



## **Comments on the Special Purpose Spatial Plan for the Skadar Lake National Park**

Centre for Protection and Research of Birds (CZIP – BirdLife Montenegro) would like to draw the attention of the Ministry of Sustainable Development and Tourism (MORiT) and relevant Ministries that the company (RZUP) responsible for drafting a Special Purpose Spatial Plan for NP Skadar Lake is developing another document of questionable quality and level of expertise, to the detriment of citizens and nature. This is a copy and paste model of the Spatial Plan for Special Purpose Coastal Zone (PPNOP). We would like to remind you that this spatial plan was heavily criticised in almost all municipalities on the coast, suffered a number of professional and lay person negative comments from the level of local government, associations of citizens and political parties. It was considered one of the worst documents of this type in the history of Montenegro. In this document, despite the declarative commitment of the MORiT to protect the Ulcinj Salina, the draft plan then foresaw the construction of an "eco-resort" with 1500 beds, positioned in one of the Salina pools, which are recognized as Protection Zone II.

The same situation is being repeated today with NP Skadar Lake Spatial Plan. Draft is lacking necessary professional expertise and data on which is creating spatial solutions for National Park as strict natural reserve. We fear that these proposed solutions even at the stage of the Preliminary Draft will have a negative effect on SEA that would be very difficult to argue later as it will rely on the information or lack thereof in this document as a plan of a higher order.

We remind you that, from the ornithological point of view, the purpose of the preliminary draft of the Special Purpose Spatial Plan NPSL is to offer a qualitative and quantitative information about the avian fauna of Lake Skadar. It is very important to know where and what are the most important species for protection and where their habitats are, with the aim to avoid conflict with future infrastructure projects. Unfortunately, this document does not give that assessment, and ones that are briefly given, are incorrect.



The document, which should approach the Skadar Lake from its European importance, contains only basic information: assessment of populations, habitats and threats. Population estimates included are so erroneous that CZIP was unable to correct them in almost half of species mentioned. Types of the habitats are limited according to the author to only 2, which is a mistake that we do not consider serious enough for preparation of a document of this level of importance. Same with the threats that are only ascertained. To illustrate the quality of data used in this Preliminary Draft we would like to offer few examples:

1. **Golden Eagle** (*Aquila chrysaetos*), otherwise the bird of the rocks and cliffs, is suggested by the author that up to 2 pairs are nesting on the lake.
2. **Great Bustard** (*Otis tarda*), extinct in this part of Europe and inhabiting dry steps is counting 5 individuals on the lake.
3. **Egyptian Vulture** (*Neophron percnopterus*), was last seen in 1997 in the canyon of the river Cijevna and its now virtually extinct in this part of Europe, but according to the author up to 5 birds are nesting on the lake.
4. **Rock Thrush** (*Monticola saxatilis*) usually nests above 1500 m above sea level but according to the author its nesting on the lake and in numbers that are equivalent to the whole country. Here the author moves the boundaries of science because it claims that the species nests in alluvial forests and meadows at the altitude of 6 - 10 meters above sea level.
5. **Northern Pintail** (*Anas acuta*), according to the author up to 60-80 individuals nest on the lake, although there are no confirmed sightings of this species of Montenegro.

Because the information in the Preliminary Draft document contains numerous inaccuracies about avian fauna and its habitats we suggest that the same Preliminary Draft is to be withdrawn until adequate baselines are established that would provide quality guidelines for the development and protection of the NP.