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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**

45th meeting

Strasbourg, 8-12 December 2025

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**Bureau of the Standing Committee**

16-18 September 2025

Strasbourg

**Open case file: 2016/04**

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

**- COMPLAINANT REPORT -**

*Document prepared by  
Green Home act green*

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To: Mr Eoghan Kelly  
Secretariat of the Bern Convention, Democratic Participation Directorate  
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Podgorica 15.07.2025.

#### REPORT

NGO Green Home would like to thank to The Standing Committee for keeping file 4/2016 open.

Key updates:

- No meaningful progress from Montenegrin government on recommendations 201.

Comments:

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.

Details:

Recommendations and measures given to the Government are listed below with its current status:

- i) The Government of Montenegro shall immediately apply the following conservation and management measures to be pursued over the next 12 months (until Jun 2026).

*Status of implementation:* Progress made in regards to the conservation and management measures in presented in the Table below (*Table 1*).

*Table 1: Progress on the recommendations of the Bern and Ramsar Secretariat*

	Conservation and management measures recommended by the Mission	Results achieved (according to the publicly available information)
(1)	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.	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. 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 <sup>1</sup> " implemented in 2019 in the area of Skadar Lake.
(2)	Elaborate immediately a reference list of all present EUNIS and Natura 2000 habitats with a focus on wetlands habitats, define their favourable conservation status and the necessary conservation measures to maintain or restore the favourable conservation status and include those measures in any planning document related to the conservation of Skadar Lake National Park, Skadarsko jezero Ramsar Site and Candidate Emerald Sites Skadar Lake.	Habitat types were defined through the project Natura 2000 Habitat Mapping of the Skadar Lake National Park. Habitat types can also be found in Management plan for national park Skadar lake for the period from 2021 – 2025, which was adopted on 03.08.2023. and states that special attention will be paid to: Encouraging scientific and research work in the area of the park in order to define future NATURA 2000 habitats.
(3)	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> ).	Management plan for national park Skadar lake for the period from 2021 – 2025 was adopted on 03.08.2023.
(4)	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.	Not implemented according to the available information.

<sup>1</sup> Natura 2000 Habitat Mapping of the Skadar Lake National park in Montenegro, available here: [https://www.researchgate.net/publication/338596069\\_Natura\\_2000\\_Habitat\\_Mapping\\_of\\_the\\_Skadar\\_Lake\\_National\\_Park\\_in\\_Montenegro](https://www.researchgate.net/publication/338596069_Natura_2000_Habitat_Mapping_of_the_Skadar_Lake_National_Park_in_Montenegro)

(5)	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	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.
(6)	In addition, the Zone I area needs to include a 300 m wide belt on the lake around the islands and the sub-lacustrine springs.	Draft on Special Purpose Spatial Plan for Skadar Lake National Park until 2025 did not apply the recommendation.
(7)	The new Special Purpose Spatial Plan for Skadar Lake National Park needs to apply the designation of Zone I of strict protection to the Poseljanski zaliv Bay and Biški Rep shore zone. Namely, pursuant to the definition of the new Plan, strict protection is to be applied to natural conservation sites of ecological importance for the functioning of natural biological process and the integrity of ecosystems. The proposed area clearly fits in this definition, but not in the definition of Zone III of sustainable use to be applied to modified or changed natural habitats.	Draft on Special Purpose Spatial Plan for Skadar Lake National Park until 2025 did not apply the recommendation of designation of Zone I of strict protection to the Poseljanski zaliv Bay and Biški rep shore zone. However, until now, Plan was not finalized and adopted. No new activities.
(8)	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.
(9)	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
(10)	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.	- 26.05.2023: 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; Proposal of the Law on Amendments to the Law on Safety of Maritime Navigation is in the process of providing opinion of EC.
(11)	No installation or constructions shall be allowed in the shore zone stretches classified with shore zone Functionality Index Under Category I (high) and II (good).	No available information on this question.

- ii) All further considerations made by Bern and/or Ramsar Convention as well as the Delegation of the European Union to Montenegro shall include the Porto Skadar Lake development on the urban planning plot UP1 and, in addition the development known as White Village on urban planning plots UP2 and UP3 of Mihailovići location as well as any other development on this location.

*Status of implementation:* Construction is stopped. However, there is no remediation implemented in the access roads where construction started.

- iii) According to the article 4 of the Decision on the adoption of SSL Mihailovići, the latter is valid until 2020, but respective building permits shall be issued within a three-year period only. The mission therefore strongly recommends to examine whether any building permit related to the location issued after October 2017 were be valid. In addition, the validity of SSL Mihailovići should not be renewed and the provisions of article 4 of the above-mentioned Decision should be applied in a way that through amendments the remaining facilities such as the landing place in front of UP1 shall be deleted.

*Status of implementation:* Construction is stopped. However, there is no remediation implemented in the access roads where construction started.

- iv) The competent authorities are asked to carefully examine the procedure which had led to the issuing of a landing place in the case of the White Village development and if necessary, revise or revoke the respective building permit. The mission recalls that pursuant to the provisions of SSL Mihailovići such a landing place must be subject of a separate environmental impact assessment.

*Status of implementation:* Construction is stopped. There is no available information on the revised permit.

- v) The competent authorities are supposed to provide and determine clear basic technical specifications and requirements in the appropriated planning documents which are related to the construction of any landing place or waste water treatment inside the protected area. Those specifications and requirements must fully consider the integrity and dynamics of the ecosystem of Skadar aLake National Park, Ramsar Site and Candidate Emerald Site.

*Status of implementation:* Not implemented.

- vi) The floating vegetation with large carpets of White-Water lily and Water Chestnuts is a special habitat on Skadar Lake. It is very sheer size of these habitat complexes that makes them representative on European level. Any reduction of those habitats shell be prohibited.

*Status of implementation:* Construction is stopped.

- vii) The Government of Montenegro should establish an effective dialogue mechanism with and participatory approach to all stakeholders in order to ensure information exchange as well as to consider any biodiversity data gathered by NGOs and the scientific community.

*Status of implementation:* One of mechanisms that could be used for the effective dialogue between stakeholders could be socio economic council already established for all five national parks.

- viii) The mission encourages the Government of Montenegro to host the upcoming biogeographical seminar on Emerald sites in SEE.

*Status of implementation:* It was not implemented in Montenegro.

- ix) The Government of Montenegro should identify and define appropriate mitigation measures.

*Status of implementation:* There is no available information that any mitigation measure was identified and defined.

- x) Recalling the recommendations of the latest EC Montenegro 2018 Report of April 2018 which states that in the coming year, the national authorities in Montenegro should inter alia in particular take measures to preserve and improve ecological value of protected areas and potential Natura 2000 and Emerald Network sites such as Ulcinj Salina, Lake Skadar and river courses. Better coordination is needed with the “appropriate assessment” procedure under the Habitats Directive. Implementation of EIA and public consultation need to improve, especially at the local level. Potential investments in hydropower and touristic development need to comply with nature protection requirements.

*Status of implementation:* In EC Montenegro report 2024<sup>2</sup> it was stated that In the fields of environment and climate change, Montenegro needs to significantly strengthen the administrative capacities at central and local level by urgently addressing staff shortages and hiring personnel, address the issue of insufficient inspection services at both levels, and address the insufficient interinstitutional coordination and the lack of sustainable financial framework. The lack of administrative capacities significantly hinders the progress in Chapter 27 and fulfilling its closing benchmarks. Montenegro should ensure that there is an institutional structure in place to deliver coordinated, strategic planning for environmental and climate investments, including the quality of the preparation and implementation of investments.

Work is still ongoing on the draft law on nature protection and the National Strategy for biodiversity and its action plan is still pending. Work on Natura 2000 network continued and about 70% of habitat territory is mapped – that work should further continue to identify and pre-designate all the sites that will be covered by the Natura 2000 network. Montenegro still needs to address the recommendations of the Bern Convention related to Skadar lake.

There is no EC Montenegro report available for 2025 yet.

This complaint has ambitions to prevent irreversible damage to NP Skadar Lake.

Note: NGO Green Home, Wildlife Montenegro and PPNEA started with the implementation of project Improving the status of *Lutra lutra* and their habitat in cross-border area of National Park Skadar Lake. Project is taking place in the cross-border area of Skadar Lake in the border area of Montenegro and Albania. National Park Skadar Lake in Montenegro and Nature Reserve Skadar Lake in Albania are targeted area of this project. Project involves significant stakeholder group including managers of protected area and their specialists, local fisherman and local citizens and enforce their role in the protection of otter and its habitat.

As part of a cross-border project launched in September last year, otter (*Lutra lutra*) monitoring was conducted at 55 locations along the Montenegrin and 35 along the Albanian shores of Lake Skadar. Preliminary results indicate otter presence at approximately half of the surveyed sites, with negative findings mostly in areas unsuitable for monitoring or affected by human pressures. This monitoring

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<sup>2</sup> EC Montenegro report 2024: [a41cf419-5473-4659-a3f3-af4bc8ed243b\\_en](https://ec.europa.eu/eip/efrag/efrag-reports/2024/01/2024-01-ec-montenegro-report)

serves as an ecological indicator, confirming the health of aquatic ecosystems and helping identify key otter habitats. As a Near Threatened species in the Mediterranean (IUCN), the otter's declining population highlights the need for targeted conservation.

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 to 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 maintain 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.

We appreciate your ongoing efforts and support, and we make ourselves available to you to answer any questions or clarifications needed.

Many thanks,



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