIM #9** – *MRC announced it has commenced with building, including creating access roads to the PSL site and that all permits have been issued.* Building work has not properly begun and cannot. According to the land registry, MRC does not have permission to build the access road. The site has no road access, water or electricity.
- **CLAIM #10** – *MRC claims that PSL has the support of the local community.* A local citizens' group opposed to the project was formed year ago, more than 5500 people have signed its petition in four weeks against Porto Skadar Lake project and further building projects on the lake

### **CLAIM #1**

*"We have the 'Green Globe' certificate for sustainable tourism issued by the United Nations, so that the project does not in any way endanger the environment."* Zindović, Vijesti 30.01.2014

*"Given that we already possess a 'Green Globe' certificate for the construction of eco-Resorts issued by the UN, we will immediately start work on our location study."* Sonigo, Vijesti 10.03.2014

**Answer obtained from Green Globe headquarters in Los Angeles: "We have neither a Mr Sonigo nor any pending certification in Montenegro in our system."**

### **CLAIM #2**

*"Owning your own villa in this unparalleled location, actively protected from mass tourism, is a special privilege: just 2 years from now, the park will come under UNESCO's protection."*  
[www.portoskadarlake.com](http://www.portoskadarlake.com)

**This statement was 100% false and, at the request of UNESCO's head office in Paris, was removed from the PSL website in December 2016.**

### **CLAIM #3**

*"All villas are designed to have the least possible impact on the natural environment. Perfectly integrated into the landscape, equipped with the most modern processes in nature conservation, waste-water treatment, natural basins with phyto-purification, solar energy and the use of the energy potential of the lake."* Zindović, Vijesti 30.01.2014

*"Nature will not be damaged in any way, because all villas will be integrated into nature. It will be equipped with modern technology for the conservation of nature ...."* Sonigo, Vijesti 10.03.2014

*"We have an Environmental Impact Assessment study, which was made according to all regulations and standards; we will also work in accordance with all environmental standards and we will make them available for scrutiny. We use the latest technology in order not to endanger the environment, and everything will be built from natural materials - glass, wood and stone."* Zindović, Vijesti 30.01.2014

*"A heliport (will be built) at one end of the estate towards the coast, to prevent helicopters from flying over the Eco Resort".*

[www.portoskadarlake.com/en/eco-resort/services](http://www.portoskadarlake.com/en/eco-resort/services)

**An assessment of this EIA was given Dr D. Mrdak, professor of the Faculty of Natural Sciences and Mathematics, University of Montenegro.<sup>1</sup>**

#### **i) no biologists were consulted**

“...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.

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<sup>1</sup>PDF - EIA Mrdak Assessment

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.”

**ii) the proposed processing of waste-water is unworkable**

“If the plan is to use natural gravitational water drainage from the primary shut-off device to the "Phyto purification 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.

1. The first is that when the lake level rises during the spring floods the "Phyto purification" units will be submerged and all wastewater will go directly into the lake.
2. 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 “Phyto purification” unless the planners’ project includes planting cane, warns, reeds or water lily that currently do not exist there.

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 waste-water. If this assessment had included a biologist and not an agricultural engineer, this would have been noted and flagged.”

**The proposal for waste-water is summarised by Dr Mrdak as being "pure science-fiction".**

“Instead of being a tool of detailed assessment of the environmental impact, to be used to reduce impacts, on here are just for the mere satisfaction of administrative forms that fully meets all the desires of investors while the public interest is reflected in the preservation of this unique space completely ignored. ”

(Appendix Critical assessment of EIA)

iii) There is no mention of heliports effect on environment in this report either.

**CLAIM #4**

*"Of course, In France, they would be delighted to see an investor with such a project. Unfortunately their tax is too high, so its citizens often invest in other countries."*

*"In France, it's common for Eco - resorts to be built right in national parks or protected areas, which are usually found in the middle of nowhere." Sonigo, Vijesti 10.03.2014*

**France is world famous for its strict building regulations and codes. A copy of the legal framework for protected areas in France<sup>2</sup> says: “In park core areas (undeveloped areas), works (except for ordinary maintenance or public interest infrastructure), buildings and facilities are forbidden as a matter of principle. (Environmental Code, Art. L.331-4).”**

**“The protection of biological diversity at the EU level is governed mainly by two directives: 53 the 1979 Birds Directive and the 1992 Habitats Directive. These areas are part of the European ecological network, Natura 2000, which aims to preserve biodiversity throughout the territory of the European Community.”**

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<sup>2</sup>PDF – Legal Framework French Protected Areas

#### **CLAIM #5**

*"He stressed that the project will be built by the people who have built the best eco resorts in many European national parks and which are today's biggest known tourist attractions." Zindović, Vijesti 30.01.2014*

**The portfolio of this "famous" French architecture studio is mostly dominated by large commercial buildings in urban areas. Porto Skadar Lake is the only project they have ever designed for a National Park. This is not the experience MRC has boasted of.**

**Finally, the integration of this resort into the landscape is unrealistic when you take the size of proposed buildings and the land area. This is reminiscent of how the project Zavala in Budva was presented and how it looks today.**

#### **CLAIM #6**

*"It is important that this complex is designed by the people of Montenegro and that it will be built by local construction companies. It will be constructed from natural materials from the area that will have no impact on the environment, working in cooperation with French designers, because something like this has not been built in your country before." Sonigo, Vijesti 10.03.2014.*

**Impresa Pizzarotti, a construction company from Italy has confirmed to us that they are in negotiation as a potential builder for the project. So much for the participation of domestic construction companies.**

**The claim that natural materials which have no impact on the environment haven't been used for buildings in Montenegro before is completely incorrect. As a matter of fact, stone has been used for centuries as a building material. By way of contrast, MRC's plans for Porto Skadar Lake employs no natural stone, no natural wood, no passive building techniques. Nothing, in fact, that could be labelled remotely "eco".**

#### **CLAIM #7**

*"I arrived in Montenegro by chance. That year I owned seven supermarkets in Bosnia and as it was too cold in Warsaw I decided not to go back there. Instead I came to Montenegro, it was close and I have never been before. "*

*"I bought 11.5 hectares of land, for which my colleagues were saying that I was completely crazy, because it is unusual to buy land before obtaining a building permit. I acted exactly the opposite. I founded the company "Montenegro Resort" in Podgorica 6 years ago, for the purpose of buying land."*

*"When I bought the land in Montenegro, at the same time I purchased eight hectares of land in Zanzibar, Tanzania, where the government was friendly and we immediately started investing. With one other person, I founded Cristal Resorts'."*

*"The rooms are not so luxurious, but it's an eco resort, everything is made from natural materials from the area. It was built in cooperation with the local population, which was very happy to work with us ... I plan to do the same in Skadar Lake." Sonigo, Vijesti 10.03.2014*

**Mr Sonigo has experience in retail business in Bosnia, Serbia, Poland but all his previous companies have ceased trading.**

**Mr Sonigo owns only a third of the aforementioned Cristal Resort - the other two owners are French nationals Arnaud Tual and Xavier Despringre. In November 2014, 6 people were shot by their manager Ivan Kodeh. The Supreme Court in Zanzibar in January 2015 led the process against the former manager who was also accused of stealing \$ 1.5 million. His 14 bank accounts in Tanzania, Cyprus, Seychelles, Poland, Switzerland and the United States have been frozen and he has since been in hiding<sup>3</sup>.**

**The Cristal resort is only one in a chain of similar resorts on a beautiful stretch of the beach and not in the National Park. It has 13 eco bungalows and it caters for travellers on a budget.**

**Msr Sonigo is not at all experienced in building or running resorts, eco or otherwise. Especially not in the protected zones.**

#### **CLAIM #8**

*"French businessman Lionel Sonigo wants to make the most beautiful Skadar Lake eco-resort in Europe, which will, he said, cost 90 million euros." Vijesti 10.03.2014*

*"We intend to build in two phases. The first phase we will build hotel complexes, and in the other exclusive villas. The total investment will cost about 75 million euros," said Zindović. Vijesti 23/07/2016*

*"In the beginning the plan was to spend 75 million euros and after the revision, it became apparent that it will cost a lot more, or 115 million euros." Sonigo, RTCG 25/12/2016*

**The financial capacity of MRC is questionable at best. The fact that the owner and General Manager are not working with the same figures speaks for itself. It is strange that someone who has been waiting for years to get building permission is revising the budget only one month before expiration of one of the permits.**

**Normally on such projects, a POF (Proof of Funds) document is required to reassure all involved parties that the company concerned has the capital to complete the proposed project. MRC is yet to provide such a document.**

#### **CLAIM #9**

*"French businessman said for 'Vijesti' that the preparatory work is likely to begin in July (2015), while next year should move forward with construction of villas." Vijesti 27.04.2015*

*"If we get a building permit as we planned and begin construction in September (2015), the resort will be completed in 2017." Sonigo, Vijesti 10.03.2014*

*" Work on the construction of the eco-resort Skadar Lake will begin in September (2016), on Biski Rep peninsula, near the village Mihailovići ... General Manager of" Montenegro Resorts "Ivan Zindovic said it will receive its first guests in 2018, by which time its planned the completion of construction of the hotel and part of the Villas. "Vijesti 23/07/2016*

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<sup>3</sup>PDF – Cristal1, Cristal2, Cristal3

*"He ( Sonigo) is not planning to halt the work of eco resort for now and it will be completed according to his plans at the end of 2019. The official opening is scheduled for 2020 as we will need few months to educate the personnel who will work in the resort." Sonigo, RTCG 25/12/2016*

*"We will begin the construction of a road to the future eco - resort, which will serve to Montenegrin citizens as well, many of whom have their properties nearby and so far, were able to see their properties only from photos. Thanks to this road they will be able to build themselves this beautiful place ... .I'm so happy that we finally got the building permit and that we can start negotiations with the local construction company. This project will be good for Montenegro and its citizens, as it will attract a new type tourists and potential investors " Sonigo, Vijesti 27/04/2015*

*"Currently we are building access roads to the site. All permits have been issued." Sonigo, RTCG 25/12/2016*

**The access road to the site from the Virpazar - Rijeka Crnojevića is not existent despite the claims that works started years ago. According to the locals from nearby Mihailovići village, land that is required for the road is under disputed ownership and cannot be built upon. Land Registry data also indicates that MRC does not own all the plots necessary to complete this road. There is no building permit for this road, neither is there an agreement to supply water or electricity to the site.**

**As of 7<sup>th</sup> January 2017 there are two diggers on site. Neither has moved since they were carried there by barge in December 2016. According to building permits issued by the Agency for Environmental Protection of Montenegro (deadline for commencing of the building 26.01.2017) and the Ministry of Sustainable Development and Tourism (deadline for commencing of the building 27 March 2017) MRC had to "start" work by the expiry date of both permits otherwise it would risk losing them.**

**It is hard to believe that two excavators transported with barges to the building site represent a serious start of works. Any experienced investor knows that any large and important project such as this requires access by road, water and electricity. And not one of these three conditions have been met.**

#### **CLAIM #10**

*"The Frenchman claims that MRC will only employ Montenegrin citizens, mostly residents of the capital Cetinje, while cooperating with all local environmental non-governmental organizations".  
Vijesti 10.03.2014*

*"Our relationship regarding this project is with the Government and the state, and not with NGOs said Sonigo. What they claim is also support from the local community. Wild Beauty - Porto Skadar Lake will be more than a VIP spot. We will be very careful to protect flora and fauna, because the fresh air and the nature of what we want to sell. Guests who live in cities and have good jobs, salaries, want to breathe clean air at a fantastic location, points out Sonigo. "RTCG 12/25/2016*

**The number of tourists visiting the lake grows annually. They take a ride in boats, kayak, hike and dine in nearby restaurants or are hosted in homestays of local people. Entire families of local villagers depend on this type of truly sustainable tourism. They know what attracts tourists to the lake and what does not. The same guides and entrepreneurs already fear they will soon have to explain to their guests why excavators are working on this unspoiled part of the lake and how it is possible to build this mega structure in a protected national park.**

**MRC does NOT have local support. Over 5000 people have signed the petition to “Save Skadar Lake” in just 3 weeks. Montenegrin Governments e-Petitions require 6000 signatures within 60 days to qualify for the consideration of the Government. Unfortunately, the government website has been out of order for more than two years.**

**If MRC does not have the funds to complete the project (see claim #8), there will be no local jobs on offer.**

**Porto Skadar Lake's own website features mention and pictures of wolves, red squirrels and bald eagles, none of which are even resident at Lake Skadar NP showing the investors knowledge of the lake he claims wants to protect. The bald eagle is in fact indigenous to North America alone!**

Based on the above claims we believe that MRC:

- Falsely claimed to have a UN Green Globe certificate, that the NP Skadar Lake will be protected by UNESCO and that the construction of this type of resort is common practice in France.
- Has zero experience in eco-tourism projects and building on this scale, especially not in the national parks.
- Provided a completely inadequate environmental impact assessment which would not be considered sufficient in France, or by Ramsar and the Bern Convention – the international bodies which govern nature conservation inside certain areas of Montenegro such as SL NP.
- The developer Sonigo does not know nor is interested in the challenges facing the local community, nor is he familiar with the animals that live on the lake that he claims he wants to protect.

It is not possible to trust the investor that this project will comply with all procedures under the strictest European criteria or bring well-being to the inhabitants of the lake, nor is it possible to believe that this project will avoid a negative impact on the original character of the National Park Skadar Lake. From all data available this project is likely to share the fate of the Hotel Harmonia in Bečići or Hotel As in Perazica Do. This kind of damage would be irreparable.

We urge the Ministry of Sustainable Development and Tourism and the Government to reconsider its decision to grant the license for the construction of this controversial project to an inexperienced investor in the protected zone of one of the most ecologically valuable parts of its territory.

## APPENDIX

### SOURCES:

Internet presentation:

[www.portoskadarlake.com](http://www.portoskadarlake.com)

Vijesti: 30.01.2014

<http://www.vijesti.me/vijesti/rijeka-crnojevica-francuz-nacrtao-vile-od-90-miliona-174843>

Vijesti: 10.03.2014

<http://www.vijesti.me/ekonomija/lionel-sonigo-cuce-se-za-porto-skadar-lake-185482>

Vijesti: 04/27/2015

<http://www.vijesti.me/vijesti/pripremni-radovi-za-put-u-julu-831019>

RTCG 25/12/2016

<http://www.rtcg.me/vijesti/turizam-i-ekologija/151515/porto-skadar-po-ekoloskim-standardima.html>

Legal Framework for protected areas in France:

[http://cmsdata.iucn.org/downloads/france\\_en.pdf](http://cmsdata.iucn.org/downloads/france_en.pdf)

Portfolio of the French architect studio:

<http://www.francoisleclercq.fr/index.php/projets/categorie/equipements>

TripAdvisor's visitors photo of Cristal Resort, Zanzibar:

[http://www.tripadvisor.co.uk/Hotel\\_Review-g616020-d610765-Reviews-or10-Cristal\\_Resort-Paje\\_Zanzibar\\_Island\\_Zanzibar\\_Archipelago.html#photos;geo=482884&detail=610765&albumViewMode=images&albumid=101&cnt=30&offset=0&filter=2](http://www.tripadvisor.co.uk/Hotel_Review-g616020-d610765-Reviews-or10-Cristal_Resort-Paje_Zanzibar_Island_Zanzibar_Archipelago.html#photos;geo=482884&detail=610765&albumViewMode=images&albumid=101&cnt=30&offset=0&filter=2)

Google

Gmail

COMPOSE

Inbox (1)

Important

Sent Mail

Drafts (182)

Spam (180)

Circles

[Gmail]Bin

From: Green Globe <[wscare@greenglobe.com](mailto:wscare@greenglobe.com)>

Date: 17 May 2016 at 11:06

Subject: Green Globe

To: [REDACTED]

We have neither a Mr Sonigo nor any pending certification in Montenegro in our system.

Sincerely,

Green Globe  
5959 W. Century Blvd., Suite 610  
Los Angeles, California 90045  
Phone: 310-337-3000

On May 17, 2016, at 4:52 PM, [REDACTED] wrote:

Name: [REDACTED]

Email: [REDACTED]

Website: <https://www.facebook.com/groups/saveskadarlake/>

Comments: To whom it may concern

Activate Windows  
Go to PC settings to activate Windows.

**CLAIM#1-MRC doesn't have a Green Globe Certificate**



30 lavish villas for sale in the Eco Resort Porto Skadar Lake

THE VILLAS

A word from the founder

Concept

Eco-spa

Services

Restaurant

Green philosophy



Owning your own villa in this unparalleled location, actively protected from mass tourism, is a special privilege: just 2 years from now, the park will come under UNESCO's protection. This means that these 30 villas are the first and last to be built and offered for sale within Skadar Lake park.

One of the main reasons that these villas were allowed to be constructed in a protected natural space is their low environmental impact, designed to be in perfect harmony with their surroundings. Each boasts a floor area of 520 m², a private pool, and top-tier amenities. They are fully integrated into the Eco Resort so that you can enjoy all the services available to residents.



Owning your own villa in this unparalleled location, actively protected from mass tourism, is a special privilege. This means that these 30 villas are the first and last to be built and offered for sale within Skadar Lake park.

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**CLAIM #2 – Proof that PSL website made untrue UNESCO protection claims**

**CLAIM #3 – MRC's Environmental Impact Assessment and PSL website show they have no knowledge of local fauna**

U R B A N I S T E S

Actualités

Agence

François Leclercq

Villes et territoires

Habitats

Equipements

Lieux de travail

Commerces

[www.francoisleclercq.fr](http://www.francoisleclercq.fr)



Ensembles : L'Ann Confluence /

Activate Windows  
Go to PC settings to activate Windows.

Actualités

Agence

François Leclercq

Villes et territoires

Habitats

Equipements

Lieux de travail

Commerces



INSEP Bois de Vincennes, Paris /

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Actualités

Agence

François Leclercq

Villes et territoires

Habitats

Equipements

Lieux de travail

Commerces



Extension du périmètre d'Euromed, 169 hectares /

Activate Windows  
Go to PC settings to activate Windows.

**CLAIM #5 – Examples of architect Francois Leclercq's current project portfolio.**

ATTACK Mr Msangi said the shooting occurred after the two sides were involved in a dispute over management at Crystal Hotel

# French investor shoots 6: police say

According to the Deputy Director of Criminal Investigations, Mr Salum Msangi, the incident occurred on Sunday at around 11.00 am

By Mwinyi Sadallah  
The Citizen Reporter

Zanzibar. Police has confirmed reports that six people were injured after being shot at by a French investor (name withheld) in Paje area in South Unguja Region. According to the Deputy Director of Criminal Investigations, Mr Salum Msangi,

the incident occurred on Sunday at around 11.00 am.

Mr Msangi said the shooting occurred after the two sides were involved in a dispute over the changing of management at Crystal hotel in Paje.

He named those who were injured by the investor as Ramadhani Mohammed, 25, Wadi Ame Khamis, 35, Ashraf

Suleiman, 36, and Nadir Ali Juma, 28.

In the list there were two television journalists who were also injured while at work.

They are Mr Munir Zakaria (Chanel 10) and Kuruthum Ali (TBC Zanzibar).

"The shooting occurred after the management, which was completing its term refused to hand over the hotel to a new management," said Mr Msangi.

### ABOUT: CRISTAL RESORT

Cristal Resort is located right in the heart of Paje beach and has a stretch of beautiful white sand beach. The hotel is known for offering top-notch accommodation, a swimming pool, hammocks and organized tours. Cristal Resort also has both Deluxe and Eco Bungalows.

According to Mr Msangi, the accused was found with a pistol and 1,000 rounds of ammunition. The accused will be arraigned after the police conclude their investigation, according to Mr Msangi.

"The accused will be arraigned after we conclude our investigation as per United Republic of Tanzania laws," Mr Msangi told the press.

In another development police are holding a Poland

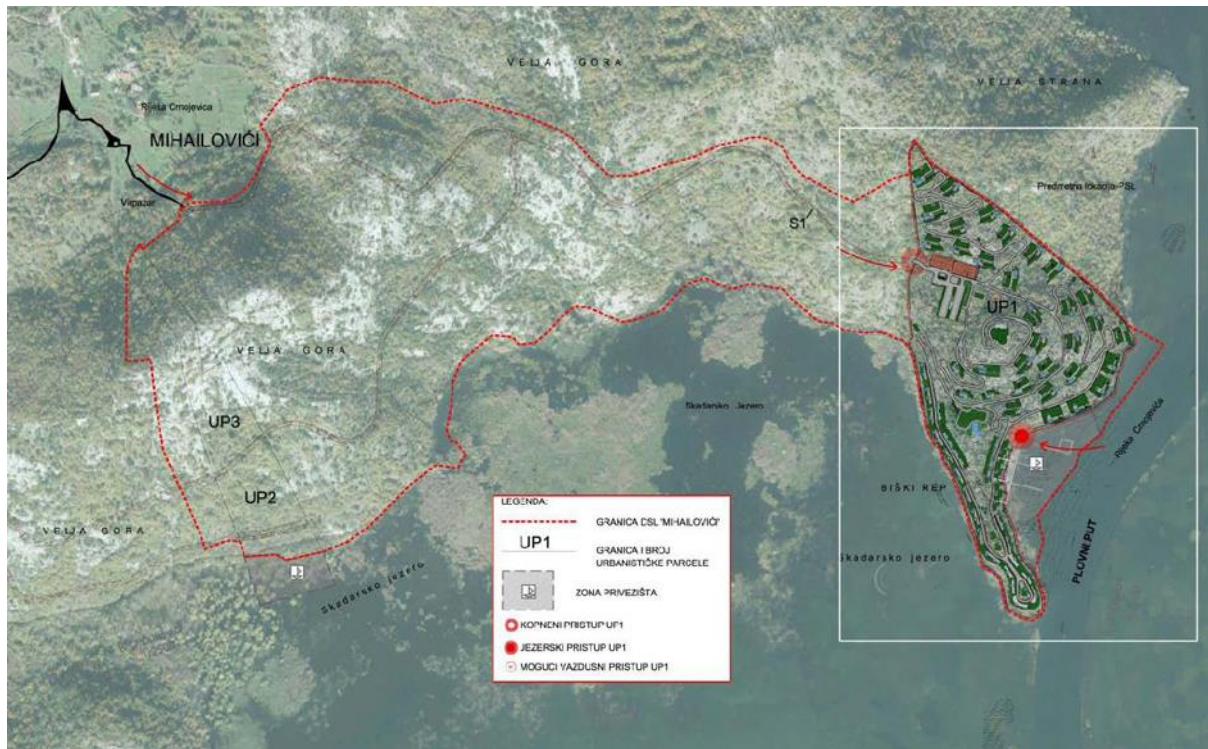
national in connection with illegal possession of a rifle and a pair of binoculars.

According to Mr Msangi, the accused was arrested by police in Mchanganu Coast in North Unguja Region.

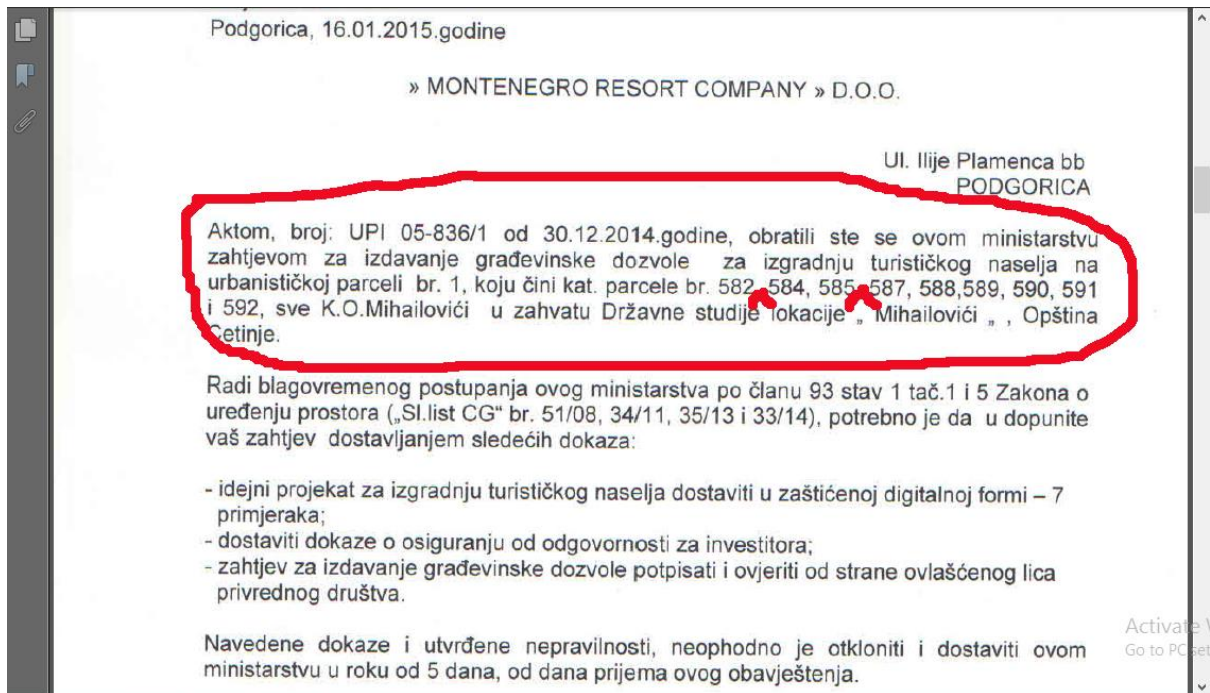
Mr Msangi said during the police interrogation the accused admitted that he has been using the rifle for the past three years.

He urged investors in Zanzibar who illegally own firearms to surrender them to police in the next two weeks.

**CLAIM #7 – Lionel Sonigo's previous business dealings (see also attached PDFs Cristal1, Cristal2, Cristal3)**



**CLAIM #9 – no access road permission.**



**CLAIM #9 – MRC does not own two of the parcels of land necessary to construct their access road.**



**CLAIM#10- Investors knowledge of parks species he claims wants to protect.**



## Nature is everywhere

The national park provides habitat for a rich diversity of plants both on land and in the lake, as well as many animal species, which take advantage of this vast protected natural reserve.

Skadar Lake is a major stopover for many birds migrating between Europe and Africa, welcoming 264 species of birds, some of them threatened.

To name just a few, you will find Dalmatian Pelicans (symbol of the lake and the national park), mallards, common snipe, common loons, Eastern imperial eagles, Eurasian eagle-owls, and black-headed gulls. ....

The park is also home to 48 species of fish including common carp, common bleak, European eel, and European chub. Mammals abound in the forest and around the lake, amidst the oaks, hornbeams, and chestnut trees, including European water voles, wolves, red foxes, and European otters.



**CLAIM#10- Investors knowledge of parks species he claims wants to protect.**