

Economic Commission for Europe

Committee on Environmental Policy

Twenty-ninth session

Geneva, 6–8 November 2024

Item 7 of the provisional agenda

Environmental performance reviews

Information paper No. 4

4 October 2024

The Fourth Environmental Performance Review of Montenegro: draft recommendations¹

Note by the secretariat

Summary

The document presents the recommendations of the Fourth Environmental Performance Review of Montenegro agreed upon by the Expert Group on Environmental Performance Reviews at its meeting held in Geneva on 9–12 September 2024.

The Committee is invited to adopt the recommendations.

Chapter 1: Legal, policy and institutional framework for environmental protection and sustainable development

Recommendation 1.1:

The Government should conduct:

- (a) *An institutional, human and financial needs assessment of the priority roles in each institution and agency working on environmental matters to begin prioritizing budget allocations and fundraise accordingly;*
- (b) *Regular training programmes or workshops for the relevant governmental bodies to contribute to the transposition and implementation of environmental legislation.*

Recommendation 1.2:

The Government should:

- (a) *Provide the necessary conditions to focus on integrated monitoring and evaluation and learning systems using the SDG platform as the pivotal instrument;*
- (b) *Achieve the target of monitoring and reporting on 60 per cent of SDG indicators by 2027 and go beyond this commitment with yearly targets.*

Recommendation 1.3:

The Government should:

- (a) *Update environment-related strategic planning documents, based on the latest available data and information, and promote their adoption, as relevant;*
- (b) *Ensure regular and timely implementation reporting for all environment-related strategic documents.*

¹ This document was not formally edited.

Recommendation 1.4:

The Government should continue to:

- (a) *Proactively engage with NGOs to encourage their contribution to the evaluation process in environmental impact assessments and strategic environmental assessments;*
- (b) *Work with the local self-government units to create a dialogue with local stakeholders.*

Recommendation 1.5:

The Government should support the Environmental Protection Agency and other relevant institutions in the process of optimization of the existing environmental monitoring networks and their upgrade, as necessary, including the maintenance of the technical equipment to ensure the fulfilment of continuous core monitoring requirements.

Recommendation 1.6:

The Government should accelerate the development and ensure adequate maintenance of:

- (a) *Websites of institutions in possession of information on environmental matters;*
- (b) *An integrated national environmental information system;*
- (c) *A pollutant release and transfer register.*

Recommendation 1.7:

The Government should ensure that biodiversity conservation and climate change concerns identified in strategic environmental assessments are integrated into related planning documents.

Chapter 2: Regulatory and compliance assurance mechanisms

Recommendation 2.1:

The Government should:

- (a) *Initiate the development and implementation of a national mechanism for environmental enforcement bodies to coordinate and align approaches and implementation plans;*
- (b) *Formalize the developed enforcement model and use it as a guide for supervisory and enforcement bodies when sanctioning environmental non-compliance;*
- (c) *Facilitate the provision of a training curriculum for enforcement bodies to ensure connection to each other's roles and responsibilities.*

Recommendation 2.2:

The Government should:

- (a) *Conduct inventories of the environmental issues that are the basis of environmental policy development, and record them in databases;*
- (b) *Analyse data obtained for policy and planning purposes and, on that basis, develop action plans for implementation.*

Recommendation 2.3:

The Government should:

- (a) *Bring the number of inspectors up to the required level;*
- (b) *Ensure the independent status of inspectors and clearly separate political, permitting and inspection functions in all relevant institutions;*
- (c) *Ensure adequate training for inspectors;*
- (d) *Encourage further development and use of standard operating procedures for environment-related inspections.*

Chapter 3: Greening the economy and financing environmental protection

Recommendation 3.1:

While protecting the vulnerable parts of the population, the Government should:

- (a) *Update taxes on air and water pollution and waste generation;*
- (b) *Revise water abstraction fees;*
- (c) *Finalize the adoption of the new legislation on the promotion of renewable energy sources.*

Recommendation 3.2:

The Government should:

- (a) *Create national guidelines for green public procurement and disseminate them across all public authorities;*
- (b) *Ensure that Government officials are trained to increase their knowledge of practices in green public procurement;*
- (c) *Mainstream environmental concerns in public-private partnerships and encourage the implementation of such partnerships in areas with positive environmental impacts.*

Recommendation 3.3:

The Government should:

- (a) *Support green entrepreneurship via facilitated access to funding, dissemination of market information, tax incentives and green grants;*
- (b) *Promote environmental awareness and green entrepreneurship within the private sector.*

Chapter 4: Implementation of international agreements and commitments

Recommendation 4.1:

The Government should carry out the necessary preparatory work for and promote joining:

- (a) *The Protocol to Abate Acidification, Eutrophication and Ground-level Ozone as amended and amendments to the Protocol on Heavy Metals and the Protocol on Persistent Organic Pollutants to the Convention on Long-range Transboundary Air Pollution;*
- (b) *The 2005 Almaty amendment on genetically modified organisms to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters;*
- (c) *The 2010 Convention on the Suppression of Unlawful Acts relating to International Civil Aviation.*

Recommendation 4.2:

The Ministry of Ecology, Sustainable Development and Northern Region Development should:

- (a) *Continue efforts to ensure the country's participation in meetings and activities under multilateral environmental agreements as well as the fulfilment of its obligations under these agreements, including reporting;*
- (b) *Ensure that adequate time and resources are allocated for nominated staff members to carry out effectively their responsibilities as members of governing bodies of multilateral environmental agreements.*

Recommendation 4.3:

The Ministry of Ecology, Sustainable Development and Northern Region Development should provide for public participation in the development of the country's position in the framework of multilateral environmental agreements.

Recommendation 4.4:

The Government should complete the process of developing a strategic partner coordination mechanism for sustainable development, use it to track and monitor funds received and ensure that projects are aligned with the strategic priorities of the country and international goals.

Recommendation 4.5:

The Ministry of Ecology, Sustainable Development and Northern Region Development should develop and make publicly available on its website a database of all technical assistance projects on environmental protection.

Recommendation 4.6:

The Government should ensure integration of environmental priorities into the programming processes of international financial institutions and development partners.

Chapter 5: Climate Change

Recommendation 5.1:

The Government should:

- (a) Mainstream climate vulnerability scenarios and adaptation measures into policies and plans, and improve coordination mechanisms and capacities for implementation of adaptation measures;*
- (b) Finalize the National Adaptation Plan and promote the elaboration of local adaptation plans targeting vulnerable sectors;*
- (c) Develop bio-meteorological forecasting, early warning and health monitoring systems for all health problems related to the potential impacts of climate change, particularly targeted towards the young, the old and people with chronic diseases;*
- (d) Upgrade rural roads in mountainous areas to adapt to changing precipitation patterns;*
- (e) Require that, within urban settlements, there are sufficient permeable areas to mitigate the urban heat island effect and reduce flooding risks;*
- (f) Promote awareness-raising among main economic sectors to deal with the impacts of climate change;*
- (g) Enhance forest management to prevent wildfires.*

Recommendation 5.2:

The Government should:

- (a) Address the impacts of droughts on electricity production;*
- (b) Upgrade existing hydroelectric power plant (HPP) infrastructure, promote better water management within HPP basins and integrate plants with other renewables to improve resilience to drought;*
- (c) Develop and implement an integrated national energy and climate plan;*
- (d) Develop and implement a long-term low greenhouse gas emission development strategy.*

Recommendation 5.3:

The Government should:

- (a) Mainstream climate change considerations into urban planning;*
- (b) Promote the implementation of nature-based solutions in urban areas to increase their climate resilience;*
- (c) Implement geo-portals collecting information on environmental constraints, hazardous areas, disaster-prone areas, and sectoral and spatial plans to promote coordination and harmonization among different levels of planning.*

Recommendation 5.4:

The Government should finalize the draft Law on Protection from the Negative Effects of Climate Change and Protection of the Ozone Layer.

Recommendation 5.5:

The Government should enhance the management of data and information on natural habitats, animal and plant communities and ecosystems related to the direct consequences of climate change.

Chapter 6: Air protection

Recommendation 6.1:

The Government should:

- (a) *Continue improving the state air quality monitoring network to reduce the downtime of the measurement stations and consider expanding the network in urban areas;*
- (b) *Invest in replacement analysers to be used during the malfunction of analysers and the periods when analysers are being calibrated;*
- (c) *Consider the use of air quality modelling to complement the national air quality measurement network, if additional measurements are not feasible.*

Recommendation 6.2:

The Government, in cooperation with relevant agencies and municipalities, should adopt an ambitious national strategy for air quality without further delay, including updated municipal air quality plans.

Recommendation 6.3:

The Government, in cooperation with relevant agencies and municipalities, should:

- (a) *Invest in in-house capacity building in emission inventories in order to improve air quality, develop future projections of emissions, and eventually recalculate the entire time series of historical emissions;*
- (b) *Ensure that all anthropogenic air emission sources are adequately covered by the legislation and implementation measures, and have a clearly defined competent authority;*
- (c) *Increase the resources of state and municipal level environmental authorities dealing with emission inventories;*
- (d) *Ensure implementation of best available techniques for all new and existing installations.*

Recommendation 6.4:

The Ministry of Ecology, Sustainable Development and Northern Region Development should complete the national transposition of the National Emission Ceilings Directive, including making ambitious emission reduction commitments.

Recommendation 6.5:

The Government together with municipalities should:

- (a) *Promote, via economic instruments where relevant, zero emission alternatives for residential heating, such as heat pumps, district heating and electric radiators;*
- (b) *Consider setting a zero emission requirement for new buildings in spatial planning;*
- (c) *Promote, via economic instruments where relevant, energy efficiency measures in residential housing to reduce the demand for heating;*
- (d) *Consider establishing a ban on coal and waste fuels for residential heating, starting with public buildings, and support it with effective implementation;*
- (e) *Establish a national quality standard for wood fuels and pellets in order to ensure that only high-quality fuels are used in residential heating and actively promote the quality criteria;*
- (f) *Promote installation of new space heaters that meet the applicable eco-design requirements.*

Chapter 7: Water management

Recommendation 7.1:

The Government should ensure:

- (a) *The establishment of legally prescribed sanitary zones for all wells and sources needed within the public water supply;*
- (b) *The regular treatment of water by disinfection in all water supply systems, preferably by an automatic dosing system;*
- (c) *The measurement of abstracted water from all wells and sources to determinate the non-revenue water and therefore identify the water losses in the system;*
- (d) *The reconstruction or rehabilitation of water supply systems, as necessary.*

Recommendation 7.2:

The Government should:

- (a) *Review the duration of the water permits for wastewater treatment plants, considering a period longer than 10 years;*
- (b) *Prepare and implement a national sewage sludge strategy;*
- (c) *Modify the responsibilities for the regulation of sewer systems, so that the authority responsible for the wastewater treatment plant is also responsible for the sewer systems bringing the wastewater;*
- (d) *Prepare and implement an action plan with deadlines for the planned municipal wastewater treatment infrastructure;*
- (e) *Carry out regular campaigns to sensitize the population to the importance of water protection, water saving and wastewater treatment, and to change personal behaviour to protect water resources.*

Recommendation 7.3:

The Government should:

- (a) *Review and reorganize the main tasks of water management, as necessary;*
- (b) *Ensure adequate staffing and increase equipment resources in water management.*

Chapter 8: Waste and chemicals management

Recommendation 8.1:

The Government, in cooperation with the municipalities of the Northern region, should develop a new sanitary landfill in that region.

Recommendation 8.2:

The Government should:

- (a) *Elaborate schemes for stimulating market-based mechanisms for the recycling and reuse of waste;*
- (b) *Introduce an extended producer responsibility scheme for specific products;*
- (c) *Introduce a network of municipal waste collection points and containers that are convenient for consumers to deliver pre-sorted waste at or close to their premises;*
- (d) *Enlarge and expand the system of waste sorting to all municipal solid generators on site, with attention to special materials groups like plastic and metal;*
- (e) *Implement a separate bio-waste collection system.*

Recommendation 8.3:

The Government, together with the local self-governments, should:

- (a) *Negotiate the creation of regional waste management enterprises;*
- (b) *Support inter-municipal cooperation in waste management with a focus on increasing waste management and recycling effectiveness together with an improved service level for local people and enterprises.*

Recommendation 8.4:

The Government should seek funding and technical solutions for the remediation of legacy waste hotspots and dumpsites.

Recommendation 8.5:

To change citizens mindset towards considering waste as a valuable resource, the Government, together with municipalities and NGOs, should:

- (a) Encourage continuous action and sharing of success stories on waste management;*
- (b) Continue to carry out regular campaigns on cleaning areas around water sources, riverbanks and ponds.*

Chapter 9: Biodiversity and protected areas

Recommendation 9.1:

The Government should develop a mechanism for monitoring and reviewing the implementation of biodiversity conservation actions.

Recommendation 9.2:

The Government should:

- (a) Review the institutional set up for the management of protected areas, and simplify and clarify roles and responsibilities, as needed;*
- (b) Change the perception that protected areas are just like any other area and raise awareness of their importance;*
- (c) Develop training resources for those involved in protected area management and make them available through training courses.*

Recommendation 9.3:

The Government should initiate work on indicators quantifying economic and social values of biodiversity and incorporate them in policies.

Chapter 10: Tourism and the environment

Recommendation 10.1:

The Government should develop and regularly update a publicly available database with environmentally relevant tourism data, considering international good practices such as the UN Statistical Framework for Measuring the Sustainability of Tourism.

Recommendation 10.2:

The Government should, based on the National Strategy on Sustainable Development:

- (a) Develop a policy to limit greenfield tourism construction in coastal areas;*
- (b) Encourage energy and material efficient and low-emission construction and renovation of accommodation establishments;*
- (c) Address overbuilding in the coastal zones.*

Recommendation 10.3:

The Government should:

- (a) Increase environmentally friendly forms of tourism-related transport;*
- (b) Reduce the impact of tourism-related maritime transport by strengthening port authorities' control and the provision of land-based electricity.*

Recommendation 10.4:

The Government should:

- (a) *Review the requirements for registration of tourism accommodation to encourage the owners of unregistered accommodation to register;*
- (b) *Require the permanent operation of the Central Tourism Register and its availability to a unit tracking tourist stays in the Statistical Office;*
- (c) *Amend the legislation as necessary and require relevant agencies to share administrative data on visitors with the Statistical Office so that all visitors can be tracked to their place of stay.*

Recommendation 10.5:

The Government should:

- (a) *Raise the upper limit on international tourist taxes and use them, inter alia, to promote environmentally-friendly practices;*
- (b) *Raise the prices of single-entry tickets to national parks for international tourists;*
- (c) *Introduce entrance fees for international tourists entering touristic hot spots based on international good practices and assess their impact;*
- (d) *Further promote and support environmental certification of tourism facilities taking into account international good practices.*

Recommendation 10.6:

The Government should:

- (a) *Integrate environmental considerations in tourism legislation and policy;*
- (b) *Develop a policy for eco-tourism and promote and incentivize decentralized and diversified eco-tourism.*

Chapter 11: Forestry and the environment

Recommendation 11.1:

The Government should increase and accelerate efforts to have international forest certification schemes operational.

Recommendation 11.2:

The Government should create and support a platform open to all relevant stakeholders and sectors to get behind the increased production, use and trade of biomass pellets and wood chips in order to continually optimize the multiple benefits already being achieved.

Recommendation 11.3:

The Government should establish a time-limited process and multistakeholder working group to research, identify and propose elements of international “forest economy” best practice most applicable or adaptable to Montenegro.

Recommendation 11.4:

The Government should support officials and citizens to co-design and undertake a programme of forest culture exchange visits and training.

Recommendation 11.5:

The Government should establish a high-level working group that is tasked with ensuring that all actions required to ensure that Montenegro reports on LULUCF emissions in the next update to its Nationally Determined Contributions are effectively implemented in a timely fashion.

Chapter 12: Industry and the environment

Recommendation 12.1:

The Government should develop, adopt and implement a national sustainable mining strategy for the development of the mining sector.

Recommendation 12.2:

The Government should:

- (a) Ensure the modernization of industrial enterprises that still use old technologies and obsolete equipment by shifting to best available techniques or greener technologies;*
- (b) Reinforce the introduction of the principles of circular and low-carbon economy for developing more resource-efficient industry;*
- (c) Continue to assess the environmental, health and safety risks of existing mining tailings and industrial waste sites and identify rehabilitation measures with the necessary funds for implementation;*
- (d) Pursue the enforcement of obligations regarding the remediation of the red mud basins and explore opportunities under the Convention on Transboundary Effects of Industrial Accidents to support their remediation and/or reutilization.*

Recommendation 12.3:

The Government should promote green technologies by:

- (a) Increasing public research and development expenditures and encouraging the private sector to increase spending on research and development;*
- (b) Continuing to strengthen the implementation capacity of the Innovation Fund;*
- (c) Enhancing the collaboration between scientific institutions and industry;*
- (d) Continuing to develop technology and innovation support centres.*

Chapter 13: Energy – Air– Health

Recommendation 13.1:

The Government, in cooperation with relevant institutions, should:

- (a) Increase the share of low-carbon electrification in final energy needs by ensuring a stable and robust electricity supply;*
- (b) Develop and adopt a national coal phase-down plan for the just and inclusive transition to low-carbon power generation, with an increased share of diversified renewable energy;*
- (c) Enhance measures to decrease energy intensity and promote energy saving.*

Recommendation 13.2:

The Government should:

- (a) Improve the health information system in order to collect relevant data on non-communicable diseases related to air pollution;*
- (b) Develop preventive actions intended to protect the population, and especially the most vulnerable, from air pollution.*

Recommendation 13.3:

The Government should:

- (a) Adopt an approach to improve air quality, reduce emissions of pollutants, and avoid and limit human exposure;*
- (b) Mainstream indoor air quality in relevant public policies, particularly in public spaces for young children and sensitive populations, and develop specific actions to improve indoor air quality;*

- (c) *Inform the population about the health impacts of poor indoor air quality and good practices to improve indoor air quality;*
- (d) *Implement the new radon legislation.*

Recommendation 13.4:

The Government should:

- (a) *Improve data on climate impacts on human health;*
 - (b) *Increase the resilience of critical infrastructure, including health facilities, to climate change;*
 - (c) *Strengthen the capacity of the health workforce to deal with climate emergencies;*
 - (d) *Increase public awareness of the adverse impacts of air pollution and climate change on human health and the environment.*
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