



Environment and Climate
Regional Accession Network **ECRAN**

ENVIRONMENTAL AND CLIMATE FORUM

Conclusions from the Second National Preparatory Meeting, Montenegro

1. Water Management - Protection of biodiversity and sustainable hydropower

- ✓ Prior to investing into planning and construction of hydropower projects, Governments should prove that they considered all alternatives to satisfy the needs that should be met by the new dam construction and that priority was given to improving the efficiency of water and energy use, as well as maximizing the output of existing dams.
- ✓ The development of new hydropower projects needs to be assessed against the requirements of the Water Framework (Article 4.7) and Bird and Habitats (Article 6.3/ 6.4) Directives and a set of other objectives under the EU water and nature protection legislation;
- ✓ Governments should make a revision of the regional and national energy development strategies and plans for hydropower development taking into account future impacts of climate change and focusing on environmental and social aspects and economic viability;
- ✓ Integrating river basin management planning including water use plans for the hydro energy production should be done with high level of transparency and public participation;
- ✓ By the end of 2016 Governments must set up a plan and technical working group for implementation of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” which defines exclusion, favourable and non-favourable zones for the hydropower;
- ✓ Clear information on all costs and benefits of a given hydropower project should be made publicly available and evaluation of all economic aspects and costs incurred by society and the natural environment should be regularly weighed against potential benefits;
- ✓ Methodology for definition of ecologically acceptable flows should be urgently agreed and regulated;
- ✓ Urgent institutional reform and capacity building should be performed in water sector, from the decision making level in Ministry of Agriculture and rural development, Water Directorate and Hydro meteorological Bureau, especially considering technical staff, aiming to implement Water Framework Directive;
- ✓ It is of critical importance to develop water cadastre with protected areas registry.

- ✓ It is needed to develop the capacity building programme for development of integrated river basin management plans interlinking the local self-governments, CSOs, individual experts and different water users and stakeholders.

2. Waste management - Management and disposal of waste in accordance with EU Acquis Communautaire

- ✓ The unacceptably poor work of inspection bodies, specifically utility inspections which operate at the local level and the Administration for Inspection Affairs which operates at the national level, regarding the implementation of the Law on Waste Management has been brought to attention.
- ✓ A proposal to unite the inspection bodies under the Administration for Inspection Affairs, which would combine the jurisdictions and increase work efficiency, was given.
- ✓ For the purpose of active participation of the NGO in the public debate on the National Plan of Waste Management proposal and the Report on the Strategic Assessment of the Effects of Waste on Environment, suggestions and comments, which would be presented to the interested organizations for collective action, should be prepared for that strategic document.
- ✓ The need for the cooperation of the NGO when it comes to sending the comments to the European Commission during the preparation of the Report on the Progress of Montenegro for 2015, which should include the achievements of the NGO in the field of waste management, has been brought to attention.
- ✓ A proposal to create a joint document which would contain comments on matters relevant to the Report on Progress as a common platform for the organizations which might be interested in undertaking such an action was given.

3. Protection of biodiversity - Compliance of the Law on wildlife, hunting and hunting practices with the Natura 2000 directives (Birds Directive and the Habitats Directive)

Many segments of game management in Montenegro are well regulated or at least based on sound foundations. But to improve management and make it compatible with EU directives certain shortcomings need to be remedied, of which we deem the following to be particularly important:

- ✓ Quality of data on the status of managed species is highly questionable due to vague regulations on monitoring methods and poor data gathering control;
- ✓ All principal data on the status of game species are collected by hunters; for this type of hunting system hunters also have an outsized role in management planning, which may both lead to conflict of interest;
- ✓ Except for hunters, the legislation does not provide for sufficient participation of other stakeholders (e.g. landowners, NGOs) in the game management process, which is required under the Aarhus Convention and should generally be a characteristic of countries with res communis systems;

- ✓ For certain species, the list of game species (e.g. brown bear, grey wolf), hunting seasons (e.g. several birds, wolf) and legislative procedures allowing hunting is not in conformity with EU legislation (Habitats and Birds directives);
- ✓ Existing regulations determines absolute population size estimates and ranking of carrying capacity of hunting grounds (bonitiranje) as the basic model of game management planning; this management planning concept is outdated, in practice often erroneous, and is being replaced around the world by an adaptive management approach;
- ✓ Hierarchical integration of 10-year and annual management plans for local hunting grounds with umbrella management plans for regional units is inadequate (not sensibly resolved); it is also impossible to verify on annual basis whether the executed measures fulfill the goals of the regional units plans, as there is no available data; and
- ✓ The legislation likely insufficiently supports coordination of game management with other sectors (e.g. forestry, nature protection).