Joint World Heritage Centre/IUCN Advisory mission to the World Heritage property "Durmitor National Park" (Montenegro)

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Contents

1. Background

The World Heritage Committee inscribed “Durmitor National Park” (Montenegro) on the World Heritage List back in 1980.[1] The Durmitor massif has been shaped by glaciers, rivers and underground streams and boasts a wide range of endemic flora, old-growth pine forests, clear Karst lakes and the deepest gorges in Europe – the Tara River canyon. The property stands out for its exceptional scenic beauty and diversity, which has been recognized under criterion (vii). The wealth of geological and geomorphological features of major scientific interest, such as the many remarkable Karst phenomena, warrant recognition under criterion (viii). This provides the basis for a broad array of habitats and ecosystems, including underground freshwater systems, harboring a diverse and partly endemic flora and fauna, recognized under criterion (x). Details are laid down in the property’s Statement of Outstanding Universal Value, which the Committee adopted retrospectively in 2015.[2]

The “Durmitor National Park” World Heritage property partly overlaps with another cultural World Heritage property. The component “Grčko groblje” of the transnational World Heritage property “Stećci Medieval Tombstone Graveyards” (Bosnia and Herzegovina, Croatia, Montenegro, Serbia) is located inside “Durmitor National Park.” The components “Plužine Grčko groblje, Žabljak” and “Bare Žugića, Žabljak” are located outside of “Durmitor National Park,” in the vicinity of its Eastern boundary. The property borders other protected areas, such as Dragisnica Nature Park, and overlaps with other international designations, including UNESCO Biosphere Reserve, whose integrated approach with its buffer and transition zones is important for predators and many other species that require much larger areas for their natural habitat. The Danube Convention applies to the Tara River Basin, which contains one of the region’s few canyons that have been spared of dam developments.[3]

In 2005, the potential dam project “Buk Bijela,” downstream of the property on the territory of Bosnia-Herzegowina, was canceled following protests and a Reactive Monitoring mission. The 2005 mission concluded that the proposed hydropower project would constitute a potential threat to the World Heritage property warranting an inscription on the List of World Heritage in Danger.[4] Besides potential threats to Tara River, another UNESCO mission already noted in 1996 the pressures from inadequately planned construction of major sports facilities and residential development. The mission of 1996 also highlighted the following conservation issues:

- rapid unplanned and uncontrolled development of the village Zabljak (also occurring at Black Lake, “Crn Gora”), including a large sport facility within the World Heritage site;
- intensified constructions at lower altitudes caused intensified grazing at higher altitudes resulting in erosion, but no limits of acceptable ecological change or sustainable carrying capacities have been determined;
- occasional control hunting of wolves and bears;
- relatively recent road construction traversing the canyon as a significant ecological intrusion;
- need for sufficient investments in park infrastructure and management capacity;

[1] see Decision **04 COM V.12**
[2] see Decision **39 COM 8E**
[3] ibid.
[4] see 2005 and 2006 reports on the state of conservation of the property at https://whc.unesco.org/en/soc/1281 and https://whc.unesco.org/en/soc/1151 respectively as well as Decision **31 COM 7B.29**.

- possible future hotel development on a plateau above the Tara River Canyon.

Based on the above observations, the 1996 mission recommended the exclusion of the town of Zabljak from the property, which was so decided by the World Heritage Committee in 2005.[5]

The 2005 mission stressed that this reduction of the core zone of the national park affected the overall conservation objectives and considered that

- further exclusions from Durmitor National Park should be halted and the exclusion of Zabljak be compensated by an extension,
- adverse impacts of urban development should be addressed, including illegal constructions as they threaten the "integrity of the site from both the environmental (waste disposal, waste water etc.) and landscape (scenery) points of view."[6]

Moreover, the 2005 mission deemed necessary the demolition of illegal constructions, the rehabilitation of the entire area in proximity of the ski facilities, and the prohibition of any further expansion of the ski facilities, which was subsequently requested by the World Heritage Committee.[7]

Further, with regards to a proposal in the Spatial Plan of the Durmitor National Park region and similar references in the Management Plan of the property, the 2005 mission recommended an extension of the property, including enhanced cooperation with Bosnia and Herzegovina with a view to a potential transboundary extension of the property, so as to ensure an ecological corridor between Sutjeska National Park (Bosnia and Herzegovina), Durmitor and Biogradska Gora National Parks (Montenegro), suggesting the national parks as core zone supported by a buffer zone. The 2005 mission recommended that the existing Tara River Biosphere Reserve could serve as a basis for the designation of the buffer zone.[8] The suggestion to improve additional areas, which would increase the long-term integrity of the World Heritage property and add complementary natural values is also included in the property's Statement of Outstanding Universal Value.[9]

In 2018, the State Party invited an Advisory mission to assist, *inter alia*, in streamlining the management process and to discuss a potential boundary modification of the property. In particular, the joint World Heritage Centre/IUCN Advisory mission to the World Heritage property "Durmitor National Park" (Montenegro) was tasked to

1. review a potential boundary modification of the World Heritage property in respect to changed boundaries of the National Park and to
2. assess the overall state of conservation of the World Heritage property.[10]

[5] see Decision **29 COM 8B.15** aligning the boundaries of the World Heritage property with those of the National Park as approved by the State Party in 1997. In response to Decision **29 COM 8B.15**, Decision **33 COM 8D** clarified the property boundaries in response to the Retrospective Inventory in 2009.
[6] Report of the International Mission to Durmitor National Park and Tara River Basin, Serbia and Montenegro, and to Bosnia and Herzegovina, 2005 p.12.
[7] See Decision **31 COM 7B.29**.
[8] Report of the International Mission to Durmitor National Park and Tara River Basin, Serbia and Montenegro, and to Bosnia and Herzegovina, 2005, p.8, 14, 15.
[9] see Decision **39 COM 8E**.
[10] see Annex I: Terms of Reference

2. Protection regime

Potential boundary modifications and identified conservation issues should be regarded in the context of the definition of national parks and its zones as stated in the Montenegrin national Law on Nature Conservation and Law on the National parks. The definition of a national park is given in Article 22 of the Law on Nature Conservation, as follows:

> "National Park is a natural area of land or area of the sea, i.e. land and sea, which is designated to protect the ecological integrity of one or more ecosystems for present and future generations, in order to prevent the inadequate use of natural assets or other harmful activities and the provision of spiritual, scientific, educational, recreational needs and the needs of visitors who consent to the preservation of the environment and culture. In the national park, it is forbidden to perform actions and activities that endanger the originality of nature." Article 24 of the same law provides the definition of nature parks: "The Nature Park is a spacious, natural or partly cultivated area of land and / or sea, characterized by a high level of biodiversity and / or geological values with significant landscape, cultural and historical values and ecological characteristics of national and international importance. In the Nature Park, it is forbidden to perform actions, and activities which endanger the characteristics, value and role of the park."

Both definitions closely follow the IUCN definition of the protected areas category II (national park) and category V (landscape park) as described by Dudley (2008).[11]

The Law on Nature Conservation (Article 31) also defines zones in protected areas in Montenegro; those zones could be applied in different protected area categories. The zones and management prescriptions are as follows:

Protection zone I – A strict protection regime, which is implemented in a protected area or part thereof with slightly changed habitats of exceptional ecological importance, which enable natural biological processes, preservation of the integrity of habitats and life communities, including extremely valuable cultural assets. In **zone I** of protection and with a strict protection regime, the following applies:

- the use of natural resources and construction of facilities is forbidden;
- scientific research and monitoring of natural processes (monitoring) is carried out on a limited scale;
- educational visits are limited;
- protective, sanitary and other necessary measures are implemented in the event of fire, natural disasters and accidents, the occurrence of plant and animal diseases and pest prevalence.

Protection zone II – Active regime of protection, which is implemented in a protected area in which the characteristics of natural habitats are partially changed, but not to the level that threatens their ecological importance, including valuable geographies and valuable sites. In **zone II** protection with active protection mode, it is allowed:

- to carry out interventions aimed at restoration, revitalization and overall improvement of the protected area;
- to perform controlled use of natural resources, without prejudice to the primary value of their natural habitats, populations, ecosystems, landmarks and geographical areas.

Protection zone III – In the protection **zone III** with a sustainable use regime it is allowed to:

- carry out interventions aimed at restoration, revitalization and overall improvement of the protected area;

[11] Dudley, N. (Editor) (2008). Guidelines for Applying Protected Area Management Categories. Gland, Switzerland: IUCN. 86pp. ISBN: 978-2-8317-1086-0

- develop settlements and supporting infrastructure to the extent that no disturbance of the basic values of the area is caused;
- perform works on the arrangement of cultural and historical heritage objects and traditional works;
- preserve the traditional activities of the local population;
- to use natural resources, if done in a selective and limited manner.

The zoning of protection zones I-III for Durmitor National Park is specified in Annex III. National parks in Montenegro can also have a "transition" or "safety" zone on the national park borders; however, **National Park Durmitor currently has no such zone.**[12] Such a belt zone is defined in the Law on Nature protection, as follows:

> "Outside the boundaries of the protected area, a safety belt can also be identified if necessary. The protection zone referred to in paragraph 7 of this Article may be determined with the aim of preventing or mitigating external factors that may negatively affect the protected area such as wastewater, solid waste, invasive species, illegal construction, tourism, rinsing of pesticides, herbicides and other chemicals, fires, afforestation with non-autochthonous plant species and other possible factors."

[12] On 16 May 2019, the State Party confirmed that it should be considered a necessity to define a buffer zone for the World Heritage property.

3. Assessments

Prior to the analysis of the proposed boundary modification and the property's state of conservation, the mission makes the following observations regarding the area of the World Heritage property "Durmitor National Park:"

- The minor boundary modification of 2005 defined the area to comprise **34,000 ha** (zone I: 3,400 ha; zone II: 25,400 ha; zone III: 5,200 ha).[13]
- The boundary clarification of 2009 in response to the Retrospective Inventory indicates that the inscribed property would comprise **32,100 ha**.[14]
- The State Party report on the state of conservation of 2012 speaks of **33,896 ha**.[15]
- The State Party report on the state of conservation of 2014 mentions **34,158.10 ha**.[16]
- The mission noticed an information board on-site, which indicates **39,000 ha**.

It was explained to the mission that these discrepancies are due to not yet digitalized cadasters of about 7,000 ha inside the national park. Following the transmission of the draft of this report, the State Party confirmed on 16 May 2019 that the area of the National Park Durmitor amounts to 32,519 ha according to the latest digital data from 2016. In order to have an accurate basis on which a potential boundary modification can be assessed, *the mission recommends the State Party to submit to the World Heritage Centre, prior to any boundary modification proposal, an official letter, including a map, specifying the exact area of the property as inscribed in 1980 and as modified in 2005, i.e. not taking into account the 2013 boundary change of the national park.*

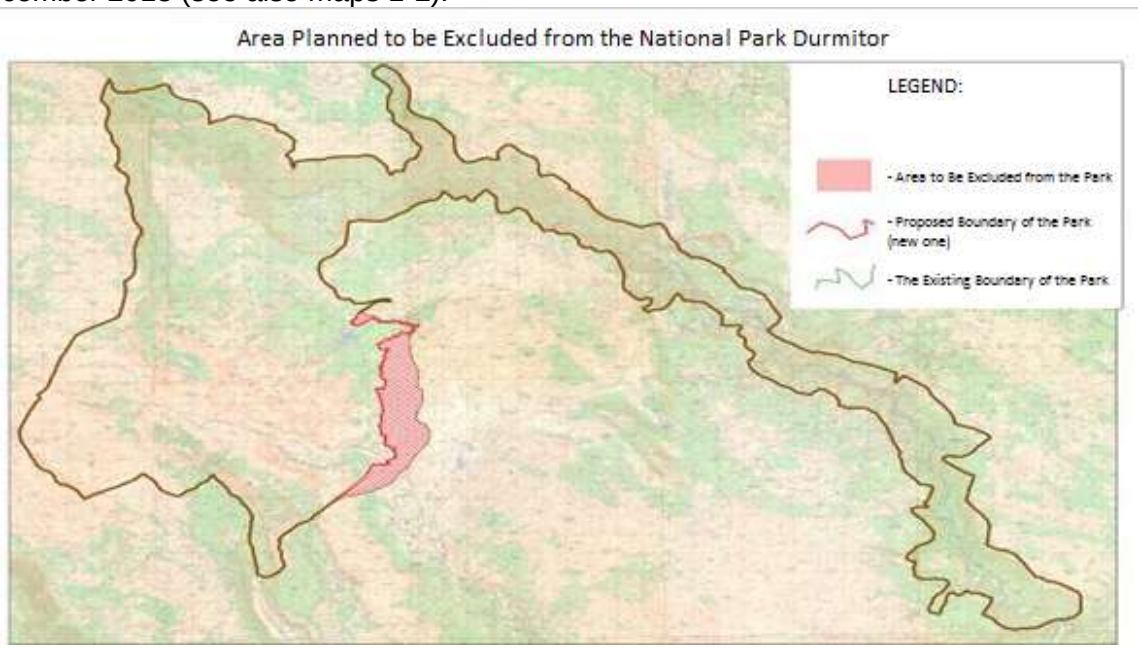
3.1 Proposal for boundary modification

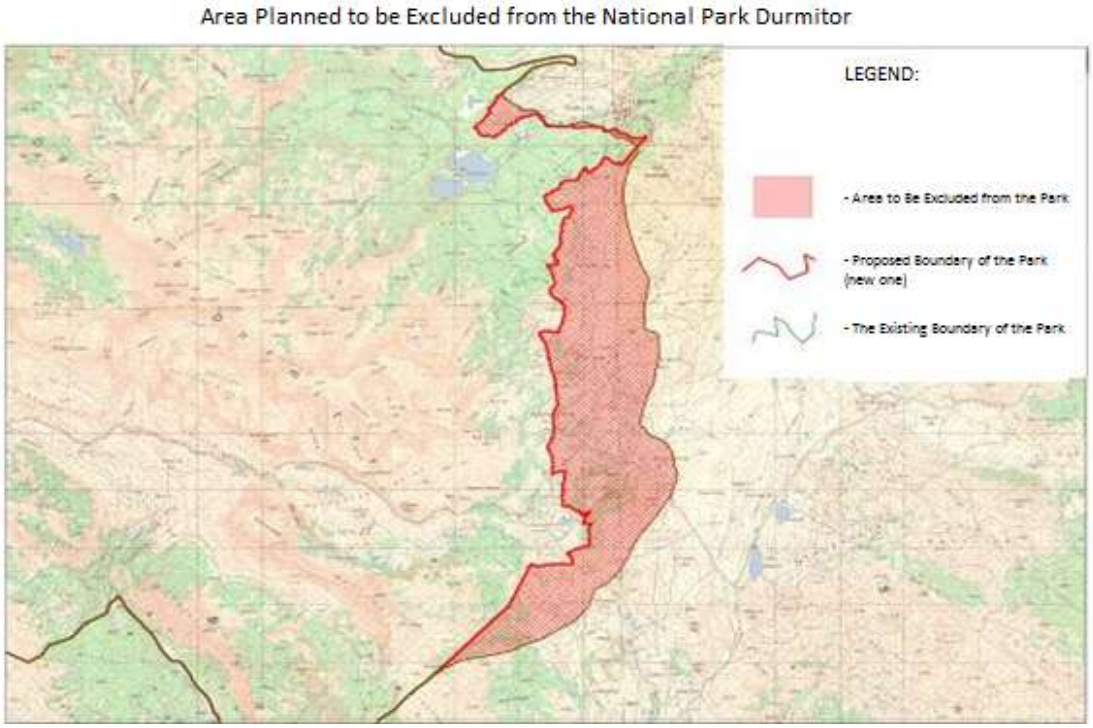
In its state of conservation reports of 2012 and 2014, the State Party informed of a new initiative having started in 2009 to exclude some parts devastated by illegal construction from Durmitor National Park. The national park boundaries were subsequently changed in 2013 through the approval of the Law on National Parks. Following review of the reports and the Periodic Reporting Questionnaire, the World Heritage Centre requested the State Party, *inter alia*, to submit the Feasibility Study on which the review of national park boundaries was based.

The 2013 Feasibility Study[17] was provided prior to the mission and has been reviewed by the mission team. The Study completed by the Institute for Nature Protection examined the loss of the area's natural qualities due to illegal constructions and informed the change of boundaries in accordance with the Law on Natural Protection. The Feasibility Study concluded that 1199.9 ha of the national park would be excluded due to "devastation" and compensated by 2570.6 ha with similar properties. Therefore, the boundary changes would actually result in an increase of 1370.7 ha. However, the compensation area has eventually not been proposed for national park status, and has instead been designated as a nature park, namely Nature

[13] See Decision **29 COM 8B.15**; see also IUCN evaluation at http://whc.unesco.org/document/151525
[14] See Decision **33 COM 8D**
[15] Ministry of Sustainable Development and Toursim (2012). National Park Durmitor (Montenegro). Progress Report
[16] Ministry of Sustainable Development and Toursim (2014). National Park Durmitor (Montenegro). Progress Report
[17] Institute for Nature Protection of Montenegro (2013). Expert Base – Feasibility Study for the Revision of the Durmitor National Park Boundaries (revised version)

Park Dragisnica and Komarnica. The Study was subject to three amendments and noted "certain problems" and "negativities" in relation to the compensation for the excluded area. Finally, the position of the Municipal Parliament of Savnik opposed the expansion of the national park into the territory of the municipality, which the study considered "inexplicable from the expert and scientific and even ecologic point of view." This study, made available to the mission, was eventually finalised on 4 December 2013 before the government approved the boundary change of Durmitor National Park through the Law on National Parks on 18 December 2013 (see also maps 1-2).





Maps 1 & 2: *The area marked in red indicates the exclusion from the national park boundaries in effect since 2013. The same area is proposed to be excluded from the World Heritage property (source: State Party report on the State of Conservation of "Durmitor National Park" submitted to the World Heritage Centre in 2014).*

In conclusion, it is important to note from the outset that, contrary to the considerations of the 2005 mission (see chapter 1):

1. the exclusion of Zabljak in 2005 has not yet been compensated by an extension, following the minor modifications to the boundaries;[18]
2. further exclusions from Durmitor National Park have not been halted, but continued through the reduction of national park boundaries in 2013 (see maps 1 & 2), whilst the boundaries of the World Heritage property are still in place.

Assessment of the area proposed for exclusion:

Urbanisation and illegal constructions are stated in the Feasibility Study[19] as the main reason for the exclusion of the areas from the territory of the National Park Durmitor in 2013, as shown in maps 1 and 2. The area concerned has been visited by the mission and can be divided into two types: One part of the excluded area, which is adjacent to the town of Žabljak, represent urbanised territory, where new hotels and stationary buildings prevail. The other part of the excluded area, expanding mainly on grassland and forest areas at the outskirts of Žabljak towards the south, is predominantly characterised by smaller weekend houses scattered along roads and paths. This sprawl and urbanisation is a result of decades of unplanned, uncontrolled and partly illegal activities. The mission was informed though that spatial plans for the area and strict legislation addressing illegal constructions has by now been put in place in Montenegro. In addition, the mission was informed that the spatial and environmental inspection was made fully operational and that some recent illegal buildings were removed.

While the mission regrets the impacts of insufficiently controlled sprawl of constructions, it notes that, in large parts, the landscape does not appear to have significantly changed within the area excluded from the national park. This is largely due to the limited size of the constructions. The landscape is still predominantly characterised by farms and their grasslands interspersed with smaller woods. All in all, *the mission considers that the illegal, unplanned and uncontrolled sprawl of new buildings in the area excluded from the national park, but still inside the World Heritage property, must not continue and any potential negative impacts on the Outstanding Universal Value be addressed. However, the mission does not see convincing arguments why the entire area would need to be excluded from the World Heritage property, provided it will benefit from an appropriate national park-level protection regime. The mission therefore recommends that the State Party consider reinstating the boundaries of the national park to their configuration prior to 2013 exclusion, assigning protection zone III in the currently excluded area, so as to ensure that the entire World Heritage property continues to benefit from an appropriate legal protection regime.*

Assessment of the area proposed for compensation:

The recently designated Dragišnica and Komarnica Nature Park has been proposed as a potential area to replace the above described excluded parts of the National Park Durmitor. Dragišnica and Komarnica Nature Park is located in the northwest of the Šavnik municipality and south to the boundaries of the National Park Durmitor. The Nature Park belongs to the cadastral municipalities of Grabovica, Komarnica, Duži, Dubrovsko and Pošćenje. The total area of the park is 8.834 ha. The area of the Nature Park belongs to the mountain type of relief with low, medium and high mountains and ridges, canyon and cliff valleys, cut into Mesozoic limestone. There are three basic zonal types of vegetation: deciduous forests, coniferous bushes, and several forest communities are registered. Endemic, sub-endemic, relict and rare

[18] See also Decision **29 COM 8B.15**

[19] Institute for Nature Protection of Montenegro (2013). Expert Base – Feasibility Study for the Revision of the Durmitor National Park Boundaries (revised version)

flora in the area of Dragišnica and Komarnica are conditioned by historical factors and the great diversity of orographic and microclimatic conditions. Regarding geological characteristics, rocks of different geological composition and age are present in this area, and most of them have Mesozoic sediments, with different variations of limestone, dolomite and flysch. The above characteristics of the proposed area demonstrate the variety of geological and biodiversity features, similar to those inside the Durmitor National Park. The proposed area could therefore potentially be an appropriate addition to the World Heritage property enhancing its integrity. However, unlike initially planned, Dragišnica and Komarnica have not been included into the National Park Durmitor but designated as a Nature Park only, which implies that the protection regime for this area is weaker than for National Park Durmitor, according to national legislation on nature in Montenegro. The management of the Nature Park is in the view of the mission not effective enough to prevent some uses of natural resources that would not be in line with the high protection standards of the national park and the World Heritage property. In particular, active forest management and hunting can be permitted in regional and nature parks of Montenegro. In addition, while national parks have their own on-place ranger services, the regional and landscape parks in Montenegro are subject to forest inspections carried out by sectoral inspectorial units.

In conclusion, *the mission considers that the proposed area of the Dragišnica and Komarnica Nature Park only qualifies for inclusion of the area into the World Heritage property if it meets the same high-level protection standards of the property, i.e. if it becomes a part of the National Park Durmitor.*

Absence of a buffer zone:

It should be noted that the property does not currently have a buffer zone, as it is the case for many sites that have been inscribed prior to the introduction of the buffer zone concept into the *Operational Guidelines for the Implementation of the World Heritage Convention*.[20] The proposed boundary modification, as presented to the mission, does not foresee an update to nowadays' standards of World Heritage properties so as to designate a buffer zone for the World Heritage property "Durmitor National Park." Buffer zones according to the *Operational Guidelines* are areas surrounding the inscribed property, underpinned by complementary legal and/or customary restrictions in terms of their use. In this way, they provide an additional layer of protection to the property. Buffer zones are supposed to play a crucial role in preventing negative impacts on the core zone and shall function as an instrument to

1. "(…) maximise the protection of the values of the protected area, including the OUV of the World Heritage property and their resilience to change,
2. maximise the connectivity of the World Heritage property/protected area with other natural lands in a landscape (...) and to maximise landscape connectivity, habitat connectivity (…),
3. integrate the World Heritage property/protected area within landscape scale conservation with community initiatives for sustainable use practises (…)"[21]

Buffer zones are not part of the inscribed property; however, they can play an essential role for the proper protection of the property. Especially the protection of biodiversity (criterion x),

[20] See UNESCO, Operational Guidelines for the Implementation of the World Heritage Convention, WHC.17/01 12 July 2017, Para. 103-107.

[21] See MARTIN Oliver and PATTI Giovanna, Ed. (2009), World Heritage and Buffer Zones. UNESCO World Heritage Paper 25. For a recent discussion on World Heritage buffer zones see also BRUNNER Robert and KÜPPER Clemens (2019), Joint World Heritage Centre/IUCN Advisory mission to the Slovak components of the World Heritage property "Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe"

and aesthetic aspects (criterion vii) benefit from protective zones that alleviate anthropogenic impacts from outside the boundaries of the respective property. While more interventions are possible in buffer zones, compared to the respective property, all interventions should not contradict the property's protection objectives and limit e.g. tourism to low-impact activities such as hiking or bird watching. Forestry management should avoid intensive management and clear cutting.

The already existing Biosphere Reserve and its zonation, overlapping with the World Heritage property, could potentially inspire boundaries for a buffer zone of the World Heritage property and create synergies between both designations. Other synergies in designing a buffer zone for the property could potentially be created when considering the proximity of two components of the transnational serial World Heritage property "Stećci Medieval Tombstones Graveyards" (Bosnia and Herzegovina, Croatia, Montenegro, Serbia), which were inscribed in 2016 under cultural criteria (iii) and (vi). Furthermore, the mission recalls the recommendations made by the 2005 mission to support other national parks located near a joint buffer zone ensuring ecological corridors and using the existing Biosphere Reserve as a basis for the designation of the buffer zone (see also chapter 1).

Besides these possible advantages arising from synergies with other designations, the mission considers important the designation of a buffer zone for the World Heritage property "Durmitor National Park" due to the various pressures on the property, including tourism and infrastructure developments, which are described in more detail further below in chapter 2.2. The lessons learned from past threats to the property also demonstrate the need for an effective buffer zone. These include past negative impacts from lead mine tailing ponds located upstream of the property and the prospect of a large-scale dam located downstream whose reservoir would reach up into the property. Tara River as one of the few last unbarrierd rivercourses should play a primordial role when considering the establishment of a buffer zone for the property.

Therefore, *the mission recommends the State Party to launch a process to designate a buffer zone for the World Heritage property "Durmitor National Park" with the primary objective to protect the property from anthropogenic pressures, taking into account ecological and visual considerations and all existing international designations and national parks nearby. The mission also recommends to re-consider the boundary modification proposal against the background of the 2005 mission recommendations, so as to*

- *identify a compensation for the exclusion from the World Heritage property that was approved in 2005;*[22]
- *halt any further exclusions from Durmitor National Park and the World Heritage property;*
- *explore possibilities for extensions of the World Heritage property to enhance ecological connectivity to other National Parks.*

3.2 State of conservation

3.2.1 Resolved conservation issues

In the past, the part of the Tara River Canyon included in the World Heritage property has been under risk due to a **lead factory and mine** located 32 km upstream of the property. The complex has been planned shortly after inscription of the World Heritage property in 1980.

[22] See also Decision **29 COM 8B.15**

Following the closure of the lead industries in the 1990s, the 2005 mission noted a cooperation project for the rehabilitation of lead mine tailings and toxic waste disposal and adjacent contaminated areas. Since then, the rehabilitation works have been finalised, also thanks to the support of international funding.

The 2005 mission stressed that the **sewage and waste disposal infrastructures** in settlements should comply with international environmental standards. Since then, significant progress has been made to address the issue. Today, sewage and waste disposal systems are in place and fully functional, according to reports to and observations by this mission.

The mission welcomes the completion of the rehabilitation works of the former lead mining complex and of sewage and waste disposal infrastructures.

In 2012, the State Party, in line with paragraph 172 of the *Operational Guidelines,* informed the World Heritage Centre of its intention to upgrade an existing **energy transmission line**. The mission visited the site where the planned transmission line would cross the Tara Canyon for approximately 2km inside the property following the same route as the already existing line.

The line is projected to cross the Tara River in protection zone III of the national park parallel to the Tara Bridge (see map 3). A Detailed Spatial Plan and a Strategic Environmental Assessment (SEA) report detailing the corridor of the transmission line of 400 kV with optical cable was adopted in 2011. The SEA has been completed on the Corridor Project from Pljevlja to the Montenegrin coast and to Italy via a 500 kV submarine cable. The new transmission line would replace an existing 120 kV transmission line in the same corridor over the Tara River.

Article 16 of the Law on National Parks restricts the construction of transmission lines through national parks in terms of deforestation and "reclamation of mountain pastures, meadows and other wetlands with native vegetation." The installation of the 400 kV line is planned to be placed on the same columns as the existing 110 kV line using the existing maintenance roads of the 110 kV line, also in order to keep the visual impacts limited. The 2012 State Party report describes the transmission line as precondition for renewable energy production and further economic and sustainable development.

The mission appreciates the State Party's transparent and early communication on the planned transmission line, in compliance with §172 of the Operational Guidelines. It considers that the upgrade of the existing transmission line next to the Tara Bridge within zone III of the national park represents the best possible option to minimise visual impacts as well as impacts from construction and maintenance works. The mission nevertheless stresses the need to apply strict environmental safeguard standards, so as to carefully monitor, reduce and mitigate any potential impacts during construction (see also chapter 3.2.2.3) and maintenance works. In terms of future planning for the region, it further advises caution in respect to potential undesired knock-on effects from this infrastructure upgrade, such as enhanced development pressures on the World Heritage property.

The region's potential for hydroelectric **dam projects** has been the primary conservation concern within the property. Project ideas for hydroelectric dams on the Tara River have been expressed/publicised at several occasions over the last decades. A project, which would have flooded a large part of the Tara River Canyon, has eventually been cancelled in 1985. These plans were resumed in 1991 and ultimately abandoned in 2005. The mission has been informed that, as of today, there are no plans to construct any dams on the Tara River, which is appreciated. The full preservation of the entire river flow is requested by the Declaration of the Parliament on the Protection of the River Tara[23] as a confirmation of the constitutional

[23] "Official Gazette of the Republic of Montenegro" 78/04 of 22 Decmber 2004

commitment of Montenegro to its development as an ecological state. According to the 2012 State Party report on the State of Conservation of the property, the Declaration prohibits construction projects in the area of the Tara canyon.

The mission underlines the importance of the Tara Declaration and recalls that the realisation of the hydropower project "Buk Bijela" would have constituted a clear ascertained danger to the OUV of the World Heritage property. An uninterrupted river flow is vital for the conservation of migratory fish species, such as the endangered Danube Salmon, which has been recognised in the property's Statement of Outstanding Universal Value.[24] The mission highlights that the eventual construction, also of small hydroelectric power plants outside the World Heritage property within the Tara river catchment could have negative impacts on the OUV of the property. In line with §172 of the Operational Guidelines, the State Party should report on any potential new plans concerning the development of new hydropower plants in the World Heritage property and its catchment area, including areas that are being considered for inclusion into the property, such as Dragišnica and Komarnica Nature Park and other adjacent areas. The mission received no information that such plans would exist.

The mission appreciates that there are reportedly no plans for dam projects within the Tara River catchment area.

3.2.2 Current conservation issues

3.2.2.1 Skiing infrastructure

When the property was inscribed in 1980, it included two small-scale skiing areas, one to the northwest, the other to the southwest of Zabljak on the Eastern slope of the Savin Kuk Mountain. This small ski area with one lift is situated in the second management zone of the Durmitor National Park. Originally designed as an isolated ski centre, mainly for day-visitors and domestic tourists, the ambitions for the area, as briefly presented to the mission at the ski centre, are far from remaining a small-scale ski centre.

The mission was informed by the mayor of Zabljak that a new spatial plan for the wider Zabljak area is under preparation, including plans for an extension and enlargement of the existing ski centre Savin Kuk, along with the extension of the existing ski lift, new lifts and new ski slopes. The mission observed that several steps towards the transformation of the ski centre into a larger-scale ski resort have already commenced. These include works on the slopes of the mountains to enable new ski corridors, construction of the infrastructure and facilities for visitors (new access roads for road traffic, extensive parking lots, erection of a garage, restaurants, creation of the water reservoir for artificial snow (see figure 1 below), etc). In the initial phase, the transformation of the existing ski lift into a six-seat cable lift and extension of the ski terrain to the topof Savin Kuk, together with the construction of the extensive water reservoir and other small work on the infrastructure for visitors, are foreseen and some already being implemented.

During the field visits, the mission observed that the construction of a pipeline and a reservoir for artificial snow generation was already underway and close to completion at the time of the visit. The water for the artificial snow creation is to be extracted from the Modro jezero (the Blue Lake), one of the characteristic Karst lakes inside the World Heritage property and in the core zone of the National Park. The capacity of the rather shallow lake is at approximately

[24] see Decision **39 COM 8E**.

25.000 m3 (expert opinion of the mission). The concept of filling the reservoir is based on the diversion of excess surface waters from the lake before and after the winter period since the lake is usually frozen in winter. Waters from the lake are supposed to be transported through an almost finalised pipeline through the World Heritage property with a length of approximately 8 km, feeding not only the newly constructed reservoir (see figure 1 & 2) for the creation of artificial snow with a capacity 55.000 m^3,[25] but also a small settlement downstream the ski resort for irrigation and water supply purposes. Apart from direct impacts on surface waters and biodiversity, diversion of waters through the pipeline will likely have a significant impact on the groundwater hydrology of the karst system of the World Heritage property. As seen from the photo below, the pipeline has negative impacts also on visual, morphological and landscape features of the area, inside the property.

According to national legislation, the water management authority should issue a permission for extraction of waters above one liter per second for artificial snow creation. During the meeting with the representatives of the water management authority, the mission learned that no request for permission of extraction of waters from Modro jezero for artificial snow creation has been asked for or granted so far.

Figure 1: *Water reservoir intended for the creation of artificial snow; Savin Kuk ski centre inside the World Heritage property*

[25] See https://m.cdm.me/english/million-investments-in-savin-kuk/

Figure 2: *Newly constructed pipeline inside the property for feeding the reservoir in figure 1*

The mission was informed that new skiing areas are foreseen to be created in the draft spatial plans for the area of Zabljak and Savin Kuk. The new developments would be implemented in the second management zone of the national park. This zone is – according to the national legislation – considered as the core zone of the National Park. It was reported to the mission that in order to align the plans with the Nature Protection Law, which prescribes zonation for the national parks, the authorities are proposing to change internal zoning of the National Park Durmitor and extend the third zone of the national park to include the entire area of the extended ski resort. Such a change is against the principles valid for every protected area, according to the IUCN guidelines on the protected area management categories.[26] Responsibility for changing the zoning system inside National Parks in Montenegro is entrusted to the Ministry of Sustainable Development and Tourism.

The mission underlines that the planned extension of the ski facilities would be clearly located inside the World Heritage property, irrespective of a potential re-zonation of the national park, and also in case the envisaged boundary modification of the World Heritage property would go ahead. The mission further notes that the World Heritage Centre has not yet been informed of these plans, in line with paragraph 172 of the *Operational Guidelines*.

Considering that the World Heritage property "Durmitor National Park" is inscribed for its aesthetic (criterion vii), geomorphological (criterion viii) and biodiversity (criterion x) values, the mission raises serious concerns over the potential impact of the extension and developments of the ski resort Savin Kuk on the OUV of the property:

a) Environmental impacts

The major infrastructures and the operation of an extended and enlarged ski resort Savin Kuk would entail negative impacts on the natural ecosystem, its biodiversity, geomorphology, connectivity role and ecological processes of the area. Extraction of waters for creation of artificial snow, by diverting surplus excess waters at the outflow of the Modro Jezero through

[26] Dudley, N. (Editor) (2008). Guidelines for Applying Protected Area Management Categories. Gland, Switzerland: IUCN. 86pp. ISBN: 978-2-8317-1086-0

the pipeline towards the artificial water reservoir at the footsteps of the ski centre Savin Kuk would also negatively affect the hydrological regime, including the underground water network. The area concerned is characterized by its Karst morphology, which is especially sensitive towards any changes of the water regimes, both surface and underground.

In addition to direct encroachment and fragmentation of the habitats and negative impacts on flora and fauna of the area, development of ski centres require additional space outside ski slopes (catering and accommodation facilities, car parking, access roads, etc.) and introduce several supportive activities, including environmentally harmful artificial snow creation. The creation and maintenance of the ski slopes would require continuous earthworks to adjust the rocky terrain resulting in modified morphology, and in interrupted and changed geomorphological processes, including exacerbated erosion risks.

b) Socio-economic impacts and long-term economic viability

The proposed development of the ski resort Savin Kuk would change entirely the existing concept of the locally important ski centre for small-scale tourism, mainly based on day visits. The mission got the impression that Savin Kuk is foreseen to become an internationally competitive ski tourism resort, which would require ongoing development and expansion of the tourism industry in Žabljak. The incompatibility of the preservation of the core zone of a World Heritage property with this type of tourism development does not appear to be fully understood at local levels. Experience shows that large-scale ski tourism developments require ongoing investments and extensions of ski slopes to remain competitive with other growing large-scale resorts. It should be noted that yearly income from the ski tourism provided to the budget of the park (in the form of payments for the use of the land inside the National Park area for recreational purposes) only comprises some ten thousands of euros (yearly budget of the park is around three quarters of a million euros and it is still increasing).

Small-scale ski resorts, based on shorter and few ski slopes can hardly provide to be self-sufficient in today's world where big ski resorts dominate. Small-scale ski resorts can only accommodate the needs of the local population, which is hardly (if at all) economically viable. Even if such developments would provide some additional employment, mainly during the winter months only, this could also foster additional abandonment of traditional agricultural jobs, important for the maintenance of the landscape, as more people would earn their incomes in the mass-tourism sector.

c) threats to the integrity of the World Heritage site

Any further development of the ski resort Savin Kuk in the area of the National Park and World Heritage site of Durmitor is not compatible with the preservation of its OUV. Durmitor National Park was inscribed under natural criteria specifically for its geomorphology, geology, scenic beauty and biodiversity. The expansion of the ski centre Savin kuk would endanger all the property's values associated with all the above criteria ,directly but also indirectly. The negative visual impact of the extended ski resort in one of the key scenic and access points to the Durmitor National Park at its emblematic point of the magnificent mountain ridge above the main visitors' aggregation point at Zabljak would negatively impact on the scenic and integrity values of the World Heritage property and provide visitors with an inaccurate impression of the Outstanding Universal Value.

The picture below indicates the existing ski lift (light blue), its extension (violet) and new ski slopes (red) according to the draft spatial plan.

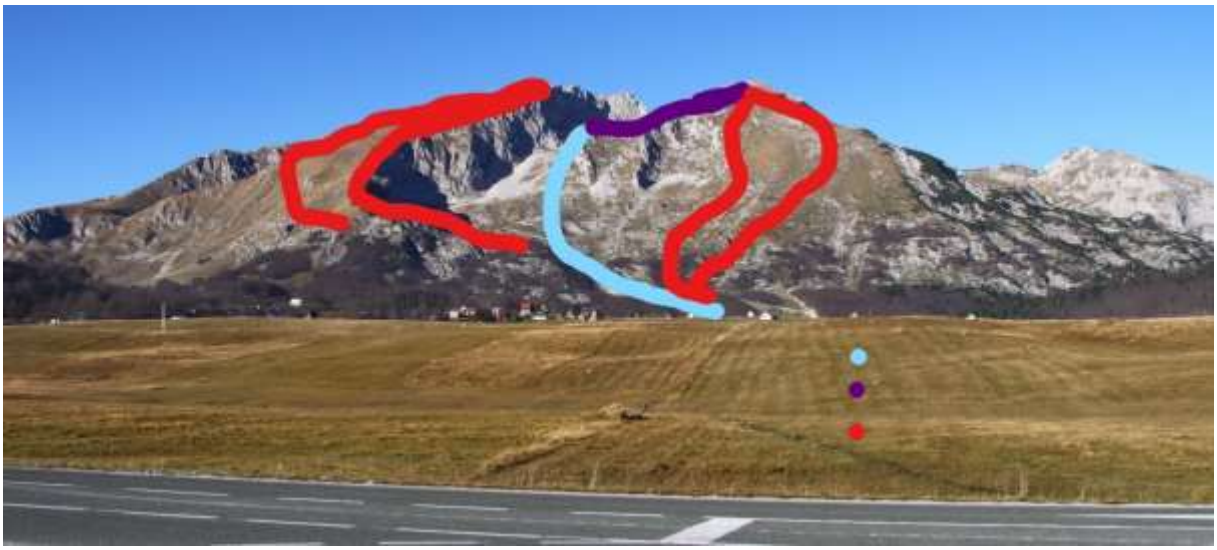


Figure 3: *existing and proposed new and extended ski lifts and slopes at Savin Kuk ski-centre (existing ski lift in light blue, its extension in violet and new ski slopes according to the draft spatial plan in red)*

d) impacts on cultural values

As noted in chapter 1, the World Heritage property "Durmitor National Park" is located nearby the components "Grčko groblje, Žabljak" and "Bare Žugića, Žabljak" of the transnational cultural World Heritage property "Stećci Medieval Tombstones Graveyards." The mission has visited both components, which are situated between 2 and 5 kilometers away from the planned ski resort, and between 1 and 4 kilometers from the current boundaries of the World Heritage property "Durmitor National Park." Due to their location, the mission considers that any major infrastructure developments and constructions between both properties, at the foot and on the slopes of the very emblematic and widely visible Savin Kuk Mountain may be relevant for the wider landscape setting of the "Grčko groblje, Žabljak" and "Bare Žugića, Žabljak" components. Any such developments and constructions between both properties could thus also be potentially relevant for both Stećci components. *The mission therefore recommends to consult ICOMOS, through the World Heritage Centre, regarding any potential future developments between the World Heritage property "Durmitor National Park" and the components "Grčko groblje, Žabljak" and "Bare Žugića, Žabljak" of the transnational cultural World Heritage property "Stećci Medieval Tombstones Graveyards," and their surrounding area.*

The mission also notes that the World Heritage Committee has expressed a clear position regarding ski developments in various decisions for other World Heritage properties, expressing concerns over potential developments of large-scale skiing facilities within the respective properties.[27] It referred to significant impacts from the development of ski facilities and ski runs deciding that such developments, or associated infrastructure, within the property and its buffer zone would result in the inscription of the property on the List of World Heritage in Danger.[28] In another instance, the Committee has urged the respective State Party to refrain from developments for Winter Olympic Games that would pose risks to the property and

[27] See Decision **41 COM 7B.8**
[28] See Decision **34 COM 7B.19**

welcomed the relocation of associated infrastructures from close proximity to the property to a new location.[29]

In conclusion, the mission considers that any further extension of the ski zone inside the property is not compatible with World Heritage standards and would constitute a clear ascertained danger to its OUV in line with para 180 of the Operational Guidelines. The mission therefore considers the zonation of the national park should not be altered, which would otherwise make the extension possible.

Therefore, the mission recommends to

1. *abandon any plans for extending the ski facilities inside the property, including new ski slopes, lifts, pipelines and related infrastructures and revoke respective amendments to the relevant spatial plans;*
1. *conduct, as a matter of priority, a rigorous Environmental Impact Assessment (EIA) in line with IUCN's Advice Note on Environmental Assessment, including the impact on the Karst flow regime, prior to any operation of the pipeline from Modro Lake to the ski zone.*

3.2.2.2 Over-visitation, constructions and tourism management

Over-visitation of the "Durmitor National Park" is a serious threat to the OUV of the property. The diagram below shows a steep increase in visitors' numbers in the period after the year 2012. An increased number of visitors, together with uncontrolled and illegal tourism infrastructure development, was the reason for the proposed boundary modification and exclusion of the Žabljak area from the World Heritage property already after the 2005 Reactive Monitoring mission. The response of the municipality and the park authorities to the growth in visitation is to concentrate accommodation facilities in Žabljak, which is adequate, but the mission emphasises that there is already a very high number of visitors in this sensitive area posing a potential threat to the OUV. The local development strategy is to construct high quality and more expensive hotels to replace old and lower standards accommodation; such a strategy in the World Heritage area should not be based on ongoing increase of tourists, whose numbers may likely already exceed the carrying capacity of the area.

The goal of the tourism offer of the World Heritage property should in the mission's view not be further development of the ski resort, but rather low impact tourism that focuses on the appreciation and enjoyment of wild and undisturbed nature through hiking and guided tours. In light of the above, it is clear that construction of new wooden bungalows (in form of prestige glamps[30]) which are planned in the area near to the Crno jezero (entrance zone to the National park near Žabljak) would aggravate disturbance and fragmentation of the World Heritage property. A new law in Montenegro on "temporary objects" (where bungalows are considered as such, as they would be constructed from wood) would allow for construction of such objects in the 3rd zone of the national park, which is in clear opposition to the aims of preservation of

[29] See Decision **32 COM 7B.25**

[30] such as high-quality tents and baracks

the Outstanding Universal Value of the World Heritage property.[31] Currently, Crno jezero is still in zone II of the national park.

Apart from direct damage to the natural environment of the property, new bungalows would attract even more visitors staying on site, especially at the time of existing high visitation peaks, which would add to the congestion of the area. More tourists would require additional supportive infrastructure and facilities within the National Park borders, such as access roads, car parking, and would contribute to more noise and pollution. The mission stresses that the State Party any new spatial plans and other plans providing for constructions or changes in the zonation of the World Heritage property should be reported to the World Heritage Centre before the decision is taken, in line with paragraph 172 of the *Operational Guidelines*.

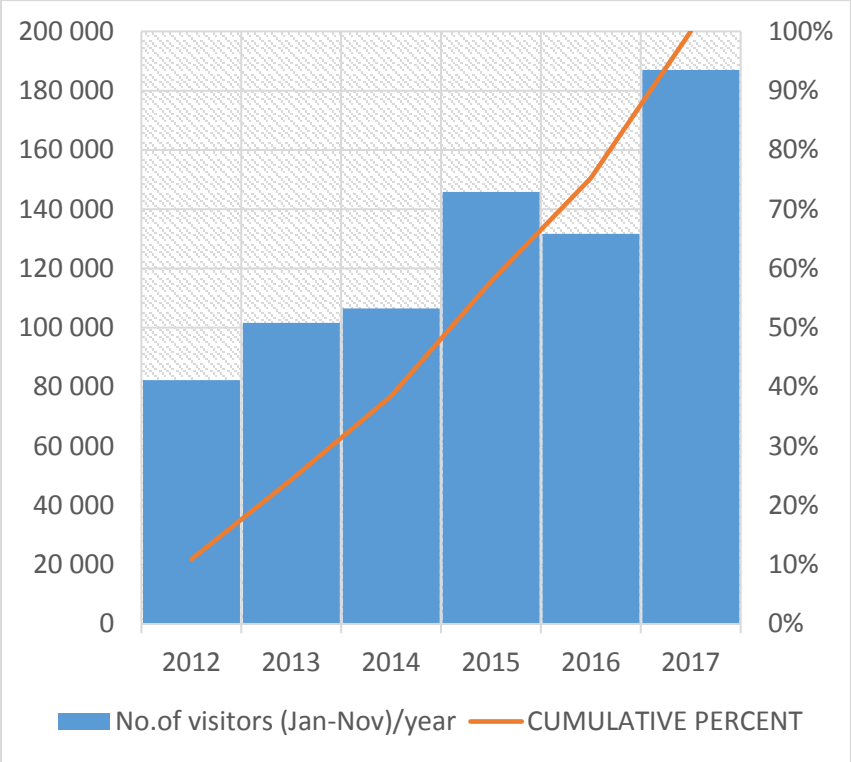


Figure 4: *Visitors at Black Lake (own figure based on data provided to the mission)*

The mission noted several zip lines and points for embarkment on the rafts at the entrances in zone III of the national park inside the World Heritage property, which are also intensively promoted. Such activities are promoted as “adventure tourism.” In view of the mission, these tourism concepts may result in negative impacts on the OUV of the property if applied too intensively and if tourists are not sufficiently sensitised for passive recreation and appreciation of nature. The mission noted that the promotion of the World Heritage principles for enjoyment

[31] For more details on such projects, see Ministry of Sustainable Development and Tourism (2018). IZMJENE I DOPUNE PLANA OBJEKATA PRIVREMENOG KARAKTERA NA PODRUČJU NACIONALNOG PARKA "DURMITOR“. ZA PERIOD 2017 – 2019. GODINE, available at http://www.mrt.gov.me/ResourceManager/FileDownload.aspx?rid=311462&rType=2&file=DURMITOR%20april%202018.pdf

of unspoilt and undisturbed nature and use of the World Heritage emblem should be more prominent and better explained to visitors.

An approach to address these issues could be the application of the UNESCO World Heritage Sustainable Tourism Toolkit, which focuses on best practice approaches to sustainable economic development through tourism and which offers direction and guidance to managers of World Heritage tourism destinations and other stakeholders to help identify the most suitable solutions for circumstances in their local environments and aid in developing general know-how for the management of each destination.[32]

The mission strongly recommends to revise the tourism vision for the property, giving priority to low impact tourism. The World Heritage Sustainable Tourism Programme toolkit could be used as a tool when addressing the sustainable tourism development options for the area of the Durmitor National Park, in consultation with the UNESCO World Heritage and Sustainable Tourism programme. This could overcome the current prevailing picture of developing mass tourism, such as extensive ski and winter tourism and adventure based activities (zip lines, massive rafting etc.), which are currently seen as the most appropriate development opportunity for the area. Lack of incentives for traditional land use, which are supportive to the OUV of the property, is preventing development of a broader vision for the national park and surrounding region, based on the preservation and appreciation of the OUV and also cultural heritage.

3.2.2.3 Park management

Durmitor National Park is divided into three management zones: a strictly protected zone covers some 10% of the park, while a zone of protection extends over 75% of the park, leaving some 15% of the total area of the park to a zone of sustainable use. To balance the needs of legitimate local livelihood and conservation is considered indispensable.[33]

In the zone of protection (2nd management zone) some of the uses of natural resources are allowed which do not comply entirely with the IUCN standards for the management of the IUCN Protected Areas category II sites.[34] One of those include the permission for “sanitary cuttings” in forests. These include removal of branches and trees that have collapsed under the snow load. Sanitary cuts are reported to be sometimes used for the extraction of wood for other uses, such as firewood at a small scale. Sanitary cuts (which are allowed and compatible with the IUCN standards in the 3rd zone of the national park) does in most cases not provide a major disturbance, as long as it is undertaken by local people for their own needs only and not for commercial and industrial purposes.

The system of management of national parks in Montenegro is coordinated by the public institution “Javno preduzeće Nacionalni parkovi Crne Gore”. There are five national parks in Montenegro and only Durmitor has the status of a World Heritage property, which requires a special management approach. The mission recognized efforts of the managerial unit of the Durmitor National Park in the management of the site, especially in terms of day-by-day management, patrolling and maintenance of the visitor infrastructure. Although not yet totally remedied, the mission was informed that no extensive illegal hunting and logging has recently been undertaken in the park, which likely is the result of an effective legal basis and enforcement. Hunting is strictly forbidden in all three zones of the national park, according to

[32] See http://whc.unesco.org/sustainabletourismtoolkit/
[33] See Decision **39 COM 8E**.
[34] Dudley, N. (Editor) (2008). Guidelines for Applying Protected Area Management Categories. Gland, Switzerland: IUCN. 86pp. ISBN: 978-2-8317-1086-0

the Law on Nature protection. There remain sporadic reports of illegal hunting, but thanks to effective patrolling system and ranger service illegal hunting could be reduced to some exceptions. The mission noted, however, that some new roads have been created and many existing ones upgraded in the park. Those roads, mainly created to enable visitation of the area and control of visitor flows, remain limited in size and represent a minimal visual intrusion. Nevertheless, care should continuously be taken in the future in order not to harm the OUV of the property due to massive visitation and opening of new and additional access for visitors to prevent any further fragmentation. The road to Dragisnica valley, for example, was upgraded for potential wood extraction, however the activity was stopped due to effective interventions by the Park management.

It was noted by the mission that no comprehensive monitoring of biological and other parameters is being implemented in the park. Except for some very elementary monitoring activities on visitor flows, counts on chamois and brown bear and some basic mapping of the changes in forests due to climate change impacts, no systematic and comprehensive monitoring schemes are put in place, which will not provide for effective management of the biodiversity and ecosystem processes. No information is systematically collected on flora, vegetation and habitats, with the exception of monitoring the dying of trees. Information on ichthyofauna was not available. It is for instance currently not possible to determine the status of the endangered Danube salmon. In light of the continuous increase in visitation, *the mission recommends to put in place a more detailed monitoring programmes for visitors as well as for key species contributing to the Outstanding Universal Value of the property.*

The mission noticed the promotion of some of tourism activities which could be promoted as a model for sustainable forms of tourism in other World Heritage sites, such as “walking-on-snow-routes” in winter. The mission was at the same time also informed about some inappropriate and even illegal activities (for example, motor jet ski-used by external visitors, even by poachers, vandalism in the Ice Cave). These activities are not in accordance with the law and the park authority is facing difficulties in enforcing this law.

The mission was informed that the transboundary cooperation with Sutjeska National Park in Bosnia and Herzegowina and Piva Nature Park exist but at a very limited level and therefore encourages the park authorities to strengthen this cooperation.

3.2.2.3 Developments upstream of the property

The mission was informed about the construction of a new motorway crossing across the Tara river near Kolašin, located upstream of the World Heritage property. The World Heritage Centre has not received any information regarding this motorway crossing in line with paragraph 172 of the *Operational Guidelines* prior to the start of the constructions or on any potential downstream impacts of the motorway crossing of the Tara River and its construction. The area concerned is located within the Tara Biosphere Reserve. During the mission, meetings with responsible authorities for the permission and construction process were organised and the mission also visited the construction site.

The project comprises the construction of a major motorway on two separate lanes and two bridges across the Tara River. In addition, there are five access ramps with embankments, piers of the bridge (located in parallel to the river course in the riverbed area) and pay toll buildings, all located within the floodplain area of the Tara River. At this section, the Tara River will be regulated, using stone lining and major bed embankments, all executed through conventional hydro-technical engineering. Regulation of the river section at the motorway working area will also require regulation of the riverbed both in the upper and lower sections of the Tara River. The construction works are currently in progress for which the river course

has been heavily altered from a braided river, stretching across the floodplain, to an artificially straightened river.

Figure 5: *deposition areas, regulation of the temporary floodplain river bed into a permanently straightened river stream drastically change the ecological character of the area.*

The mission was informed that at least 20 different variations of the route for the motorway were presented and discussed in the process of granting the permission. From the reflections gained in the field, the mission is of the view that a less impactful variation of the route could have been identified. The main negative impact of the agreed solution lies in the fact that the location of the ramps and deviations to and from the motorway route, together with the pay-toll object, are located in the heart of the floodplain area of the Tara River. By urbanising the space in the wide river floodplain, support infrastructure for the motorway and typical major bed embankments in the form of intensive river regulation, were applied. This, as a consequence, destroys the floodplain character of the Tara River in this section. Floodplain character of the torrent-type river is essential to maintain the ecological values of the Tara River, together with its biodiversity, especially fish fauna. If the floodplain area would not be build up, no river regulation works would be needed (including up- and downstream of the section) and the impacts on the riverine ecology would be lower.

Besides the fact that the project foresees the replacement of the floodplain area under and besides the bridge, the mission observed that the construction works are being implemented without safeguards for the riverine environment. The project foresees that the former area of floodplains, where Tara River shifted its course every season in the wide floodplain terrain, will be transferred into an artificially planted forest. Floodplains will be reduced and remaining parts will become low-biodiversity value area, while the core biodiversity values and characteristic habitat features for floodplains (riffles, shallow pools, temporarily flooded areas etc.) will be lost. The floodplain river is transformed into strictly regulated river with a determined channel, which will drastically alter the ecological character of this river section.

Several temporary deposition areas, gravel storage areas, ramps, and even gravel out-take areas were observed by the mission in the wider floodplain area and river bed. The area is

dumped with trash and deposited materials also beyond the construction site. Although the majority of those negative impacts could be addressed after the final works on the highway construction, it is clear that some impacts will be visible also after the conclusion of the works.

Extraction of gravel from the river bed was observed at some places along the river corridor. The mission was informed that there was a "moratorium" in Montenegro imposed on gravel extraction from river beds in recent years; however, new legislation is foreseen to re-open rivers for gravel extraction. The mission points out that gravel extraction from the Tara River and its tributaries can have negative impacts on the OUV of the World Heritage property. The assessment of downstream impacts should include the impacts of any gravel extraction from the riverbed and disposal of materials into the riverbed in the course of the construction works.

Figure 6: *construction and deposition area in the floodplains of the Tara River*

The mission was informed about the efforts of the authorities to prevent infringements of environmental standards during the construction phase. Monitoring of the environmental and biological parameters during the construction phase is not adequate as it does not cover all the needed parameters and especially the results of the monitoring are not reported promptly with the instructions to the construction company and supervisors of the project so as the needed adaptations of the construction works could be applied in practice to mitigate negative impacts of the interventions.

In conclusion, the mission recommends to assess and closely monitor the downstream impacts of the Tara River highway crossing on the Outstanding Universal Value of the property as a matter of urgency, including a confirmation of the status of the endangered Danube salmon, and to keep the World Heritage Centre updated about the findings. It further recommends to complete an EIA that takes into account all potential downstream impacts on the World Heritage property, and to develop a rigorous Environmental Management Plan to mitigate any downstream impacts.

4. Conclusion and recommendations

This Advisory mission report has reviewed a potential boundary modification of the World Heritage property “Durmitor National Park” in respect to changed boundaries of the National Park and assessed the overall state of conservation of the property. Overall, the mission highlights the challenge to harmonise the development aspirations of the wider region with the conservation of the property’s Outstanding Universal Value, whose protection is a condition and enabler for sustainable development of the wider region. Based on this, the mission draws the following conclusions:

1. Proposed boundary modification

The area of the National Park was reduced in 2013 to exclude a strip between the villages of Zabljak and Provalija at the foot of the “Savin Kuk” peak. This was done in response to the “devastation” of the respective area by illegal buildings. The State Party plans to align the boundaries of the World Heritage property with the new boundaries of the National Park and to add a Nature Park in the south of the property as a “compensation” to the World Heritage property. The mission stresses that

a) the area excluded from the National Park has been negatively impacted by uncontrolled developments, but it is not devastated,

b) the proposed compensation, being a Nature Park, would have a much weaker protection regime than the national park, allowing e.g. for logging and hunting if the responsible forestry administration and local authorities decide so.

2. State of conservation

Overall, the field visits to the property confirmed that the Outstanding Universal Value of the property is not lost, but increasingly impacted. The mission particularly welcomes that a number of previous conservation issues have been successfully resolved. However, the mission raises three concerns, especially about on-going and future developments within and in vicinity of the property:

a) The development of tourism results in over-visitation and development pressures around Black Lake as well as in the planned significant extension of a ski-centre inside the World Heritage property, including artificial snow infrastructure already being built, comprising a 6.5 km pipeline through the property to the Karst lake “Modro Jezero”;

b) This is also correlated with developments and urban sprawl from Zabljak (excluded from the WH property in 2005) into the property, especially in proximity of the ski zone before and after the exclusion of this area from the National Park in 2014. In the view of the mission, planning and development of this area should also be considered in the context of two nearby components of the transnational serial World Heritage property “Stećci Medieval Tombstone Graveyards.”

c) The construction of a highway bridge across the Tara River, located upstream of the World Heritage property, and inside the Tara River Biosphere Reserve, has devastated the Tara riverbed at and around the construction site, including through the extraction and disposal of sand and gravel along the Tara riverbed. The potential downstream impacts on the World Heritage property, including on the population of the endangered Danube salmon are currently unclear.

Based on these conclusions, the mission recommends the State Party to

1. *submit to the World Heritage Centre, prior to any boundary modification proposal, an official letter, including a map, specifying the exact area of the property as inscribed in 1980 and as modified in 2005, i.e. not taking into account the 2013 boundary change of the national park;*
2. *consider reinstating the boundaries of the national park to their configuration prior to 2013 exclusion, assigning protection zone III in the currently excluded area, so as to ensure that the entire World Heritage property continues to benefit from an appropriate legal protection regime;*
3. *launch a process to designate a buffer zone for the World Heritage property "Durmitor National Park" with the primary objective to protect the property from anthropogenic pressures, taking into account ecological and visual considerations and all existing international designations and national parks nearby;*
4. *re-consider the boundary modification proposal against the background of the 2005 mission recommendations, so as to*
   - *identify a compensation for the exclusion from the World Heritage property that was approved in 2005;*
   - *halt any further exclusions from Durmitor National Park and the World Heritage property;*
   - *explore possibilities for extensions of the World Heritage property to enhance ecological connectivity to other National Parks;*
5. *caution in respect to potential undesired knock-on effects from the infrastructure upgrade through the energy transmission line, such as enhanced development pressures on the World Heritage property;*
6. *consult ICOMOS, through the World Heritage Centre, regarding any potential future developments between the World Heritage property "Durmitor National Park" and the the components "Grčko groblje, Žabljak" and "Bare Žugića, Žabljak" of the transnational cultural World Heritage property "Stećci Medieval Tombstones Graveyards," and their surrounding area;*
7. *abandon any plans for extending the ski facilities inside the property, including new ski slopes, lifts, pipelines and related infrastructures and revoke respective amendments to the relevant spatial plans;*
8. *conduct, as a matter of priority, a rigorous Environmental Impact Assessment (EIA) in line with IUCN's Advice Note on Environmental Assessment, including the impact on the Karst flow regime, prior to any operation of the pipeline from Modro Lake to the ski zone;*
9. *revise the tourism vision for the property, giving priority to low impact tourism. The World Heritage Sustainable Tourism Programme toolkit could be used as a tool when addressing the sustainable tourism development options for the area of the Durmitor National Park, in consultation with the UNESCO World Heritage and Sustainable Tourism programme;*
10. *put in place a more detailed monitoring programme for visitors as well as key species contributing to the Outstanding Universal Value of the property;*
11. *assess and closely monitor the downstream impacts of the Tara River highway crossing on the Outstanding Universal Value of the property as a matter of urgency, including a confirmation of the status of the endangered Danube salmon and keep the World Heritage Centre updated about the findings, and to complete an EIA that takes into account all potential downstream impacts on the World Heritage property, and to develop a rigorous Environmental Management Plan to mitigate any downstream impacts.*

While the mission appreciates the provision of information e.g. on the planned electricity transmission line, in conformity with paragraph 172 of the Operational Guidelines, the mission recommends to

12. *systematically inform the World Heritage Centre, in line with paragraph 172 of the Operational Guidelines about significant construction projects inside and nearby the World Heritage property, as well as impactful projects located upstream of the property, before a decision has been made.*

ANNEX I: Terms of Reference

Terms of Reference
Joint World Heritage Centre/IUCN Advisory Mission
to the World Heritage property Durmitor National Park, Montenegro
12-16 November 2018

A letter was sent from the World Heritage Centre, on 18 November 2016 addressed to Montenegro and concerning the process of boundary changes within the World Heritage Property "National Park Durmitor". This letter was sent upon receiving information from the State Party through the Report on State of Conservation and Periodic Reporting Questionnaire, regarding changes to the boundaries of Durmitor National Park adopted through the new Law on National Parks which was considered to have potential impact on the Outstanding Universal Value of the World Heritage property. The State Party has invited a joint World Heritage Centre/IUCN Advisory Mission to consider this issue on site and to assess the overall state of conservation of the property. Taking into consideration the *Operational Guidelines for the Implementation of the World Heritage Convention*, the Mission shall in particular:

1. Assess the changes introduced to the boundaries of Durmitor National Park and their potential implications on the conservation of the Outstanding Universal Value of the World Heritage property;

2. In line with paragraph 172 and 173 of the Operational Guidelines, assess any other relevant conservation projects and issues that may negatively impact on the Outstanding Universal Value of the property, including the conditions of authenticity, integrity and protection and management.

The mission will take place for 5 days from 5 to 9 November 2018.

Objectives of the mission:

Concerning the main objectives of the mission, the mission shall:

1. Assess the implications of changes introduced to the boundaries of Durmitor National Park in relation to the Outstanding Universal Value of the World Heritage property;

2. Evaluate possible implications for the current boundary delineation of the property and discuss possible options for aligning the boundaries with those of the national park;

3. Meet the responsible authorities to discuss proposed spatial plans and other relevant documentation and provide recommendations regarding the integration of these requirements to safeguard the protection of the Outstanding Universal Value within the spatial plans;

4. Based on the above, provide recommendations on the most appropriate mechanism under the Operational Guidelines to address the potential need for boundary changes in the property.

5. Provide technical advice to the local and national authorities on appropriate solutions which will avoid or mitigate any potential negative impact on the Outstanding Universal Value of the World Heritage property. Special reference should be made to Committee's Decision **39 COM 8E** and the retrospective Statement of Outstanding Universal Value for the property, in which the Committee emphasized the necessity of management to ensure control of development that might threaten the ecological, socio-economic and cultural values of the property.

6. Assess and make recommendations on any other relevant conservation issues that may

negatively impact on the Outstanding Universal Value of the property, including the conditions of authenticity, integrity and protection and management.

The mission is attentive to the fact that two of the three Montenegrin components of the transnational World Heritage property “Stećci Medieval Tombstone Graveyards” are located within Durmitor National Park.

The mission will prepare a concise report on the findings and recommendations within 6 weeks following the site visit.

ANNEX II: Mission programme

National Commission of Montenegro for UNESCO

United Nations Educational, Scientific and Cultural Organization

Advisory Mission for the World Heritage property

National Park Durmitor

November, 05th - 09th, 2018

Contact persons: Milica Nikolić
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Draft Programme

Monday, November 05th

- Arrival at Podgorica Airport; Hotel Accommodation
- **14:00-15:30h Meeting with the Minister of Sustainable Development and Tourism, Mr. Pavle Radulović**, on ongoing projects and policies within the area of National Park and its surrounding, implementation of the Convention, state of conservation of the Property, activities within MAB area, protection of the environment and other subjects of interest;
  Venue: Ministry of Sustainable Development and Tourism, Podgorica
- **15:30-16:15h** Lunch
- **16:30 – 18:30h Meeting with representatives of relevant NGOs:**
  - NGO OZON;
  - NGO Green Home;
  - NGO Centre for the Protection and Research of Birds of Montenegro;

- MANS; etc..

- **20:00h Working dinner**

Tuesday, November 06th

- 08:00 Departure from the Hotel

- **08:15 – 09:30h Meeting with Deputy Prime Minister for Economic Policy and Financial System and Minister of Agriculture and Rural Development, Mr. Milutin Simović,** on Governmental policies directed towards the area, protection of water and water management;
  Venue: Ministry of Agriculture and Rural Development

- **09:45-10:45h Meeting with the Minister of Transport and Maritime Affairs, Mr. Osman Nurković,** on the activities regarding the construction of highway Bar Boljare
  Venue: Ministry of Transport and Maritime Affairs, Podgorica

- **11:00- 12:00h Meeting with the Director of the Water Adminsitration, Mr. Damir Gutić,** on state policies, challenges within the proper managment, priorities for the next period
  Venue: Bulevar Revolucije no.24. Podgorica

- **12:15–13:15 Meeting with the director of the Public Company National Parks of Montenegro, Mr. Elvir Klica**, on the implementation of the Convention and other relevant standards, challenges within the implementation, state of conservation of the National Park
  Venue: National Parks of Montenegro, Podgorica

- **Departure for Žabljak** with field visit to the area of construction works for the highway;

- Lunch in Kolašin

- Hotel Accommodation**, dinner hosted by the Mayor of Žabljak**

Wednesday, November 07th

- **09:00 – 10:30 Meeting with the Mayor of Žabljak, Mr. Veselin Vukićević,** on ongoing projects, tourism pressure, needs of citizens, management of the Property, monitoring of the state of conservation;

  Venue: Municipality of Žabljak

- **10:15-13:45 Field Visit to the Western Part of the Property**, accompanied by representatives of:

  - Žabljak Municipality
  - Ministry of Sustainable Development and Tourism;
  - Forestry Administration
  - National Commission of Montenegro for UNESCO

- **14:00 – 15:30 Meeting with the director of National Park Durmitor, Mr. Tomo Pajović,** on the state of conservation, visitor statystics, system of monitoring, inspection, relevant documents and other subjects of interest

  Venue: Premisses of Durmitor National Park, Žabljak

- Dinner at 19h

Thursday, November 08th

- **08:00 Departure for Pljevlja and field visit to Northern Part of the Property** accompanied by representatives of:

  - Žabljak Municipality
  - Ministry of Sustainable Development and Tourism;
  - Forestry Administration
  - National Commission of Montenegro for UNESCO

- 12:45 -14:15 Lunch

- **14:30 – 15:45 Meeting with the director of the Forestry Administration, Mr. Nusret Kalač,** on the state of conservation, system of monitoring, inspection, relevant documents and other subjects of interest

- Return to Žabljak

- **20:00 Working dinner**

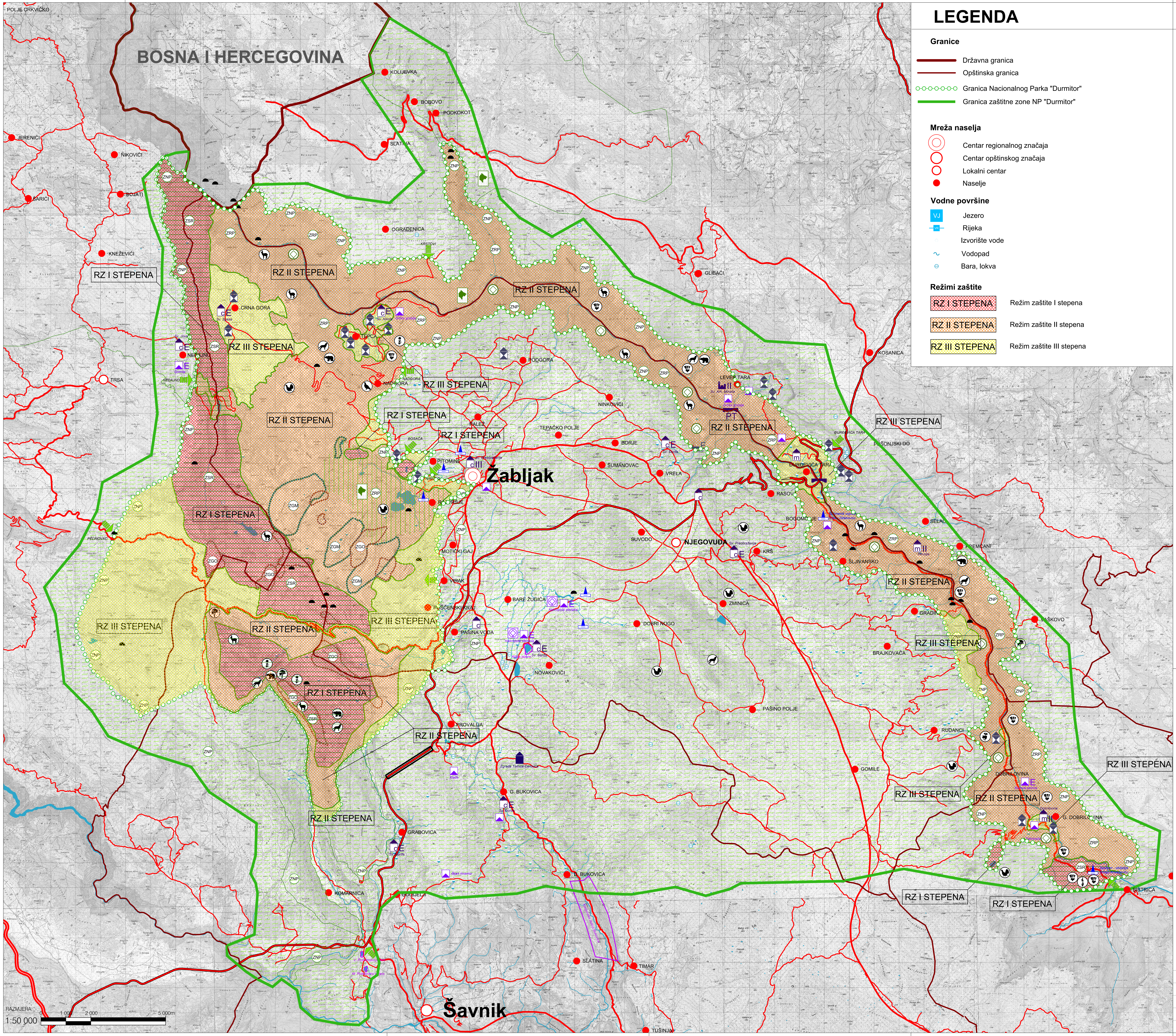
Friday, November 09th

- 08:00h Departure for Podgorica via Plužine (depending from the weather conditions condition) in order to assess Southern part of the Property
- 13:00 – 14:30 Lunch in Plužine
- **20:00h Working dinner** for all stakeholders hosted by the Ministry of Sustainable Development and Tourism

Saturday, November 10th

- Transfer to the Airport

ANNEX III: Maps



LEGENDA

Granice

- Državna granica
- Opštinska granica
- Granica Nacionalnog Parka "Durmitor"
- Granica zaštitne zone NP "Durmitor"

Mreža naselja

- Centar regionalnog značaja
- Centar opštinskog značaja
- Lokalni centar
- Naselje

Vodne površine

- VJ Jezero
- Rijeka
- Izvorište vode
- Vodopad
- Bara, lokva

Režimi zaštite

- RZ I STEPENA — Režim zaštite I stepena
- RZ II STEPENA — Režim zaštite II stepena
- RZ III STEPENA — Režim zaštite III stepena

Prirodna baština

- ZNP — Nacionalni park
- ZSR — Strogi rezervat prirode
- ZRP — Posebni rezervat prirode
- Zaštitna zona NP "Durmitor"
- Zaštićeno područje međunarodnog značaja (MAB, UNESCO)
- Zaštićeno područje državnog značaja
- ZGM — Zaštićeni geomorfološki objekti
- ZGO — Zaštićeni geološki i paleontološki objekti
- Potencijalna zaštićena prirodna dobra van NP "Durmitor"
- Ulazni punkt u NP
- Speleološki objekat

Lokaliteti rijetkih i zaštićenih životinjskih i biljnih vrsta

- Medvjed
- Vuk
- Divokoza
- Veliki tetrijeb
- Mali tetrijeb
- Munika
- Runolist
- Glišićev zvončić
- Gospina papučica
- Malijev jeremičak

Nepokretna kulturna baština

- II Kulturno dobro druge kategorije
- III Kulturno dobro treće kategorije
- E Evidentirano kulturno dobro
- Predlog za upis u svjetsku baštinu u pripremi
- m Manastir
- c Crkva
- s Spomen dom
- Arheološki lokalitet
- Ambijentalna cjelina
- Stari grad
- Profana arhitektura
- Fortifikaciona arhitektura
- Inženjerska arhitektura
- Spomen obilježje

Saobraćajna infrastruktura

- Aerodrom
- Heliodrom
- Magistralna saobraćajnica
- Regionalna saobraćajnica
- Lokalni put

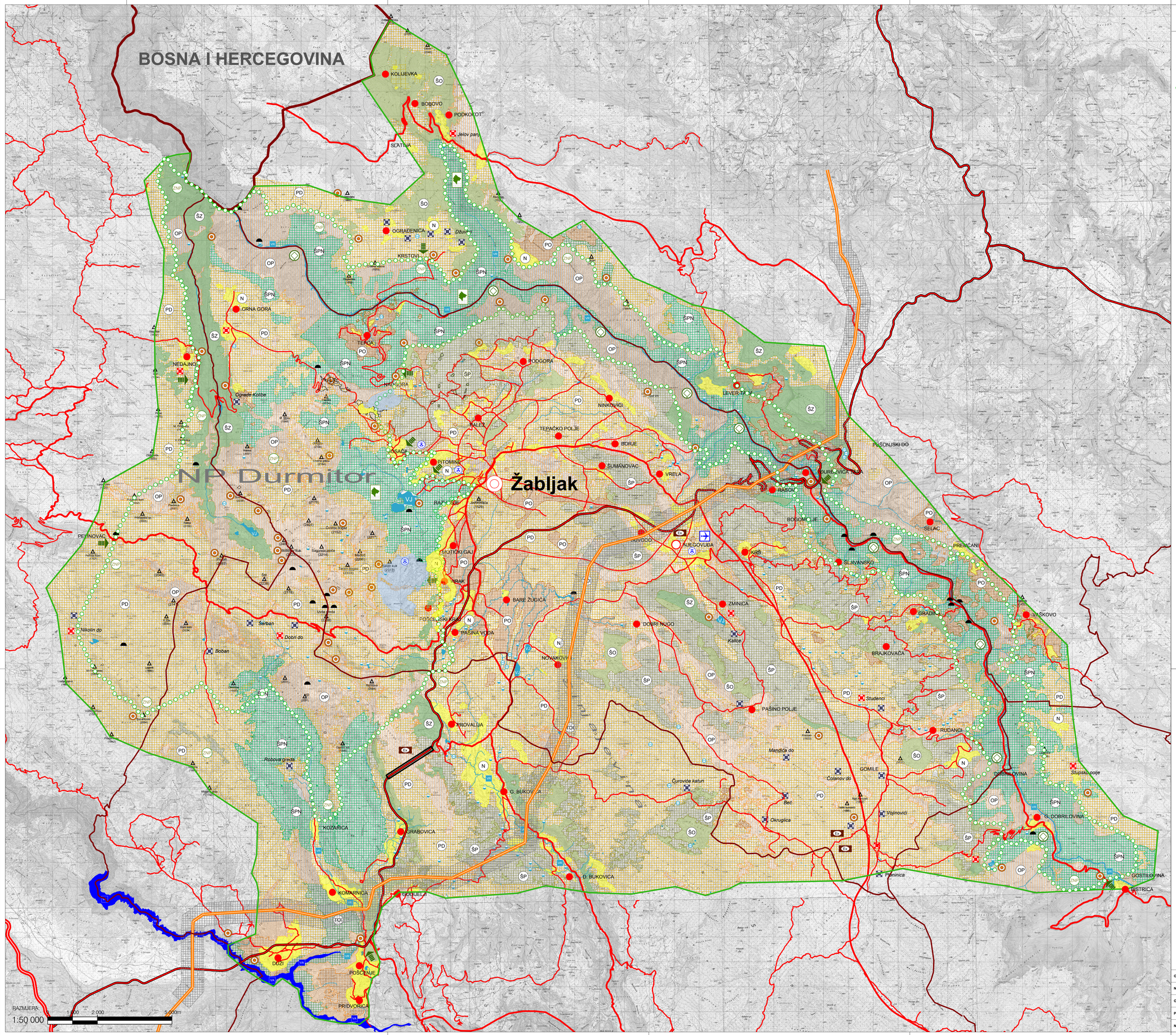
CRNA GORA
MINISTARSTVO ODRŽIVOG RAZVOJA I TURIZMA

PROSTORNI PLAN POSEBNE NAMJENE ZA NACIONALNI PARK "DURMITOR"

IBI GROUP

CAU
Centar za Arhitekturu i Urbanizam

OBRAĐIVAČ PLANA	KONZORCIJUM IBI - CAU	Odluka o donošenju plana: Broj: 27-5/16-2/4 EPA 1031 XXV Podgorica, 22. jul 2016. godine
NARUČILAC	MINISTARSTVO ODRŽIVOG RAZVOJA I TURIZMA	
ODGOVORNI PLANER	Ksenija Vukmanović, dipl. inženjer arhitekture	Faza izrade plana: PLAN
PLANER	Kevin Harper, dipl.pr.planer	RAZMJERA: 1 : 50000
NAZIV GRAFIČKOG PRILOGA	PLAN ZAŠTITE I REŽIMA KORIŠĆENJA PROSTORA	Broj grafičkog priloga 11



LEGENDA

Granice

- Državna granica
- Opštinska granica
- Granica Nacionalnog Parka "Durmitor"
- Granica zaštitne zone NP "Durmitor"

Mreža naselja

- Centar regionalnog značaja
- Centar opštinskog značaja
- Lokalni centar
- Naselje
- Katun
- Katun u turističkoj ponudi (odmorište)

Namjena površina

- Nacionalni park
- Regionalni park
- Zaštićeno područje međunarodnog značaja (MAB, UNESCO)
- Zaštićeno područje državnog značaja
- Ulazni punkt u NP
- Naselja
- Obradivo zemljište
- Drugo poljoprivredno zemljište
- Šume sa posebnom namjenom
- Privredne šume
- Zaštitne šume
- Ostalo šumsko zemljište
- Ostale prirodne površine (goleti, kamenjari, stjenovite padine i dr.)
- Skijalište
- Koridor dalekovoda 400 kV Crnogorsko primorje - Pljevlja
- Hidroakumulacija Komarnica
- Jezero
- Rijeka
- Akumulacija
- Bara, lokva
- Izvorište vode
- Vodopad
- Važan planinski vrh
- Pećina
- Vidikovac
- Istražni prostor mineralne sirovine

Saobraćajna infrastruktura

- Aerodrom
- Heliodrom
- Brza saobraćajnica
- Magistralna saobraćajnica
- Regionalna saobraćajnica
- Lokalni put

CRNA GORA
MINISTARSTVO ODRŽIVOG RAZVOJA I TURIZMA

PROSTORNI PLAN POSEBNE NAMJENE ZA NACIONALNI PARK "DURMITOR"

IBI GROUP
CAU

OBRAĐIVAČ PLANA	KONZORCIJUM IBI - CAU	Odluka o donošenju plana: Broj: 27-5/16-2/4 EPA 1031 XXV Podgorica, 22. jul 2016. godine	
NARUČILAC	MINISTARSTVO ODRŽIVOG RAZVOJA I TURIZMA		
ODGOVORNI PLANER	Ksenija Vukmanović, dipl. inženjer arhitekture	Faza izrade plana: PLAN	
PLANER	Kevin Harper, dipl.pr.planer	RAZMJERA: 1 : 50000	9
NAZIV GRAFIČKOG PRILOGA	NAMJENA POVRŠINA - PLAN	Broj grafičkog priloga	

ANNEX IV: Mission team

Andrej SOVINC

IUCN

Clemens KÜPPER

UNESCO World Heritage Centre