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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
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 BY THE GOVERNMENT -

*Document prepared by
the Ministry of Sustainable Development and Tourism, Montenegro*

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- November 2019 -

I) INTRODUCTION

Skadar Lake is the largest lake in the Balkans, with an area of 40,000 ha. It was proclaimed the National Park in 1983, and it is dominated by the aquatic ecosystem, which is also a cryptodepression. The lake covers an incredibly varying area ranging from 300 to 500 km². Its uniqueness and beauty is reflected in the richness of flora and fauna. Skadar Lake is one of the most important habitats of birds in the Mediterranean, that is, the nesting, feeding and resting site for 282 species of birds, i.e. for 150,000 specimens annually, of which 98% is protected by the national legislation and international conventions.

Moreover, Skadar Lake is a habitat for: 1,900 plant species, 54 species of freshwater molluscs, 45 species of fish (native carp and bleak), 16 species of amphibians, 28 species of reptiles, 57 species of mammals (the otter, which is nearly endangered, is particularly characteristic). Many of these animal species are listed in Annexes I and II of the Bern Convention. Therefore, in 1989, Skadar Lake was recognized as an internationally important bird area (IBA-Important Bird Area), and in 1995 it was included in **the World List of Wetlands of International Importance (Ramsar Sites)**.

A rare pelican, *Pselecanus crispus*, is the trademark of this National Park. The average depth of Skadar Lake is 6m, and as some parts of the bottom are below the sea level, in some places it reaches a depth of up to 60m. Such places on Lake Skadar are called "eyes". The shore of Skadar Lake is picturesque and abounds in wetland-type peninsulas and bays. Skadar Lake hides numerous endemic species of plant and animal life. It is also adorned with small islands, known as *gorice*, covered with wild dog rose, laurel and ivy.

Skadar Lake is also rich in cultural and historical monuments which are scattered over a large part of this national park. This beautiful lake has its islands. There was a prison once on one island, while today this island is inhabited only by birds, on the second island there is the Monastery of St. Nicolas, and the most beautiful beach of the Lake – Pješečac is situated on the third island. This little beach captivates with simplicity and clean water.

The **State Location Study "Mihailovići"**, covers the area located in the southern part of the Old Royal Capital of Cetinje, with the total area of 59 ha. The land area covers 57 ha, of which 8 ha is river basin land and a much smaller area is water area (2.02 ha).

The decision on developing the SSL „Mihailovići“, on the basis of **Special Purpose Spatial Plan Skadar Lake**, was adopted by the Government at the session held on **4th October 2012**. The scope of the SSL „Mihailovići“ relates to Zone III-buffer zone of the National Park „Skadar Lake“.

Considering that Skadar Lake has also been a Ramsar site since 1995, ever since the beginning of development of the SSL „Mihailovići“ there has been a sensitive treatment of this important freshwater wetland habitat. All issues of relevance for the preservation of Skadar Lake as a potential Emerald and NATURA 2000 habitat, in the context of adapting the construction of structures in the Ramsar area, were elaborated in the **Report on the Strategic Environmental Impact Assessment**. Also, due to the location specificity during development of the SSL „Mihailovići“, in addition to the **Report on Strategic Environmental Impact Assessment**, a **Study on Landscape Protection and a Study on the hydrological-hydrogeological characteristics of the terrain of the location** were also developed.

The public debate on the Draft of the SSL „Mihailovići“ and Draft Report on the Strategic Environmental Impact Assessment was held in the period from 7 to 22 February 2014. During the Public debate which took place at the Secretariat for planning and spatial development and environmental protection, or at the Round Table held on 19th February 2014 in the Old Royal Capital of Cetinje, there were no interested parties. Observations were submitted by: Old Royal Capital of Cetinje, as well as interested parties: MJ Property Podgorica and Montenegro Resort Company.

The state authority responsible for implementing the procedure for strategic environmental impact assessment, i.e. the Environmental Protection Agency, in August 2014, gave its approval to the Report on Strategic Environmental Impact Assessment.

On 23rd October 2014, the Government passed the Decision on the adoption of SSL „Mihailovići“. The decision was published in the Official Gazette of Montenegro No. 49/14. The planned tourist accommodation capacities in the SSL „Mihailovići“ are located within the two tourist complexes, which will be formed on the principle of ECO Lodge (eco-village). **The first tourist complex area of 11.85 ha is planned at the location of Biški rep** in the western part of the State Study for Mihailovići, on the urban lot UP1. **The second tourist complex is planned in the eastern part of the SSL „Mihailovići“, on two urban lots - UP2 and UP3, the total area of 3.51 ha.**

Since 2016 until now, Ministry of Sustainable Development and Tourism provided all necessary information to both Bern Secretariat and Ramsar Secretariat in relation to the issue of the ecological character of Ramsar area of Skadar Lake in the context of the development of commercial projects.

Following submission of a complaint in relation to the development of a commercial project on Skadar Lake by an Informal Citizens Group from Virpazar to the Secretariats of both Bern and Ramsar Convention, in the period June 12-14 2018 joint advisory mission by the Bern Convention and Ramsar Convention took place. During the mission all necessary information and detailed answers were provided, as well as documentation. The experts of the Mission had an opportunity to talk to all relevant state institutions, and visit the Skadar Lake National Park.

In this regard, at the 38th session of the Standing Committee of the Bern Convention, held from 27-30 November 2018, the issue of opening the case of Porto Skadar Lake was discussed (**number: 2016/04: Development of a commercial project in the Skadar Lake National Park and candidate Emerald site (Montenegro)**). It is important to note that the Secretariat of the Bern Convention did not open the case of Porto Skadar Lake on the Standing Committee, but it defined a set of recommendations with the deadline for implementation until December 2019, whose implementation will be closely monitored.

The Ministry of Sustainable Development and Tourism coordinates, with other competent institutions, the fulfilment of the above recommendations. Below is the **First Report on the Implementation of Recommendations covering the Reporting Period December 2018 - December 2019.**

II) Implementation of Recommendation No. 201 (2018) of the Standing Committee of the Bern Convention

At the 38th session held in the period 27-30 November 2018, the Standing Committee of the Bern Convention defined a set of recommendations for the Government of Montenegro in relation to the construction in the Skadar Lake National Park, which should be implemented in the next 12 months, that is, until December 2019.

1.) The Government of Montenegro should immediately implement the following conservation and management measures in the next 12 months:

1.1. Halt any 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 a realistic environmental impact assessment.

In accordance with Article 108 of the Law on Nature Protection (“Official Gazette of Montenegro”, No. 56/16), the environmental inspection performs regular inspection supervision of the location in question. During the inspection supervision procedure, which was carried out in the period from February to July this year, by accessing the location that consists of urban parcel number 1 - UP1, it has been found that on the very location there are no constructed structures of any purpose. Only road cutting works that had been previously carried out have been registered on the location.

By accessing the location that consists of urban plots UP2 and UP3, it has been stated that the road that had been previously cut through is being extended, as a temporary structure for the needs of the future construction site. In addition, it has been found that there are no constructed structures of any purpose on the location.

With further inspection controls from July to October, ending with the last inspection carried out on 17th October 2019, it has been stated that no change in the state of construction has occurred on the location in question. Namely, the roads that had been cut through in the previous period are overgrown with vegetation and no other activities are being carried out.

Article 9 of the Law on Spatial Planning and Construction of Structures (“Official Gazette of Montenegro”, No. 051/08, 040/10, 034/11, 040/11, 047/11, 035/13, 039/13, 033/14, 064/17 and 011/19) stipulates that preliminary works are works that precede the construction of the structure, and they include, among other, works on sanitation of the terrain and ensuring smooth traffic flow, use of the surrounding space, and earthworks.

Article 104 further stipulates that preliminary works for construction may be commenced by the investor upon the issuance of a building permit.

According to the above, it has been stated that preliminary works are being carried out on the terrain, which are being carried out based on the building permit issued on the basis of the Conceptual Design, while works on the construction of structures that can be carried out only on the basis of the Final Design are not being performed.

Mapping of Skadar Lake and preparation of a habitat map with the scale 1:10,000 for the above mentioned locations were carried out with the assistance of GIZ, as part of the transboundary project “Conservation and Sustainable Use of Biodiversity at Lakes Prespa, Ohrid and Shkodra/Skadar (CSBL)”, the beneficiaries of which are Montenegro, Northern Macedonia and Albania.

All habitat types of interest to the community from Annex II of the EU Habitats Directive, i.e. Natura 2000 Habitats, as well as all other habitat types (natural and artificial) as “non-Natura 2000 habitat” have been mapped.

Final results are expected by December 2019, when we will be able to provide you with the Reference List of Skadar Lake Habitats, as well as a GIS Habitat Layer covering the entire national park area.

1.2. 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.

As part of the IPA project “Establishment of the Natura 2000 Network”, in the period April 2016 - April 2019, a list of species and habitats covering nine Key Biodiversity Areas (KBAs) was prepared. Habitats of the Skadar Lake National Park were not included in this project. At the request of the Ministry of Sustainable Development and Tourism regarding the implementation of recommendations of the Standing Committee of the Berne Convention, and with the support of the Environmental Protection Agency, the process of habitat mapping on Skadar Lake was initiated in accordance with the existing data on habitats in Albania and the list of reference species.

The draft Natura 2000 habitat reference list was developed through the IPA project “Establishment of the Natura 2000 Network” and it was also used during the above mentioned habitat mapping that was planned by GIZ for 2019 through the project “Conservation and Sustainable Use of Biodiversity at Lakes Prespa, Ohrid and Shkodra/Skadar (CSBL)”. All habitat types of interest to the community from Annex II of the EU Habitats Directive, i.e. Natura 2000 Habitats, as well as all other habitat types (natural and artificial) as “non-Natura 2000 habitat” have been mapped. Field research data will be combined with desktop surveys, especially in the case of wetland surfaces and wetland areas.

Habitat mapping activities will be completed by December 2019. The entire process started with the organisation of the first transboundary workshop related to the Draft Reference List of Skadar Lake Habitats, which was held on 28th May 2019 in Vranjina in the premises of the Skadar Lake National Park. The Environmental Protection Agency was in charge of coordinating all activities. The first field visit was made in May 2019. Mapping of Skadar Lake habitats was completed in August, and gathered data were then forwarded to the expert team for verification.

The project roundtable was held on 31st October 2019 and it discussed the results as well as the feedback on verification from the expert team. The final results are expected by December 2019, when we will be able to submit the Reference List of Skadar Lake Habitats to the Secretariat of the Berne Convention.

In addition, within the CSBL Project, a “Monitoring Manual for Lake-bound Species and Habitats” was prepared in cooperation with EURONATUR, local experts and non-governmental organisations from the three countries, and with the support of the relevant state authorities. This publication will assist all interested parties in effective and systematic coordinated monitoring of species and habitats on Ohrid, Prespa and Skadar lakes in accordance with the EU Birds Directive and the Habitats Directive.

The “Monitoring Manual for Lake-bound Species and Habitats” includes two types of lake habitats and 21 species, 14 of which are listed in the EU Birds Directive and the Habitats Directive. By establishing the status of protection of sensitive or even vulnerable species, indicative conclusions can be drawn about the overall status of protection of the lake flora and fauna. Furthermore, the Manual covers a fairly broad and representative taxonomic spectrum, ranging from floating aquatic plants to flood trees and from dragonflies

to otters. Should regular monitoring be carried out for all these species in the future, all three beneficiary countries will have a sound basis for nature conservation.

The status and conservation measures will also be defined based on habitat mapping results, and afterwards incorporating the guidelines and conservation measures into the new Spatial Plan of Montenegro will be discussed.

1.3. 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*).

Skadar Lake National Park is part of the Public Enterprise National Parks of Montenegro (Javno preduzeće Nacionalni parkovi Crne Gore - JPNP). The National Parks of Montenegro is responsible for the management of the entire Montenegrin territory side of Skadar Lake. This also includes monitoring of flora and fauna.

In the area of Skadar Lake National Park, regular biodiversity condition monitoring is carried out. The Skadar Lake National Park Management Plan for 2016-2020, as well as the Annual Management Program, defines activities for monitoring species on the territory of the National Park.

Numerous activities are implemented in accordance with the Skadar Lake National Park Annual Management Program for 2019, *Strategic Area 3: research, supervision, restoration and improvement of ecosystems, habitats and conditions*, through which the status of threatened, sensitive, vulnerable, important and protected ecosystem species is defined, pressures on ecosystems, habitats and species are reduced and protective measures are implemented.

The Skadar Lake National Park Management Program, within this strategic area, enables monitoring of plant and animal species listed in Appendix I and II of the Berne Convention, as well as potential habitats of Natura 2000. Planned monitoring of species and habitats is carried out in accordance with the capacities of the expert departments of the National Parks of Montenegro, i.e., by involving experts trained for specific groups of organisms.

In accordance with previously planned monitoring dynamics, activities related to monitoring of listed species and habitats are carried out in defined time-periods during the year, depending on the biology or phenology of the given species, i.e., the dynamics of vegetation development.

Planned activities were carried out at the end of the second and in the third quarter of 2019 for most species included in the Skadar Lake NP Management Program.

Of the Skadar Lake NP species listed in Appendix I of the Berne Convention and/or in Annex II of the Habitat Directive, monitoring of *Marsilea quadrifolia* has been carried out, as envisaged by the 2019 Skadar Lake NP Management Program. This year's habitat survey on the Moračica River (Žabljačke Livade) revealed that part of the population discovered in 2016 is also to be found in the upper course of the river, where it is more numerous and has more coverage on both river banks. By summarizing the data from 2016 and 2019, it can be concluded that the population of *Marsilea quadrifolia* species in this location is stable for the time being. However, as the habitat is prone to being overgrown, further monitoring is necessary. No negative anthropogenic impacts have been observed.

For other species included in the aforementioned lists, previously collected field data are available for the following:

- *Trapa natans* (water chestnut) – which occupies large areas of the Skadar Lake water. It is not endangered and therefore is not monitored.
- *Caldesia parnassifolia*, at the location of Pančeva Oka and Crni Žar - further monitoring is anticipated as only individual specimens have been recorded. It is assumed to be more numerous and present in this area, but due to the densely overgrown peat habitat, this area is inaccessible and difficult to explore. The threat to this species is loss of its habitat due to the overgrowing process.
- *Quercus robur* subsp. *scutariensis* - the habitat has been anthropogenically altered before proclamation of the national park (by creating agricultural land that is located on privately owned estates). Specimens of this species are in good condition. From an ecological point of view, it is possible to revitalize the habitats and the communities it builds, but the species is present on agricultural land.
- *Gladiolus felicis* (accepted name *Gladiolus palustris*) - is present along the northern shore of Lake Skadar, in rocky vegetation. No threat factors have been recorded.
- *Orchis provincialis* - numerous individual specimens are present along the northern shore of the Lake. It is not threatened.
- *Ramonda serbica* - The habitat of this species is found in the gorge of Murička River on the southern slopes of Mount Rumija. The population is numerous and protected by the terrain morphology. Negative anthropogenic impacts have not been observed. It is necessary to monitor the habitat periodically.

***Lutra lutra* – Euroasian Otter**

Monitoring otter (*Lutra lutra*), a species from Appendix II of the Berne Convention, started in 2011 in Skadar Lake National Park and has since been implemented through program activities of the National Park. GIZ funded monitoring otters on Skadar Lake through the project “Conservation and Sustainable Use of Biodiversity at Lakes Prespa, Ohrid and Shkoder/Skadar (CSBL)” in 2013 and 2017, and in 2017 the NGO Centre for Conservation and Bird Study (Centar za zaštitu i proučavanje ptica - CZIP) was the implementer of this project. The Environmental Protection Agency (Agencija za zaštitu prirode i životne sredine - AZPŽS) was also involved in the first and second phase of the project and has data on the results of monitoring otter.

Furthermore, a Protocol for monitoring otter on Lake Skadar has been developed in accordance with which monitoring has been carried out. Through the aforementioned project in 2017, this protocol was aligned with the protocol in accordance with which Albania and Northern Macedonia worked.

In 2019, monitoring was carried out in the period June - October. The method of systematic observation of otter was used, i.e., visiting the terrain in order to find otter traces, remnants of food and otter excrement. Monitoring otter is performed during the day so as not to disturb the otter, and a photo sensor camera is installed at certain locations in addition.

The presence of otter has been confirmed at the following locations: Vranjina Island, valley and river of Orahovštica, Kunježa Bay, Prevlaka, entrance to the Virpazar Canal, valley and the shore around Kunježa Bay, Debeli Rt, Jovovice Bay, Šišarine Bay, tributaries of the Sutormanska River and Krnjice. Signs of otter presence in the form of faeces and paw prints were found at all locations. Excrement have not been registered, nor individual otters.

Also, in accordance with Article 100 of the Law on Nature Protection (“Official Gazette of Montenegro”, No. 54/16), the Environmental Protection Agency monitors the state of nature conservation on the basis of the Annual Monitoring Program adopted by the Government.

According to preliminary results, the Environmental Protection Agency found the presence of otter at the following locations: Orahovštica River, the location of Obid and Donji Murići, Biševina River, as well as the lower course of Rijeka Crnojevića. At the location of Poseljani, where the presence of otter was recorded in the previous period, this year’s field visit did not record its presence.

In addition, during 2019, in the direction of Jovovića Bay and Šišerina, one incident of otter perishing was recorded, and at the location of Bakine Tigle three cases: one cub and two adult animals.

Graphical display of the results of monitoring otter is submitted in Annex I.

1.4. Provide and submit to the Secretariat of Convention georeferenced and digitalized borders, as well as appropriate updated data forms on the corresponding Candidate Emerald Site and Ramsar Site.

The Ministry of Sustainable Development and Tourism currently only has a working version of the digitized boundary of the Skadar Lake National Park, which was prepared for the needs of developing the Spatial Plan for Special Purpose for the Skadar Lake National Park. It can be found in Annex II. (Figure 1. and 2.)

A GIS habitat map that covers the entire area of the National Park will be completed and submitted to the Ministry of Sustainable Development and Tourism by December 2019. Immediately after the results of the project have been submitted, the Ministry will forward them to the Convention Secretariat.

1.5. 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.

Preparatory activities are underway to begin drafting of a new planning document - the General Regulation Plan of Montenegro, which will include the area of the Skadar Lake National Park, as one of the segments of the Plan, in accordance with Article 17 of the Law on Spatial Planning and Construction of Structures.

The General Regulation Plan of Montenegro is a planning document that defines in detail the goals and measures of the spatial and urban development of Montenegro, taking into account the specific needs that arise from regional specificities, elaborates the goals of spatial planning and regulates rational usage of space and sea areas, in accordance with: economic, social, environmental and cultural-historical development.

The Spatial Plan for Special Purpose for Skadar Lake National Park Lake from 2001 will be used as the ground basis for preparing the planning document for the Skadar Lake area.

Areas that should be designated as zone I of strict protection will be taken into account during preparation of the Plan and included in it after the environmental protection guidelines and conditions have been provided by the competent environmental institutions.

1.6. In addition, the Zone I area needs to include a 300 m wide belt on the lake around the islands and the sublacustrine springs.

The areas of Zone I as well as the protection belt, will be considered through the process of development of the new General Regulation Plan of Montenegro, under which the area of the Skadar Lake National Park will be elaborated, after the competent institutions have developed the Revision Study of the Protected Area.

1.7. 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.

Development of the Special Plan for Special Purpose for Skadar Lake National Park was discontinued on 31st December 2018, in accordance with Article 217 of the Law on Spatial Planning and Construction of Structures (“Official Gazette of Montenegro”, No. 64/17, 44/18 and 63/18).

Preparatory activities are underway to begin drafting of a new planning document - the General Regulation Plan of Montenegro, within which the area of the Skadar Lake National Park will be elaborated as one of plan segments, in accordance with Article 17 of the Law on Spatial Planning and Construction of Structures.

Areas that should be designated as zone I of strict protection will be taken into account during preparation of the Plan and included in it after the environmental protection guidelines and conditions have been provided by the competent environmental institutions.

1.8. 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.

Article 16, paragraph 1, item 42 of the Law on National Parks (“Official Gazette of Montenegro”, No. 28/14 and 39/16) stipulates prohibiting the usage of vessels with a motor of more than 10 hp (boats, speedboats, scooters, etc.) without authorisation, except for the needs of state authorities.

The Draft Law on Amendments to the Law on Maritime Navigation Safety is being prepared, which, after its adoption, will prohibit the use of vessels with a motor of more than 10 horsepower (boats, powerboats, scooters, etc.) without authorisation, except for the needs of state authorities and in case of emergency.

In addition, the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period, which will certainly contribute to more intensive implementation of navigation and vessel control on Skadar Lake.

In order to increase the safety of navigation on the Lake, setting up an AIS Base Station on the shore of Lake Skadar is planned, which will allow the instalment of AIS transmitters in navigation vessels for passenger transportation. Thus, the coastal station “BARRADIO” will at every moment have the real-time picture of movement of passenger vessels on Skadar Lake. Furthermore, there are plans to build a port in Virpazar, which will be the base for all AIS vessels sailing on Skadar Lake.

1.9. The use of personal water crafts (water scooters) and any other water activities which can harm the floating vegetation must be prohibited.

In order to combat all kinds of illegal activities in the area of the Skadar Lake National Park as efficiently as possible, at the beginning of 2018 a Working Group was formed consisting of representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbour Master’s Office, who at periodical meetings analyse the measures taken and discuss future activities in order to efficiently safeguard this protected area and, among other things, enable compliance with the provisions related to navigation restrictions on Lake Skadar.

The following topics were discussed at the last meeting of the Working Group held on 21st October 2019:

- Changing the composition of the Working Group formed by Decision no. 325-114/17-23 from 24th July 2017;
- Continuation of the “Stop Poaching” campaign, communication with the public;
- Increasing supervision at critical points that emerged between two meetings of the Working Group;
- Revision of the Action Plan;

- Agreement on priority activities until the end of 2019.

Furthermore, in the coming period, efforts will be made to establish communication with the local population, as well as to raise awareness of the importance and values of National Parks aimed at respecting legal restrictions, as well as protecting the aquatic vegetation in the lake.

In addition, after adoption of the Law on Amendments to the Law on Maritime Navigation Safety riding speedboats and jet boats will be prohibited.

1.10. 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.

The Draft Law on Amendments to the Law on Maritime Navigation Safety is being prepared, which, after its adoption, will prohibit the use of vessels with a motor of more than 10 horsepower (boats, powerboats, scooters, etc.) without authorisation, except for the needs of state authorities and in emergency situations.

Article 4 of the Draft Law on Amendments to the Law on Maritime Navigation Safety provides speed limitation to four knots at the following locations on Skadar Lake: Mihailovići area, Poseljanski Bay, Biški Rep, estuary of Rijeka Crnojevića, estuary of Bazagurska Matica and the area around Liponjak Island.

Also, this issue will be one of the topics at the next meeting of the Working Group for combating unlawful actions in the area of the Lake Skadar National Park, as well as during preparation of the new planning document - the General Regulation Plan of Montenegro.

1.11. No installations or constructions shall be allowed in the shorezone stretches classified with Shorezone Functionality Index under category I (high) and II (good).

The implementation of the Water Framework Directive (WFD) represents a number of common technical challenges for EU Member States as well as candidate countries. A shared understanding and approach is of crucial importance for successful and efficient implementation of the Directive in Montenegro, which the Government of Montenegro is aware of. Therefore, in accordance with the Water Directive, the issue of zoning of the Lake Skadar National Park will be discussed in cooperation with the Water Administration. The National Parks of Montenegro and the Water Administration, through planned cooperation, will also define the guidelines for implementation of control and prohibition of works that have been defined by the said Directive in zone categories I (high) and II (good).

The document “Shorezone Functionality Index - Skadar Lake” was published through the CSBL Project in May 2017. This document highlights the key aspect of the WFD - hydromorphological status assessment. It consists of a combination of hydrological and morphological assessments.

According to morphological, structural and biotic parameters, the results show that 46% of the total perimeter of the lake falls into the high category, followed by the good category with 23.4%, then the moderate category with 24.8%, the weak category with 0.92% and the bad category with 4.9%. (Annex II - Figure 3).

In addition, prohibiting installations or construction in lake zones may be an integral part of the planning document guidelines, which will be discussed during the process of preparation of the General Regulation Plan of Montenegro.

2. 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.

For all further steps made in relation to the projects Porto Skadar Lake and White Village, as well as during preparation of any planning document, the opinions and recommendations of the Berne and Ramsar Convention, as well as of the Delegation of the European Union to Montenegro will be taken into account.

3. Examines whether any building permit related to the location issued after October 2017 were valid as 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. 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.

SLS "Mihailovići" is valid until 2020, and its extension is not planned. The Directorate for Construction in the Ministry of Sustainable Development and Tourism, after October 2017, **has not issued any building permits** in the area within the scope of the State Location Study "Mihailovići".

In this area, the following building permits were issued before October 2017:

- to the investor "Montenegro resort company MRC", for the construction of a tourist resort on UP1, number: UPI 0503-836/12-2014 of 27 March 2015, and
- to the investor "MJ Property", for the construction of a tourist resort: a 5-star category hotel with annexes, on UP2 and UP3, number: UPI 1054-87/12 of 6 June 2016.

Moreover, in the said building permits, pursuant to Article 93 of the Law on Spatial Planning and Construction of Structures ("Official Gazette of Montenegro, no. 51/08, 34/11, 35/13 i 33/14), a condition is laid down that works must commence within 2 years from the date of issuance of a building permit and that otherwise the construction right will cease to apply.

According to the data obtained from the Directorate for Inspection Affairs and Licensing in the Ministry of Sustainable Development and Tourism, the investor "MJ Property" doo Podgorica, submitted a notice of commencement of construction works, and started preparatory works on 1 June 2018, under the number 107/4-1522/1 within the legal deadline.

With regard to the issued building permit, the investor "Montenegro Resort Company" submitted a notice of commencement of works on 10 February 2017, also within the legal deadline.

The above mentioned building permits were issued for the preliminary design. The Urban-Planning and Technical Conditions for berths are issued separately, independently of Urban-Planning and Technical Conditions for the construction of other parts of tourist resorts. Accordingly, the berth permit is issued in a special procedure and it requires development of an Environmental Impact Assessment Study.

However, at the UP1 location, a permit for the construction of a berth was not issued because it was not the subject of a building permit.

4. Carefully examines the procedure which 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. Pursuant to the provisions of SSL Mihailovići such a landing place must be subject to a separate environmental impact assessment.

According to the Urban and Technical Requirements (UTR) building permits for moorings are issued separately, independently of the UTRs for construction of other parts of the tourist resorts. The issuance of a building permit for a mooring is envisaged in a separate procedure and an environmental impact assessment procedure needs to be carried out for it.

Building permits for UP1, UP2 and UP3 have been issued on the basis of a Conceptual Design. Also, a building permit for the construction of a mooring has not been issued for location UP1.

5. Provides and determines 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.

The Law on Strategic Environmental Impact Assessment ("Official Gazette of Montenegro" No. 59/11 and 52/16) stipulates the conditions, manner and procedure for carrying out an assessment of the impact of certain plans and programmes on the environment through the integration of environmental protection principles in the process of preparation, adoption and implementation of plans and programmes that have a significant impact on the environment. This Law is 100% harmonized with the SEA Directive.

Regarding technical specifications and requirements during the construction of a mooring, building permits are issued in a separate procedure and independently from the Urban and Technical Requirements (UTU) for construction of other parts of tourist resorts. An environmental impact assessment procedure needs to be carried out in order to obtain a building permit.

EIA procedure is conducted in accordance to the Law on Environmental Impact Assessment which is 100% harmonized with the EIA Directive from 2014.

6. 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;

Pursuant to Article 56 of the Law on Nature Protection ("Official Gazette of Montenegro", No. 54/16) and Article 29 of the Law on National Parks ("Official Gazette of Montenegro", No.39/16), the responsibilities of the Manager (in this case of the Lake Skadar National Park) to conduct control of activities on the lake related to preventing endangerment of floating vegetation by controlling waterways and fishing organised with nets have been defined.

In line with the aforementioned preparation of the Draft Law on Amendments to the Law on Maritime Navigation Safety, riding speedboats and jet boats will be prohibited on Lake Skadar. Furthermore, "STOP Poaching" campaigns will be implemented in order to prevent poaching that disrupts the balance of the lake ecosystem, while raising public awareness.

In addition, the Order on fishing bans, restrictions and measures for the protection of fish ("Official Gazette of Montenegro", No 21/12), stipulates that the catch of all fish species and other aquatic organisms is prohibited in the fishing area of "Lake Skadar" at Rijeka Crnojevića from Obod Cave to the places of Gradina and Lisinj until 15th May 2025. As well as in the following locations: Pančeva Oka, Crni Žar, Pjavnik (Pantovac), Omerova Gorica, Manastirska Tapija, Golubovo Island, Manastirski Vrbiš and Grmožur Island.

The catch of all fish species and other aquatic organisms in the fishing area of "Lake Skadar" at the Plavnica River and along the entire course of the Virpazar Channel is prohibited until 15th May 2021.

Protection of floating vegetation will also be considered during preparation of the General Regulation Plan of Montenegro and detailed elaboration of the Lake Skadar National Park within it, with an accompanying Strategic Environmental Impact Assessment.

7. Establishes 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.

Ministry of Sustainable Development and Tourism is strongly devoted to the collaboration with professional ecological NGOs since this kind of cooperation should be of great use in terms of providing guidelines and recommendations which would assist in implementation of proper environmental policies. In addition to that, open dialogue and cooperation with all relevant stakeholders are necessary since Montenegro builds its future on the principles of sustainable development along with promotion of responsible attitude towards environment.

There is a continuous dialogue going on between the Government and the civil society in accordance with the Law on Strategic Environmental Impact Assessment and the Law on Environmental Impact Assessment, since they set out mechanisms for public participation in the decision-making process.

The dialogue additionally gains importance through the communication that has been achieved through the work of four Aarhus Centres (two at the state level and two at the NGO level).

Pursuant to the Decree on the election of NGO representatives in the working bodies of the state administration and organising public discussion within the preparation of laws and strategies, the NGO sector is continuously invited to participate in the work of the working bodies in drafting of environmental laws and strategies.

Until 26th March 2019, four calls for NGOs to participate in the drafting of laws and by-laws were announced, whereas for three no candidates applied and for one of the calls two NGOs applied. During 2019, three public discussions were held.

In 2018, out of a total of nine calls for NGOs, for five no candidates applied, while four representatives applied for four calls, i.e. three, because a representative of one NGO applied for two calls. During 2018, nine public discussions were organised.

During 2017, out of a total of eight calls, for five no candidates applied, while for three calls three candidates applied, i.e. two, because a representative of one NGO applied for two calls. In 2017, three public discussions were organised.

Furthermore, in order to strengthen the capacities at both the Government and NGO levels, trainings, supported by the OSCE Mission to Montenegro, have been conducted for years in a row to strengthen the dialogue of both sectors. There is ongoing work to improve dialogue with the civil society, and this trend will continue. Within the workshops organised for strengthening of capacities for implementation of strategic and environmental impact assessments, special emphasis has been placed on strengthening cooperation with the civil society.

In addition, this type of cooperation also refers to the partnership relationship in the sector of cross-border projects, that is, cooperation of the NGO sector with the Ministry of Sustainable Development and Tourism in the implementation of international agreements in this field.

Since June 2018, approximately 250 representatives of the interested public have attended public discussions for EIA studies. The following projects were of particular interest to the public: two public discussions for Adriatic Sea 3D Geophysical Survey in the, Bar - about 40 interested citizens, including the media; exploitation of technical construction stone in Bioče - Bioče - about 30 interested citizens; construction of two small hydropower plants on the Bukovica River - Šavnik - about 50 interested citizens, representatives of the media and NGOs; and construction of a tourist resort on Lake Skadar - about 20 interested citizens, NGOs and the media.

The NGO sector participated in evaluation of impact assessment studies based on the Public Call announced by the Agency and their representatives were selected as members of the Evaluation Commission. This refers to the projects of Adriatic Sea 3D Geophysical Survey, Hotel Kraljičina Plaža, SHP, construction of a tourist resort on Lake Skadar and exploitation of technical building stone.

For the Public Call for a Member of the Commission for Evaluation of the Environmental Impact Assessment for the Smokovac Loop, which is part of the Bar - Boljare Highway, the Smokovac - Mateševo section, there were no interested parties.

A representative of the NGO sector - NGO Green Home, took part in preparation of the new Law on Environmental Impact Assessment, which was adopted in November 2018.

Based on previous cooperation achieved concerning the issue of development of the commercial project of Porto Skadar Lake on Lake Skadar, it has been announced that during the process of preparation of the planning documents, as well as the environmental impact assessment study, NGOs had no comments. NGOs also had a member in the Commission for Evaluation of the Environmental Impact Assessment of the White Village and they had no comments.

8. Considers hosting the upcoming biogeographical seminar on Emerald sites in SEE.

Regarding database development for the Emerald Network, Areas of Special Importance, we would like to inform you that, based on information published in the book "CONSERVING WILD BIRDS IN MONTENEGRO - a first inventory of potential Special Protection Areas", 32 potential SPA areas have been identified so far. Namely the criteria that are applied in the Birds Directive are in line with the criteria for the Berne Convention, since the Natura 2000 Network in the EU countries also qualifies as the Emerald Network. Most potential Emerald areas overlap with SPA areas.

The boundaries of the SPA areas are scientifically well justified, by surveys of foreign and national experts through the three-year IPA project "Establishment of Natura 200 network in Montenegro"(april 2016 – april 2019.). However, as only 14% of the territory of Montenegro was covered by the said project, here is still no complete picture of the habitats. If we were to use the existing data where KBAs overlap with potential Emerald areas, we would have data for about 10 - 12 potential Emerald areas. Therefore, research should be continued.

Continuation of research related to establishment of the Natura 2000 network in 2019 was enabled with funds from the budget of the Government of Montenegro in the amount of 200,000 Euros (research is being wrapped up), while for 2020 operational funds will be provided through the IPA 2016 Project, "Technical Support for Monitoring and Implementation of Environmental and Climate Action Policies".

Updating of the Emerald database for proposed locations by using data collected through the IPA project is a time-consuming task, thus the Ministry of Sustainable Development and Tourism, in collaboration with the Environmental Protection Agency, will work on revising potential Emerald areas in the coming period. Thereafter, a more detailed overview of the status of the proposed Emerald areas will be provided in order to continue implementation of further activities.

Ministry of Sustainable Development and Tourism is with great enthusiasm ready to be the host of the biogeographical seminar.

9. Identifies and defines appropriate mitigation measures;

Appropriate guidelines and measures for the prevention, reduction or elimination of harmful impacts on environment have been identified through the process of Strategic Environmental Impact Assessment and Environmental Impact Assessment.

The definition of mitigation measures will be possible at a time when the concept of lake zoning becomes clear, since the optimum zoning is a prerequisite for the future development and preservation of Skadar Lake on the principles of ecological sustainability. Attention will also be paid to reducing the process of eutrophication through the reduction of pollution, not only of the aquatic environment, but also of the surrounding area in the entire basin of Skadar Lake. The monitoring system should be strengthened and improved through the selection and regular monitoring of indicator parameters. As far as birds are

concerned, this system is already operative through regular monitoring of nesting and wintering populations within several European schemes.

Through drafting of the planning documents, rules for the construction of structures in national parks will be obeyed. Also, a plan of management, administration, hunting and protection of the fishing stock (through the development of the Fishery Base) will be developed.

Regular and strict application of legal penalty provisions will demotivate the potential occurrence of illegal collection of protected and/or rare species (plant and animal) for commercial and collector purposes.

10. Takes 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, as stated in the recommendations of the latest EC Montenegro 2018 Report of April 2018. 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.

Montenegro is working dedicatedly to protect the environment, and is increasingly focusing on prevention, reduction to the fullest extent possible, total elimination of pollution and provision of sound management of natural resources, especially regarding the increasing level of ecosystem pollution due to uncontrolled discharge of ballast water, invasive species expansion, emissions from land-based sources of pollution, and disruption to natural balance due to increasing urbanisation.

Pursuant to Article 8 of the Law on Environmental Impact Assessment (“Official Gazette of Montenegro” 075/18), the obligation to obtain the environmental impact assessment (EIA) approval has been established. The developer of the project the EIA is requested for or of the project for which a decision has been adopted on the necessity to prepare a Study may not commence execution of the project or obtain approval to carry out the activities without the approval of the Study or the decision that no Study is required.

It also stipulates that when for the impact assessment process it is necessary to conduct an acceptability assessment procedure, such procedure shall be carried out within the environmental impact assessment process in accordance with the Law on Nature Protection. When the environmental impact assessment process is conducted as part of other procedures in accordance with specific regulations, those procedures shall be conducted in a coherent manner. The acceptability assessment procedure in accordance with Article 46 of the Law of Nature Protection consists of a preliminary and main assessment of acceptability.

Acceptability assessment is conducted when it is possible to plan, program, design, especially in combination with other plans, programs and projects that may have adverse effects on the target species and habitats and on the conservation objectives and ecological integrity of the ecological network.

The Ministry of Sustainable Development and Tourism has adopted a Rulebook on the contents of Acceptability Assessment Study for the ecological network area (“Official Gazette of Montenegro” no. 45/17).

In accordance with the National Strategy with Action Plan for implementation, transposition and enforcement of the EU Acquis on Environment and Climate Change 2016-2020, additional training on this topic is planned at national and local level. The first in a series of trainings was carried out in late March 2019, with a focus on the local level, where experts presented experiences in the context of conducting strategic and environmental impact assessment, as well as disseminating information and public consultation. Besides competent authorities, Aarhus Centers have a significant role in the context of better public consultation.

With regard to the Ulcinj Salina, the Government is aware that the Salina, as one of the 10 largest and newest salt flats in the Mediterranean, and as a habitat of global importance for feeding and nesting waterfowl, has

been facing problems, which is why we give special importance to its protection. We are addressing this problem with utmost seriousness and we remain committed to this as well as to other similar issues.

At the session held on June 24, the Ulcinj Municipality Assembly passed the Decision on the declaration of Ulcinj Salina a Nature Park.

According to the results of the Conservation Study, which was carried out during the process of declaring Ulcinj Salina a Nature Park, it fulfills 6 out of 9 criteria for application for inclusion in the Ramsar List (List of Wetlands of International Importance).

On July 2nd, 2019, Ministry of Sustainable Development and Tourism submitted to the Ramsar Secretariat an official nomination with a completed entry form for including Ulcinj Salina in the List of Wetlands of International Importance. Ulcinj Salina was declared a wetland of international importance on September 9th, 2019 and is included on the Ramsar List.

With regard to Lake Skadar, the implementation of the Berne Convention recommendations is underway.

With regard to the UNESCO World Heritage Site Tara River Canyon, in the context of the highway construction, a control mechanism has been set up through the work of competent inspection bodies with authorisation to operate (environmental inspection, water inspection), as well as supervision by an international consultant of the French-Italian consortium over the execution of works. The Government established a Commission for the technical acceptance of works, and the contractor, in addition to the obligation to comply with and implement the measures under the Environmental Impact Assessment Study, also prepared a remediation action plan approved by the Environmental Protection Agency. Additionally, regular monitoring of the bottom fauna is carried out by the expert team of the Faculty of Science.

In general, in respect of investments in hydropower and tourism development, the Law on Strategic Environmental Impact Assessment (SEA), Law on Environmental Impact Assessment (EIA) and Law on Nature Protection (Article 18, and Articles 45, 46 and 48 in particular).

Guidelines and rules for nature protection prescribing that strategies, spatial plans, plans for the installation of temporary structures, plans and programs for the management and use of natural resources (mining, energy, transport, maritime sector, water management, agriculture, forestry, hunting, fishing, tourism and other activities which may have an impact on nature), strategic development plans and programs must include guidelines and conditions for nature protection.

Article 40 prescribes procedures for issuing approvals for actions, activities and services in protected areas as well as procedures for environmental impact assessment of projects (EIA and SEA).

The Environmental Protection Agency provides guidelines and rules for nature protection upon request. In addition, all the above mentioned procedures for issuing permits or approvals (EIA, SEA, permits for actions, activities and services in protected areas) are carried out in accordance with the prescribed legal procedures.

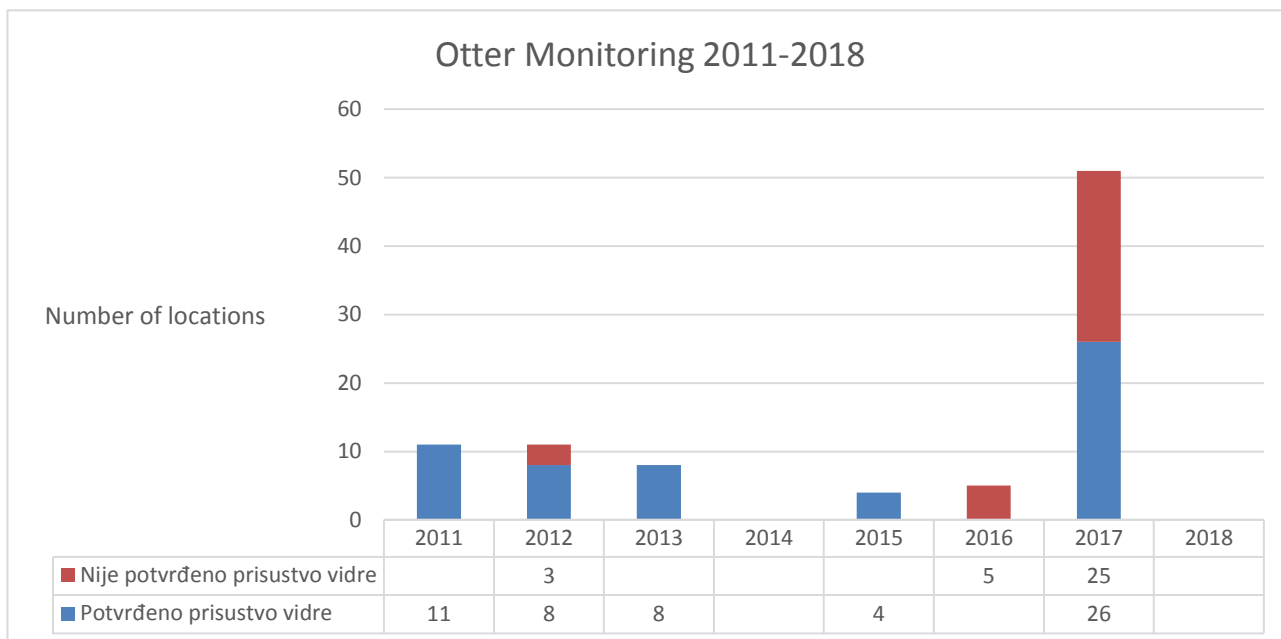
11. Prepares a schedule and programme of work to implement the above recommendations, including details of the person/actors responsible, along with the timetable with clear milestones and deadline for each recommended action.

The draft of Working plan is prepared in form of table which is provided in Annex III.

12. Regularly reports on progress in the implementation of the Recommendation, as requested by the Bureau to the Standing Committee to the Convention and the Committee itself.

Montenegro will regularly report to the Bureau of the Bern Convention on the progress of implementation of the recommendations in accordance with the request of the Standing Committee.

Annex I

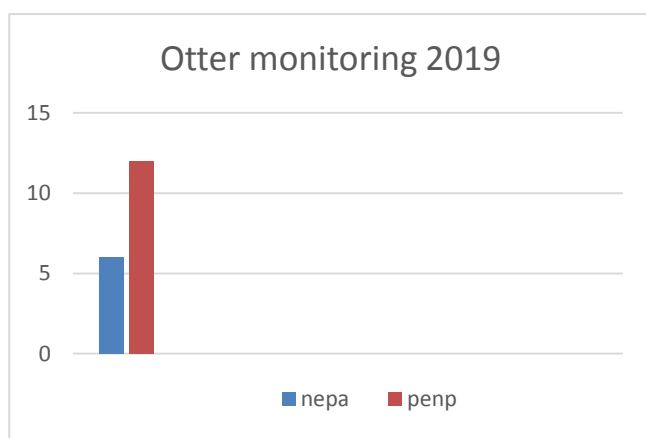


■ The presence of the otter has not been confirmed

■ The presence of the otter has been confirmed

The numbers in the column do not represent the number of otters, but the number of their traces (footprint or feces). Also, except for 2017, the research on the otter has not been conducted in the entire lake, but only in certain places, specifically in the places where the otter has been observed by the local population (surveys) or the places where the otter has been endangered (run over or drowned in the fishing traps or nets), and they are not a representative sample for the whole lake, but only for a special location.

Moreover, due to the limited funds allocated for this activity, monitoring of the otter has not been performed in order to obtain the numerical data. The aim of this monitoring is to determine the presence of otters, their habitats and the factors that threaten them, and to adopt the measures for the protection of the otter and its habitat on the basis of these researches.



Annex II

Nacionalni park Skadarsko jezero

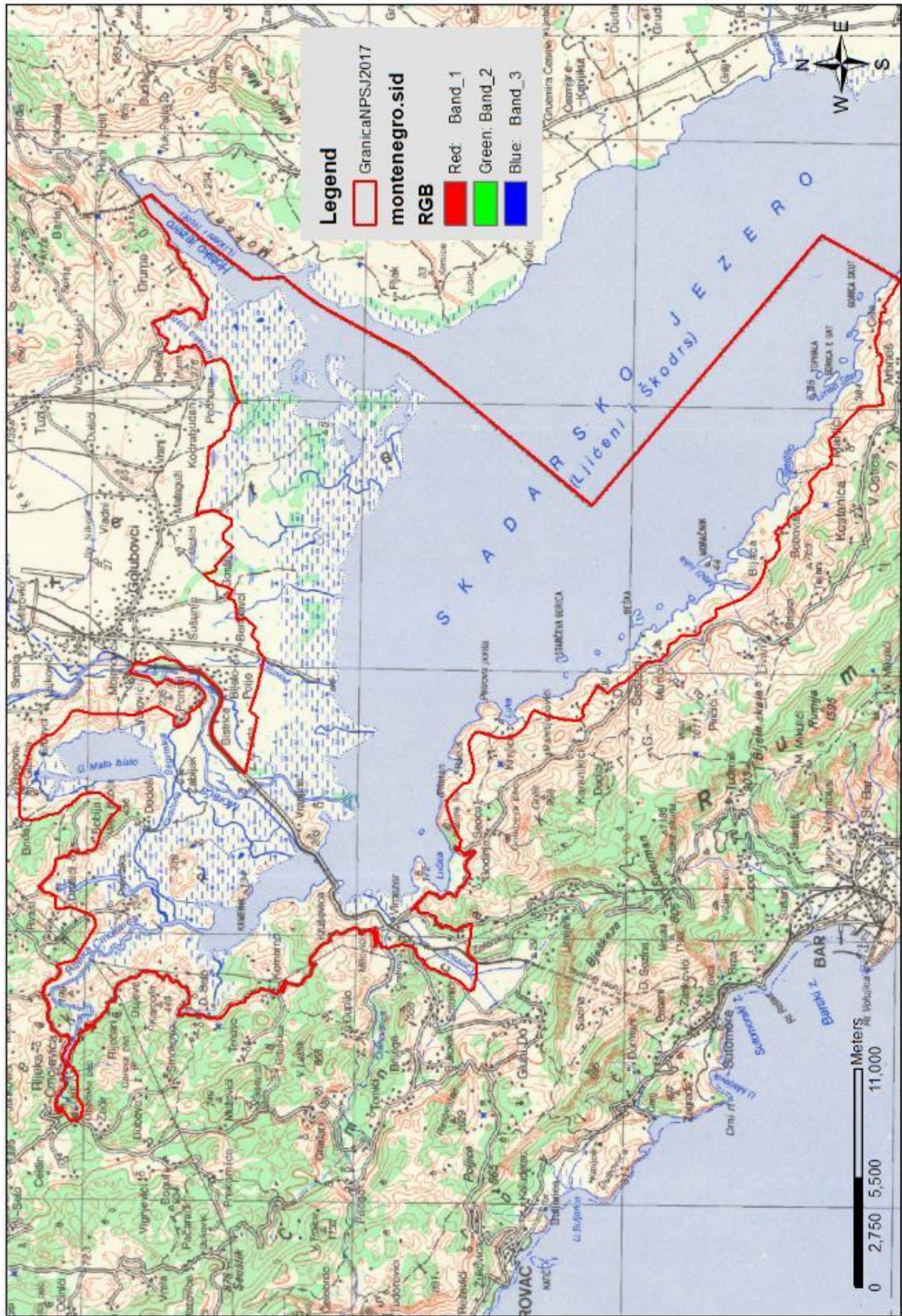


Figure 1.

Nacionalni park Skadarsko jezero



Figure 2.

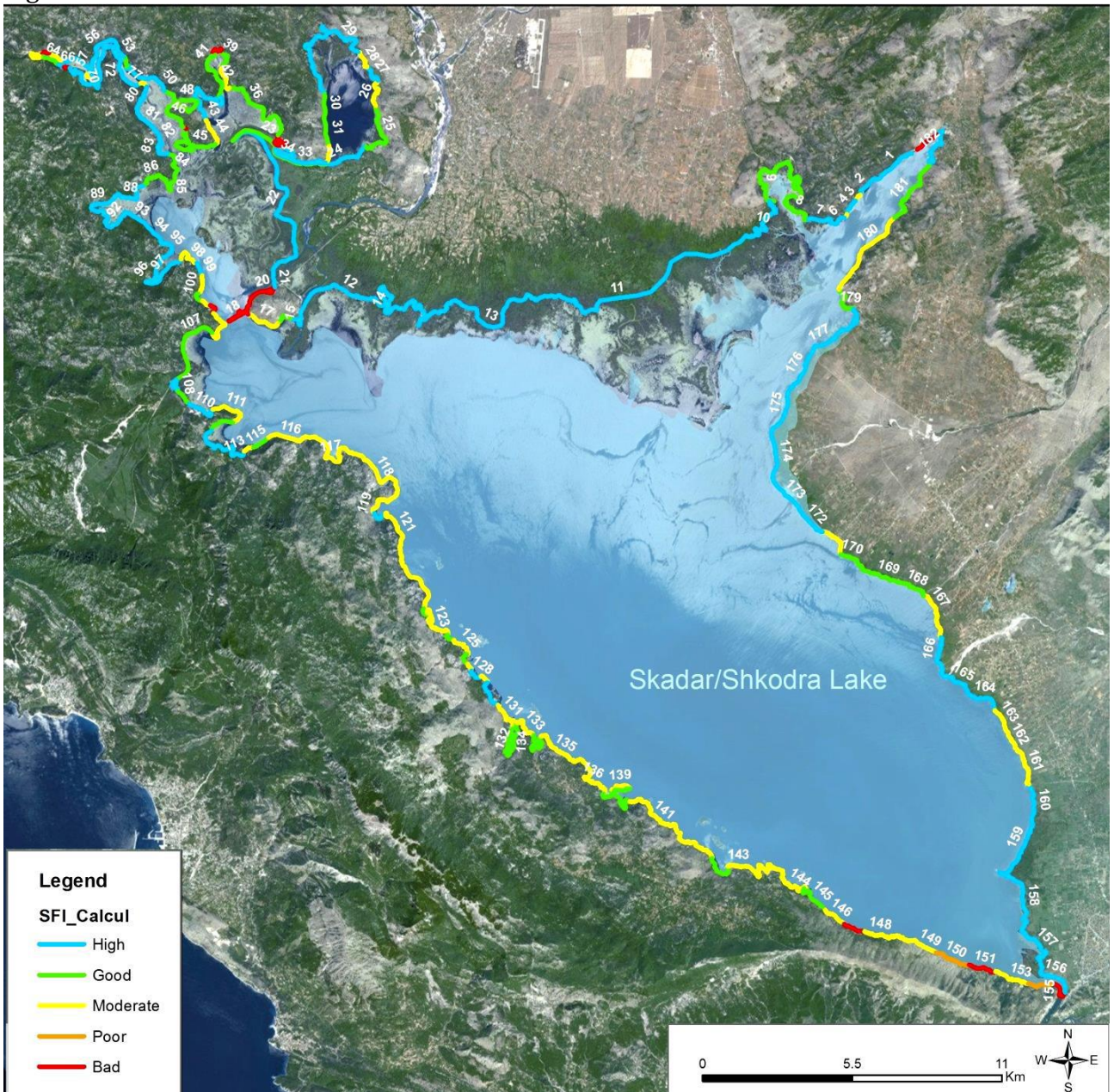


Figure 3

Annex III

WORKING PLAN				
No.	Measures	Activities	Realization time	Responsible authorities
1	Halts 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 has been provided for “Mihailovići“, Poseljanski Zaliv Bay, Biški Rep, the mouth of Crnojevića river, the mouth of Bazagurska matica and the islands Liponjak and Galići. 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	<ul style="list-style-type: none"> - the environmental inspection performs regular inspection supervision of the location; - detailed habitat map has been done with the assistance of GIZ; - the transboundary workshop held on 29-30th May; - finish mapping in August; - held Round table on 31st October, for data verification; 	<ul style="list-style-type: none"> - the results of mapping of the Skadar lake will be available in December 2019. 	MSDT/NEPA/GIZ
2.	Elaborates 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,	<ul style="list-style-type: none"> - The reference list of habitats for Skadar lake will be compiled through the GIZ project "Mapping habitats of Skadar lake" in December 2019; - methodology was developed in April/May 2019; - the habitat mapping was done for the entire area of Skadar lake; - the first field visit was paid on 30th May 2019; 	<ul style="list-style-type: none"> - the final reference list will be completed in the December of 2019. 	GIZ / NEPA

		<ul style="list-style-type: none"> - “Monitoring Manual for Lake - bounded species and habitats”, was done in cooperation with EURONATUR; - The status and conservation measures will also be defined on the basis of the results of the mapping of habitats; 		
3.	Establishes and runs a monitoring system on species strictly protected according to Appendices I and II of the Bern Convention respectively NATURA 2000 species and habitats by the National Environmental Protection Agency at first, at least in the area mentioned under (i). The monitoring system must include the otter (Lutra lutra),	<ul style="list-style-type: none"> - develop protocol monitoring of species from Annex I and II of the Bern Convention; - conduct regular monitoring of species from Annexes I and II of the Bern Convention under the established protocol; - regular monitoring of biodiversity status performed by NEPA AND PENP of Montenegro; 	<ul style="list-style-type: none"> - November 2019 - December 2019 	Public enterprise for national parks / NEPA
4.	Provides the Conventions' secretariats with georeferenced and digitalised borders of and respective updated data forms on the corresponding Candidate Emerald Site and Ramsar Site	<ul style="list-style-type: none"> - delivered working version of the digitalized border of the Skadar Lake National Park; (Annex II); - GIS Habitat Layer will be delivered in December; 	- November 2019.	MSDT / Directorate for Spatial Planning
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	- Preparatory activities are underway for the commencement of the development of a new planning document the General Regulation Plan of Montenegro, under which, the area of the NP Skadar Lake will be elaborated, as one of the segments of	2019-2020	MSDT/ Directorate for Spatial Planning

	of strict protection,	the plan;		
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,	- will be considered through the process of development of the new General Regulation Plan of Montenegro;	2019-2020	MSDT / Directorate for Spatial Planning
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,	- Preparatory activities are underway to commence the preparation of a new planning document the General Regulation Plan of Montenegro;	2019-2020	MSDT / Directorate for Spatial Planning
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,	- the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period; - it is planned to set up the AIS base station on the shore of Skadar Lake; - Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbourmasters' Office;	On continuous basis	Public enterprise for national parks / Harbor Captain Bar

		<p>- the construction onf the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake;</p>		
9.	<p>The use of personal water crafts (water scooters) and any other water activities which can harm the floating vegetation must be prohibited,</p>	<p>- the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period;</p> <p>- it is planned to set up the AIS base station on the shore of Skadar Lake,;</p> <p>- Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbourmasters' Office;</p> <p>- the construction on the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake;</p> <p>- after adoption of the Law on Amendments to the Law on Maritime Navigation Safety, the use of vessels with a motor of more than 10 horsepower (boats, powerboats, scooters, etc.) will be prohibited;</p>	On continuous basis	Public enterprise for national parks /Harbour Captain Bar

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,	<p>- Article 4 of the Draft Law on Amendments to the Law on Maritime Navigation Safety provides speed limitation to four knots at the following locations on Skadar Lake: Mihailovići area, Poseljanski Bay, Biški Rep, estuary of Rijeka Crnojevića, estuary of Bazagurska Matica and the area around Liponjak Island;</p> <p>- the Zone I will be considered through the process of development of the new General Regulation Plan of Montenegro;</p>	Partly done On continuous basis	Ministry of transport and maritime affairs / Public enterprise for National Parks
11.	No installations or constructions shall be allowed in the shore zone stretches classified with Shore zone Functionality Index under category I (high) and II (good);	<p>- The document “Shorezone Functionality Index - Skadar Lake” was published through the CSBL Project;</p> <p>- define guidelines for the implementation of control and prohibition of works in accordance with the Water Framework Directive;</p> <p>- the bans on installations or constructions in the lake zones will be considered during the preparation of the General Regulation Plan of Montenegro;</p>	On continuous basis	Public enterprise for national parks / Water Administration
12.	Includes 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;	- opinions and recommendations of the Bern and Ramsar conventions, as well as the EU delegation of Montenegro, will be taken into account;	On continuous basis	MSDT

13.	Examines whether any building permit related to the location issued after October 2017 were valid as 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. 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;	<ul style="list-style-type: none"> - The State Location Study (SLS) Mihailovići is valid until 2020, and drafting of a new study has not been planned. - after October 2017, MSDT has not issued any building permits in the area within the scope of the State Location Study "Mihailovići"; - At the UP1 location, a permit for the construction of a berth was not issued. 	Done	MSDT
14.	Carefully examines the procedure which 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. Pursuant to the provisions of SSL Mihailovići such a landing place must be subject to a separate environmental impact assessment;	<ul style="list-style-type: none"> - It is stipulated that the berth permit is issued in a special procedure and it requires development of an Environmental Impact Assessment Study; - Building permits for UP1, UP2 and UP3 are issued for the preliminary design; - A license for a berth in the White Village case has not been issued; 	Done	MSDT / Directorate for Spatial Planning / Directorate for construction
15.	Provides and determines 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;	<ul style="list-style-type: none"> - The Law on Strategic Environmental Impact Assessment ("Official Gazette of Montenegro" No. 59/11 and 52/16) stipulates the conditions, manner and procedure for carrying out an assessment of the impact of certain plans and programmes on the environment; - With regard to the technical specifications and conditions for the 		MSDT / Directorate for Spatial Planning / Directorate for construction

		construction of berths, it is necessary to prepare an Environmental Impact Assessment Study;		
16.	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;	<ul style="list-style-type: none"> - control of the waterway; - control fishing networks; - after adoption of the Law on Amendments to the Law on Maritime Navigation Safety, the use of vessels with a motor of more than 10 horsepower (boats, powerboats, scooters, etc.) will be prohibited; - In addition, Paragraph 30 of the Order on fishing bans, restrictions and measures for the protection of fish (“Official Gazette of Montenegro”, No 21/12) of 21st February 2019, stipulates that the catch of all fish species and other aquatic organisms is prohibited in the fishing area of “Lake Skadar” until 15th May 2025; - The protection of floating vegetation will also be considered during the development of the General Regulation Plan of Montenegro, under which, the area of the NP Skadar Lake will be elaborated, as one of the segments of the plan; 		MSDT - Directorate for Environment / Public enterprise for national parks / NEPA
17.	Establishes an effective dialogue mechanism with and participatory approach to all stakeholders in order to ensure information exchange as well as to	- The dialogue additionally gains importance through the communication that has been achieved through the work of	On continuous basis	MSDT

	<p>consider any biodiversity data gathered by NGOs and the scientific community;</p>	<p>four Aarhus Centres (two at the state level and two at the NGO level);</p> <ul style="list-style-type: none"> - Until 26th March 2019, four calls for NGOs to participate in the drafting of laws and by-laws were announced, whereas for three no candidates applied and for one of the calls two NGOs applied. During 2019, three public discussions were held; - In 2018, out of a total of nine calls for NGOs, for five no candidates applied, while four representatives applied for four calls, i.e. three, because a representative of one NGO applied for two calls. During 2018, nine public discussions were organized; - in order to strengthen the capacities at both the Government and NGO levels, trainings, supported by the OSCE Mission to Montenegro, have been conducted for years in a row to strengthen the dialogue of both sectors; - Since June 2018, approximately 250 representatives of the interested public have attended public discussions for EIA studies; - The NGO sector participated in evaluation of impact assessment studies based on the Public Call announced by the Agency and their representatives were 		
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		<p>selected as members of the Evaluation Commission;</p> <p>- A representative of the NGO sector - NGO Green Home, took part in preparation of the new Law on Environmental Impact Assessment, which was adopted in November 2018;</p>		
18.	Considers hosting the upcoming biogeographical seminar on Emerald sites in SEE;	<p>- the book “CONSERVING WILD BIRDS IN MONTENEGRO - a first inventory of potential Special Protection Areas” was published;</p> <p>- 32 potential SPA areas have been identified so far by Bird Directive;</p> <p>- Ministry of Sustainable Development and Tourism is with great enthusiasm ready to be the host of the biogeographical seminar;</p>	On continuous basis	MSDT/ Directorate for Environment
19.	Identifies and defines appropriate mitigation measures	<p>- Appropriate guidelines and measures have been identified through the process of Strategic Environmental Impact Assessment and Environmental Impact Assessment;</p> <p>- Through the development of planned documentation, the rules for constructing facilities in national parks will be respected, and will be developed the Plan of management, administration, hunting</p>	On continuous basis	MSDT

		and protection of the fishing stock (through the development of the Fishery Base);		
20.	<p>Takes 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, as stated in the recommendations of the latest EC Montenegro 2018 Report of April 2018. 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;</p>	<p>- In accordance with Article 8 of the Law on Environmental Impact Assessment (Official Gazette of Montenegro, No. 075/18 of 23 November 2018), the obligation to obtain an approval for an impact assessment has been established;</p> <p>- It also stipulates that when for the impact assessment process it is necessary to conduct an acceptability assessment procedure, such procedure shall be carried out within the environmental impact assessment process in accordance with the Law on Nature Protection;</p> <p>- Acceptability assessment is conducted when it is possible to plan, program, design, especially in combination with other plans, programs and projects that may have adverse effects on the target species and habitats and on the conservation objectives and ecological integrity of the ecological network;</p> <p>- The Ministry of Sustainable Development and Tourism has adopted a Rulebook on the contents of Acceptability Assessment Study for the ecological network area ("Official Gazette of Montenegro" no. 45/17);</p>	On continuous basis	MSDT, NEPA

		<ul style="list-style-type: none">- In line with the National Strategy With Action Plan For Transposition Implementation And Enforcement Of The Eu Acquis On Environment And Climate Change 2016-2020, in late March 2019, with a focus on the local level, where experts presented experiences in the context of conducting strategic and environmental impact assessment, as well as disseminating information and public consultation; - At the session held on June 24, the Ulcinj Municipality Assembly passed the Decision on the declaration of Ulcinj Salina a Nature Park; - Ulcinj Salina was declared a wetland of international importance on September 9th, 2019 and is included on the Ramsar List; - With regard to Lake Skadar, the implementation of the Berne Convention recommendations is underway; - In general, in respect of investments in hydropower and tourism development, the Law on Strategic Environmental Impact Assessment (SEA), Law on Environmental Impact Assessment (EIA) and Law on Nature Protection (Article 18, and Articles 45, 46 and 48 in particular); - The Environmental Protection Agency		
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		provides guidelines and rules for nature protection upon request. In addition, all the above mentioned procedures for issuing permits or approvals (EIA, SEA, permits for actions, activities and services in protected areas) are carried out in accordance with the prescribed legal procedures;		
21.	Prepares a schedule and programme of work to implement the above recommendations, including details of the person/actors responsible, along with the timetable with clear milestones and deadline for each recommended action;	- The draft of Working plan is prepared in this table;	Done	MSDT/Directorate for Environment
22.	Regularly reports on progress in the implementation of the Recommendation, as requested by the Bureau to the Standing Committee to the Convention and the Committee itself.	- Regularly report to the Bureau of the Bern Convention in accordance with the request of the Standing Committee;	- February 2019; - November 2019;	MSDT / Directorate for Environment

- March 2019 -



MONTENEGRO

MINISTRY OF SUSTAINABLE DEVELOPMENT
AND TOURISM

PROGRESS REPORT ON THE IMPLEMENTATION OF RECOMMENDATION No. 201 (2018)

III) INTRODUCTION

Skadar Lake is the largest lake in the Balkans, with an area of 40,000 ha. It was proclaimed the National Park in 1983, and it is dominated by the aquatic ecosystem, which is also a cryptodepression. The lake covers an incredibly varying area ranging from 300 to 500 km². Its uniqueness and beauty is reflected in the richness of flora and fauna. Skadar Lake is one of the most important habitats of birds in the Mediterranean, that is, the nesting, feeding and resting site for 282 species of birds, i.e. for 150,000 specimens annually, of which 98% is protected by the national legislation and international conventions.

Moreover, Skadar Lake is a habitat for: 1,900 plant species, 54 species of freshwater molluscs, 45 species of fish (native carp and bleak), 16 species of amphibians, 28 species of reptiles, 57 species of mammals (the otter, which is nearly endangered, is particularly characteristic). Many of these animal species are listed in Annexes I and II of the Bern Convention. Therefore, in 1989, Skadar Lake was recognized as an internationally important bird area (IBA-Important Bird Area), and in 1995 it was included in **the World List of Wetlands of International Importance (Ramsar Sites)**.

A rare pelican, *Pselecanus crispus*, is the trademark of this National Park. The average depth of Skadar Lake is 6m, and as some parts of the bottom are below the sea level, in some places it reaches a depth of up to 60m. Such places on Lake Skadar are called "eyes". The shore of Skadar Lake is picturesque and abounds in wetland-type peninsulas and bays. Skadar Lake hides numerous endemic species of plant and animal life. It is also adorned with small islands, known as *gorice*, covered with wild dog rose, laurel and ivy.

Skadar Lake is also rich in cultural and historical monuments which are scattered over a large part of this national park. This beautiful lake has its islands. There was a prison once on one island, while today this island is inhabited only by birds, on the second island there is the Monastery of St. Nicolas, and the most beautiful beach of the Lake – Pješečac is situated on the third island. This little beach captivates with simplicity and clean water.

The **State Location Study "Mihailovići"**, covers the area located in the southern part of the Old Royal Capital of Cetinje, with the total area of 59 ha. The land area covers 57 ha, of which 8 ha is river basin land and a much smaller area is water area (2.02 ha).

The decision on developing the SSL „Mihailovići“, on the basis of **Special Purpose Spatial Plan Skadar Lake**, was adopted by the Government at the session held on **4th October 2012**. The scope of the SSL „Mihailovići“ relates to Zone III-buffer zone of the National Park „Skadar Lake“.

Considering that Skadar Lake has also been a Ramsar site since 1995, ever since the beginning of development of the SSL „Mihailovići“ there has been a sensitive treatment of this important freshwater wetland habitat. All issues of relevance for the preservation of Skadar Lake as a potential Emerald and NATURA 2000 habitat, in the context of adapting the construction of structures in the Ramsar area, were elaborated in the **Report on the Strategic Environmental Impact Assessment**. Also, due to the location specificity during development of the SSL „Mihailovići“, in addition to the **Report on Strategic Environmental Impact Assessment**, a **Study on Landscape Protection and a Study on the hydrological-hydrogeological characteristics of the terrain of the location** were also developed.

The public debate on the Draft of the SSL „Mihailovići“ and Draft Report on the Strategic Environmental Impact Assessment was held in the period from 7 to 22 February 2014. During the Public debate which took place at the Secretariat for planning and spatial development and environmental protection, or at the Round Table held on 19th February 2014 in the Old Royal Capital of Cetinje, there were no interested parties. Observations were submitted by: Old Royal Capital of Cetinje, as well as interested parties: MJ Property Podgorica and Montenegro Resort Company.

The state authority responsible for implementing the procedure for strategic environmental impact assessment, i.e. the Environmental Protection Agency, in August 2014, gave its approval to the Report on Strategic Environmental Impact Assessment.

On **23rd October 2014**, the Government passed the **Decision on the adoption of SSL „Mihailovići“**. The decision was published in the Official Gazette of Montenegro No. 49/14. The planned tourist accommodation capacities in the SSL „Mihailovići“ are located within the two tourist complexes, which will be formed on the principle of ECO Lodge (eco-village). **The first tourist complex area** of 11.85 ha is **planned at the location of Biški rep** in the western part of the State Study for Mihailovići, on the urban lot UP1. **The second tourist complex** is planned in the **eastern part of the SSL „Mihailovići“, on two urban lots - UP2 and UP3**, the total area of 3.51 ha.

Since 2016 until now, Ministry of Sustainable Development and Tourism provided all necessary information to both Bern Secretariat and Ramsar Secretariat in relation to the issue of the ecological character of Ramsar area of Skadar Lake in the context of the development of commercial projects.

Following submission of a complaint in relation to the development of a commercial project on Skadar Lake by an Informal Citizens Group from Virpazar to the Secretariats of both Bern and Ramsar Convention, in the period June 12-14 2018 joint advisory mission by the Bern Convention and Ramsar Convention took place. During the mission all necessary information and detailed answers were provided, as well as documentation. The experts of the Mission had an opportunity to talk to all relevant state institutions, and visit the Skadar Lake National Park.

In this regard, at the 38th session of the Standing Committee of the Bern Convention, held from 27-30 November 2018, the issue of opening the case of Porto Skadar Lake was discussed (**number: 2016/04: Development of a commercial project in the Skadar Lake National Park and candidate Emerald site (Montenegro)**). It is important to note that the Secretariat of the Bern Convention did not open the case of Porto Skadar Lake on the Standing Committee, but it defined a set of recommendations with the deadline for implementation until December 2019, whose implementation will be closely monitored.

The Ministry of Sustainable Development and Tourism coordinates, with other competent institutions, the fulfilment of the above recommendations. Below is the **First Report on the Implementation of Recommendations covering the Reporting Period December 2018-February 2019**.

IV) IMPLEMENTATION OF RECOMMENDATION NO. 201 (2018) OF THE STANDING COMMITTEE OF THE BERN CONVENTION

At the 38th session held in the period 27-30 November 2018, the Standing Committee of the Bern Convention defined a set of recommendations for the Government of Montenegro in relation to the construction in the Skadar Lake National Park, which should be implemented in the next 12 months, that is, until December 2019.

D) The Government of Montenegro should immediately implement the following conservation and management measures in the next 12 months:

1) Halt any 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 a realistic environmental impact assessment.

The mapping of Skadar Lake and preparation of a habitat map with a scale of 1: 10,000 for the above locations will be done with the assistance of GIZ, within the framework of the cross-border project "Conservation and sustainable use of biodiversity at Lakes Prespa, Ohrid and Shkodra/Skadar (CSBL)", whose beneficiaries are Montenegro, Northern Macedonia and Albania. It is expected that the first field visit will be in April/May 2019, while the results of mapping of the lake can be expected in the second half of 2019.

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.

The reference list of habitats will be compiled through the IPA project "Establishment of the Natura 2000 Network", whose implementation officially started on 26th April 2016. The reference list of Natura 2000 habitats will be used and revised during the above-mentioned habitat mapping planned by GIZ for 2019, through the project "Conservation and sustainable use of biodiversity at Lakes Prespa, Ohrid and Shkodra/Skadar (CSBL)". It is expected that the final reference list will be completed in the second half of 2019.

The status and conservation measures will also be defined on the basis of the results of the mapping of habitats, whereupon it will be discussed that the guidelines and conservation measures are incorporated into the new Special Purpose Spatial Plan for 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*).

Regular monitoring of the state of biodiversity is carried out in the area of the Skadar Lake National Park. Monitoring activities of the species on the territory of the National Park are defined by the 2016-2020 Management Plan for Skadar Lake National Park and Annual Management Programmes. In Montenegro, special attention is paid to protected species, as well as to the species we are bound by the conventions signed by Montenegro, so the focus is on both plant and animal species from Annexes I and II of the Bern Convention. Regular monitoring of these species is carried out in accordance with the capacities of the professional services of the Public Enterprise National Parks of Montenegro, or by the engagement of experts professionally educated for certain groups of organisms.

The monitoring of the otter (*Lutra lutra*), a species from Annex II of the Bern Convention, started in 2011 in the Skadar Lake National Park and it has been implemented since then through the programming activities of the National Park. In 2013 and 2017, GIZ funded the otter monitoring on Skadar Lake through the project "Conservation and sustainable use of biodiversity at Lakes Prespa, Ohrid and Shkoder/Skadar (CSBL)", and the implementer of this project in 2017 was the NGO Centre for Protection and Research of Birds. The Agency for Nature and Environment Protection was also involved in both the first and second phase of the project and has the data on the findings of otter monitoring.

Furthermore, the Protocol for Otter Monitoring on Skadar Lake was developed, under which the monitoring was carried out. In 2017, through the abovementioned project, this Protocol was harmonized with the Protocol used by the colleagues from Albania and North Macedonia and it will soon be forwarded to the National Environmental Protection Agency. A graphic representation of the findings of otter monitoring will be provided in Annex I.

4) Provide and submit to the Secretariat of Convention georeferenced and digitalized borders, as well as appropriate updated data forms on the corresponding Candidate Emerald Site and Ramsar Site.

The Ministry of Sustainable Development and Tourism currently has only a working version of the digitalised border of the Skadar Lake National Park, which was made for the needs of development of the Special Purpose Spatial Plan for the Skadar Lake National Park.

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.

The preparation of the Special Purpose Spatial Plan for the Skadar Lake National Park was suspended on 31 December 2018, pursuant to Article 217 of the Law on Spatial Planning and Construction of Structures ("Official Gazette of Montenegro" No. 64/17; 44/18 and 63/18).

Preparatory activities are underway for the commencement of the development of a new planning document – the General Regulation Plan of Montenegro, under which, the area of the Skadar Lake National Park will be elaborated, as one of the segments of the Plan, in accordance with Article 17 of the Law on Spatial Planning and Construction of Structures. When drafting the planning document for the area of Skadar Lake, the solutions of the Spatial Plan of the Special Purpose Area of the Skadar Lake National Park from 2001 will be used as the baseline.

Areas that should be proclaimed as Zone I of Strict Protection will be considered when drafting the planning document and incorporated into it after the competent environmental protection institutions have submitted guidelines and requirements.

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.

The areas of Zone I as well as the protection belt, will be considered through the process of development of the new General Regulation Plan of Montenegro, under which the area of the Skadar Lake National Park will be elaborated, after the competent institutions have developed the Revision Study of the Protected Area.

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.

The development of the Special Purpose Spatial Plan for the Skadar Lake National Park was suspended on 31 December 2018, pursuant to Article 217 of the Law on Spatial Planning and Construction of Structures ("Official Gazette of Montenegro" No. 64/17; 44/18 and 63/18). Preparatory activities are underway to commence the preparation of a new planning document – the General Regulation Plan of Montenegro, under which, the area of the Skadar Lake National Park will be elaborated, as one of the segments of the plan, in accordance with Article 17 of the Law on Spatial Planning and Construction of Structures.

The areas that should be proclaimed Zone I of strict protection will be considered during drafting of the planning document and incorporated into it after the guidelines and requirements have been submitted by the competent environmental protection institutions.

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.

Article 16, paragraph 1, item 42 of the Law on National Parks (Official Gazette of Montenegro 28/14 and 39/16) prescribes the prohibition of the use of vessels with an engine of more than 10 hp (boats, speedboats, scooters, etc.) without approval, except for the needs of state administration bodies.

In addition, the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period, which will certainly contribute to the more intensive implementation of the control of navigation and vessels on Skadar Lake.

In order to increase the safety of navigation on the lake, it is planned to set up the AIS base station on the shore of Skadar Lake, and to enable the installation of AIS transmitter in the navigation vessels for transportation of passengers. Thus, the coast station "BARRADIO" will have a realistic picture of movement of passenger vessels on Skadar Lake at any moment.

Moreover, the construction of the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake.

9) The use of personal water crafts (water scooters) and any other water activities which can harm the floating vegetation must be prohibited.

For the purpose of more efficient fight against all types of unlawful actions in the area of the Skadar Lake National Park, at the beginning of 2018, a Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbourmasters' Office, who, at periodic meetings, analyse the measures undertaken and agree on the activities to efficiently protect this protected area and, inter alia, particularly observe the provisions related to the restrictions regarding the navigation on Skadar Lake.

At the next meeting of the Working Group, discussion about these prohibitions regarding the negative impact on floating vegetation, is envisaged.

Furthermore, the activities on establishment of communication with the local population are going to be undertaken in the coming period, as well as on raising awareness of the significance and values of the National Parks with the aim of complying with legal restrictions and protecting the aquatic vegetation of the lake.

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.

This issue will also be one of the topics at the next meeting of the Working Group for the prevention of unlawful actions in the area of the Skadar Lake National Park, as well as in the course of development of a new planning document – the General Regulation Plan of Montenegro.

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 implementation of the Water Framework Directive sets a number of common technical challenges for EU Member States and candidate countries. A common understanding and approach is crucial for the successful and efficient implementation of the Directive in Montenegro. Therefore, in accordance with the Water Directive, the issue of zoning of the Skadar Lake National Park will be considered in cooperation with the Water Administration. Through planning cooperation, the Public Enterprise for National Parks and the Water Administration will also define the guidelines for the implementation of control and prohibition of works defined by the said Directive in the zones of Category I (high) and Category II (good).

In addition, the bans on installations or constructions in the lake zones can be an integral part of the planning document guidelines, which will be discussed during the process of finalization of a new Spatial Plan - the General Regulation Plan of Montenegro.

II) Includes 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.

For all further steps undertaken with regard to the development of the Porto Skadar Lake and White Village project, the opinions and recommendations of the Bern and Ramsar Conventions, as well as EU delegation to Montenegro.

III) Examines whether any building permit related to the location issued after October 2017 were valid as 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. 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.

SLS "Mihailovići" is valid until 2020 and its validity will cease at the moment when the new Spatial Plan has been adopted. The Directorate for Construction in the Ministry of Sustainable Development and Tourism, after October 2017, has not issued any building permits in the area within the scope of the State Location Study "Mihailovići". In this area, the following building permits were issued before October 2017:

- to the investor "Montenegro resort company MRC", for the construction of a tourist resort on UP1, number: UPI 0503-836/12-2014 of 27 March 2015, and
- to the investor "MJ Property", for the construction of a tourist resort: a 5-star category hotel with annexes, on UP2 and UP3, number: UPI 1054-87/12 of 6 June 2016.

Moreover, in the said building permits, pursuant to Article 97 of the Law on Spatial Planning and Construction of Structures, a condition is laid down that works must commence within 2 years from the date of issuance of a building permit and that otherwise the construction right will cease to apply. According to the data obtained from the Directorate for Inspection Affairs and Licensing in the Ministry of Sustainable Development and Tourism, the investor "MJ Property" doo Podgorica, submitted a notice of commencement of construction works, and started preparatory works on 1 June 2018, under the number 107/4-1522/1 within the legal deadline.

With regard to the issued building permit, the investor "Montenegro Resort Company" submitted a notice of commencement of works on 10 February 2017, also within the legal deadline.

The above mentioned building permits were issued for the preliminary design. The Urban-Planning and Technical Conditions for berths are issued separately, independently of Urban-Planning and Technical Conditions for the construction of other parts of tourist resorts. Accordingly, the berth

permit is issued in a special procedure and it requires development of an Environmental Impact Assessment Study.

However, at the UP1 location, a permit for the construction of a berth was not issued because it was not the subject of a building permit.

IV) Carefully examines the procedure which 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. Pursuant to the provisions of SSL Mihailovići such a landing place must be subject to a separate environmental impact assessment.

Yes, according to the Urban-Planning and Technical Conditions, permits for berths are issued separately, independently of Urban-Planning and Technical Conditions for the construction of other parts of tourist resorts. It is stipulated that the berth permit is issued in a special procedure and it requires development of an Environmental Impact Assessment Study.

Building permits for UP1, UP2 and UP3 are issued for the preliminary design, which means without the approvals obtained from the competent authorities for urban-planning and technical conditions in accordance with special regulations.

A license for a berth in the White Village case has not been issued.

V) Provides and determines 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.

The Law on Strategic Environmental Impact Assessment ("Official Gazette of Montenegro" No. 59/11 and 52/16) stipulates the conditions, manner and procedure for carrying out an assessment of the impact of certain plans and programmes on the environment through the integration of environmental protection principles in the process of preparation, adoption and implementation of plans and programmes that have a significant impact on the environment. This Law is 100% harmonized with the SEA Directive.

With regard to the technical specifications and conditions for the construction of berths, permits are issued in a special procedure and independently of urban-planning and technical conditions for the construction of other parts of tourist resorts. It is necessary to prepare an Environmental Impact Assessment Study (EIA Study) in order to obtain a permit. EIA procedure is conducted in accordance to the Law on Environmental Impact Assessment which is 100% harmonized with the EIA Directive.

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;

The protection of floating vegetation will also be elaborated during the development of the new Spatial Plan of Special Purpose for National Park Skadar Lake, and accompanying Strategic Environmental Assessment Study.

VII) Establishes 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.

Ministry of Sustainable Development and Tourism is strongly devoted to the collaboration with professional ecological NGOs since this kind of cooperation should be of great use in terms of providing guidelines and recommendations which would assist in implementation of proper

environmental policies. In addition to that, open dialogue and cooperation with all relevant stakeholders are necessary since Montenegro builds its future on the principles of sustainable development along with promotion of responsible attitude towards environment.

Also, all Laws in the area of environment in Montenegro emphasize involvement of NGOs and civil society in decision making procedure. Based on the previous corespondance made on the matter of development of the commercial projects on Skadar Lake, it was reported that during the procedure of development od planning documents as well as environmental impact assessment studies, no comments and suggestions were received from NGOs.

VIII) Considers hosting the upcoming biogeographical seminar on Emerald sites in SEE.

Ministry of Sustainable Development and Tourism is with great enthusiasm ready to be the host of the biogeographical seminar. The holding of the biogeographical seminar would be possible in the second half of 2019, due to the necessity to finalize List of habitats (during May 2019).

IX) Identifies and defines appropriate mitigation measures;

Appropriate guidelines and measures for the prevention, reduction or elimination of harmful impacts on environment have been identified through the process of Strategic Environmental Impact Assessment and Environmental Impact Assessment.

The definition of mitigation measures will be possible at a time when the concept of lake zoning becomes clear, since the optimum zoning is a prerequisite for the future development and preservation of Skadar Lake on the principles of ecological sustainability. Attention will also be paid to reducing the process of eutrophication through the reduction of pollution, not only of the aquatic environment, but also of the surrounding area in the entire basin of Skadar Lake. The monitoring system should be strengthened and improved through the selection and regular monitoring of indicator parameters. As far as birds are concerned, this system is already operative through regular monitoring of nesting and wintering populations within several European schemes.

Through drafting of the planning documents, rules for the construction of structures in national parks will be obeyed. Also, a plan of management, administration, hunting and protection of the fishing stock (through the development of the Fishery Base) will be developed.

Regular and strict enforcement of criminal law provisions will demotivate and eliminate the illegal collection of protected and/or rare species (plant and animal) for commercial and collecting purposes.

X) Takes 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, as stated in the recommendations of the latest EC Montenegro 2018 Report of April 2018. 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.

Montenegro is committed to protecting the environment, and an increased attention is paid to the prevention, reduction to the extent possible, eliminating pollution completely and ensuring reasonable management of natural resources, especially in relation to the growing level of pollution of the ecosystem due to uncontrolled discharge of ballast waters, invasive species propagation, emission of pollution from land-based sources, and disturbance of the natural balance due to the urbanization, etc.

In accordance with Article 8 of the Law on Environmental Impact Assessment (“Official Gazette of Montenegro”, No. 075/18 of 23 November 2018), the obligation to obtain an approval for an impact assessment has been established. The holder of the project for which it is required Elaborate or project for which a decision has been taken on the need to develop Elaborate, can not approach the execution

of the project, or obtain approval for performing the activity without the consent of the study or decisions that the elaboration of the study is not necessary.

Also, it is stipulated that, when the impact assessment process involves the implementation of the appropriate assessment procedure, the admissibility appropriate assessment procedure is carried out within the framework of the impact assessment procedure in accordance with the Law on Nature Protection.

When the impact assessment procedure is conducted under other procedures in accordance with special regulations, these procedures shall be implemented in a coherent manner.

In accordance with the National Strategy with Action Plan for Transposition Implementation and Enforcement of the EU acquis on environment and climate change 2016-2020, additional training is planned at both the state and local levels. The first in a series of trainings, is being realized at the end of march this year, especially with accent on the local level. Experts from member states will present experiences in the context of the implementation of strategic and environmental impact assessment, as well as the dissemination of information and public consultations. In the context of better public consultation, besides the relevant authorities, the Aarhus Centers play a special role.

The appropriate assessment process is incorporated into Montenegrin legislation, and according to the Law on Nature Protection, one of the most important mechanisms for the protection and preservation of the ecological network. The procedure for the appropriate assessment pursuant to Article 46 of the Law on Nature Protection consists of the previous and the main assessment.

Appropriate Assessment is carried out when there is a possibility to plan, program, project, especially in combination with other plans, programs and projects can have a negative impact on the targeted species and habitats and to the conservation objectives and ecological integrity of the ecological network. It does not matter whether the procedure located in the area or outside of it, it is important to examine its potential impact. Thus, for example, regulation of the river upstream can have an impact on the area of the ecological network (target species and habitats) kilometers downstream.

The Ministry of Sustainable Development and Tourism has adopted the Rulebook on the Accurate Content of the Study on the Appropriate Assessment for the Ecological Network Area ("Official Gazette of Montenegro", No. 45/17).

After the EU accession, all projects (eg infrastructure), all plans (eg forest management plans, water management plans, waste management plans, land use plans) and any strategies that take place inside or near certain Natura 2000 sites will be subject to the Appropriate Assessment (AA) process and will have to meet all the requirements set out in Article 6 of the Habitats Directive.

At its session held on 4 October 2018, the Government of Montenegro adopted the Information on the Project "Finalization of the Study on Protection of the Ulcinj Salina Area" with the proposed further steps in the continuation of the process of proclaiming Ulcinj Salina the protected area. On 17 October 2018, the Ministry of Sustainable Development and Tourism submitted a Study on Protection of Ulcinj Salina to the Municipality of Ulcinj, so that the Municipality could continue to implement the procedure for the establishment of protection of Ulcinj Salina by organizing a public debate for the Study on Protection, the Proposal of a Decision on Proclamation of a Protected Nature Reserve and Proposal of a Decision on Appointment of the Manager, in accordance with the Law on Nature Protection.

Ulcinj Municipality started a public hearing at the end of December 2018 and it was completed on January 31 2019. Consideration of received suggestions and integration of comments from the Public Hearing in the Protection Study is under way. After that and followed by an opinion from the Ministry of Agriculture and Rural Development and approval from the Ministry of Sustainable Development and Tourism, Ulcinj Municipality will send the documents for the adoption and proclamation of Ulcinj Salina as nature park by the Assembly of Ulcinj Municipality.

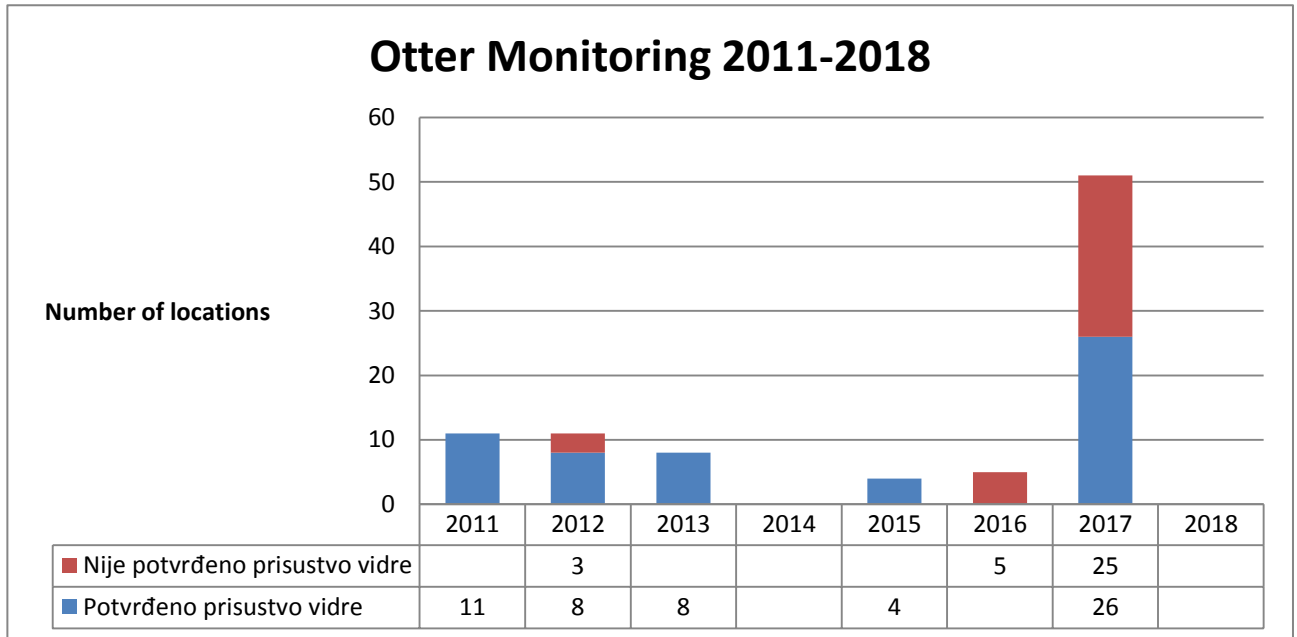
- XI) Prepares a schedule and programme of work to implement the above recommendations, including details of the person/actors responsible, along with the timetable with clear milestones and deadline for each recommended action.**

The draft of Working plan is prepared in form of table which is provided in Annex II.

- XII) Regularly reports on progress in the implementation of the Recommendation, as requested by the Bureau to the Standing Committee to the Convention and the Committee itself.**

Montenegro will regularly report to the Bureau of the Bern Convention on the progress of implementation of the recommendations in accordance with the request of the Standing Committee.

Annex I



- The presence of the otter has not been confirmed
- The presence of the otter has been confirmed

The numbers in the column do not represent the number of otters, but the number of their traces (footprint or feces). Also, except for 2017, the research on the otter has not been conducted in the entire lake, but only in certain places, specifically in the places where the otter has been observed by the local population (surveys) or the places where the otter has been endangered (run over or drowned in the fishing traps or nets), and they are not a representative sample for the whole lake, but only for a special location.

Moreover, due to the limited funds allocated for this activity, monitoring of the otter has not been performed in order to obtain the numerical data. The aim of this monitoring is to determine the presence of otters, their habitats and the factors that threaten them, and to adopt the measures for the protection of the otter and its habitat on the basis of these researches.

Annex II

WORKING PLAN

WORKING PLAN				
No.	Measures	Activities	Realization time	Responsible authorities
1	Halts 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 has been provided for “Mihailovići“, Poseljanski Zaliv Bay, Biški Rep, the mouth of Crnojevića river, the mouth of Bazagurska matica and the islands Liponjak and Galići. 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	<ul style="list-style-type: none"> - will be done with the assistance of GIZ; - the first field visit will be in April/May 2019; 	<ul style="list-style-type: none"> - while the results of mapping of the lake can be expected in the second half of 2019. 	MSDT /GIZ
2.	Elaborates 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,	<ul style="list-style-type: none"> - The reference list of habitats will be compiled through the IPA project "Establishment of the Natura 2000 Network"; - The status and conservation measures will also be defined on the basis of the results of the mapping of habitats; 	<ul style="list-style-type: none"> - the final reference list will be completed in the second half of 2019. 	GIZ / NEPA
3.	Establishes and runs a monitoring system on species strictly protected according to Appendices I and II of the Bern Convention respectively NATURA 2000 species and habitats by the National Environmental Protection Agency at first, at least in the area mentioned under (i). The monitoring system must include the otter (Lutra lutra),	<ul style="list-style-type: none"> - develop protocol monitoring of species from Annex I and II of the Bern Convention; - conduct regular monitoring of species from Annexes I and II of the Bern Convention under the established protocol; - regular monitoring of biodiversity status monitoring; 	<ul style="list-style-type: none"> - November 2019. 	Public enterprise for national parks / NEPA

4.	Provides the Conventions' secretariats with georeferenced and digitalised borders of and respective updated data forms on the corresponding Candidate Emerald Site and Ramsar Site		- November 2019.	MSDT / Directorate for Spatial Planning
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,	- Preparatory activities are underway for the commencement of the development of a new planning document the General Regulation Plan of Montenegro, under which, the area of the NP Skadar Lake will be elaborated, as one of the segments of the plan;	2019-2020	MSDT/ Directorate for Spatial Planning
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,	- will be considered through the process of development of the new General Regulation Plan of Montenegro	2019-2020	MSDT / Directorate for Spatial Planning
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,	- Preparatory activities are underway to commence the preparation of a new planning document the General Regulation Plan of Montenegro.	2019-2020	MSDT / Directorate for Spatial Planning
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,	- the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period; - it is planned to set up the AIS base station on the shore of Skadar Lake, - Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety	On continuous basis	Public enterprise for national parks / Harbor Captain Bar

		Department and the Harbourmasters' Office; - the construction of the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake;		
9.	The use of personal water crafts (water scooters) and any other water activities which can harm the floating vegetation must be prohibited,	- the Ministry of Transport and Maritime Affairs will increase the number of maritime navigation safety inspectors in the coming period; - it is planned to set up the AIS base station on the shore of Skadar Lake, - Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbourmasters' Office; - the construction of the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake;	On continuous basis	Public enterprise for national parks /Harbour Captain Bar
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,	- the construction of the Port of Virpazar is planned, which will be the base for all AIS vessels navigating on Skadar Lake; - it is planned to set up the AIS base station on the shore of Skadar Lake, - Working Group was formed with the representatives of the Ministry of Sustainable Development and Tourism, the Administration for Inspection Affairs, the Police Administration, the Maritime Safety Department and the Harbourmasters' Office;		Harbor Captain Bar / Public enterprise for national parks
11.	No installations or constructions shall be allowed in the shore zone stretches classified with Shore zone Functionality Index under category I (high) and II (good);	- define guidelines for the implementation of control and prohibition of works in accordance with the Water Framework Directive.		Public enterprise for national parks / Management for waters

		- the bans on installations or constructions in the lake zones can be an integral part of the General Regulation Plan of Montenegro;		
12.	Includes 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;	- opinions and recommendations of the Bern and Ramsar conventions, as well as the EU delegation of Montenegro, will be taken into account.		MSDT
13.	Examines whether any building permit related to the location issued after October 2017 were valid as 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. 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;	- SLS "Mihailovići" is valid until 2020 and its validity will cease at the moment when the new Spatial Plan has been adopted. - after October 2017, has not issued any building permits in the area within the scope of the State Location Study "Mihailovići"; - At the UP1 location, a permit for the construction of a berth was not issued because it was not the subject of a building permit.		MSDT
14.	Carefully examines the procedure which 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. Pursuant to the provisions of SSL Mihailovići such a landing place must be subject to a separate environmental impact assessment;	- It is stipulated that the berth permit is issued in a special procedure and it requires development of an Environmental Impact Assessment Study; - Building permits for UP1, UP2 and UP3 are issued for the preliminary design, which means without the approvals obtained from the competent authorities for urban-planning and technical conditions in accordance with special regulations. - A license for a berth in the White Village case has not been issued.		MSDT / Directorate for Spatial Planning / Directorate for construction
15.	Provides and determines 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	- The Law on Strategic Environmental Impact Assessment ("Official Gazette of Montenegro" No. 59/11 and 52/16) stipulates the conditions, manner and procedure for carrying out an assessment of		MSDT / Directorate for Spatial Planning / Directorate for construction

	must fully consider the integrity and dynamics of the sensitive ecosystem of Skadar Lake National Park, Ramsar Site and Candidate Emerald Site;	the impact of certain plans and programmes on the environment through the integration of environmental protection principles in the process of preparation, adoption and implementation of plans and programmes that have a significant impact on the environment. - With regard to the technical specifications and conditions for the construction of berths, it is necessary to prepare an Environmental Impact Assessment Study;		
16.	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;	- control of the waterway; - control fishing networks; - The protection of floating vegetation will also be considered during the development of the new Spatial Plan Special Purpose of "Skadar Lake		MSDT - Directorate of Environment / Public enterprise for national parks / NEPA
17.	Establishes 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;		On continuous basis	MSDT
18.	Considers hosting the upcoming biogeographical seminar on Emerald sites in SEE;	- the finalization of this List is expected in early May 2019. - After preparing the List of habitats, it will be possible to host biogeographical seminar,	- in the second half of the 2019.	MSDT/ Directorate of Environment
19.	Identifies and defines appropriate mitigation measures	- Appropriate guidelines and measures have been identified through the process of Strategic Environmental Impact Assessment and Environmental Impact Assessment. - Through the development of planned documentation, the rules for constructing facilities in national parks will be respected, and will be developed the Plan of management, administration, hunting and		MSDT

		protection of the fishing stock (through the development of the Fishery Base).		
20.	Takes 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, as stated in the recommendations of the latest EC Montenegro 2018 Report of April 2018. 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;	<p>- In accordance with Article 8 of the Law on Environmental Impact Assessment (Official Gazette of Montenegro, No. 075/18 of 23 November 2018), the obligation to obtain an approval for an impact assessment has been established.</p> <p>- It is stipulated that when the impact assessment process involves the implementation of the assessment procedure for admissibility,</p> <p>- In line with the National Strategy With Action Plan For Transposition Implementation And Enforcement Of The Eu Acquis On Environment And Climate Change 2016-2020, further implementation of training is planned at the state and local level;</p>	On continuous basis	MSDT/Directorate of Environment
21.	Prepares a schedule and programme of work to implement the above recommendations, including details of the person/actors responsible, along with the timetable with clear milestones and deadline for each recommended action;	- The draft of Working plan is prepared in this table	Done	MSDT/Directorate of Environment
22.	Regularly reports on progress in the implementation of the Recommendation, as requested by the Bureau to the Standing Committee to the Convention and the Committee itself.	- Regularly report to the Bureau of the Bern Convention in accordance with the request of the Standing Committee.	- February 2019; - September 2019;	MSDT / Directorate of Environment