
Summary

REPORT ON THE IMPLEMENTATION OF THE GREEN AGENDA FOR THE WESTERN BALKANS IN MONTENEGRO

WITH A FOCUS ON THE PILLARS OF DECARBONISATION (CLIMATE AND CLEAN ENERGY) AND
BIODIVERSITY
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LIST OF ABBREVIATIONS:

CBAM	Carbon Border Adjustment Mechanism
CZIP	Center for Protection and Research of Birds
EU	European Union
EIB	European Investment Bank
EBRD	European Bank for Reconstruction and Development
ETS	Emissions Trading System
GEF	Global Environment fund
GHG	Greenhouse gas emissions
IBA	Important bird and biodiversity areas
IPA	Instrument for Pre-Accession Assistance
IBM	Institute of Marine Biology
JPNP	Public Enterprise for National Parks
KfW	German government-owned development and promotional bank
LCDS	Low Carbon Development Strategy
MRV	Monitoring, reporting, and verification system
NECP	National energy and climate plan
CSO	Civil society organisations
SPA	Special Protection Areas
UNCBD	United Nations Convention on Biological Diversity
UNDP	United Nations Development Programme
WB	Western Balkans

1. INTRODUCTION

Report on the situation in areas relevant to the Green Agenda (hereinafter: the Report), i.e. the degree of fulfilment of obligations under the Action Plan for the Green Agenda for the Western Balkans (hereinafter: the Action Plan), resulted from the regional project “Green Agenda Navigator – Empowering Civil Society to Support the Development of Climate-Neutral and Resilient Economies in the Western Balkans,” implemented by the Belgrade Open School in cooperation with six regional partners: the organisation Eco-team from Montenegro, the association Aarhus Center in Bosnia and Herzegovina, the organisation Eco-Z from Kosovo*, the Center for Environmental Research and Information Eko-svest from North Macedonia, the organisation Protection and Preservation of Natural Environment from Albania, as well as the organisation CEE Bankwatch Network. The project is co-funded by the European Union (hereinafter: the EU).

The main objective of the Project is to strengthen the capacities of civil society organisations (hereinafter: CSOs), support regional cooperation, and create opportunities for CSOs to engage in decision-making and policy-making processes. In this context, Eco-team carried out an analysis and prepared the National Report with recommendations for key stakeholders in Montenegro.

The Report assesses the current level of progress in the preparation and implementation of national legislation, provides an overview of the state of institutional structures and administrative capacities, stakeholder participation, financing, and other aspects relevant for those areas/pillars of the Green Agenda that are being evaluated, namely: Decarbonisation (climate and clean energy) and Biodiversity.

The selection of these pillars was determined through a prior agreement at the project team level and conditioned by the fact that Eco-team has many years of experience in monitoring activities in the fields of decarbonisation and nature protection. Given the challenges identified in monitoring the implementation of the Action Plan, the preparation of this Report is based on the Joint Proposals of Non-Governmental Organisations for the Revision of the Action Plan for the Implementation of the Green Agenda for the Western Balkans¹, from October 2024. The Report covers the period from June 2023, when the Comprehensive Analysis of the Strategic and Legislative Framework in Areas Relevant to the Green Agenda² was prepared, until June 2025.

The necessary information for the preparation of the Report was collected based on a Questionnaire, which was submitted to key actors responsible for implementing activities under

¹ <https://rb.gy/7kribf>

² NGO “Eco Team”, *Sveobuhvatna analiza strateškog i zakonodavnog okvira u oblastima relevantnim za Zelenu Agendu (Podgorica, Eco Team, 2023)*

the Green Agenda. After consolidating the responses, desk research and an assessment of the degree of implementation of measures arising from the pillars Decarbonisation (climate and clean energy) and Biodiversity were carried out. Finally, challenges were identified, followed by conclusions and recommendations for their mitigation and/or elimination.

The structure of the Report consists of an analysis of achievements and challenges, conclusions, and recommendations for the measures referred to. In line with the agreed methodology within the project team, it was not necessary to consider measures relating to regional actions, nor those measures that are unlikely to bring progress.

2. DECARBONISATION ANALYSIS

STRATEGIC AND LEGISLATIVE FRAMEWORK

The recently adopted new Energy Law³ (“Official Gazette of Montenegro,” No. 28/2025) regulates energy activities, the conditions and manner of their performance with a view to ensuring quality and secure supply of energy to final consumers, the organisation and management of the electricity and gas market, as well as other issues of relevance to the energy sector. The Law also defines the preparation of the National energy and climate plan (hereinafter: NECP).

The Law on Protection against Adverse Impacts of Climate Change⁴ (“Official Gazette of Montenegro,” No. 73/2019), which regulates protection against adverse impacts of climate change, the reduction of greenhouse gas emissions (hereinafter: GHG), the protection of the ozone layer, and other issues related to protection against adverse impacts of climate change, was adopted in 2019. A new Law, to be renamed the Law on Climate Change, is in preparation and is expected to be adopted by the end of September 2025. The Draft of the new Law sets as its objective the achievement of climate neutrality by 2050.

INSTITUTIONAL FRAMEWORK AND ADMINISTRATIVE CAPACITIES

The Ministry of Ecology, Sustainable Development and Northern Region Development is the main national authority responsible for national environmental and climate change policy. Within the Ministry, the Directorate for Climate Change and Sustainable Development, namely the Department for Climate Change, employs 5 staff members.

In accordance with the Rulebook on Internal Organisation and Job Classification of the Ministry of Energy and Mining⁵, the Ministry of Energy and Mining performs administrative tasks related

³ NGO “Eco Team”, *Sveobuhvatna analiza strateškog i zakonodavnog okvira u oblastima relevantnim za Zelenu Agendu* (Podgorica, Eco Team, 2023)

⁴ NGO “Eco Team”, *Sveobuhvatna analiza strateškog i zakonodavnog okvira u oblastima relevantnim za Zelenu Agendu* (Podgorica, Eco Team, 2023)

⁵ NGO “Eco Team”, *Sveobuhvatna analiza strateškog i zakonodavnog okvira u oblastima relevantnim za Zelenu Agendu* (Podgorica, Eco Team, 2023)

to the fields of energy, energy efficiency, mining, geology, hydrocarbons, and concessions within its competence. The Ministry has a mandate to prepare the NECP to achieve strategic objectives by 2030 and the transition to a low-carbon economy by 2050.

Within the Directorate for the Power Sector, the Department for Power Sector Development employs 5 officials, while the Directorate for Energy Efficiency, specifically the Department for the Development of the Legal Framework in the Field of Energy Efficiency and Promotion, employs a total of 5 staff members.

Recently, an institutional mechanism for managing Just Transition has been established, namely the National Council for Just Transition, chaired by the Minister of Energy and Mining. This body represents the central authority for steering and coordinating the transition process in line with national development goals, European standards, and the needs of local communities – particularly Pljevlja, which lies at the centre of this process.

STAKEHOLDER INVOLVEMENT

Within the “Climate and Energy” pillar, in addition to the Ministry of Ecology, Sustainable Development and Northern Development and the Ministry of Energy and Mining, other state administration bodies also have obligations for implementing the measures: the Ministry of Economic Development, the Ministry of Transport, the Ministry of Maritime Affairs, the Ministry of Agriculture, Forestry and Water Management, the Ministry of Foreign Affairs, the Ministry of European Affairs, the Environmental Protection Agency, as well as local self-governments, universities, schools, relevant business sectors, NGOs / the civil sector, and others.

The NGO sector was involved in the technical working group during the preparation of the NECP draft, as well as during the drafting of the Climate Change Law. The key contributions of the NGO sector and civil society to the NECP and the strategic environmental assessment, as well as to the Climate Change Law, are expected during the public consultation process.

OTHER RELEVANT ASPECTS

In early June 2025, Coalition 27⁶ presented Shadow Reports for Chapter 27⁷ and Chapter 15⁸, noting limited progress in both negotiation chapters. Coalition 27 is an informal network of 18 non-governmental organisations from Montenegro, serving as a platform for joint

⁶ <https://koalicija27.me/>

⁷ https://www.greenhome.co.me/ova_doc/izvjestaj-iz-sijenke-za-poglavlje-27-za-period-maj-2024-jun-2025-poglavlje-27-u-vremenskoj-zamci/, preuzeto 20. juna 2025,

⁸ https://www.greenhome.co.me/ova_doc/izvjestaj-iz-sijenke-za-poglavlje-15-energija-jun-2025/, preuzeto 20. juna 2025,

participation of civil society organisations in the process of adopting EU standards and values in the field of environmental protection.

According to the Shadow Report for Chapter 15, the adoption of the NECP and the full transposition of the “Clean Energy for All Europeans” package requirements continue to be delayed. The new Energy Law and the Law on the Use of Renewable Energy Sources represent important steps towards alignment with the EU acquis in the fields of electricity and renewable energy sources. However, functional implementation remains slow and fragmented. Although the laws recognize important mechanisms (e.g. aggregation, smart metering, dynamic pricing, energy communities), their operational application has been postponed due to the need to adopt a large number of by-laws, technical regulations, and digital tools.

This model of transposition – where a significant part of obligations is transferred to secondary legislation – carries a high risk of delays and regulatory gaps, which limits the achievement of objectives on the ground. Institutional capacities, particularly in terms of staffing, technical equipment and inter-ministerial coordination, remain insufficient for full implementation of the EU acquis. At the same time, functional mechanisms for monitoring, reporting and data verification have not yet been established, which is crucial for meeting requirements in the fields of energy, climate and sustainable development.

FINANCIAL CHALLENGES FOR THE “DECARBONISATION” PILLAR

According to the Assessment for the Implementation of the Action Plan for the Closing Benchmarks of Chapter 27⁹, for the period 2021–2025, funds amounting to €482,996,838 are required. Estimates for the next period are not available.

The financing structure under this Action Plan includes the following sources:

1. **State budget (45%)**, comprising the following structure: current budget (€9,443,091 – 4% of total budgetary funds), capital budget (€39,071,637 – 18% of total budgetary funds), loans (€161,243,700 – 75% of total budgetary funds, provided by the European Investment Bank (hereinafter: EIB), World Bank, German government-owned development and promotional bank (hereinafter: KfW), European Bank for Reconstruction and Development (hereinafter: EBRD), and other

⁹ Ministarstvo ekologije, održivog razvoja i razvoja sjevera, *Izveštaj o realizaciji Akcionog plana za ispunjavanje završnih mjerila u Poglavlju 27 – Životna sredina i klimatske promjene za izvještajni period mart – avgust 2024. godine* (Podgorica, 2024) <https://wapi.gov.me/download-preview/63296fd7-2cd8-4065-8e92-51059c14f28f?version=1.0>, preuzeto 27. maja 2025

banks involved in water supply and wastewater projects), and local self-government units (€5,935,345 – 3%);

2. **Investments by public enterprises (5%)**, primarily in projects related to municipal wastewater management (activity 4.32);
3. **Investments from pre-accession assistance – IPA (15%)**, to which should also be added funds from the Western Balkans (hereinafter: WB) Green Agenda, the structure of which is not yet known, and investments from other donors (4%), such as United Nations Development Program (hereinafter: UNDP), the World Bank, and others;
4. **Investments by business entities (31%)**, a portion of which will also be secured through loans from commercial banks.

Budget expenditures by program structure: Budget expenditures under the program structure “Energy Management and Development and Energy Efficiency” amount to €1,976,539.76, while for the sub-program “Energy” alone, they amount to €424,426.70 for 2025. Budget expenditures under the program structure “Energy Management and Development and Energy Efficiency” are projected as follows: €1,440,000.00 for 2026 and €1,470,000.00 for 2027. For the spending unit Ministry of Ecology, Sustainable Development and Northern Development, budget expenditures are as follows: €2,161,300.01 for 2025, €2,305,306.93 for 2026, and €2,314,239.45 €¹⁰ for 2027.

Out of the total budget of Montenegro, which amounts to €4,026,835,022.67 for 2025, allocations for the program “Energy Management and Development and Energy Efficiency” for 2025 account for 0.05%.

Budget Expenditures by Programme Structure: “Ecology and Nature”, for the sub-programme “Ecology,” budget expenditures for 2025 for the spending unit Ministry of Ecology, Sustainable Development and Northern Development amount to €1,026,216.61, of which €88,500 is allocated to the activity “Improvement and Implementation of Activities in the Field of Climate Change.” Out of Montenegro’s total budget, which amounts to €4,026,835,022.67 for 2025, allocations for climate change-related activities for 2025 account for 0.0022%.

¹⁰ Skupština Crne Gore “Zakon o budžetu Crne Gore za 2025. godinu” (Podgorica, 2025)
<https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/391/3552-20866-33-24-5-190.pdf>, str. 343 – 494, preuzeto 27. maja 2025.

Unfortunately, the funds allocated in the budget are presented as a total amount, and it is therefore not possible to determine how much has been earmarked for individual actions. Consequently, it is also not possible to assess whether the allocated funds are sufficient.

MEASURE: DEVELOP AND IMPLEMENT AN INTEGRATED ENERGY AND CLIMATE PLAN

Even though the deadline for its finalisation expired in June 2024, Montenegro has still not adopted the NECP. The draft NECP was submitted to the Energy Community in December 2024¹¹. The Energy Community Secretariat prepared recommendations on the draft plan (01/2025)¹², which were submitted to the Government of Montenegro at the end of March 2025. The NECP is in its final preparation phase. At the end of June, together with the Strategic Environmental Assessment, it was put out for a 40-day public consultation, during which significant participation from stakeholders is expected, particularly strong reactions from NGOs and civil society. Key issues include the operation of the Pljevlja thermal power plant over the next 15 years, i.e., until the end of 2040, as well as the construction of new large hydropower facilities, based on updated data on feasibility and hydrology. This is especially relevant for the Komarnica Hydropower Plant, for which the Environmental Protection Agency has not yet approved the submitted Environmental Impact Assessment Report. It is important to note that there is strong civil society opposition to the construction of the Komarnica Hydropower Plant, both due to the preservation of landscapes, primarily the Nevidio canyon, and due to the impacts of climate change on hydrology and the future operation of hydropower plants.

After the finalisation of both documents, in accordance with the public consultation report, they will be submitted to the European Commission for review, and subsequently for adoption, which is scheduled by the end of September 2025. However, it can already be anticipated that this deadline is likely to be extended. The Strategic Environmental Assessment for the NECP has been prepared; however, its draft was not submitted to the Energy Community Secretariat for review along with the NECP document, which had been one of the recommendations for improving the NECP draft.

The draft NECP foresees the phase-out of coal use by the end of 2040. This year was selected without a prior detailed and comprehensive assessment of the cumulative environmental impacts arising from the continued operation of the Pljevlja thermal power plant until 2040,

¹¹ Government of Montenegro "Draft of the National Energy and Climate Plan of Montenegro" (Podgorica, 2024) https://www.energy-community.org/dam/jcr:af9fe606-98a7-4eec-83ab-1a8a9035f63e/NECP%20Montegro_all%20chapters_9%20Dec%202024.pdf, preuzeto 28. maja 2025.

¹² Government of Montenegro "Draft of the National Energy and Climate Plan of Montenegro" (Podgorica, 2024) https://www.energy-community.org/dam/jcr:af9fe606-98a7-4eec-83ab-1a8a9035f63e/NECP%20Montegro_all%20chapters_9%20Dec%202024.pdf, preuzeto 28. maja 2025.

with particular emphasis on its impacts and their interconnection with the decarbonisation targets set out in the NECP and related emission reduction objectives. Furthermore, the document does not analyse the just transition in the Pljevlja coal region, nor does it provide clear guidance on how the process of phasing out coal for electricity and heat production will be completed, which was meant to be the primary measure and purpose of this document. Finally, the draft NECP does not provide clear guidance for achieving climate neutrality by 2050.

MEASURE: ALIGN WITH THE EU EMISSIONS TRADING SYSTEM AND/OR INTRODUCE OTHER CARBON PRICING INSTRUMENTS

Existing obligations for the transition of the energy system, in line with the new ambitions to accelerate transformation and implement decarbonisation of the energy sector, require political decisions on the introduction of carbon pricing in energy consumption sectors. Therefore, it is necessary to establish a more sustainable Emissions Trading System (hereinafter: ETS), as the existing national ETS, currently operating only one installation (Pljevlja TPP), is not aligned with the requirements of the EU ETS Directive.

The price of ETS allowances in the national system (€24/tCO₂) is significantly lower than in the EU ETS (€71.20/tCO₂ as of 07/07/2025). Moreover, the national system still allows free allocation of emission allowances, whereas free allocation in the EU ETS has already been phased out for electricity generation.

Furthermore, the competent authorities need to define a clear date and draft a process for the gradual phase-out of lignite-based power generation. Only in this way will the EU continue to support the region in implementing the Green Agenda and developing carbon pricing policies, taking into account the EU Carbon Border Adjustment Mechanism, including through technical and financial assistance.

The new Climate Change Law will fully transpose the updated EU ETS Directive 2003/87/EC, including the second phase of the Emissions Trading System (EU ETS2), which covers buildings, road transport, and small enterprises not included in the EU ETS.

The primary focus of the Ministry of Ecology, Sustainable Development and Northern Development, in cooperation with the Ministry of Energy and Mining and the Environmental Protection Agency, should be on the implementation of the ETS and ETS2 systems, obtaining a positive opinion from the European Commission, and the adoption of the law by the end of September 2025. Simultaneously, it is essential to establish a Monitoring, reporting, and verification system (hereinafter: MRV) for ETS, ETS2, maritime, and aviation sectors. At the

same time, it is necessary to analyse the entities that will be part of the ETS2 system to ensure a clear understanding of the participants and prepare for implementation. To accurately identify the CO₂-emitting entities required to participate in the ETS systems, specific registries and reports must be used, containing CO₂ emission data, such as the national inventory, the EEA registry, energy consumption reports, and the business registry.

The competent authorities have yet to establish the MRV system, which was expected to be in place by the end of 2023. Its establishment is now anticipated by 1 January 2026, in line with the Reform Agenda, and in 2026 and 2027 it will be necessary to begin data collection, monitoring, and reporting. This will also prepare the country for its obligations following EU accession.

Although the draft Climate Change Law is in its final stage (having received a positive opinion from the European Commission), it does not define a timeline for the introduction of the full EU ETS price or the phase-out of free emission allowances. The gradual introduction of a price for CO₂ emission allowances until reaching the full EU ETS price, followed by the phase-out of free emission allowances for fossil fuel-based electricity generation, as well as the alignment of other industries (by 2034), will be regulated by a by-law. This by-law is expected to define the new national ETS for stationary installations until EU accession and the full transition to the EU ETS.

Additionally, the draft NECP only partially addresses carbon pricing, as the introduction of carbon prices is considered part of the With Additional Measures (WAM) policy scenario. It is necessary to include policies and measures related to Montenegro's planned activities to further improve and upgrade the current carbon pricing system, also considering the EU Carbon Border Adjustment Mechanism (CBAM Regulation)¹³, to better align with the scope and price of the EU ETS and facilitate a smoother transition to the EU ETS upon EU accession.

The aim of this process is to contribute to the preparation of a draft proposal for updating the Decarbonisation Roadmap, including the commitment to achieving climate neutrality by 2050. The proposal, being prepared by the European Commission, is expected to be adopted at the Energy Community Ministerial Council meeting in 2025, by which time Montenegro's preferences regarding an acceptable carbon pricing policy scenario will be submitted.

3. CONCLUSIONS FOR THE DECARBONISATION PILLAR

In the field of climate and energy, significant activities have been carried out directly linked to the implementation of measures from the Action Plan. After more than five years of work

¹³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:4696271>, preuzeto 28. maja 2025.

and attempts to finalise it, the preparation of the NECP has finally been completed, establishing the prospective energy and climate targets for 2030 in accordance with the Energy Community framework and the EU acquis. Furthermore, after several years of development, the draft Climate Change Law has also been prepared, continuing the alignment with the EU ETS and the introduction of other carbon pricing instruments (ETS2). In addition, coal subsidies are being gradually phased out, strictly in compliance with state aid rules. The Pljevlja Thermal Power Plant will be offline for eight months during 2025 due to ecological reconstruction works, which will significantly reduce air pollutant emissions during its further operation, in accordance with the applicable Industrial Emissions Act. Regarding a just transition in the Pljevlja coal region, some activities have also been initiated, although not very substantial, with active participation in the EU Coal Regions in Transition Initiative for the WB and Ukraine.

4. RECOMMENDATIONS FOR THE DECARBONISATION PILLAR

In line with the commitments undertaken under the WB Green Agenda / European Green Deal for the Decarbonisation pillar, it is necessary to:

1. The Ministry of Ecology, Sustainable Development and Northern Development shall prepare and submit to the Government of Montenegro for adoption the draft Climate Change Law, stipulating the establishment of the MRV system, the introduction of EU carbon pricing instruments, and the achievement of carbon neutrality by 2050, no later than the end of Q3 2025;
2. The Ministry of Energy and Mining, in cooperation with the Ministry of Ecology, Sustainable Development and Northern Development and other public institutions and stakeholders, shall finalise the NECP and the corresponding Strategic Environmental Assessment in accordance with the provisions of the EU Climate Law, the Governance Regulation, Energy Community recommendations, and other elements of the EU climate policy framework, no later than the end of September 2025;
3. The Ministry of Ecology, Sustainable Development and Northern Development shall prepare a Long-Term Low-Carbon Development Strategy (hereinafter: LCDS) in accordance with the provisions of the EU Climate Law, the Governance Regulation, and other elements of the EU climate policy framework, and adopt it no later than Q1 2026;
4. The Ministry of Ecology, Sustainable Development and Northern Development shall adopt a set of by-laws by the end of 2025 to regulate the MRV system for ETS and ETS2;
5. The Environmental Protection Agency shall establish the national registry of ETS and ETS2 participants.

5. BIODIVERSITY ANALYSIS

STRATEGIC AND LEGISLATIVE FRAMEWORK

The Biodiversity Strategy with the Action Plan¹⁴ was valid until 2020. Work is currently underway on the preparation of a new Strategy through a GEF-funded project. An initial stakeholder workshop was held in April 2024.

Work is underway to update and align policies, strategies, programs and plans with regional and global frameworks. In the context of the Convention on Biological Diversity (hereinafter: UNCBD) and its Global Biodiversity Framework (GBF), under which the EU Biodiversity Strategy is aligned with the Green Deal, it is necessary to submit an updated National Biodiversity Strategy and Action Plan (NBSAP), as required of UNCBD Parties.¹⁵

The following have been prepared: the Sixth National Report to the UNCBD¹⁶, the Draft Strategy for the Development of Forests and Forestry of Montenegro (2024–2028)¹⁷, Forest Health Status Report (2023)¹⁸, Forest Fire Protection Plans (2023)¹⁹, Annual Forest Management Program (2023)²⁰ and the Annual Forest Management Program (2024)²¹.

Management plans for the five national parks are valid until 2025; draft plans for public consultation have not yet been prepared. Decisions have been adopted on the designation of protected areas – natural monuments “Dražin Vrt”²² and “Sopot”²³; Decisions establishing the Red List of Butterflies of Montenegro²⁴, Decision establishing the Red List of Reptiles and Amphibians of Montenegro²⁵ and the List of Plant and Animal Species with Priority Species,

¹⁴ Ministarstvo održivog razvoja i turizma “Nacionalna strategija biodiverziteta sa Akcionim planom 2016-2020” (Podgorica, 2015) <https://www.gov.me/dokumenta/e830968f-4f16-475a-96ee-0e7e1fd00b2f>, preuzeto 27. maja 2025.

¹⁵ Tintor, V. *WB6 Roaming Report 2024* (Regional Cooperation Center, Sarajevo, 2025) <https://www.rcc.int/pubs/208/wb6-roaming-report-2024>, preuzeto 26. maja 2025.

¹⁶ Ministarstvo održivog razvoja i turizma *Šesti nacionalni izvještaj crne gore prema konvenciji Ujedinjenih nacija o biološkoj raznovrsnosti* (Podgorica, 2023) <https://eusluge.euprava.me/ServiceImages/eParticipacije/f7f6e772-ae21-4efe-9936-0356bfa12536.pdf>, preuzeto 26. maja 2025.

¹⁷ <https://www.gov.me/clanak/javna-rasprava-o-tekstu-nacrta-strategije-razvoja-suma-i-sumarstva-crne-gore>

¹⁸ Ministarstvo poljoprivrede, šumarstva i vodoprivrede “Izvještaj o zdravstvenom stanju šuma u 2023. godini” (Podgorica, 2024) <https://www.gov.me/dokumenta/06452c0e-9e17-40f0-b8e3-1a26b06e1d8d>, preuzeto 27. maja 2025.

¹⁹ Uprava za gazdovanje šumama i lovištima, “Izvještaj o zdravstvenom stanju šuma za 2023. godinu” (Pljevlja, 2024) http://www.upravazasume.me/razni_fajlovi/1733470110.pdf, preuzeto 27. maja 2025.

²⁰ Uprava za gazdovanje šumama i lovištima “Godišnji program gazdovanja šumama za 2023. Godinu” (Pljevlja, 2023) <https://wapi.gov.me/download-preview/31237b65-00b7-4f6e-b6a2-56d442cd7b2d?version=1.0>, preuzeto 27. maja 2025.

²¹ Uprava za gazdovanje šumama i lovištima “Godišnji program gazdovanja šumama za 2024. Godinu” (Pljevlja, 2024) http://www.upravazasume.me/razni_fajlovi/1713528456.pdf, preuzeto 27. maja 2025.

²² Vlada Crne Gore “Predlog odluke o proglašavanju zaštićenog područja Spomenik prirode „Dražin vrt”” (Podgorica, 2024) <https://www.gov.me/dokumenta/f495f785-3b86-4479-a79b-fb175d39e34a>, preuzeto 27. maja 2025.

²³ Vlada Crne Gore “Predlog odluke o proglašavanju zaštićenog područja Spomenik prirode „Sopot”” (Podgorica, 2024) <https://www.gov.me/dokumenta/5a70293f-0535-4d78-aae0-c9277280febd>, preuzeto 27. maja 2025.

²⁴ <https://me.propisi.net/sluzbeni-list-crne-gore-br-87-2023-od-27-9-2023-godine/>

²⁵ <https://me.propisi.net/sluzbeni-list-crne-gore-br-87-2023-od-27-9-2023-godine/>

including bird species and species for which ecological network areas²⁶. Red Lists for plants, fungi, fish and Odonata are currently in preparation.

The Nature Protection Law (“Official Gazette of Montenegro”, No. 54/16, 18/19 and 84/24) has only partially transposed the Habitats Directive and the Birds Directive, i.e., not all provisions of the directives have been transposed or they have been transposed incompletely.

A Draft Law on Amendments to the Nature Protection Law is currently being prepared, which is expected to further transpose these directives, but its adoption has been delayed since the second quarter of 2024²⁷. The draft law was published for public consultation in June 2023²⁸.

Public consultations have been completed on the Draft Studies for the revision and the Draft Decisions on the designation of the category, boundaries, status and protection regime of the Natural Monuments “Plaža Pećin” and “Ratac with Žukotrlica”²⁹. During the public consultation period, the Ministry of Tourism, Ecology, Sustainable Development and Northern Development received comments, opinions and suggestions from the Secretariat for Urbanism and Sustainable Development and the Municipality of Budva.³⁰

INSTITUTIONAL FRAMEWORK AND ADMINISTRATIVE CAPACITIES

The Ministry of Ecology, Sustainable Development and Northern Region Development is the focal point for the implementation of the Green Agenda. There is an evident lack of capacity to implement the numerous obligations arising from the Green Agenda, although part of the obligations is implemented through the Directorate for Nature Protection, which, in addition to the Director General and two Heads of Department, has seven staff members³¹.

Other competent institutions include: the Environmental Protection Agency, the Ministry of Agriculture, Forestry and Water Management, the Forest Administration, the Public Enterprise for National Parks of Montenegro (hereinafter: JPNPCG), the Institute of Marine Biology (hereinafter: IBM), the Public Enterprise “Coastal Zone Management” (JP Morsko Dobro), the Biotechnical Institute, local self-governments, and NGOs.

²⁶ <https://me.propisi.net/sluzbeni-list-crne-gore-br-112-2024-od-22-11-2024-godine/>

²⁷ Ministarstvo evropskih poslova, Program pristupanja Crne Gore Evropskoj uniji (Vlada Crne Gore, 2024) <https://www.eu.me/wp-content/uploads/2024/04/4-IV-24-Nacrt-PPCG-a-2024-2027-za-OS.pdf>, pristupljeno 05. juna 2025., str. 166

²⁸ <https://eusluge.euprava.me/eParticipacija>, pristupljeno 07. juna 2025. godine

²⁹ Ministarstvo turizma, ekologije, održivog razvoja i razvoja sjevera “Javna rasprava za Nacrte studija revizije i Nacrte odluka o proglašavanju kategorije, granica, statusa i režima zaštite Spomenika prirode “Plaža Pećin” i Spomenika prirode “Ratac sa Žukotrlicom” (Podgorica, 2024) <https://www.gov.me/clanak/javna-rasprava-za-nacrte-studija-revizije-i-nacrte-odluka-o-proglasavanju-kategorije-granica-statusa-i-rezima-zastite-spomenika-prirode-plaza-pecin-i-ratac-sa-zukotrlicom>, preuzeto 28. maja 2025.

³⁰ Ministarstvo turizma, ekologije, održivog razvoja i razvoja sjevera, Izvještaj o sprovedenoj javnoj raspravi za Nacrt studije revizije i Nacrt odluke o proglašavanju kategorije, granica, statusa i režima zaštite spomenika prirode „Plaža Pećin“, broj:06-322/24-1009/4, Podgorica, 10.05.2024. godine

³¹ Ministarstvo ekologije, održivog razvoja i razvoja sjevera, „Pravilnik o unutrašnjoj organizaciji i sistematizaciji Ministarstva ekologije, održivog razvoja i razvoja sjevera“ (Podgorica, 2024) <https://www.gov.me/dokumenta/ffb41f12-dae1-4d83-a097-bd3a897d92ad>, preuzeto 27. maja 2025.

The capacities for preparing protection studies are strong, given that the Environmental Protection Agency has taken over the staff of the former Institute for Nature Protection. Capacities for habitat and species mapping are being continuously built through training and practical work and also include independent experts and representatives of CSOs.

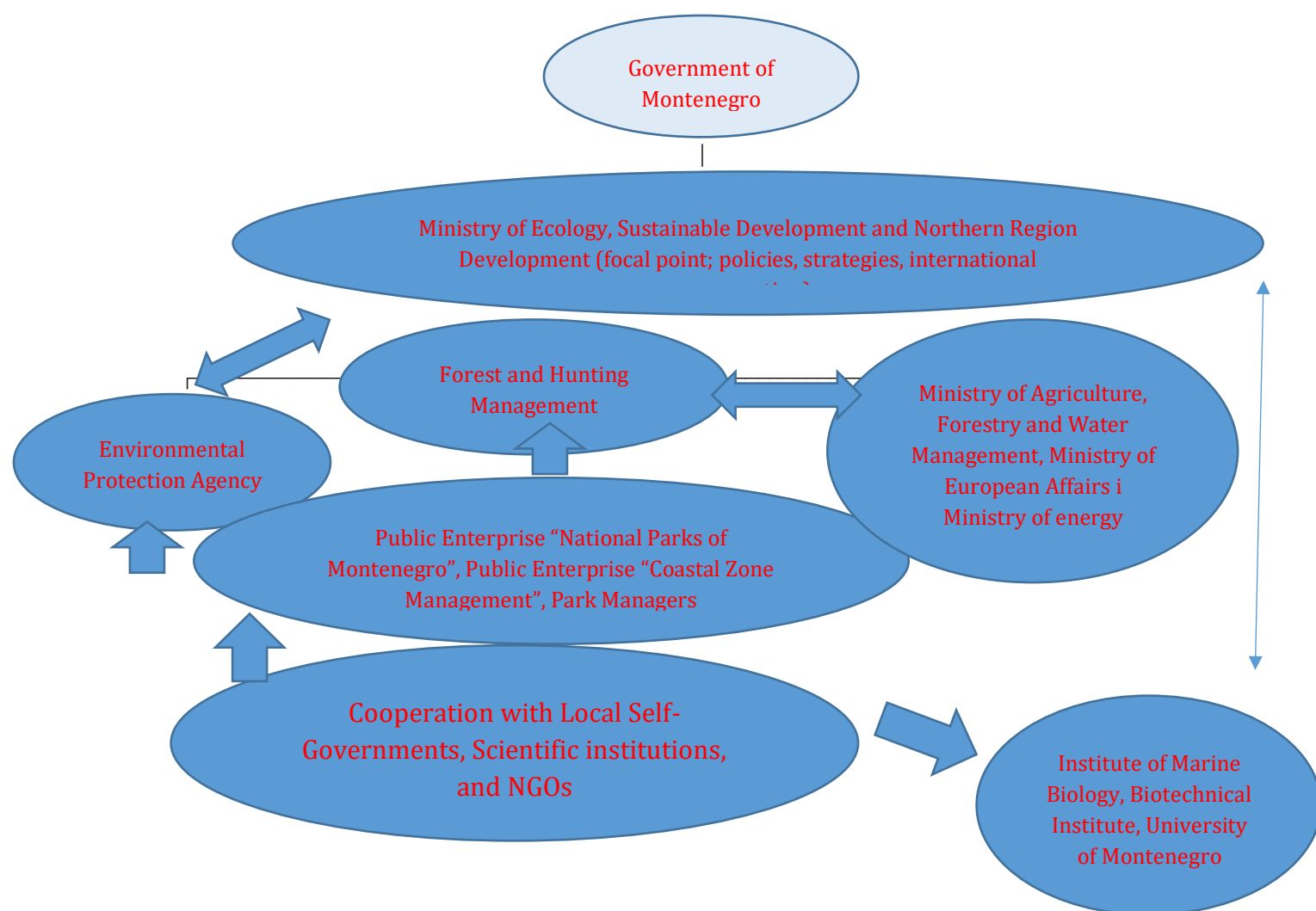


Figure 1. Diagram of Competent institutions for the Biodiversity pillar

STAKEHOLDER INVOLVEMENT

To ensure the participation of CSO representatives, a public call³² was announced for the nomination of NGO representatives³³ to take part in the working group preparing the Nature Protection Law. Two representatives were selected. The participation of CSO representatives allows their positions to be presented; however, there is no formal mechanism to ensure that well-argued positions are considered, as the final decision rests with the legislator. Most proposals during the drafting of the law were either rejected or partially accepted, indicating that the Ministry retains discretionary authority to regulate the legislation, provided certain justifications are given.

The public call for public consultation was published on 8 June 2023³⁴ and lasted until 18 July 2023. The report on the conducted public consultation was published on 4 August 2023³⁵.

During the public consultation on the Draft Nature Protection Law, Center for Protection and Research of Birds (hereinafter: CZIP) submitted 20 comments addressing a range of deficiencies, including the lack of shelters for wild animals and insufficiently precise competencies of authorities in this area, as well as the illegal wildlife trade, which is one of the most lucrative criminal activities. According to EUROPOL data, it generates approximately €4.4 billion annually worldwide. Smuggling in Montenegro involves lions, kangaroos, African tortoises, and other exotic animals. It was proposed that NGOs be allowed to initiate the designation of protected areas, prepare Protection Studies, hold the status of managers of protected areas, and conduct biodiversity monitoring in accordance with their professional qualifications; that Action Plans for species be prepared and implemented; that any legal or natural person causing damage to protected species or natural habitats be obliged to carry out remediation measures in accordance with the law governing liability for environmental damage; that requests for the preparation of expert documents—Protection Studies—and requests for area revisions may also be submitted by citizens' associations; that protective zones for each protected area must be established; and that prohibited activities be clearly defined, among other measures.

In addition to CZIP, five comments were submitted by the Dinaric Parks Network, which highlighted that zoning of protected areas should be addressed through spatial plans of special purpose for category II areas, and through management plans for other categories of

³² <https://www.gov.me/clanak/javni-poziv-za-predlaganje-predstavnik-nejvladine-organizacije-za-rad-u-radnom-tijelu-za-izmjene-dopune-zakona-o-zastitu-prirode>, pristupljeno 07. juna 2025.

³³ <https://wapi.gov.me/download-preview/6a7631c7-6d69-4d90-8303-693b0b86927d?version=1.0>

³⁴ <https://www.gov.me/clanak/javni-poziv-za-javnu-raspravu-o-nacrtu-zakona-o-zastiti-prirode>, pristupljeno 12. jula 2025. godine

³⁵ <https://www.gov.me/clanak/izvjestaj-o-sprovedenoj-javnoj-raspravi-o-tekstu-nacrta-zakona-o-zastiti-prirode>, pristupljeno 12. jula 2025. godine

protected areas; that a physical protection service needs to be defined; that protected areas should be managed by public institutions; and other recommendations.

At the 33rd meeting of the Standing Committee of the Bern Convention held in November 2023, the case of Porto Skadar Lake was discussed. The case was opened in 2016 following a complaint by the NGO Green Home and a group of Virpazar citizens regarding the planned construction of two tourist complexes, Porto Skadar Lake and White Village, within the Skadar Lake National Park. The recommendations of the joint mission of the Bern and Ramsar Conventions included: a complete halt of the project, preparation of a spatial plan, zoning, habitat mapping, prohibition of high-speed vessels on the lake, and a number of other measures. The delegates of the Bern Convention expressed concern about the situation in this protected area, not only regarding the planned construction of the Porto Skadar Lake and White Village projects, but also in relation to numerous other existing problems and threats. The case remains open, and the Secretariat of the Bern Convention will continue to monitor it and require full implementation of the recommendations provided to the State of Montenegro³⁶.

The Montenegrin Ecologists' Society (CDE), together with the Young Ecologists' Society of Nikšić and the KOD Organisation, submitted a complaint in April 2022 to the Secretariat of the Bern Convention regarding the decision of the Government of Montenegro to grant a concession to EPCG for the Komarnica Hydropower Plant for electricity production. By issuing the concession decision, Montenegro violated Articles 3 and 4 of the Bern Convention, which obliges the Parties to enhance national policies for the conservation of wild flora and fauna, as well as recommendations concerning the protection of wild animals and natural habitats. At the 43rd meeting of the Standing Committee of the Bern Convention, held on 29–30 March 2023, the case concerning the planned construction of the Komarnica Hydropower Plant was also noted. In its report, the Secretariat of the Bern Convention expressed concern regarding the construction of the Komarnica HPP and highlighted that the data used to prepare the Environmental Impact Assessment were 30 years old, requesting an explanation from the Government of Montenegro³⁷.

There is currently an announcement regarding planned construction in the hinterland of Velika Plaža in Ulcinj, which has been protected since 1968. The habitat is of EU significance. Protection measures have been proposed for each zone, as well as for important habitats and species. The Act on Conditions and Guidelines for Nature Protection was issued by the Environmental Protection Agency to the then Ministry responsible for spatial planning for the purpose of preparing spatial planning documentation – DSL, Sector 66, Modules II, III,

³⁶ Koalicija 27, Izveštaj iz sjenke za Poglavlje 27 - Životna sredina i klimatske promjene, Kap progressa u moru obaveza (2024).

³⁷ Convention on the conservation of European wildlife and natural habitats "Meeting report" (Strasbourg, 2023) <https://rm.coe.int/tpvs07e-2023-meeting-report-1st-bureau-2023/1680aac4cb>, preuzeto 28. maja 2025.

and VI³⁸. In the immediate vicinity is the Ulcinj Saltworks, which is relevant to a large part of the final benchmarks under the sub-area “Nature Protection” and is a prerequisite for the closure of Chapter 27 – Environment and Climate Change³⁹.

OTHER RELEVANT ASPECTS

A case of poor implementation is the Komovi Nature Park, an area extremely rich in forests, where economic logging is carried out regardless of the protection status of the area. A study titled “Economic Forest Exploitation in Komovi Nature Park: The Case of the Opasanica–Travska Gora Management Unit” was prepared for this purpose. Extensive logging and forest exploitation in this area, as well as the construction of forest roads for timber extraction, lead to habitat fragmentation for many mammal species. Forest logging, especially if not strictly adhered to and supervised according to concession conditions, severely and drastically disrupts existing habitats, cuts off movement corridors—primarily for large mammals—and causes disturbance that affects their reproduction, or may even lead to the death of individual animals of certain species. Forest logging, as well as the construction of forest roads, also negatively affects bird fauna⁴⁰. Forest logging, as well as the construction of forest roads, also negatively affects bird fauna. Another example is illegal construction in Durmitor National Park, which prompted a Study for the Revision of the Boundaries of the National Park⁴¹, to exclude certain settlements that, due to degradation, no longer meet the criteria for protection. In both cases, poor management of the protected area can be observed.

A series of activities have been identified that may negatively affect biodiversity and the establishment of ecological networks. Key examples include: illegal construction in Gornji Štoj, only 50 meters from a waterbird colony, with the most endangered species being the Eurasian Spoonbill, Glossy Ibis, Little Cormorant, Gak, Little Egret, Yellow Heron, Grey Heron, and Cattle Egret; the construction of a bridge over the Bojana River, immediately above the confluence of its two branches where Ada Bojana forms, representing the largest complex of floodplain alluvial forests on the eastern Adriatic coast; and the planned construction of a military training ground on Sinjajevina, for which the “Save Sinjajevina – Activists of the Civic Initiative” submitted a petition in 2022 with 22,000 citizen signatures to the European Union Delegation and the Government in Podgorica, requesting the annulment of the decision.

³⁸ <https://www.gov.me/clanak/javna-rasprava-o-nacrtu-dsl-dio-sektora-66-moduli-ii-iii-i-vi-velika-plaza-i-nacrtu-izvjestaja-o-strateskoj-proceni-uticaja-na-zivotnu-sredinu>

³⁹ Ministarstvo ekologije, prostornog planiranja i urbanizma “Akcioni plan za ispunjavanje završnih mjerila u Poglavlju 27 - Životna sredina i klimatske promjene” (Podgorica, 2021) <https://wapi.gov.me/download/abaef2f4-d824-4d42-a05d-e6a8ad92a09d?version=1.0>, preuzeto 27. maja 2025

⁴⁰ Koalicija 27. “Ekonomska eksploatacija sume Opasanica” (Podgorica)

<https://www.greenhome.co.me/wpcontent/uploads/2024/10/Ekonomska-eksploatacija-sume-Opasanica.pdf>, preuzeto 27. maja 2025.

⁴¹ Ministarstvo održivog razvoja i turizma “Inovirana Stručna podloga - Studija izvodljivosti za reviziju granica Nacionalnog parka Durmitor” (Podgorica, 2013) <https://www.gov.me/dokumenta/c38370b9-c07d-454c-a825-597e62bbff39>, preuzeto 27. maja 2025.

The Nature and Environmental Protection Agency have completed a study titled *“Determination of the Baseline Biodiversity Status on Sinjajevina”* for the wider area planned for the military training ground. At the government session held on 25 April 2024, the Government issued Urban-Technical Conditions for the preparation of technical documentation for the construction of the “Sinjajevina – Part II” wind farm. Within this wind farm complex, preliminary data indicate the construction of 44 wind turbines with a total installed capacity of 290.40 MW. This demonstrates that the Government of Montenegro is moving away from the idea of establishing a protected area on Sinjajevina⁴².

A new species for science (*Petrolanium crnojevici* Dragičević, Vuksanović & Surina) has recently been discovered in the flora of Montenegro. The species *Petrolanium crnojevici* was found in limestone rock crevices in the Štitari area near Cetinje. Procedures for the protection of this locality and species have not yet been initiated.

The proposed EMERALD sites in Montenegro were established at the meeting of the Standing Committee of the Bern Convention in December 2010. The updated list of officially nominated sites was reconfirmed in December 2024⁴³.

A revision of the Important bird and biodiversity areas (hereinafter: IBA) sites has been carried out. The project was implemented in partnership between BIRDLIFE and CZIP, and the resulting data indicate an increase in the number of IBA sites in Montenegro. Instead of the previous five sites—Durmitor, Biogradska Gora, Skadar Lake, Ulcinj Saltworks, and Šas Lake—33 sites have been identified, covering 54% of Montenegro’s territory. Locations with the highest number of species meeting the criteria are the Bojana Delta with 40 species, Ulcinj Saltworks with 33 species, and Skadar Lake with 29 species. Some of the largest territorial sites are Sinjajevina (48,671 ha), Prošćenske Planine (46,752 ha), Piva (50,438 ha), and Durmitor (51,446 ha)⁴⁴. The significance of the IBA revision also lies in its contribution to the establishment of the Natura 2000 network, as they share the same criteria for the portion related to the Birds Directive and Special Protection Areas (hereinafter: SPA)⁴⁵.

Activities for the establishment of the Natura 2000 network have continued. The implementation of the EU-funded project *“Support for the Establishment of the Natura 2000 Ecological Network in Montenegro”* is currently underway. The project commenced on 29

⁴² Koalicija 27, Izvještaj iz sjenke za Poglavlje 27 - Životna sredina i klimatske promjene, Kap progresa u moru obaveza (2024).

⁴³ Convention on the conservation of european wildlife and natural habitats *“Updated list of officially nominated candidate Emerald Network sites”*, (Strasbourg, 2024) <https://rm.coe.int/pa18e-2024-draft-candidate-list-emerald-network-sites-2779-8956-4427-1/1680b27e33>, preuzeto 28. maja 2025.

⁴⁴ <https://czip.me/2023/08/02/crna-gora-dobila-novu-mreza-iba-podrucja/>, pristupljeno 05. juna 2025.

⁴⁵ Koalicija 27, Izvještaj iz sjenke za Poglavlje 27 - životna sredina i klimatske promjene (Koalicija 27, 2024) https://www.greenhome.co.me/wp-content/uploads/2020/07/ONLINE_Izviestaj-iz-sjenke-2024-MNE_pages_compressed-1.pdf, pristupljeno 05. juna 2025.

May 2024, with a three-year implementation period. It is being carried out by a consortium of companies, Eptisa Southeast Europe d.o.o. and EPTISA Servicios de Ingenieria SL. The project aims to improve information on species and habitats listed in the annexes of the Habitats Directive and the Birds Directive present in Montenegro, through mapping and data collection activities at selected sites. The establishment of the Natura 2000 network will enable the connection of significant sites, benefiting both the EU and Montenegro. Additionally, the establishment of the EMERALD network would provide a significant contribution to the conservation of areas important for ecosystem connectivity. According to the available information and following interviews with representatives of competent institutions, there are no officially identified areas that are important for ecosystem connectivity, nor are there areas legally protected specifically for this purpose. Developing a comprehensive green infrastructure network is essential for establishing connections between urban, peri-urban, and rural areas, enhancing biodiversity, maintaining corridors, and enabling ecosystem services. Such networks should be incorporated into spatial planning, providing cooling effects, recreational spaces, and habitats for wildlife. This approach creates a resilient urban environment that contributes to climate adaptation and biodiversity conservation. Restoration of natural habitats through large-scale projects focused on wetlands, coastal zones, and degraded landscapes is another key aspect. Promoting nature-based solutions can significantly increase urban green coverage. Encouraging cities to adopt these solutions involves providing technical assistance and capacity-building support. The benefits include ensuring food and water security, reducing poverty, and contributing to public health conservation. The establishment of transboundary/border ecological corridors is crucial for facilitating species migration and genetic exchange, which are essential for climate adaptation.

CZIP has implemented a restoration project for the Ulcinj Saltworks, with continuation planned through GEF and IPA-funded projects. The preparation of the Ulcinj Saltworks Management Plan has been completed⁴⁶.

FINANCIAL CHALLENGES FOR THE “BIODIVERSITY” PILLAR

Detailed information on the financing of activities related to the aforementioned measures is not publicly available, considering the structure of Montenegro’s 2025 Budget Law. For the implementation of obligations under Chapter 27, funds amounting to €482,996,838 are required⁴⁷, while the budgeted funds for 2025 are insufficient to carry out the necessary

⁴⁶ Medenica, K. “Predstavljanje Izvještaja iz Sjenke za Poglavlje 27” pptx. (Evropska kuća, jun 2025.)

⁴⁷ Akcioni plan za završna mjerila za Poglavlje 27, za period 2021-2025. str. 68-106, preuzeto 27. maja 2025.

activities. Estimates for the subsequent period are not available. Sources of financing include the state budget, the capital budget, loans, and local government units.

According to the 2025 Budget Law⁴⁸, budget expenditures presented by program structure are as follows: under “Spatial Planning and Environmental Protection”, for the sub-program “Ecology and Nature Protection”, total expenditures for 2025 amount to €15,568,486.00, for 2026 – €11,135,169.58, and for 2027 – €10,215,917.36. For the spending unit Ministry of Ecology, Sustainable Development, and Northern Montenegro, expenditures amount to €2,161,300.01 for 2025, €2,305,306.93 for 2026, and €2,314,239.45 for 2027.

Of the total budget of Montenegro, which for 2025 amounts to €4,026,835,022.67, allocations for the sub-program “Ecology and Nature Protection” represent 0.39%.

Pursuant to Article 28 of the Nature Protection Act, funds for the preparation of protection studies are provided from the budget of Montenegro, European Union funds, donations from international organisations, and other sources in accordance with this law. In this regard, there is a possibility of identifying financing sources for the preparation of protection studies.

Management of protected areas remains a challenge, particularly for sites that require significant funding for conservation. An example is the Ulcinj Saltworks, where the annual budget of the Municipality of Ulcinj, i.e., the managing authority, plans approximately €300,000 in accordance with the Annual Programs and Management Plans. This amount is insufficient considering that capital infrastructure works require approximately €1,000,000, according to the *Report on the Implementation of the Action Plan for the Fulfillment of Final Benchmarks under Chapter 27 – Environment and Climate Change* for the reporting period March–August 2024.

MEASURE: COMPLETE THE TRANSPOSITION AND IMPLEMENTATION OF THE EU BIRDS AND HABITATS DIRECTIVES

The Birds Directive has been partially transposed through the *Law on Amendments and Supplements to the Law on Wildlife and Hunting* (“Official Gazette of Montenegro”, No. 51/25), while the Habitats Directive is partially transposed through the *Forestry Law* (“Official Gazette of Montenegro”, No. 77/24)⁴⁹.

The Nature Protection Act transposes the provisions of the Habitats Directive and the Birds Directive relating to: definitions of terms, the obligation to establish the NATURA 2000

⁴⁸ Skupština Crne Gore “Zakon o budžetu Crne Gore za 2025. Godinu” (Podgorica, 2025), <https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/391/3552-20866-33-24-5-190.pdf>, str. 343 – 494, preuzeto 27. maja 2025.

⁴⁹ <https://www.sluzbenilist.me/registri/F8052E30-8E7C-4C5D-99F2-9BA2E7057094>

ecological network, conservation measures, measures for the establishment of a strict species protection system, prohibitions on capturing or killing wild fauna species, and research and scientific work.

The provision concerning the assessment of the acceptability of interventions in nature has not been fully transposed, representing a step backward compared to the 2008 Law. Measures for the conservation, maintenance, or restoration of sufficient habitat diversity and size for all bird species, as well as the maintenance and management of habitats in accordance with ecological requirements both inside and outside protected areas, the restoration of destroyed biotopes, and the resolution of conflicts between species protection and aviation safety, have not been addressed.

Full compliance will be achieved through the adoption of: the Regulation on the Declaration of the Ecological Network, Ecological Corridors, Management Methods, and Financing of the Ecological Network; the Rulebook specifying the detailed content of the study for the main appropriate assessment; the Rulebook on the requirements regarding personnel and organisational capacity for carrying out protection, enhancement, promotion, and sustainable development of protected areas and ecological network sites, which must be met by the managers of protected areas and ecological network sites; as well as a series of other subordinate regulations, the List of Strictly Protected and Protected Species, and the new Hunting Seasons Rulebook.

Pursuant to Article 46 of the Nature Protection Act, it is prescribed that the appropriate assessment for ecological network sites shall be conducted when there is a possibility that a plan, programme, or project, either individually or in combination with other plans, programmes, or projects, may have a significant negative impact on the conservation objectives and negatively affect the ecological integrity of the ecological network site. The appropriate assessment procedure consists of a preliminary assessment and a main assessment. The procedure is not conducted for plans, parts of plans, programmes, or projects that are necessary for the management of the ecological network site or are directly linked to it. For plans and programmes subject to the Strategic Environmental Assessment procedure, and for projects subject to the Environmental Impact Assessment procedure, the appropriate assessment is conducted within the framework of those procedures. Although prescribed by law, the appropriate assessment procedure is still not being implemented as such, since Montenegro currently has no officially designated ecological networks, which is highly concerning for a candidate country for EU accession. The Environmental Protection Agency conducts the procedures for environmental impact assessments of projects and strategic environmental assessments of plans and programmes.

In this context, the Agency should also carry out the appropriate assessment of interventions affecting nature. However, the administrative capacities of the Agency are limited and insufficient to perform this procedure, given the numerous demands directed at the Agency related to the execution of expert tasks in nature protection.

With the adoption of the new *Law on Spatial Planning* ("Official Gazette of Montenegro", No. 19/25)⁵⁰ the mechanism for verifying issued conditions and guidelines for nature protection has been abolished. Previously, the Agency for Environmental Protection provided consent on planning documents as the authority responsible for technical conditions (former Law on Spatial Planning and Construction of Buildings, Article 37). This change allows construction without alignment with nature protection measures and conditions, which is certainly a cause for concern among NGOs and the professional public.

The challenges in implementing this measure are reflected in: insufficient capacities of the Ministry of Ecology, Sustainable Development and Northern Development, and the Environmental Protection Agency; inconsistencies between sectoral policies and legal provisions; insufficient funds allocated for nature and biodiversity protection; inadequate inspection and enforcement of nature protection, particularly at the local level; lack of systematic biodiversity data as a basis for monitoring, since data are not consolidated into a single database but exist in various separate sources; absence of both systematic data generation and monitoring, which is required as a mandatory conservation measure recognized in environmental impact assessment reports; lack of baseline biodiversity studies; insufficient institutional capacity for project implementation; and misalignment of strategic documents addressing biodiversity issues.

MEASURE: DESIGNATE NEW PROTECTED AREAS IN ACCORDANCE WITH THE CBD 2030 TARGETS, THE BERN CONVENTION STRATEGY 2030, AND THE EMERALD NETWORK TIMELINE PROPOSED IN 2024.

The CBD 2030 target aims to protect 30% of terrestrial, freshwater, and marine areas, while the Bern Convention's goal is to achieve 35% coverage of Emerald sites by 2030.

The final milestone 5 for the closure of EU accession negotiations in Chapter 27 relates to the obligation that:

"Montenegro submits to the Commission a list of proposed Natura 2000 sites, sufficiently covering habitat types and species in accordance with the requirements of the Birds and Habitats Directives. Montenegro demonstrates the capacity to manage the Natura 2000 network, including by granting the Ulcinj Saltpans the appropriate protection status and effectively implementing the necessary conservation measures leading to the improvement of conservation status."

National protected areas cover 13.22% of Montenegro's terrestrial territory and 1.87% of its marine area. Montenegro has a total of 80 protected areas, encompassing various protection categories (strict nature reserve, national park, special nature reserve, nature park, natural

⁵⁰ <https://www.sluzbenilist.me/registri/6EE56585-92B9-4083-A3E4-F0980A4C2C1D>

monument, and park of exceptional features)⁵¹. Of these 80 protected areas, 53 have an appointed management authority, while 27 do not⁵². Management plans exist for 22 protected areas, five have an adopted management plan, and only one has an adopted Annual Management Program for 2024⁵³.

The Environmental Protection Agency has prepared draft review studies for 22 out of 80 protected areas (27.5%), while review studies still need to be completed for 63 protected areas (79%). Additionally, the Environmental Protection Agency has prepared draft studies for the national parks “Durmitor” and “Skadar Lake,” while the review study for NP “Lovćen” is currently in progress⁵⁴. Most of the protected areas declared in recent years remain “paper parks,” lacking a management authority or adopted management plans. The Municipality of Bijelo Polje has designated Đalovića Gorge as a protected area and initiated the process for preparing a protection study for the Ćehotina River within its territory. The Municipality of Pljevlja has initiated steps toward protecting the upper course of the Ćehotina River within its territory. The Municipality of Kolašin has initiated the preparation of protection studies for the Mrtvica Canyon, Kapetanovo and Brničko Lakes, as well as the Dulovina Forest Park. On the other hand, there are examples such as the Cijevna and Zeta rivers, which have been declared protected areas at the local level, but lack effective management.

Cijevna River Canyon – managed by the Secretariat for Urban Planning of the Municipality of Tuzi – was declared a protected area in 2017. Seven years after its designation, the area still does not have an established management body, and pressures on the site are evident, including poaching of salmonid species such as the huchen and brown trout, sand and gravel extraction, construction along the riverbank, concrete embankments, as well as upstream hydropower development in Albania. Zeta River Valley – declared a protected area in 2019, spanning the territories of Podgorica and Danilovgrad – is experiencing pronounced poaching, with particular threat to the soft-muzzled trout, an endemic species. It is necessary for the two municipalities to reach an agreement on establishing a single joint management authority for this area. Due to insufficient political will and lack of understanding of the concept of nature protection, such an agreement has not yet been reached⁵⁵.

The greatest threats to protected areas are: uncontrolled tourism, energy development, illegal construction, unregulated logging, exploitation of natural resources, inadequate

⁵¹ Parkovi Dinarida “Analiza nedostataka u upravljanju zasticeim podrucjima” (Podgorica, 2023) <https://parksdinarides.org/wp-content/uploads/2023/11/Analiza-nedostataka-u-upravljanju-zasticeim-podrucjima.pdf>, preuzeto 27. maja 2025.

⁵² Parkovi Dinarida “Analiza nedostataka u upravljanju zasticeim podrucjima” (Podgorica, 2023) <https://parksdinarides.org/wp-content/uploads/2023/11/Analiza-nedostataka-u-upravljanju-zasticeim-podrucjima.pdf>, preuzeto 27. maja 2025.

⁵³ <https://biodiversitymontenegro.me/>

⁵⁴ Agencija za zaštitu životne sredine “Odgovor na Zahtjev za Slobodan pristup informacijama” (Podgorica, 2025) <https://epa.org.me/wp-content/uploads/2025/02/07-UPI-4-2.pdf>, preuzeto 28. maja 2025.

⁵⁵ Izvještaj iz sjenke za Poglavlje 27 -Životna sredina i klimatske promjene, Kap progressa u moru obaveza (2024), <https://www.greenhome.co.me/novosti/>, pristupljeno 05. juna 2025.

management of protected areas—particularly at the local level, failure to implement the assessment of the suitability of activities in protected and proposed Emerald sites, misalignment of spatial planning documents and management plans, insufficient cooperation between supervisory authorities and protected area managers, inadequate penal policy, insufficient capacities for monitoring and management, non-continuous mapping of habitats and species (for the establishment of the Natura 2000 network), as well as an inadequate organisational structure and system for financing and managing protected areas and species. A major issue is poor implementation, although there are also legal gaps in the current legislation.

6. CONCLUSIONS FOR THE BIODIVERSITY PILLAR

Delays in the preparation of the Draft Law on Nature Protection, the Law on National Parks, management plans for national parks, and other protected areas with lower protection levels are unjustified and call into question proper nature management. The failure of competent authorities to respond to violations of the law⁵⁶ and the integration of biodiversity into strategic and planning documents raises concerns about the capacity to perform entrusted tasks, which undoubtedly requires accountability.

Regarding the newly proposed measures, it should be noted that the Habitats Directive and the Birds Directive have not been fully transposed and implemented. Work is underway on the designation of new protected areas, the revision of existing ones, and the mapping of NATURA 2000 habitats, but obligations related to the establishment of the Emerald network have been stagnating for a long time.

7. RECOMMENDATIONS FOR THE BIODIVERSITY PILLAR

In line with the commitments undertaken under the Green Agenda for the WB/European Green Deal for the Biodiversity Pillar, it is necessary to:

1. The Ministry of Ecology, Sustainable Development and Northern Development shall prepare and submit to the Government of Montenegro for adoption the Draft National Biodiversity Strategy, no later than the fourth quarter of 2025;
2. The Ministry of Ecology, Sustainable Development and Northern Development shall prepare and submit to the Government of Montenegro for consideration the Draft Nature Protection Law, which shall prescribe the obligation to develop a 10-year Nature Protection Program in order to fully implement the UNCBD objectives and align them with the goals of other multilateral agreements ratified by Montenegro, no later than the fourth quarter of 2025;

⁵⁶ <https://czip.me/2025/06/25/agencija-za-zastitu-zivotne-sredine-saucesnik-u-nezakonitom-usvajanju-prostornog-plana-crne-gore/>

3. The Ministry of Ecology, Sustainable Development and Northern Development, together with the Environmental Protection Agency, shall intensify activities on the establishment of the Natura 2000 network and involve stakeholders and the civil sector in these activities, no later than the first quarter of 2026;
4. The Ministry of Ecology, Sustainable Development and Northern Development and the Public Enterprise National Parks of Montenegro, in cooperation with local governments, shall accelerate the preparation and implementation of management plans for all protected areas, considering that the management plans for national parks are valid until 2025. Continuous work on the establishment of new protected areas is also necessary;
5. The Environmental Protection Agency shall establish a monitoring system for habitats and species, as well as a reporting system in accordance with the requirements of the Habitats Directive and the Birds Directive; establish green infrastructure to enable connectivity between ecosystems and habitats and create conditions for linking green corridors with areas of importance;
6. The funds allocated for nature/biodiversity protection are insufficient for the implementation of necessary activities, and the 2026 budget should plan for an increase in the resources allocated for nature protection;
7. The funds allocated for nature/biodiversity protection are insufficient for the implementation of necessary activities, and the 2026 budget should plan for an increase in the resources allocated for nature protection.
8. The Ministry of Ecology, Sustainable Development and Northern Development shall strengthen the capacities of the inspection services.
9. Through inter-ministerial cooperation, the Ministry of Ecology, Sustainable Development and Northern Development shall emphasise the necessity of full implementation of the legislative framework in the field of biodiversity.

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