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AND NATURAL HABITATS

**Standing Committee**

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**Possible file**

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

**- REPORT OF THE ON-THE-SPOT APPRAISAL -  
(12-14 June 2018)**

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## CONTENT

<b>Summary</b> .....	3
<b>Background of the open case file Development of a commercial project in Skadar Lake National Park and Candidate Emerald Site (Montenegro) and objectives of the mission</b> .....	5
<b>Terms of Reference of the appraisal mission</b> .....	7
<b>Skadar Lake National Park/Skadarsko Jezero Ramsar Site N°784 and Candidate Emerald Site Skadar Lake</b> .....	7
<b>State of conservation</b> .....	7
<b>State of the Porto Skadar Lake Development</b> .....	10
<b>State of the White Village Development</b> .....	11
<b>Related Environmental Impact Assessments</b> .....	11
The 2013 Report on the Strategic Environmental Impact Assessment of the Mihailovići Location State Study .....	11
The 2015 Environmental Impact Assessment of Porto Skadar Lake Resort .....	12
The 2017 Baseline Study on Biodiversity .....	12
The Environmental Impact Assessment of White Village Resort .....	13
<b>Examination of potential impacts on Ramsar Site No. 784 and Candidate Emerald Site ME0000003</b> .....	13
<b>Recommendations to the Government of Montenegro</b> .....	14
<b>ANNEX A: Programme and participants</b> .....	17
<b>ANNEX B: Aerial image</b> .....	19
<b>ANNEX C: 2018 Public Hearing Draft Special Purpose Spatial Plan (Skadar Lake NP)</b> .....	20

## SUMMARY

This is the first on-the-spot appraisal by the Bern Convention and the second Ramsar advisory mission to Skadar Lake National Park, Ramsar Site and Candidate Emerald Site in Montenegro. The first Ramsar advisory mission took place in 2005 and dealt inter alia with developments similar to those which are subject to this case.

A formal Case File was opened in 2016 when a complaint was submitted to the Secretariats of both the Bern and the Ramsar Convention by an Informal Citizens Group from Virpazar. The complainant addressed its chief concerns which include the prevention of the development of a commercial project known as “Porto Skadar Lake” and the damaging precedent this will set as well as the prevention of the Spatial Plan incorporating further tourist developments in Skadar Lake National Park.

The on-the-spot appraisal and Ramsar advisory mission was asked to collect information on the state of development of the “Porto Skadar Lake Project”, to assess its possible impact on the Skadar Lake National Park, the Candidate Emerald Site and the Ramsar Site, to examine the Environmental Impact Assessments prepared for the “Porto Skadar Lake Project” and to make recommendations. Meetings were held with the Montenegrin authorities, representatives of the complainant and a range of other stakeholders, and the location of the development was visited in the field.

The developments in question are situated inside the Candidate Emerald Site Skadar Lake ME0000003. They are not part of the Candidate Emerald Site Sasko jezero, Rijeka Bojana, Knete, Ada Bojana ME000000C as initially stated in the Complaint Form T-PVS/Files (2016) 49.

With its floating vegetation, sublacustrine springs, islands and the merging mouths of Crnojevića river and Bazagurska matica the broader area in question (Poseljanski Zaliv Bay and Biški Rep) offers unique habitat conditions. Even during its short visit in the field the mission could easily observe various species strictly protected according to Appendices I and II of the Bern Convention.

At the time of the mission’s visit, preparatory construction works were observed at the “Porto Skadar Lake” development site. In addition, another development known as “White Village” has been identified in close vicinity to the Porto Skadar Lake development. The “White Village” development has not been reported as of yet. Building permits were issued in 2015 resp. in 2016 after three urban building plots had been designated in the area in question by the 2014 Mihailovići Location State Study which resulted from a governmental decision.

Both developments contain tourist facilities with hotels, villas, spa and wellness centres and service facilities. An access road must be constructed, too. It is subject to a separate current proceeding on the granting of permission.

The 2014 Mihailovići Location State Study provides landing places on the eastern shore of the urban building plot UP1 and in front of UP2. Whilst the building permit issued for „Porto Skadar Lake“ does not comprise any landing place, the building permit issued for „White Village“ does. However, no separate EIA of this landing place as requested by the provisions of SSL Mihailovići has been provided.

The 2013 Report on the Strategic Environmental Impact Assessment of the Mihailovići Location State Study discusses the appearance of several terrestrial and aquatic habitats in general, but does not provide any detailed habitat map of the area in question. There is also very little information on how the described habitat types relate to the provisions of the Bern Convention and the EU Habitat Directive. This is particularly true for the wetlands habitats. Only a very little portion of the abundant wetlands area is considered whereas the concept provides landing places and PWC slipways.

The impact of boating and yachting as well as other water sports on the environment has not been appropriately assessed in any of the examined documents.

The respective environmental impact assessments on „Porto Skadar Lake“ and on „White Village“ follow the approach of the above mentioned Strategic Environmental Impact Assessment and mainly assess impacts on the environment within the boundaries of the related urban building plots only.

Positive elements of progress are the baseline studies on biodiversity requested by the line ministry through its Administration for inspection affairs. In comparison with the previous assessments and studies, they provide on-site data even though these data are based on a one-time seasonal survey only. For most of the presented results the sample plots are indicated on a map or are comprehensibly described. However, the area considered mainly matches the related urban building plots of the Mihailovići Location State Study only. The endangered endemic freshwater snail *Bithynia skadarskii* has been found just in the littoral of the eastern shore of Biški Rep where the installation of a landing place/marina/tourist harbor is planned. It must be noted that the baseline studies on biodiversity do not provide any information on otter (*Lutra lutra*) although this is required by the provisions of the Mihailovići Location State Study.

Almost all of the examined studies and assessments come to the conclusion that the expected waste waters may have a negative impact on the environment and an appropriate treatment of waste water was therefore an imperative measure. Any discharge of waste water should be avoided on any shoreline of distinct concavity such as SFI stretch 86.

The Report concludes with recommendations for eleven conservation and management measures to be pursued over the next 12 months:

- (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.
- (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.
- (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 (*Lutra lutra*).
- (4) Provide the Conventions' secretariats with georeferenced and digitalised borders of and respective updated data forms on both the corresponding Candidate Emerald Site and Ramsar Site.
- (5) The new Special Purpose Spatial Plan for Skadar Lake National Park needs to follow the approach of the 2001 Special Purpose Spatial 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.
- (6) In addition, the Zone I area needs to include a 300 m wide belt on the lake around the islands and the sublacustrine springs.
- (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 processes and the integrity of the ecosystem. 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.
- (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.

- (9) The use of personal water crafts (water scooters) and any other water activities which may harm the floating vegetation must be prohibited.
- (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 from the shore have to be stipulated.
- (11) No installations or constructions shall be allowed in the shorezone stretches classified with Shorezone Functionality Index under category I (high) and II (good).

The mission 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 Decision on its adoption should be applied in a way that through amendments the remaining facilities such as the landing place in front of UP1 shall be deleted. The competent authorities are also asked to carefully examine the procedure which had led to the issuing of building permit for a landing place in the case of the *White Village* development and, if necessary, to revise or revoke the respective building permit. The competent authorities are supposed to determine clear basic technical specifications and requirements in the appropriate 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 sensitive ecosystem of Skadar Lake National Park, Ramsar Site and Candidate Emerald Site.

#### **BACKGROUND OF THE OPEN CASE FILE DEVELOPMENT OF A COMMERCIAL PROJECT IN SKADAR LAKE NATIONAL PARK AND CANDIDATE EMERALD SITE (MONTENEGRO) AND OBJECTIVES OF THE MISSION**

The origins of this case date back to 2015 when the Ministry of sustainable development and tourism issued a building permit to a private company on the basis of the 2014 Mihailovići State Location Study to develop a commercial project on Biški Rep peninsula in the northwestern part of Skadar Lake National Park and Ramsar Site. A complaint was submitted to the Secretariats of both the Bern and the Ramsar Convention by an Informal Citizens Group from Virpazar (Montenegro) on 1 June 2016. The Informal Citizens Group from Virpazar addressed its chief concerns which include the prevention of the development of a commercial project known as "Porto Skadar Lake" and the damaging precedent this will set as well as the prevention of the Spatial Plan incorporating further tourist developments in Skadar Lake National Park.

Anterior to that, the 2005 Report on Ramsar Advisory Mission No. 56 to Skadarsko jezero Ramsar Site (then Serbia and Montenegro), had already stated that "Several illegal buildings (restaurants, etc.) were recently erected along the lake shores. They need to be removed rapidly, if possible at the owners' costs. It is important that the National Park authorities can promote and implement a coherent land use policy according to the agreed Physical Plan for the area and the Park's conservation and development program 2005-2010. The important tourist development of Motel Plavnici currently under construction, with a marina and special boat access to the lake, established with the Ministry of Environment's approval inside the core area of the National Park, should not be allowed to become a precedent for further unregulated developments (eventually to be legalized after their establishment inside the Park). Further such developments could seriously jeopardize the recognition of the National Park and Ramsar Site status at international level." The report also requests the line ministry to update the Ramsar Information Sheet (RIS) and to provide a Ramsar Site Map, according to the guidelines and explanations provided in Handbook 7 and to send it rapidly via e-mail to the Ramsar Secretariat.

The Secretariat of the Ramsar Convention pursued its communication by letters of 27 June 2016 and 20 September 2016 on possible change in the ecological character of Ramsar Site N°784 Skadarsko Jezero with regards to the Porto Skadar Lake project and four dams foreseen on the Morača river and an enquiry of 7 July 2017 requesting an update on the status of Montenegrin Sites in the Ramsar List of Wetlands of International Importance and Open Article 3.2 cases of ecological change at Ramsar Sites (Skadarsko jezero). The Ministry summarised in a letter of 26 August 2016 to the Ramsar Secretariat the legal procedures undertaken (location study, environmental impact assessment

study) underlining that appropriate measures are in place to assess and respond to any changes in the ecological character of the Ramsar Site.

Meanwhile, the European Parliament resolution on the 2016 Commission Report on Montenegro (2016/2309(INI)) of 16 March 2016 has called inter alia (32) *on the competent authorities to undertake the necessary protection and conservation measures in relation to Lake Skadar in order to maintain its ecological characteristics including its ecological integrity; calls on the government to ensure that the transformation of national parks into a state-owned limited company will have no adverse effects on their protection; recognises, in this context, the concerns expressed in the framework of the Ramsar and Bern conventions regarding the special-purpose spatial plan for the Skadar Lake National Park, including the Porto Skadar Lake project; expresses concern about significant delays in establishing protection for areas which are identified as potential Natura 2000 network areas such as the Skadar Lake National Park; recalls the need for sound and strategic environmental impact assessments in line with the EU acquis and international standards.*

After having received a governmental report of October 2016 and another Complainant's report of February 2017, the Bureau of the Bern Convention on its meeting of 21 March 2017 recognised that Skadar Lake is a biodiversity hotspot in Europe and particularly important for local communities' social and economic development. The Secretariat was to request a new updated report from authorities on the following points:

- the state of play of the new Spatial Plan of the National Park and how this draft Plan is articulated with the Mihailovići Location State Study
- the state of development of the commercial project and any mitigation measures planned,
- the results of the on-going scientific research and investigations aimed at reconsidering the candidate Emerald sites boundaries in the country, including the Skadar Lake site and
- authorities' opinion on the feasibility of organising a fact-finding mission to the area in 2017, in cooperation with other international organisations and Conventions.

A request for a copy of the EIA study developed for the project was made.

The Government reported back in April and August 2017.

The Bureau thanked the national authorities on its meeting in September 2017 for their detailed report, as well as the complainants for the updated information provided to its attention. The Bureau welcomed the kind invitation of the authorities for the organisation of an on-the-spot assessment in the Skadar Lake national Park in relation to the planned tourist project. The Bureau agreed with national authorities that such a visit would be useful for shedding light on the current protection of the National park, on the exact status of development of the project, on providing guidelines and recommendations on how the nation authorities should proceed further with the developments plans in full respect of their international obligations. Therefore, the Bureau accepted the invitation of the national authorities and instructed the Secretariat to work, in cooperation with the national authorities, on a possible organisation of the appraisal in 2018. The Secretariat sought collaboration with the Ramsar Convention, the European Union and IUCN in order to ensure synergies for the organisation of the appraisal.

In its Montenegro 2018 Report (SWD (2018) 150 final) of 17 April 2018 the European Commission communicated to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions inter alia: *In the coming year, Montenegro should in particular take measures to preserve and improve the ecological value of protected areas and potential Natura 2000 sites such as Ulcinj Salina, Lake Skadar and river courses (p.79). Potential investments in hydropower and touristic developments need to comply with nature protection requirements (p. 80).*

Instantly before the mission, a petition with 13516 signatures was submitted by the Informal Citizens Group from Virpazar and Green Home on 5 June 2018 "calling for the suspension of building a hotel, villa and marina complex by an inexperienced investor".

## **TERMS OF REFERENCE OF THE APPRAISAL MISSION**

On the basis of the information provided by the authorities and NGOs the On-the-spot Appraisal (OSA) and Ramsar Advisory Mission shall:

- i. collect information on the state of development of the “Porto Skadar Lake Project” and assess its possible impact on the Skadar Lake National Park, the candidate Emerald site and the Ramsar Site;
- ii. examine the Environmental Impact Assessments prepared for the “Porto Skadar Lake Project” and in particular whether it fully assesses its potential impacts on the Ramsar and the candidate Emerald sites;
- iii. discuss with relevant competent authorities at national and local level, including the Park authorities, NGOs concerned, local stakeholders and citizen groups;
- iv. draft recommendations to Montenegrin authorities on:
  - actions to undertake taking into account the possible impacts of the development of the commercial project to the protected habitats and species in the Skadar Lake National Park, Candidate Emerald Site and Ramsar Site;
  - conservation and management measures to be implemented;

to be examined and possibly adopted by the Standing Committee to the Bern Convention and to be published as a Ramsar Advisory Mission report with recommendations for follow-up actions.

## **SKADAR LAKE NATIONAL PARK/SKADARSKO JEZERO RAMSAR SITE N°784 AND CANDIDATE EMERALD SITE SKADAR LAKE**

Skadarsko Jezero (lake Skadar or Shkodra, named after the Albanian town near its shores) is the largest freshwater lake in the Balkans with a surface varying between 370 and 530 km<sup>2</sup> depending on water level fluctuations (regularly up to 4m and more). Two thirds of the lake are situated in Montenegro, the rest in Albania. The karst lake is of tectonic origin with an average depth of 6m. About thirty underwater spring holes ("oka") are significantly deeper (up to 60m). The lake is abundantly fed by waters from numerous rivers and subterranean springs. River Morača (flowing through the Montenegrin capital Podgorica) contributes the largest volume of water (170m<sup>3</sup>/s on average). The Bojana river (Buna in Albanian) is the only outflow towards the Adriatic Sea. Lake Skadar supports a lush wetland vegetation of floating water plants, various reed, sedge and willow species. The flora is very rich with more than 25 rare and endemic species, including the endemic water chestnut (*Trapa natans scutariensis*) in the lake and Skadar oak (*Quercus robur scutariensis*) in its surroundings. On the hillsides around the lake remain woodlands (including old-growth chestnut *Castanea* forests) and Mediterranean shrub communities. The diverse fauna includes endemic invertebrates, 48 fish species in the lake water catchment (39 inside the National Park), 281 bird species, and many other vertebrates. The traditional fisheries on the lake concern mainly carp (*Cyprinus carpio*), bleak (*Alburnus albonella*) and eel (*Anguilla anguilla*). The lake provides important habitats for many species of nesting, staging and wintering waterbirds, some of which are globally threatened (e.g. Dalmatian pelican *Pelecanus crispus* and pygmy cormorant *Phalacrocorax pygmeus*). Large numbers of waterbirds occur during spring migration. Human activities include fishing and tourism, as well as poaching

## **STATE OF CONSERVATION**

Biški Rep, the toponym of the peninsular area on which the Porto Skadar Lake project shall be developed, is located on the northwestern shore of Skadar Lake almost where the Crnojevića river pours in Vučko Blato and forms a headland. The headland has been out of any permanent structure. There are small islands Liponjak and Galići in close vicinity which are part of a wider archipelago. During a short visit to the location, the mission could easily observe undisturbed complexes of free floating vegetation in front of Biški Rep and of high density in the adjacent Poseljanski Zaliv Bay where small sublacustrine springs appear in addition “which significantly contribute to the overall

biodiversity of the lake”<sup>1</sup>. „All the sublacustrine springs are a unique phenomenon of Skadar Lake and important to the preservation of fish. They are also retreats for species that require clean and good quality water, and low water temperature”<sup>2</sup>. Annex B to this report shows the area of Biški Rep and Poseljanski Zaliv Bay, as well as the beneath mentioned stretches of Shoreline Functionality Index (SFI).

The above mentioned habitats seem to fit into the habitat lists of both EUNIS (most probably C1.32 Free-floating vegetation of eutrophic waterbodies and C1.33 Rooted submerged vegetation of eutrophic waterbodies) and NATURA 2000 (most probably 3150 Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation). They have to be seen as part of the greater complexes of floating vegetation of Skadar Lake which are by their sheer size and representativeness without doubt of European importance. „Unique is the size of the Water Chestnut (*Trapa natans*) carpets in Europe, but even more beautiful are the different species of flowering water lilies, e.g. White Water-lily (*Nymphaea alba*). Macrophyte carpets cover 30 km<sup>2</sup> of the Lake's surface”<sup>3</sup>. The mission's observations correspond with the basic habitat map published by the Adriatic Flyway Project „to support nature conservation, environmental impact assessments and spatial planning purposes”<sup>4</sup>. The mission also observed a location of a breeding colony of Whiskered Tern (*Chlidonias hybrida*) in front of Biški Rep on the floating vegetation in between Liponjak and Galići, and there seem to be more such colonies. Whiskered Terns, and other species strictly protected according to Appendices II of the Bern Convention such as Ferruginous Duck (*Aythya nyroca*) and Pygmy Cormorant (*Phalacrocorax pygmeus*) could be easily observed on floating vegetation and around the small sublacustrine springs in the Poseljanski Zaliv Bay.

According to the results of the GIZ study on shorezone functionality the Shorezone Functionality Index (SFI) values of Biški Rep and Poseljanski Zaliv Bay fall within the highest functionality level I (category High) and level II – (category Good)<sup>5</sup>. There are 5 different categories of functionality, ranging from bad to high, as suggested by the WFD 2000/60/CE<sup>6</sup>. Only the functionality levels I and II (categories High and Good) meet the elements of quality of good ecological state of water bodies as requested by the WFD. The fact that most of category I shoreline on the Montenegrin shore of Skadar Lake is concentrated in the north, from Podhumski Zaliv Bay to Plavnica and around the natural area of Crnojevića river<sup>7</sup>, gives even more importance to the area of Poseljanski Zaliv Bay and Biški Rep. On closer consideration it appears that the stretches 85 (Biški Rep - eastern shore and headland) and 86 (Biški Rep - western shore) fall within the scope of SFI category II only because of natural processes and conditions: in case of stretch 85 it is obviously the streaming of the Crnojevića river that prevents a larger width of the shorezone, i.e. the functional area which includes both the littoral (aquatic) and the riparian (terrestrial) zone. The broader the shorezone the higher is its functionality. In case of stretch 86 it is the concavity of the shoreline that lowers its functionality. Namely, concavity increases the risk of concentrating discharge of polluted or waste water.

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<sup>1</sup> PEŠIĆ, V., KARAMAN, G.S., KOSTIANOY, A.G. & VKAŠINOVIĆ-PEŠIĆ, V. : Conclusions: Recent Advances and the Future Prospects of the Lake Skadar/Shkodra Environment.

<sup>2</sup> Schneider-Jacoby, M., Stumberger, B. & Schwarz, U. (2010) Zonation concept for Lake Skadar-Shkoder and the Bojana-Buna delta. - In: Denac, D., Schneider-Jacoby & M., Stumberger, B. (eds.): Adriatic flyway – closing the gap in bird conservation. Euronatur, Radolfzell, pp.109-110.

<sup>3</sup> Schneider-Jacoby, M., Stumberger, B. & Schwarz, U. (2010) Zonation concept for Lake Skadar-Shkoder and the Bojana-Buna delta. - In: Denac, D., Schneider-Jacoby & M., Stumberger, B. (eds.): Adriatic flyway – closing the gap in bird conservation. Euronatur, Radolfzell, p. 103.

<sup>4</sup> SCHWARZ, U. (2010): habitat mapping of the Livanjsko polje (BA), the Neretva Delta (HR; BA) and Lake Skadar-Shkoder (ME, AL). - In: Denac, D., Schneider-Jacoby & M., Stumberger, B. (eds.): Adriatic flyway – closing the gap in bird conservation. Euronatur, Radolfzell, pp. 79-87.

<sup>5</sup> GIZ (2017): Shorezone Functionality Skadar/Shkodra Lake. Implementing the EU Water Framework Directive in South-Eastern Europe. Tirana, p. 40.

<sup>6</sup> GIZ (2017): Shorezone Functionality Skadar/Shkodra Lake. Implementing the EU Water Framework Directive in South-Eastern Europe. Tirana, pp. 6-7.

<sup>7</sup> GIZ (2017): Shorezone Functionality Skadar/Shkodra Lake. Implementing the EU Water Framework Directive in South-Eastern Europe. Tirana, p. 59.



The location is situated within Skadar Lake National Park and hence within Skadarsko Jezero Ramsar Site No. 784. According to topic 5. *Site Protection Status* of the respective Emerald Standard Data Form of December 2005, it is also part of the Candidate Emerald Site Skadar Lake ME0000003. It is not part of the Candidate Emerald Site Sasko jezero, Rijeka Bojana, Knete, Ada Bojana ME000000C as initially stated in the Complaint Form T-PVS/Files (2016) 49.

The prevailing, most precise information on the boundaries of Skadar Lake National Park, and hence Candidate Emerald Site ME0000003 and Ramsar Site No. 784 has been provided by the 1999 map of the 2001 Special Purpose Spatial Plan for Skadar Lake National Park (Official Gazette No. 46/01). It is important to note that in case of the area of Crnojevića river, the boundary here was revised and generally lifted up to the 150 m a.s.l. contour line in order to provide a more precise border line. The Plan has been in force, though according to the Report by the Government of 2 Aug 2017 a new Special Purpose Spatial Plan for Skadar Lake National Park is currently being drafted.

Pursuant to Article 21 of the Law on spatial development and construction of structures (Official Gazette of Montenegro, No. 51 as of 22 August 2008, 40/10, 34/11, 47/11, 35/13, 39/13, 33/14) a Special Purpose Spatial Plan shall be developed and adopted for the territory or parts of territories of one or more local self-governments with common natural, regional or other features, of special significance for Montenegro and which require a special development and use regime (national park, coastal area, marine zone, nature reserve, recreational-tourism region, cultural-historical region, exploitation field used for the surface exploitation of mineral resources and similar).

The 2001 Special Purpose Spatial Plan for Skadar Lake National Park provides a Plan of Zones<sup>8</sup> based on the designation of three categories of zoning:

- (1) Zone of category I of values which by its objectives and conditions might be named a core zone. The basic goal of conservation here is maintaining the existing ecological processes and the connectivity of biotopes as well as preserving the genetic pool;
- (2) Zone of category II of values comprises portions of changed, relatively stable natural environment important to the broader Skadar Lake basin. The basic goal of conservation here is maintaining ecological processes at the best possible level.
- (3) Contact Zone which consider even areas outside the boundary of the national park.

With each category goes a description specifying corresponding topographies. It is important to note that the „submerged mouth of Crnojevića river” is listed under the Zone of category I of values. The lake’s archipelago is mentioned here, too. A respective conservation status is to be provided for the archipelago, inter alia for Liponjak island in front of Biški Rep<sup>9</sup>. The 2001 Special Purpose Spatial Plan for Skadar Lake National Park does not provide any map of zoning which would depict the provisions of the Plan of Zones. That makes it difficult to properly assign a particular area to a certain category of zoning.

However, a map of zoning of Skadar Lake National Park is provided in the 2011-2015 Management Plan though it in essence does not entirely correspond with the provisions of the 2001 Special Purpose Spatial Plan for Skadar Lake National Park. Namely, according to that map Biški Rep, Poseljanski Zaliv Bay, the Liponjak and Galići islands and the mouth of the Crnojevića river fall in the scope of a Zone III of protection. The 2001 Special Purpose Spatial Plan for Skadar Lake National Park does not recognise any comparable “Zone of category III of values”. Its third category of zoning is the Contact Zone that is of entirely different purpose. According to the provisions of the 2001 Special Purpose Spatial Plan for Skadar Lake National Park the above mentioned area in question should be designated a Zone of category I of values.

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<sup>8</sup> PROSTORNI PLAN PODRUCJA POSEBNE NAMJENE ZA NACIONALNI PARK "SKADARSKO JEZERO" ("Sl. list RCG", br. 46/01), Drugi dio planske projekcije (2<sup>nd</sup> part), 5.2 Plan zona (Plan of Zones)

<sup>9</sup> PROSTORNI PLAN PODRUCJA POSEBNE NAMJENE ZA NACIONALNI PARK "SKADARSKO JEZERO" ("Sl. list RCG", br. 46/01), Drugi dio planske projekcije (2<sup>nd</sup> part), 7.1 Zaštita prirode (Nature Conservation), Ostali objekti predviđeni za zaštitu (Other planned conservation sites)

## STATE OF THE PORTO SKADAR LAKE DEVELOPMENT

The Porto Skadar Lake development is to be situated on urban building plot UP 1 as designated by the Mihailovići Location State Study<sup>10</sup>. A building permit of 27 March 2015 has been given to the Montenegro Resort Company MRC Ltd. in Podgorica on the basis of a conceptual design to build in phases a vacation resort that comprises

- a hotel facility to be erected in phase 1 with a reception, a restaurant, a spa centre, a complex of service facilities as well as accommodation facilities including six sections of which one represents a marina village, three Suite 130 villas, one larger Suite 300 villa and two (pilot) annexes/villas
- a complex of annexes/villas to be erected in phase 2 with additional 27 annexes/villas of various types.

According to the project description in the 2015 Environmental Impact Assessment, the resort shall be open all year. Its capacity would be up to 437 guests.

The gross surface area of the resort development totals up to 3,57 ha whilst the gross building area adds up to some 19.900 m<sup>2</sup>.

Pursuant to the building permit the investor is obliged to provide the master design. In addition, the investor will forfeit the permit if the commencement of the construction is initiated only after 2 years after the issuing of the permit. It is said in the Report by the Government of 2 Aug 2017 that preparatory works started in December 2016. During its site visit, the mission found that preparatory road construction works had started on Biški Rep.

In addition, the investor applied on 14 February 2017 for a building permit for the construction of an access road which was forwarded by the line ministry to the competent authority, the municipality of the Old Royal Capital of Cetinje. According to the project description given in the 2015 Environmental Impact Assessment the area shall be made accessible in two ways:

- through construction of two additional roads, one coming from the Mihailovići settlement and one following the existing earth road alongside the western shore
- across the lake by providing speed boat transport.

The construction of a marina-landing place with 16 mooring places is planned on the eastern shore of Biški Rep close to the mouth of Crnojevića river. The 2015 Environmental Impact Assessment (p. 69) recommends the installation of a demountable, wooden bateau construction. However, it is said that this facility shall be subject to a separate building permit.

The Nature and Environmental Protection Agency approved on 30 March 2017 the Waste Management Plan submitted by the investor.

The investor informed the mission that a consultancy is working on feasible solutions of waste water treatment and landscaping as well. According to the complaint, the solutions of waste water treatment primarily proposed by the investor have been a matter of great concern as

- the EIA did not provide any plan for a central wastewater collection plant and thus it was not clear where the treated waste water is to be drained. Waste water should not be drained alongside SFI stretch 86.
- the proposed “phyto-purification” units were potentially submerged in spring and were not able to work during autumn and winter.

Equally, the SSL Mihailovići concludes that despite the primarily proposed “phyto-purification” the installation of a sewage system shall be considered<sup>11</sup>.

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<sup>10</sup> This plot totals up to 11,85 ha and comprises the parcels of land No. 582, 584, 5585, 587, 588, 589, 590, 591 and 592 of the Mihailovići land register of Cetinje.

<sup>11</sup> Državna studija lokacije Mihailovići. CAU - Centar za arhitekturu i urbanizam d.o.o., Podgorica, Sept. 2014, p. 59

## **STATE OF THE WHITE VILLAGE DEVELOPMENT**

The mission noticed the appearance of construction machinery at Velja Gora which is situated farther west of Biški Rep in the Poseljanski Zaliv Bay on the urban building plots UP2 and UP3<sup>12</sup> as designated by the Mihailovići Location State Study. However, no construction works had been commenced until the mission's field visit. The mission discovered that another building permit was issued to MJ PROPERTY Ltd. in Podgorica on 06 June 2016. One must note, that the numbers of parcels of land mentioned in the building permit are not entirely conform to the numbers mentioned in the respective environmental impact assessment. In contrast to the above mentioned building permit for the Porto Skadar Lake development, this building permit entitles MJ PROPERTY Ltd. to construct a landing stage/mooring place and applies therefore to the water body of Skadar Lake in addition. However, the respective plot seems not to be subject to the building permit. The development includes a vacation resort – 5 star hotel with annexes and comprises a gross development surface area of 0,91 ha. It consists of a hotel (garage, basement, two stories), a service facility with landing stage, restaurant, spa and wellness centre as well as 24 annexes/villas of various types. It is planned to connect the development with the road planned under the Porto Skadar Lake development.

## **RELATED ENVIRONMENTAL IMPACT ASSESSMENTS**

### **The 2013 Report on the Strategic Environmental Impact Assessment of the Mihailovići Location State Study**

Pursuant to Article 23 of the Law on spatial development and construction of structures (Official Gazette of Montenegro, No. 51 as of 22 August 2008, 40/10, 34/11, 47/11, 35/13, 39/13, 33/14) a location study at state level may be adopted for the regions which are within the scope of a Special Purpose Spatial Plan and which are not elaborated in details by such plan.

The location study at state level shall inter alia determine requirements for construction and execution of works within the region of the Special Purpose Spatial Plan.

The Mihailovići Location State Study (SSL Mihailovići) results from a governmental decision of 4 October 2012 to elaborate the SSL "Mihailovići" on the basis of the Special Purpose Spatial Plan for Skadar Lake National Plan. A public hearing on the Draft Study and Draft Report on the Strategic Environmental Assessment had been organized then from 7 – 22 February 2014 at the Secretariat for planning and spatial development and environmental protection and a round table was held at Old Royal Capital of Cetinje on 19 February 2014 with no interested parties participating, but observations submitted by Old Royal Capital of Cetinje, MJ Property Podgorica and MRC. The short notice of the announcement of this public hearing has been a matter of the complaint. However, the Study was adopted on 23 October 2014. Pursuant to article 4 of the Decision on its adoption, SSL Mihailovići is valid until 2020, but respective building permits have got to be issued within a three-year period.

The Mihailovići location comprises an area of 59 ha of which 2,02 ha belong to the water body of the lake. The fact, that no further information is given about the area surveyed under the Strategic Environmental Assessment may lead to the conclusion that the assessment is limited to the above-mentioned surface area only.

Tourist facilities are planned in the eastern and western part of the area whilst the remaining surface would be out of any development except road construction. According to that concept (p. 18) three so-called Urban building plots (UPs) have been formed: UP1 in the eastern part covering the headland of Biški Rep and UP2 and UP3 in the western part. The latter forms a narrow stripe which starts at the shore (UP2) and continues upwards to Velja Gora (UP3). It must be noticed that SSL Mihailovići provides for two landing places one on the eastern shore of UP1 with 16 mooring places and a second one in front of UP2 with 8 mooring places. It defines the landing places as shore infrastructure alongside a tourist resort with respective facilities on the shore and in the lake waters equipped to receive and to safely moor vessels. A (wooden) bateau construction is allowed for, only. The technical specification mentions slipways for personal watercrafts (PWC) – water scooters, too.

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<sup>12</sup> The urban building plot UP2 comprises the parcels of land No. 504/2, 504/3, 505 and 506 whilst UP3 is composed of parcels of land No. 504/1, 504/4 and 506/2 of the Mihailovići land register of Cetinje.

However, SSL Mihailovići requires separately elaborated EIAs of the landing places<sup>13</sup>. However, the miscellaneous use of the term landing place in the documents is misleading. Namely, in the same report it is even said that “the construction of a tourist nautical harbor is planned in the eastern part of the tourist development, close to the mouth of the Crnojevića river” (p. 20).

The 2013 Report discusses the appearance of several terrestrial and aquatic habitats in the area, but does not provide any more detailed habitat map. As mentioned earlier in this report, a basic habitat map covering the area of the Mihailovići location had been available at the time. There is also very little information how the described habitat types relate to the provisions of the Bern Convention and the EU Habitat Directive. This is particularly true for the wetland habitats.

The mission was informed by the Ministry that a Study on Landscape Protection and a Study on hydrological- hydrogeological characteristics of the location have been drafted, but none of those documents have been presented.

### **The 2015 Environmental Impact Assessment of Porto Skadar Lake Resort**

Eco Aqua Consulting Ltd. at Podgorica elaborated and submitted in January 2015 an environmental impact assessment of Porto Skadar Lake Resort. Earlier, in November 2014 a public debate was held, but no other interested parties were present except representatives of Cetinje, MRC and drafters of the EIA. Similar to the SEA of the Mihailovići Location State Study, the circumstances of the announcement of this public hearing have been a matter of the complaint.

Related to the assessment of impact on habitats according to the EUNIS habitat classification, the EIA provides a table with wetlands habitat types on lake level (table 12, p. 42) which seems to follow Resolution No. 4 (1996) of the Bern Convention. However, the environmental impact assessment does not provide any further assessment of impact on habitats on site level, but states (p. 44) instead that “the biotopes in the Detailed Study of Mihailovići location<sup>14</sup> are described as follows but on lake level without any detailed reference to the very area of the development “. Nevertheless, the EIA concludes (p. 109) that the terrestrial habitats will not be essentially impacted if respective conservation measures are undertaken.

### **The 2017 Baseline Study on Biodiversity**

On 24 May 2017, the investor of Porto Skadar Lake development submitted to the Administration for Inspection Affairs a Study on baseline condition of biodiversity<sup>15</sup> pursuant to the Ecological Inspection decision of 15 November 2016 „which ordered the investor to implement measures relating to the implementation of or conducting research for the „Study on baseline condition of biodiversity“ which needs to be finalised by the end of preparatory works, as specified by the EIA Study”<sup>16</sup>. The Study elaborates the baseline condition of phytoplankton, flora and vegetation, zoobenthos, terrestrial invertebrates, fish and birds. Mammals are not considered. Usually, such a baseline study „precedes the elaboration of an environmental impact assessment or might be a part of it“ (p. 44). „Although in the case of the Porto Skadar Lake development ... the sequence of the procedure was not followed ... one can conduct a baseline study“ (p. 44). In comparison with the other assessments and studies, this one provides on-site data even though the results are based on a one-time seasonal survey only. For most of the presented results the sample plots are indicated on a map or are comprehensibly described. However, the area in question mainly matches the UP1 plot of SSL Mihailovići only. It does not consider a broader perspective. Nevertheless, the Study emphasises the importance of the shorezone of Biški Rep and the broader area for spawning of all occurring phytophil ichthyofauna (p. 40) which according to their biology shall be found later the year in the very vicinity of the site throughout to

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<sup>13</sup> Državna studija lokacije Mihailovići. CAU - Centar za arhitekturu i urbanizam d.o.o., Podgorica, Sept. 2014, p. 102

<sup>14</sup> Detaljna studija predijela „Mihailovići“ za potrebe DSL Mihailovići, Planplus d.o.o. Podgorica, Feb. 2014

<sup>15</sup> Pešić, V., Marić, D., Rakočević, J., Caković, D, Šundić, M. & Vizi, O. (2017): Elaborat Nulto Stanje Biodiverziteta na lokaciji „Biški Rep“. Podgorica, May 2017.

<sup>16</sup> Development of a commercial project in Skadar Lake National Park and candidate Emerald site (Montenegro), REPORT BY THE GOVERNMENT, T-PVS/Files (2017) 13, Standing Committee of the Bern Convention, p. 4

Vučko blato (p. 42). The survey on birds even decidedly considers a broader area inbetween Poseljanski Zaliv Bay, Rudinski and Zlogorski Lug, Prevlaka and the Bazagurska Matica river.

The Study identifies the abundance of two NATURA2000 habitats, the 62A0 Eastern submediterranean dry grasslands and the 8210 Calcareous rocky slopes with chasmophytic vegetation. Although the floating vegetation and vegetation indicating other wetlands habitats are mentioned, a classification of them in line with EUNIS or NATURA2000 habitat typology and criteria of representativeness remains absent. However, it is stated that so well-developed floating vegetation offers diversity in habitat to various species and that due to its key role any removal of floating vegetation will reduce the functionality of the shore, i.e. its ability to mitigate pollution from the mainland.

It is remarkable and important that the endangered endemic freshwater snail *Bithynia skadarskii* has been found just in the littoral of the eastern shore of Biški Rep where the installation of a landing place/marina/tourist harbor is provided.

It must be noted that the Study does not provide any information on mammals and the otter (*Lutra lutra*) in particular. Pursuant to the provisions of SSL Mihailovići, chapter 16.1.4, the otter shall be monitored<sup>17</sup>.

### **The Environmental Impact Assessment of White Village Resort**

This Assessment mainly uses information from the Mihailovići Location State Study as well but considers some site-specific data which seem to come from a baseline study on biodiversity of 2018. Unfortunately, the mission had no opportunity to look at that study. However, one can infer from information provided by the environmental impact assessment, that the baseline study on biodiversity was mainly based on a one-time survey obviously done in early spring. However, referring to it, the EIA names the existence of a “62A0 NATURA 2000 habitat” (p. 35). It is stated that a more precise survey shall be undertaken later in May when this type of habitat shows its most typical floristic aspect. For the same reason, i.e. the chosen period of survey (early spring), the wetland habitats were poorly surveyed as the survey was mainly based on remaining vegetation from the previous year. The Assessment therefore concludes that the inventory of all remaining seasonal floristic aspects shall be continued systematically, the mapping of species important on national and international level shall be conducted and potential NATURA2000 sites shall be recognized and their representativeness evaluated (p. 37). The environmental impact assessment provides also site-related data on fish. The abundance of the NATURA2000 species of European bitterling (*Rhodeus amarus*) is approved and it is said that the abundance of European eel (*Anguilla anguilla*) is to be expected. The Assessment states the abundance of the NATURA2000 species of Four-lined snake (*Elaphe quatuorlineata*) and Hermann’s tortoise (*Testudo hermanni*) and the endemic species of Sharp-snouted rock lizard (*Dalmatolacerta oxycephala*) and concludes that further monitoring is needed as all three species are facing an all-over decline in population.

Despite the fact that the building permit includes the installation of a landing place , the environmental impact assessment does not assess any possible impact of such an installation/construction and related yachting and boating on the environment. Pursuant to the provisions of SSL Mihailovići a separate EIA of the landing place shall be elaborated, but has neither been presented to the mission nor is it available on the relevant web-site of the line ministry.

### **EXAMINATION OF POTENTIAL IMPACTS ON RAMSAR SITE NO. 784 AND CANDIDATE EMERALD SITE ME0000003**

Although the boundaries of areas of examination or survey are not clearly indicated in none of the foresaid environmental impact assessments and studies but the 2017 Baseline study on biodiversity, it is obvious that all of them examined the closer area of Mihailovići location or parts of it depending on the respective development which they were related to. Almost all of them conclude that the expected waste waters may have a negative impact on the environment and therefore an appropriate

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<sup>17</sup>Državna studija lokacije Mihailovići. CAU - Centar za arhitekturu i urbanizam d.o.o., Podgorica, Sept. 2014, p. 91

treatment of waste water were an imperative measure. Because of the above mentioned concavity of SFI stretch 86 which relates to UP2, no waste water treatment should be installed alongside this stretch.

It is not clearly open to scrutiny to which extent the adjacent habitat areas were considered. As previously stated in this report, transport by speedboat as well as two landing places are envisaged whereas the terminology found in the documents ranges from mooring and landing place to marina and even tourist nautical harbor. “The impact of boating can be clearly seen on the whole lake surface and even inside the most sensitive and internationally protected habitats, such as floating vegetation” and “the number of fast motor boats – speedboats – is increasing in the National Park (ME), although these boats are known to damage the natural assets (floating vegetation), irradiate colonies of Whiskered Terns by large unnatural waves (about 50% of the floating water carpets, mainly west of Vranjina, are already without colonies of Whiskered Terns, a huge impact that is to be mitigated), ruin the remoteness and quietness of the Lake ...”<sup>18</sup>.

The impact of boating and yachting might even increase as the new draft 2018 Special Purpose Spatial Plan for Skadar Lake National Park<sup>19</sup> provides a waterway and various landing places and piers alongside the western lake shore from the Bojana river throughout up to Crnojevića Rijeka. The Mihailovići location (*eco naselje Mihailovići*) is designated as separate development area out-of-settlement, but not adequately shown on the respective map (see Annex C). No landing places are indicated in the UP1 and UP3 area. The Mihailovići State Location Study is shown in Table 8 as one of planning documents regulating Skadar Lake National Park, although it meanwhile has expired. A remark is given that the Study shall be harmonized with the provisions of the new Plan, but only an area of 1,81 ha is indicated. The whole area including the shorezone and the lake waters of this part are assigned to Zone III of sustainable use (see Annex C), where limited development were allowed. One has to notice that the whole area of the Poseljanski Zaliv Bay and Biški Rep seems to be not considered nor under the areal type 1.2 Natural Lake areal with aquatic vegetation (p. 77), where it shall belong to, nor under any other areal type.

## RECOMMENDATIONS TO THE GOVERNMENT OF MONTENEGRO

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

<sup>18</sup> Schneider-Jacoby, M. (2010): Guidelines for the zonation of Lake Skadar-Shkoder. - In: Denac, D., Schneider-Jacoby & M., Stumberger, B. (eds.): Adriatic flyway – closing the gap in bird conservation. Euronatur, Radolfzell, p.91.

<sup>19</sup>Izvještaj o strateškoj procjeni uticaja na životnu sredinu za Prostorni plan posebne namjene Nacionalnog parka Skadarsko jezero – NACRT. Ministarstvo održivog razvoja i turizma, Podgorica, April 2017.

Environmental Protection Agency at first at least in the area mentioned under (1). The monitoring system must include the otter (*Lutra lutra*).

- (4) Provide the Conventions' secretariats with georeferenced and digitalised borders of and respective updated data forms on the corresponding Candidate Emerald Site and Ramsar Site.
  - (5) The new Special Purpose Spatial Plan for Skadar Lake National Park needs to follow the approach of the 2001 Special Purpose Spatial 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.
  - (6) In addition, the Zone I area needs to include a 300 m wide belt on the lake around the islands and the sublacustrine springs.
  - (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 processes and the integrity of the ecosystem. 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.
  - (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.
  - (9) The use of personal water crafts (water scooters) and any other water activities which can harm the floating vegetation must be prohibited.
  - (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 from the shore have to be stipulated.
  - (11) No installations or constructions shall be allowed in the shorezone stretches classified with Shorezone Functionality Index under category I (high) and II (good).
- ii. All further considerations made by the 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.
  - iii. According to 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 amandments the remaining facilities such as the landing place in front of UP1 shall be deleted.
  - iv. The competent authorities are asked to carefully examine the procedure which had let 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 to a seperate environmental impact assessment

- v. The competent authorities are supposed to provide and determine clear basic technical specifications and requirements in the appropriate 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 sensitive ecosystem of Skadar Lake National Park, Ramsar Site and Candidate Emerald Site.
- vi. The floating vegetation with large carpets of White Water-lily and Water Chestnut is a special habitat on Skadar Lake. It is the very sheer size of theses habitat complexes that makes them representative on European level. Any reduction of those habitats shall be prohibited.
- 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.
- viii. The mission encourages the Government of Montenegro to host the upcoming biogeographical seminar on Emerald sites in SEE.
- ix. The Government of Montenegro should identify and define appropriate mitigation measures.
- x. Recalling the recommendations of the latest EC Montenegro 2018 Report of April 2018 which states that in the coming year, the national authorities of Montenegro should inter alia in particular take measures to preserve and improve the 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 consultations need to improve, especially at the local level. Potential investments in hydropower and touristic developments need to comply with nature protection requirements.



## **ANNEX A: PROGRAMME AND PARTICIPANTS**

### **Mission Team:**

Mr Goran Gugić (Independent Expert)  
Mr Tobias Salathé (Ramsar Convention)  
Mr Gianluca Silvestrini (Bern Convention)

### **National Authorities:**

Mr Pavle Radulović, Minister of Ministry of Sustainable Development and Tourism (MSDT)  
Mr Saša Radulović, State Secretary for environment, MSDT  
Ms Ivana Vojinović, General Director of Directorate for environment, MSDT  
Ms Dragana Čenić, General Director of the Directorate for Space Planning, MSDT  
Ms Tatjana Vujošević, Director General of Directorate of Construction, MSDT  
Mr Til Dieterich, Senior Adviser at Directorate for Environment, MSDT  
Ms Anela Sijarić, Directorate for environment, MSDT

### **Skadar Lake National Park Authorities:**

Mr Elvir Klica, Director of the Public Enterprise for National Parks of Montenegro (PENPM)  
Dr Aleksandar Mijović, Chief for natural and cultural protection and sustainable development  
Dr Veselin Luburić, Adviser for protection and sustainable development of PENPM  
Mr Nenad Ivanović, Director of the NP Skadar Lake  
Mrs Azra Vuković, Management Board of the National Parks of Montenegro  
Ms Marijana Dzaković, PR Officer, National Parks of Montenegro

### **Complainant:**

Mr Milan Knezević - Citizens group from Virpazar  
Ms Nataša Kovačević - NGO Green Home  
Mr Danilo Mrdak - Scientist  
Ms Bjanka Prkljačić - Noe Conservation  
Ms Jovana Janušević - NGO CZIP  
Ms Emma Heywood - Virpazar local business  
Ms Krstinja Petranović - Virpazar local business

### **Promoter of the Porto Skadar Lake Project:**

Mr Lionel Sonigo  
Mr Ivan Zindović  
Ms. Julie Plet

### **EU Delegation to Montenegro:**

Ms Ana Stanišić Vrbica  
Mr Slađan Maslac

<b>MONDAY, 11 JUNE 2018</b>	
14h20 (OS 727) 20h00 – 22h00	Arrival of the team in Podgorica and accommodation <b>Dinner with Minister Pavle Radulović</b> <i>(Restaurant “Porto” street Stanka Dragojevića no 40.Podgorica)</i>
<b>TUESDAY, 12 JUNE 2018</b>	
09h30 – 11h00	<b>Meeting with officials of the Ministry of Sustainable Development and Tourism</b> <i>(Ministry of Sustainable Development and Tourism, IV – Proleterske 19, Podgorica)</i>
11h00	Departure to Skadar Lake National Park
11h40 – 13h00	<b>Meeting with Skadar Lake National Park authorities</b> <i>(Headquarters of the National Park Skadar Lake in Vranjina)</i>
13h00 – 14h00	<i>Lunch</i>
14h30 – 16h00	<b>Meeting with the Informal Citizens Group from Virpazar, representatives of NGOs and civil society organisations</b> <i>(Guestgouse Virski Pub, Virpazar)</i>
16h00	Departure of the team to the Hotel Centre Ville in Potgorica
16h45 – 18h00	<b>Meeting with the promoters of the development of Porto Skadar Lake Project</b> <i>(office of MRC, Hotel Centre Ville, street Cetinjska 7, Potgorica)</i>
<b>WEDNESDAY, 13 JUNE 2018</b>	
09h00 – 13h00	<b>Field visit of the Park area concerned by the development project, candidate Emerald site and Ramsar site</b> <i>(Headquarters of the National Park Skadar Lake in Vranjina)</i>
13h00 – 14h00	<i>Lunch</i>
14h00 – 17h30	<b>Continuation of the field visit and meeting with local authorities and stakeholders</b>
17h30	Departure of the team to the Hotel in Potgorica
19h00 – 21h00	<b>Dinner and debriefing of the team in Podgorica</b>
<b>THURSDAY, 14 JUNE 2018</b>	
9h30 – 10h30	<b>Meeting with the Delegation of the European Union to Montenegro</b> <i>(EU Delegation, Vuka Karadžića 12, Podgorica)</i>
10h45 – 12h30	<b>Meeting (Debriefing) with officials of the Ministry of Sustainable Development and Tourism</b> <i>(Ministry of Sustainable Development and Tourism, IV – Proleterske 19, Podgorica)</i>
15h10 (OS 728)	Return flight of the team

**ANNEX B: AERIAL IMAGE**

The area of Biški Rep and Poseljanski Zaliv Bay with stretches of Shorezone Functionality (green: category I – high; yellow: category II – good)



