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Open case file: 2016/04

**Development of a commercial project in Skadar Lake National Park
and candidate Emerald site (Montenegro)**

- GOVERNMENT REPORT -

*Document prepared by the
Ministry of Ecology, Sustainable Development and Northern Region Development*

Update for the Autumn Bureau Meeting



Crna Gora
Ministarstvo ekologije,
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Report on Complaint No. 2016/04: Montenegro: Development of a commercial project in Skadar Lake National Park and candidate Emerald site

August, 2026

In response to the request of the Standing Committee of the Bern Convention, following its 45th meeting held from 8 to 12 December 2025, and in accordance with the decision to change the status of the case-file concerning Skadar Lake from “open” to “possible”, Montenegro hereby submits its progress report on the measures undertaken and progress achieved since the previous reporting period.

The report reflects the latest available information and developments up to July 2026. Montenegro remains committed to continued cooperation with the Bern Convention and to further strengthening the protection and sustainable management of the Skadar Lake ecosystem in accordance with national legislation and its international obligations.

1. Illegal structures along the shores of Skadar Lake

Montenegro acknowledges the concern expressed by the Standing Committee regarding illegal structures located along the shores of Skadar Lake.

The competent authorities, including the management of Skadar Lake National Park and the competent inspection services, continue to identify and monitor illegal construction and other unauthorised changes in space within the National Park. Identified cases are documented and referred to the competent authorities for further administrative and, where applicable, enforcement action.

The issue of illegal and unauthorised structures in protected areas remains an important priority of the competent authorities. In April 2026, the Government established strengthened coordination of inspection oversight in national parks, with particular attention to resolving the status of temporary structures and preventing further unplanned development and degradation of protected areas.

The competent authorities of Montenegro will continue to undertake inspections and other measures within their respective legal competences in accordance with national legislation, including measures concerning the removal of structures where the relevant legal and administrative conditions for such action have been established, while ensuring that the conservation objectives of the National Park and the protection of the lake's natural values are taken into account.

2. Mihailovići – Porto Skadar Lake and White Village

With regard to the Mihailovići area and the projects referred to as Porto Skadar Lake and White Village. It should be noted that the permits concerned were issued under the planning and construction framework applicable at the time of their issuance. Official records also indicate that no construction activity was taking place at the relevant locations during previous inspection controls, as you could see in October 2025 during a field visit to Lake Skadar.

Following the adoption of the Spatial Plan of Montenegro until 2040 and in the context of the ongoing preparation of the Special Purpose Spatial Plan for Skadar Lake National Park, the competent authorities will further assess the compatibility of existing planning and development arrangements with the current legal framework and the protection objectives applicable to the National Park.

Montenegro will ensure that any further action concerning the validity or implementation of the relevant permits is undertaken by the competent authorities in accordance with the applicable legal procedures and taking into account the requirements for the protection of Skadar Lake National Park, including the relevant recommendations of the Bern Convention.

3. Control of vessel speed on Skadar Lake

Montenegro acknowledges the concern expressed by the Standing Committee regarding compliance with prescribed vessel speed limits on Skadar Lake and considers the effective regulation and enforcement of navigation rules an important element of the protection of the lake ecosystem.

The issue of excessive vessel speed on Skadar Lake has been recognised by the competent authorities as a priority requiring both improved enforcement and further strengthening of the legal framework. In November 2024, the Ministry of Maritime Affairs announced the preparation of a new legislative framework for

navigation, with the regulation of navigation on Skadar Lake, including speed limits, controls and sanctions for non-compliance, identified as one of the key objectives.

An important step in this process was the preparation of the Draft Law on Maritime Safety, which expressly defines navigation on the waters of Skadar Lake, the Rijeka Crnojevića and the Bojana River up to the limits of navigability as navigation subject to the relevant maritime safety framework. The Draft Law was published for public consultation in December 2025.

In parallel, in January 2026, the Ministry of Maritime Affairs initiated consultations on the preparation of a Draft Law on Inland Navigation, with the objective of comprehensively regulating navigation on the inland waters of Montenegro and further aligning the national framework with the EU acquis.

The strengthening of the legal framework is accompanied by increased enforcement activities on Skadar Lake. During July 2026, the Border Police and the competent maritime safety authorities carried out intensified joint controls of vessels on the lake. On 11 July 2026, 14 vessels and their operators were inspected, with irregularities identified in two cases and sanctions to be imposed by the competent Harbour Master's Office. On 14 July 2026, 11 vessels and 11 operators were inspected, with irregularities identified in eight cases, which were also referred for sanctioning.

The competent authorities have also introduced intensified inter-institutional monitoring of navigation, including the use of field inspections and, where applicable, technological monitoring systems. The strengthened control activities are intended both to improve compliance with navigation rules and to prevent activities that may adversely affect the safety of navigation and the natural values of Skadar Lake.

The existing legal framework already establishes prescribed speed limits and provides for sanctions in cases where vessels exceed the permitted speed. Specific restrictions also apply to certain types of vessels and engines operating on Skadar Lake.

4. Protection of the Eurasian otter (*Lutra lutra*)

Montenegro continues to implement measures for the protection of the Eurasian otter (*Lutra lutra*) in accordance with the applicable legislation, management plans and annual management programs for protected areas, in particular the National Park Skadar Lake.

The Eurasian otter is a strictly protected species under national legislation and its protection is therefore incorporated into the management and conservation framework applicable to Skadar Lake National Park.

The management of the species and its habitats is carried out through the management planning framework of the National Park, including measures aimed at maintaining and improving the conservation status of aquatic and riparian ecosystems, preventing pressures on habitats, monitoring biodiversity and strengthening control and enforcement activities.

This year, 2026, new Management Plan for the Skadar Lake National Park was prepared for the period 2026 - 2030. The preparation process included consultations with local communities and other relevant stakeholders, and the draft Plan was subject to public consultation in February 2026.

The new Management Plan places the protection and conservation of natural values among its main management areas and sets out specific management objectives and activities, together with indicators, implementation priorities, responsible institutions and partners.

In addition to the framework for management planning, significant progress has been made through targeted surveys and monitoring of the otter population. A transboundary initiative for monitoring the Eurasian otter was implemented in the Skadar Lake area and its wider transboundary context. The results have significantly expanded the available information on the distribution and abundance of the species in the Skadar Lake National Park and transitional zones.

The collected data provide an important scientific basis for improving management planning and developing appropriate conservation measures at national and transboundary levels. They also contribute to strengthening the capacity of relevant institutions to conduct regular biodiversity monitoring and use the results in

conservation planning and reporting in accordance with international conventions. Montenegro will continue to implement measures for the protection of the species *Lutra lutra* through the management framework of the Skadar Lake National Park, including monitoring the species and its habitats, protection of aquatic and coastal ecosystems, prevention and control of pressures affecting the species, and strengthening cooperation with relevant institutions and neighboring Albania in the management of the transboundary ecosystem of Skadar Lake.

The results of the ongoing monitoring will be taken into account in the implementation of the new Management Plan and future conservation and monitoring activities of the species.

5. Progress on the Special Purpose Spatial Plan for Skadar Lake National Park

The legal framework for the preparation of spatial planning documents is established by the Law on Spatial Planning. Pursuant to Article 23, the Spatial Plan of Montenegro constitutes the highest-level strategic planning document and provides the general and long-term framework for the organisation, use, development and protection of the territory of Montenegro.

The Spatial Plan of Montenegro until 2040 was adopted by the Government of Montenegro on 27 June 2025. The Plan establishes the strategic framework and objectives for spatial development, including the protection of natural and environmental values. It does not determine individual construction projects or specific development interventions; such decisions are addressed through lower-level planning documents, which must be consistent with the state-level spatial planning framework.

Following the adoption of the Spatial Plan of Montenegro, the preparation of lower-level planning documents, including Special Purpose Spatial Plans, is being progressed in accordance with the Law on Spatial Planning. Pursuant to Article 24 of the Law, a Special Purpose Spatial Plan is prepared and adopted for an area, or parts of the territory of one or more local self-government units, characterised by common natural, regional or other features of particular importance for Montenegro and requiring a specific regime of organisation, planning, use and protection. This includes, inter alia, national parks and other areas of particular environmental and spatial importance.

For national parks, the Special Purpose Spatial Plan is prepared on the basis of the relevant Protection Study and in accordance with the requirements and recommendations arising from applicable international treaties, agreements and conventions.

In the case of Skadar Lake National Park, the Protection Study was prepared in 2023. Following the completion of this Study, the Ministry of Ecology, Sustainable Development and Northern Region Development formally addressed the Ministry of Spatial Planning, Urbanism and State Property with a request to initiate the preparation of the Special Purpose Spatial Plan for Skadar Lake National Park.

The preparation of the SPP Plan is therefore being pursued within the established legal and institutional framework. The process requires the integration of the findings of the Protection Study, the applicable spatial planning framework, nature protection requirements and the relevant obligations arising from international instruments, including the Bern Convention and Recommendation No. 201 (2018).

In this context, Montenegro also considers the recent progress in establishing the Natura 2000 ecological network to be particularly relevant. Skadar Lake has been included in the proposed Natura 2000 network as a proposed Site of Community Importance (pSCI) and as a proposed Special Protection Area (SPA). The identification and delineation of these areas have been based on extensive field research, habitat and species mapping and spatial analysis. The results of this process provide an important updated scientific basis for the future spatial planning and management of the National Park.

Furthermore, during 2026, the proposed Natura 2000 network was subject to public consultation and intersectoral consultations. Relevant comments and observations from state administration bodies, local self-government units, public enterprises, scientific institutions, NGOs and other stakeholders were considered in the process of finalising the proposal. This consultation process has also provided an opportunity to further identify and assess potential interactions between conservation objectives and existing or planned development activities.

The preparation of a Special Purpose Spatial Plan for a national park is necessarily a complex and multi-sectoral process. It requires coordination between the competent ministries and public institutions, the national park management authority, local self-government units, scientific and professional institutions, as well as sectors responsible for tourism, forestry, water management, energy, infrastructure and other relevant areas. The process must also take into account existing land uses, development pressures and the need to reconcile different, and sometimes competing, interests while ensuring that the conservation objectives of the National Park are not compromised.

Montenegro is aware of the concerns expressed by the Standing Committee regarding the need to ensure that the future SPP Plan for Skadar Lake National Park adequately addresses the points contained in Recommendation No. 201 (2018). Accordingly, the relevant requirements of the Recommendation will be taken into consideration throughout the preparation and adoption of the planning document.

The Government of Montenegro remains committed to continuing the preparation and adoption of the Special Purpose Spatial Plan for Skadar Lake National Park in accordance with the applicable legislation, the results of the Protection Study, the most recent scientific and spatial data, including the Natura 2000 mapping results, and Montenegro's international obligations for the protection of the Skadar Lake ecosystem.

Montenegro will continue to keep the Bern Convention informed of further progress in this process.

6. Detailed habitat mapping of Skadar Lake

A dedicated Natura 2000 habitat mapping exercise for Skadar Lake National Park was already carried out in 2019 with the support of GIZ, within the project "Conservation and Sustainable Use of Biodiversity at Lakes Prespa, Ohrid and Shkodra/Skadar". The mapping was undertaken specifically to support the establishment of the Natura 2000 network and was aligned with the methodology applied under the national Natura 2000 process. EUNIS habitat classification was used and subsequently harmonised with the Natura 2000 habitat classification.

The 2019 mapping covered the area of Skadar Lake National Park and resulted in a spatial habitat layer comprising 346 polygons covering approximately 467 km². A total of 22 habitat types of Community interest were identified, including two priority habitat types. The resulting GIS data provided a detailed spatial basis for further assessment of the distribution and conservation importance of habitats within the National Park.

These results have subsequently been complemented and updated through additional field surveys, habitat assessments and spatial analyses undertaken within the wider national process of establishing the Natura 2000 ecological network. The available spatial database integrates information on habitats and species of European importance and provides the basis for identifying and delineating Natura 2000 sites.

Skadar Lake is included in the current proposal as a Site of Community Importance (pSCI) and as a Special Protection Area (SPA). The proposed boundaries and associated conservation information are based on available field data, habitat mapping and spatial analyses.

During 2026, the proposed Natura 2000 network, including the Skadar Lake area, was subject to public and intersectoral consultations. The comments received from competent authorities, local governments, scientific institutions, NGOs and other stakeholders were reviewed and addressed in the relevant consultation reports.

The next step was the finalisation of the Standard Data Forms, spatial datasets and supporting documentation for submission to the European Commission through Reportnet 3, it allowing the proposed network to undergo the European Commission's assessment of its sufficiency.

The 2019 dedicated Skadar Lake mapping, together with subsequent surveys and updates, provides the scientific and GIS basis for the detailed representation of habitats and their integration into the proposed Natura 2000 network.

The relevant GIS data and cartographic materials can be made available to the Bern Convention Secretariat.