

Natural and Culturo-Historical Region of Kotor (Montenegro) (C 125ter)

1. Executive Summary of the report

The State Party of Montenegro stays devoted towards sustaining requests set by the Decision 46 COM 7B.11 of the World Heritage Committee, emphasizing its commitment to Heritage Impact Assessments (HIA) as additional mechanism of protection, especially for major developing projects. Aware of the challenges in terms of the large number of construction requirements, the insufficient number of personnel capacities in the field of cultural heritage, as well as in the implementation of legal procedures, the State is strongly committed to improving HIA, other protection measures and applying international standards. The State Party emphasizes its commitment to protecting Outstanding Universal Value (OUV) and plans to inform UNESCO through Heritage Impact Assessments.

The Ministry of Culture and Media appointed new director for the Administration for the Protection of Cultural Properties, which will contribute to the stability of the institution's operations and thus improve the process of developing HIA, as well as other strategic documents important for the protection of the Region.

The Government of Montenegro appointed the Council for the Management of the Region of Kotor in 2024. Despite the fact that after elections held in October 2024, local government has not been established yet, which complicates the work of expert bodies and process of decision-making, the Council held several sessions and continued activities on the revision of the Management Plan. After the establishment of the government in the Municipality of Kotor, formal legal conditions will be created for the finalization of the draft of this document, which will be submitted to WHC.

The Administration for Protection of Cultural Properties has issued the Study on the protection of cultural properties for the purposes of the new Spatial Plan of Montenegro, which have prescribed protection measures for Outstanding Universal Values of the Natural and Culturo-Historical Region of Kotor.

Regarding the quarries, the Administration for Protection of Cultural Properties has acted in accordance with the recommendations of the WHC. In accordance with the Technical Review related to the construction of the proposed quarries, all activities are stopped.

2. Response to the Decision of the World Heritage Committee

1. *Welcomes the preparation of Heritage Impact Assessments (HIA) for a number of developments and the provision of information on various proposed projects, and encourages the State Party to continue to improve the HIA process and to pay particular attention to the indirect and cumulative impacts of the many projects being implemented, in the light of the strategic documents being prepared for the property and the Guidance and Toolkit for Impact Assessments in a World Heritage Context;*

Montenegro has integrated the preparation of HIA (Heritage Impact Assessment) into the legislative framework through the Law on the Protection of the Natural and Culturo-Historical Region of Kotor. The law stipulates that the Administration for the Protection of Cultural Properties decides on the need for the implementation of the procedure for preparing an Individual Heritage Impact Assessment, based on ICOMOS guidelines.

Despite the efforts of institutions in the field of cultural heritage to take the necessary steps to improve legal frameworks and the knowledge of experts in order to follow international standards in the preparation of HIA, the Administration for the Protection of Cultural Properties, as the main institution for preparing HIA, faces numerous challenges, primarily due to the small number of qualified staff in this area.

At the end of 2024, the Government of Montenegro appointed the Director of the Administration for a five-year term based on the proposal of the Ministry of Culture and Media, which will contribute to the stability of the institution's operations and thus improve the process of developing HIA studies, as well as other strategic documents important for the protection of the Region. We highly value the proposal from the UNESCO World Heritage Centre to hold educational workshops on the development of HIA studies to further train experts from relevant institutions in the field of cultural heritage to understand and apply modern standards and other protection mechanisms for the preservation of world heritage and enhance decision-making capabilities at the national level.

During the reporting period, we continuously informed UNESCO about all development projects that could have a potential negative impact on the Region of Kotor and followed the recommendations, which is of particular importance to us in the process of protecting the outstanding universal values of the Kotor Region.

2. *Welcomes the commitment of the State Party to invest in the further development of knowledge, expertise and capacity-building in the field of cultural heritage and impact assessment, and invites the State Party to coordinate with the World Heritage Centre for any required support;*

The Ministry of Culture and Media of Montenegro, following procedures, continuously collaborates with UNESCO, it carries out numerous activities, implements UNESCO conventions, and follows recommendations from the World Heritage Centre for the protected Region of Kotor. The Ministry also submits heritage impact assessments and other relevant documents for review for protection of outstanding universal values of the property, and cooperates with other departments to implement recommendations and obligations towards UNESCO.

In order to strengthen human resources in the field of cultural heritage, the Ministry of Culture and Media has been funding the Interdisciplinary Study Program in Conservation and Restoration at the University of

Montenegro since 2021, which demonstrates the government's commitment to the process of safeguarding the values of cultural heritage.

3. *Notes the progress made by the State Party in finalising the draft Management Plan, urges it to expedite the process with a view of making it a fully operational tool for the effective management of the entire World Heritage property and its buffer zone, to submit the final draft to the World Heritage Centre for review by the Advisory Bodies at the earliest opportunity and prior to its formal adoption, and to ensure appropriate incorporation of the recommendations of the Advisory Bodies, and reiterates its request that the Management Plan incorporate the recommendations of the 2018 mission and address the following issues, in particular:*

The Government of Montenegro on the proposal of the Ministry of Culture and Media has adopted a Decision on the appointment of the Council for the Management of the Region of Kotor in 2024. Its responsibilities include, among other things, coordinating the development, revision, and implementation of the Management Plan, initiating and monitoring the realization of projects and activities outlined in the Management Plan.

The Council is chaired by the President of the Municipality of Kotor. Despite the fact that after elections held in October 2024, local government has not been established yet, which complicates the work of expert bodies and process of decision-making, the Council held several sessions and continued activities on the revision of the Management Plan. After the establishment of the government and the election of the President of the Municipality of Kotor, formal legal conditions will be created for the finalization of the draft of this document, which will be submitted to WHC.

a) Development Issues in harmony with the Spatial Urban plan for Kotor Municipality,

Draft Management plan already reflects on major development issues, which are also considered through HIA system. Spatial plan of Kotor Municipality from 2020 have incorporated almost all recommendations from the Report of the Reactive Monitoring Mission from 2018.

The Administration for the Protection of Cultural Properties has developed the Study on the protection of cultural properties for the purposes of the new Spatial Plan of Montenegro, which is currently being drafted. This represents a significant step forward in terms of protection measures for the Kotor Region. The study clearly reflects the state's negative stance regarding the location of the bridge construction at Verige (near the Church of St. Nedelja).

Following the adoption of this Plan, all lower-level planning documents, including the PUP Kotor, will be aligned with the prescribed protection measures. This confirms that the state is demonstrating particular attention to preserving the OUV of the Kotor Region. In this way, protection measures for the Kotor Region will be strengthened, and conditions will be created to reduce the number of HIA studies.

The Spatial Plan of Montenegro (PPCG) is the most important strategic planning document in the system of spatial planning, which determines the national goals of spatial development, in accordance with the overall economic, social, ecological and cultural-historical development needs of the country. It plans the

development and general basis of the organization, use, arrangement and protection of the territory of Montenegro for the planning period until 2040.

b) Protection and conservation of tangible and intangible attributes that convey Outstanding Universal Value (OUV) and other heritage values.

Study on the protection of cultural properties and Spatial Urban Plan of Kotor Municipality have protected all attributes of the OUV to the best possible extent, but also through administrative procedures, such as introduction of HIA into the legislative framework for every project which might have a potential negative impact on the preservation of the value, in order to further strengthen the protection measures for the Kotor Region, especially when it comes to sensitive locations.

Additionally, special attention has been given to the protection of intangible values as defined in the Convention on the protection and safeguarding of intangible cultural heritage, thus only in this part of the Management Plan intangible characteristics can be stated so as to give a context for the protection of the OUV.

c) Disaster risk reduction.

The Government of Montenegro adopted the The Strategy for Disaster Risk Reduction for the period 2025-2030 in December 2024, along with an Action Plan for 2025-2026, that will be the basis for observing this issue in the Management plan, which has specific chapter dedicated to reducing disaster risks in the Region of Kotor.

Among other things, the Strategy includes strengthening the resilience of cultural heritage to disaster risks. The aim is to enhance the capacity of relevant institutions and organizations to effectively manage disaster risks in the cultural heritage sector and cultural institutions. Key steps include: conducting training and education for directors and staff on risk management and the protection of cultural heritage; developing and adopting standardized procedures and protocols for risk management in the cultural heritage sector and cultural institutions in general; raising public awareness and involving local communities, through public information campaigns on the importance of heritage protection and risk management, as well as organizing workshops and seminars for local communities and owners of cultural assets.

Measures for protection against potential risks that could threaten the Region of Kotor are also included in the Action Plan for 2025-2026.

d) Tourism management, including issues related to the direct, indirect and cumulative impacts that tourism could have on the property; and underlines the availability of the World Heritage Centre and the Advisory Bodies to accompany the final stages of this process, including through an Advisory mission, if the State Party deems it appropriate;

Municipality of Kotor has prepared the "Sustainability Study of Kotor as a tourist destination". The study is prepared by the Global Council for Sustainable Tourism and its preparation is financed by the Municipality of Kotor, the Port of Kotor and Cruising Line Industry Association-CLIA. This Study should answer the questions of how successfully Kotor can respond to the problem of the pressure of a large number of tourists, and in which direction it should develop as a tourist destination.

For the protection from the excessive number of tourists visiting Kotor, especially regarding cruise tourism, the state is strongly committed to finding an alternative solution to the current docking in the bay, in order

to relocate the entry of cruise ships and thereby cope with tourism pressures. A special chapter of the Management Plan is dedicated to tourism management.

4. *Welcomes the State Party's efforts to find an adequate and sustainable tourism management model for the property that is compatible with the protection of the OUV of the property; recommends that a Strategic Environmental Assessment (SEA) be carried out to manage proactively tourism development throughout the property and invites the State Party to submit any relevant strategic document to the World Heritage Centre for review by the Advisory Bodies prior to its finalisation and implementation;*

The Ministry of Spatial Planning, Urbanism, and State Property, along with the Environmental Protection Agency, have prepared the Report on the Strategic Environmental Impact Assessment for the Spatial Plan of Montenegro until 2040, along with the Public Consultation Report, which is currently in the phase of obtaining opinions from relevant institutions. Within this report, the preservation of the exceptional universal values of the Natural and Cultural-Historical Area of Kotor has been identified through specific goals. These values are realized in the unity of attributes that contribute to the integrity and cohesion of the overall landscape structure (both built and natural), as an essential quality of the Natural and Cultural-Historical Region of Kotor.

Protection measure includes: Implementation of the International Convention for the Protection of World Cultural and Natural Heritage, Decisions of the World Heritage Committee, and Reports (findings and recommendations) from UNESCO missions regarding the condition of the Natural and Cultural-Historical Area of Kotor from 2003 to 2018.

5. *Further reiterates its request to the State Party to submit the following documents at the earliest opportunity to the World Heritage Centre for review by the Advisory Bodies:*
 - a) *The buffer zone study to define areas in and around the property where an impact assessment should be required for potential projects*

In the upcoming period the state will be dedicated to strengthening the mechanisms for protecting the buffer zone, which has also been recognized through the new Study for the protection of cultural properties for the purpose of creating the Spatial plan of Montenegro, completed at the end of 2024. This Study serves as the foundation for future activities, which will be more specifically defined through a Special Study.

- b) *A planning document for the Lepetani area that would detail direct construction requirements and complement the Spatial Urban Plan of Tivat currently in force,*

The Administration for Protection of Cultural properties has adopted the Study for Protection of Cultural Properties for the purposes of drafting amendments and supplements to the DUP "Lepetani" and the UP "Tourist Zone Lepetani," Municipality of Tivat, in 2020.

Considering the chronology of actions taken by the Administration regarding the planning documentation for the Lepetani area, it was concluded that after issuing the opinions in 2020, which stated that the relevant

planning documents must be aligned with the Study for Protection of Cultural Properties before being submitted for opinion, the Administration did not receive any further requests for action.

c) The HIA comprising alternative comparative solutions for the Verige bridge, when it is completed,

As of today, conceptual solutions, which serve as the basis for the preparation of the Heritage Impact Assessment, have not been developed. In communication with the Ministry responsible for the Spatial Plan of Montenegro and Monteput d.o.o. Podgorica, which are responsible for the preparation of conceptual solutions for the crossing over Verige and other alternative routes (over Luštica), a preliminary review of the Proposed Spatial Plan of Montenegro indicates that a decision on the selection of the corridor for the fast traffic route through the Natural and Culturo-Historical Region of Kotor has not yet been made. In this regard, once the conceptual solutions for all proposed routes are developed, and in line with the Spatial Plan of Montenegro on this matter, special mechanisms for assessing and evaluating the impact on the outstanding universal values of the Region will be applied.

We emphasize that the Administration for the Protection of Cultural Properties, for the purposes of the new Spatial Plan of Montenegro, which is currently being developed, has prepared a Study for Protection of Cultural Properties, that clearly expresses the state's negative stance regarding the proposed location for the construction of the bridge at Verige (near the Church of St. Nedjelja). This Study must be incorporated into the Spatial Plan of Montenegro.

d) The detailed spatial plan under preparation for the conversion and construction of a hotel complex on the site of the former Fjord Hotel and the Jugooceanija building,

The Administration for the Protection of Cultural Properties has prepared the Study for Protection of Cultural Properties for the purposes of amendments and supplements to the State Location Study "Sector 16" – for the area of the former Jugooceanija office building and Fjord hotel, which outlines protection measures.

Subsequently, the Administration issued an Opinion on the Draft Amendments and Supplements to the State Location Study "Sector 16," in which it stated that "... the subject planning document is not aligned with the Study, which was prepared for the amendments and supplements to the State Location Study 'Sector 16' Kotor."

It was emphasized that before proceeding with the preparation of the Proposal for Amendments and Supplements to the State Location Study "Sector 16" Kotor, it is necessary to align it with the Protection Study. Additionally, it was noted that for further protection, individual Heritage Impact Assessments (HIA) of the draft State Location Study should be prepared, along with alignment with other protection measures outlined in the Study.

e) Relevant documentation on any other projects proposed in the property, buffer zone or wider setting that may have a potential negative impact on the OUV, with particular attention to the indirect and cumulative impacts of the many projects State of conservation of properties WHC/24/46.COM/7B, p. 36 inscribed on the World Heritage List being implemented, in the light of the strategic

documents being prepared for the property and in accordance with the Guidance and Toolkit for Impact Assessments in a World Heritage Context;

The mechanism for preparing the Heritage Impact Assessment was introduced into the national legislation (The Law on Protection of the Natural and Cultural-Historical Region of Kotor) since 2019.

Localities in the protected region for which the procedure for the preparation of the Heritage Impact Assessment should be initiated shall be determined by a special act of the Administration for the Protection of Cultural Properties. The expert team is obliged to prepare a proposal for a Heritage Impact Assessment, based on the ICOMOS guidelines is usually submitted by the Administration to the Montenegrin National Commission for UNESCO, in order to obtain an opinion from UNESCO.

The Montenegrin National Commission for UNESCO submits to the Administration a review from UNESCO.

Ministry of Culture and Media of Montenegro submits to the World Heritage Centre, beside HIAs, information and presentations about planned projects that could have negative impact on OUV of the property.

6. *Notes that according to the Technical Review of the proposed quarrying within the property and its buffer zone, it appears to be incompatible in scale and intensity with the sustainable management of the property, recommends that no new quarrying concessions be granted and that a mitigation strategy be developed to limit the potential harm to the property's OUV and requests furthermore that the recommendations of the Technical Reviews for the other proposed projects are considered with regards to authorisations and mitigation measures;*

Regarding the information about the formation of new/extension of concessions for old quarries, the Administration for protection of cultural properties has acted in accordance with the recommendations of the WHC since receiving the Technical Review related to the construction of the proposed quarries and all activities were stopped.

7. *Encourages the State Party to invite an Advisory mission to the property to assist in defining a strategic and sustainable approach to the multiple development requests and to avoid any risk of cumulative impacts on the property's OUV, using all available planning tools, including the Management Plan and SEAs;*

We deeply value UNESCO's guidance and it would be our honor to host experts from World Heritage Centre and ICOMOS, in order to assess and advise us on planned infrastructure projects within the World Heritage property. As the arrival of experts' is announced for 26th of March 2025, we have started with the organisation their arrival to Montenegro.

3. Other current conservation issues identified by the State(s) Party(ies) which may have an impact on the property's Outstanding Universal Value

No other conservation issues have been identified by the State Party.

4. In conformity with Paragraph 172 of the *Operational Guidelines*, describe any potential major restorations, alterations and/or new construction(s) intended within the property, the buffer

zone(s) and/or corridors or other areas, where such developments may affect the Outstanding Universal Value of the property, including authenticity and integrity.

The Ministry of Culture and Media of Montenegro regularly submits to the World Heritage Centre information and presentations about planned projects that could have negative impact on OUV of the property.

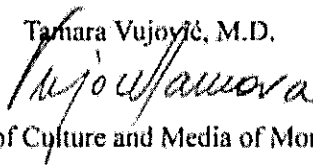
At this particular moment, there is no additional information beyond what has already been shared.

5. Public access to the state of conservation report

The State Party consents to providing public access to this report.

6. Signature of the Authority

Tamara Vujojević, M.D.



Minister of Culture and Media of Montenegro

