



The European Union's Programme for Montenegro

Strengthening the Capacities for Implementation of the Water Framework Directive in Montenegro

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Adriatic River Basin Plan

Annex 3: Consultations



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This project is implemented by **SAFEGE** in Consortium with **Eptisa Servicios de Ingenieria**



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1 Public Consultation Meeting

Following the production of the RBMPs and the SEAs, the English and Montenegrin versions of both documents were placed on the website of the Water Administration, where legally they must remain for a period of 6-months for public viewing.

Public hearings was held in Podgorica on 20 December 2019 as part of a public debate on the Draft River Basin Management Plan for Adriatic Basin and the Draft Strategic Environmental Impact Assessment for RBMP for Adriatic Basin.

The Water Directorate, in accordance with applicable legislation, is obliged to enable active participation of the public and interested persons in the process of preparing and adopting the RBMP, or its modification after the review process has been carried out, and make all documentation relevant for its preparation available.

Comments received during and after the public consultations together with comments from all public administrations were answered with agreed changes and additions were integrated into the draft RBMP documents.

A special team of experts was responsible for the preparation of the Strategic Environmental Assessment Report for the River Basin Management Plans for both Basins. The Expert Team pointed out that further procedure for adopting the Strategic Assessment requires compliance with the obligations and measures prescribed by the law.



Public hearing in Podgorica 20/12/2019

List of participants:

Name	Institution
Damir Gutic	Water Administration
Milo Radovic	Water Administration
Nikola Bajceta	MPPR
Petar Numanovic	Municipality Podgorica
Drazen Bjelobrkovic	Municipality Golubovci
Milanka Baljevic	Municipality Golubovci
Momcilo Blagojevic	MPPR
Nenad Lekic	VIK BAR
Marija Bulatovic	VIK BAR
Ismeta Gjoka	Municipality Tuzi
Nikola Popovic	VIK Tivat
Miljana Erakovic Karadzic	Municipality Niksic
Marija Planinic	Regional water supply company
Danijela Kosic Zujovic	Regional water supply company
Svjetlana Lalic	Regional water supply company
Tamara Brajovic	EPA
Zdenka Ivanovic	Project Team
Danilo Mrdak	Project Team
Bela Casani	Project Team
Momir Paunovic	Project Team
Zoran Stevanovic	Project Team
Dusan Rakic	Project Team
Patrick Reynolds	Project Team
Maja Krivokapic	Project Team
Darko Vuksanovic	SEA Team
Mihailo Buric	SEA Team

2 Ministry of Agriculture and Rural Development (MARD)

No.	Page	Comment	Response
1.	9	The artificial lakes in the Adriatic basin are also Vrtac, Liverovici and Grahovsko.	Corrected in the text
2.	20	Alignment with the UWWT Directive has not just begun, but this Directive has largely been transposed (95%).	Corrected in the text
3.	20	<ul style="list-style-type: none"> - Agglomerations are defined in the Rulebook on Geographical Boundaries for the number and capacity of agglomerations (this is hereinafter referred to as the Plan) - Sensitive areas were determined by the Decision on the designation of sensitive areas (Official Gazette of Montenegro 46/17 of 18 July 2017), - In order to protect the waters, Montenegro has chosen not to designate less sensitive areas. 	Corrected in the text
4.	20	The NEAS, as well as the Negotiating Position, specifies the year 2035 for the completion of the construction of sewage systems.	Corrected in the text
5.	21	The directive is fully transposed through the Water Act and its by-laws. The proposal is not made through the Water Management Financing Act or the Law on Protection and Rescue.	Corrected in the text
6.	21	Amendments to the Act have been completed and the Rulebook is: Rulebook on the Preliminary Assessment of the Flood Risk Assessment and the Flood Risk Management Plan ("OG of MNE 69/15).	Corrected in the text
7.	21	A new Plan for the next 6-year cycle - General Plan for the Protection from the Harmful Effect of Waters, for Waters of Importance for Montenegro, for the Period from 2017 to 2022 ("Official Gazette of Montenegro", No. 17 / 17 of 17 March 2017)	Corrected in the text

No.	Page	Comment	Response
8	21	The PFRA is not prescribed by the Water Basis, but its preparation is prescribed by the Water Act. There are data in the Water Basis that can be used when designing a PFRA.	Corrected in the text
9.	443 i dalje	The implementation of the Program of Measures does not specify the Water Directorate, which should be a key institution, both in the preparation of the Plans (in accordance with the Law on Waters) and in their implementation, and the MORT and the AHCR and other institutions are mentioned.	Corrected in the text

3 Water Administration (WA)

No. ¹	Ch.	Page	Comment	Response
1	0	title	Plan upravljanja Jadranskim slivom ili Plan upravljanja vodnim područjem Jadranskog sliva?	Adriatic River Basin Management Plan (Draft) (in Montenegrin)
3		title	The period for which the RBMPs are valid needs to be indicated on the title	This time period is not the decision of the consultant
5		8	It is noted that the RBMP was prepared in accordance with the general conditions in Annex VII of the WFD, as well as with national regulations (Official Gazette of Montenegro, No. 39/09...), need to specify the name of the Regulations.	This will be specified
7	1	12	Prenošenje nije završeno kroz Zakon o finansiranju upravljanja vodama i Zakon o zaštiti i spašavanju? It is not clear what this sentence means	This will be clarified in Montenegrin version
11		25	2.1 GENERAL CHARACTERISTICS OF THE ADRIATIC RIVER BASIN Description of the surface waters – is only given for 3 rivers and one lake. What about the rest?	Title of the section will be changed to read. Description of the main (or major) surface waters.
12		26	Maps – in English it stands only Adriatic, and in Montenegrin it stands - "Adriatic Rivers without Bojana" what is correct?	The official name is "Adriatic Rivers without Bojana", it will be adjusted
22		32	In table 2.5. the ordering of water bodies is impractical, e.g. the list of water bodies begins with Bojana River and ends with Bojana River, with all other water bodies in between. There is no length or surface for certain water bodies. In English it is Length or Area (m or m ²) and in Montenegrin it is the length of the area. There are coordinates given for coastal but not for surface waters, why?	The lengths of certain water bodies have not provided by the GIZ (where the data originates). We will ask GIZ again for these data in order to complete the table. The ordering is based on rivers first (1-33) and then lakes (34-41). Transitional and coastal water require geographical coordinates for identification as part of the WISE.

¹ Comment numbers refer to original comments provided by the Water Administration which included comments for the Danube River Basin.

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23		32	Table 2.5: The use of colours for shading within the table is not explained	These have been removed
24		35	In figure 2.2, River Cijevna is a single surface water body, even in the protected area and in the area which is endangered by exploitation and drying in the summer months. The draft version showed a different typology and 2 water bodies on the Cijevna River. This example jeopardizes credibility of other delineations	The initial (draft) typology was not considered accurate.
25		35	Figure 2.2, Legend: DWB is not in the list of abbreviations It may be recommended to mention HMWB only in Figure 2.3, not in both, because Fig 2.2 is supposed to show the typology for delineation, whereas Fig 2.3 indicates the condition of surface water bodies. This should reflect in the title of figures	DWB will be added to the list of abbreviations. HMWB will be removed from Figure 2.2
26		36	Figure 2.3: the following river sections in the map are not assigned to any surface water bodies: - after junction of 14 and 17; - before 18 and 29; - between 18 and 33; - between 33 and 30; - after 21 and 24 - the connections between 2/3 and 38 (Skadar lake); - 15 is doubled If this is due to poor printing quality, appropriate resolutions of maps would be required	It is possible to zoom in on the maps as high quality jpegs have been used in the document. All SWBs are appropriate, e.g. after junction 14 and 17, the river remains as 14.
28		36	There is no legend for delineation of Skadar Lake	Please clarify this comment
29		37, 38	Figures 2.4 and 2.5 would be more understandable when using for instance a greyscale background map of the surrounding	Agreed. These maps were not produced by the project GIS team but will be altered to include a greyscale background

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			territory	map.
47		75	Table 2.9 the periods of analysis differ; some end in 2000, the last ones in 2014. Does it mean monitoring stopped in 2014? Are there no more recent data available?	As already stated in point 40, this is an available set of correct data. Periods for which we have correct data are processed, taking into account the simple lack of data due to station interruption or unreliable data. Stations with a series until 2014 are the stations for which data were obtained until that year from the Hydrometeorological Service. In the meantime, the data has been updated for a number of stations and is available for future analysis.
48		75	Table 2.9 Bojana river is not included here with a discharge, but in Table 2.10 with elevation. Is there no discharge monitoring available?	Continuous discharge measurements are not carried out on the Bojana River as a border river. Therefore, only the water level is displayed. Negotiations are currently underway on joint discharge measurements of the two Hydrometeorological Institutes.
49		75	Table 2.9 Bojana river is assigned a 4 times bigger area than Skadar lake. Is that correct?	Yes, because the Bojana river basin belongs to the Drim river basin.
50		75	Table 2.9 For Bojana river there is no flow/discharge indicated. Can it be explained why? See table 5.3, station Fraskanjel	As mentioned above, the Bojana River is a border river between Montenegro and Albania. The boundary line is in the middle of the watercourse, so it was not possible to measure the flow by the river profiles. All current knowledge about the Bojana flow is based on flow measurements in the territory of Albania, where this river belongs entirely to Albania. Efforts are now being made to remedy this situation by joint measurements.
51		81	The accurate determination of the water balance in the Adriatic River Basin, which is ultimately essential to the RBMP, is highlighted as a supplementary measure in the PoMs in Section	Text changed. This is placed in the tasks for IHMS in Tables 11.1 and 11.2

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			9 to be carried out in full during the 2021-2017 RBMP cycle. This highlighted statement cannot be verified in chapter 9, or the Annex PoM. Verify RBMP cycle!!!	
52		82	The accurate determination of the EF measurements in all rivers and downstream of water storage facilities in the Adriatic River Basin, which is ultimately essential for the maintenance of river ecosystems, is highlighted as a supplementary measure in the PoMs in Section 9 to be carried out in full during the 2021-2017 RBMP cycle. This highlighted statement cannot be verified in chapter 9, or the Annex PoM. Verify RBMP cycle!!!	Text changed. This is placed in the tasks for IHMS in Tables 11.1 and 11.2
54		82	...and taking into account the general climate complexity of the area... it can not be seen how the climate complexity of the area is taken into account for the subsequent statements were observed up until 2010: for which period, since when? More frequent and longer heat waves ... compared to when?	This section provides a summary of information taken from the 2 nd National Communication on Climate Change (2015)
55		83	increase of 1.4 °C in the period 2046 – 2055. not clear. Does it mean increase from 2046 till 2055; or is it increase of the average from today (which year/period is that?) till the period 2046-2055?	The latter.
56		85, 86	Figure 2.29/30 Climate change projections ... The projections in the figures are for temperatures, and not for temperature differences; therefore, climate projections, and not climate change projections	Agreed. The title of the figure will be changed.
60		88	The content of this page would nicely and logically fit under Chapter 2.3	This will be considered.

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68		97	Table 3.2 ... structure of the table and distinction of the two columns is not clear; what exactly is the difference between „Description of data“ and „Type of information“ (for instance: census is Description of data; report on water tariff is Type of information)	Agreed, this is not clear. The table will be restructured.
71		102	Private studies: type of data source that needs further explanation	‘Private studies’ refer to data collected by the team members. This will be altered to read ‘academic studies’ with reference to the originator.
72		109	The State territory is administratively divided... This information should be given in the characterization of the basin (chapter 2), for instance it says, that Niksic municipality is located 96% in the Adriatic basin. Where is the exact border? Based on which data? It is another argument for the introduction of common Chapeau chapters (umbrella)	The exact borders of the split municipalities are shown in Figure 3.3, represented as the border of the two river basins.
73	3.5	111	Legend: Density Inhabitants per km2	This will be altered to include the word inhabitants in the legend.
74		112	3.5.3 Driving forces is this chapter for all Montenegro, or for the Adriatic/Danube basin?	On the whole, for Montenegro. For most economic indicators, data is not available per river basin.
76		113	Table 3.11 What is the definition of agglomeration?	In accordance with Article 8 of the Law on Municipal Waste Water Management ("Official Gazette of Montenegro", No. 002/17 of 10/01/2017) the definition of an agglomeration is as follows: Agglomeration is an area where the population and / or economic activities are concentrated in such a way that municipal wastewater can be collected and carried to the wastewater treatment plant or to the final discharge point. This

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				will be added into the text.
77		113	Table 3.11 Why is Kolasin municipality not included? On page 109 it says 47% of it is in the Adriatic basin area.	In the Municipality of Kolasin there is only one agglomeration – City of Kolasin, which is situated in the area of Danube river Basin. In the Adriatic basin there is no agglomerations with ≥ 2000 PE.
78		113	Table 3.11 There is detailed information about settlements in certain areas. Why is it not possible to conclude on the population within basin areas for the split municipalities (Podgorica, Niksic, Kolasin)	It is not possible to determine the population in these areas, and it is unnecessary, given that it is a very small population.
79		116	Table 3.13: Mojanovici (No.13) is a village in Golubovci, which itself is a part of capital Podgorica. Selection and distinction of settlements needs explanation	Agglomerations are defined in the Rule Book on Geographic Borders, Number and Capacity Agglomerations ("Official Gazette of Montenegro", No. 078/17). Will remove row with Mojanovici.
80		116	as early as 2005, the Government of Montenegro adopted an important strategic position reference needed	„With respect to the Adriatic River Basin, as early as 2005, the Government of Montenegro adopted an important strategic position in the field of waste water – Master plan for wastewater Costal Region and Municipality of Cetinje , in line with the policy documents provided and planned for the construction of sewage treatment plants and wastewater in urban parts of the municipality, as well as bringing the system into a state in accordance with the Urban Wastewater Treatment Directive (UWWTD“. Explanation will be added in the text.
81		118	Podgorica 04/2019.... correct?	Yes – footnote will be added ‘preparation of the main design and tender process. Furthermore, in September 2019- A contract has been signed

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				for the construction of a Waste Water Treatment Plant (WWTP) in Podgorica.
82		119	Figure 3.4.... Podgorica, Herceg Novi: not labelled in map	This will be inserted into the map
83		120	Table 3.16.... difficult to read, columns need to be switched; is gravel mining missing?	Yes, this is missing. It will be added. Also, a separate section on gravel extraction will be added in the RBMP.
84		120	Nationally, there are only 5 IPPC permissions, so this cannot be the primary source of information but the 5 permissions are included in the list of pressures.	Yes. IPPC permissions received: landfills Livade in Podgorica and Mozura in Bar, Toscelik Alloyed Engineering Steel in Niksic, Thermo-electricity power plant in Pljevlja, and plant for acetylene production in Bijela
85		121	Table 3.17: wastewater, and industrial water discharge to groundwater is not licensed!!!	There are no wastewater discharges into groundwater. Column in table will be removed
86		122/1 23	Figure 3.5 ... Title suggests industrial enterprises; the legend shows only waste disposal sites (identical Figure 3.7 on page 135)	Comment correct. This image will be deleted.
87		127	Chapter 3.6.4 ... is there no data available? There are studies done at least on Skadar lake (GIZ). No references given.	Yes, data is available. However, this section was included only to provide a summary of the situation.
94		124	...economic area... better: economic sector? The number was impressive in 2016 was over 1.8 million ...	Agree, sector will be used. Impressive will be removed.
97		127	... they can quickly come ... The main threats ... reference needed	Reference will be added
99		130	Incomplete key to the figure. What does the size of pie charts indicate?	The pie charts are a relative estimation of the differences based in Table 4.19. The word relative is added to the legend.

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100		131	Capacity of landfill is 1,056,036.21 m ³ unrealistic accuracy of figure! ... is planning to build ... is there a time frame, that could be given? Reference is needed	Capacity of landfill is 1,000,000 m. „Deponija" Ltd. will build a leachate treatment plant for the leachate generated in sanitary cells on landfill “Livade”.
101		135	Figure 3.7 is identical with Figure 3.5 Within the legend, the town symbol is listed alone, whereas river, border, and lake are separated and listed under ‘waste disposal’ which should be rearranged	This will be removed and Figure 3.5 will be rearranged.
102		136	Chapter 3.6.7 Data and information is available from directorate of Fisheries in MARD	If further data is provided, this data will be included.
104		137	Table 3.22: again, Kolasin is not included	Refer to response to comment 77
106		141	Table 3.23 Water availability from springs in the Adriatic River Basin ... The figures show potential yield (availability). What is the source of this data??? Why is it presented by municipality?	Reference is in footnote, this is IPA project. Will add this also in table title.
107		143	Figure 3.10 Springs and wells designated for human consumption these are definitely not all existing wells. What is the combination spring/well? The project on kadastre of springs for water supply can be used for information update	Not all of springs should be shown, just utilized for w.s. Spring/Well means there are both at the waterworks.
109		150	Chapter 3.9.2... The barrier at the aluminium plant in Podgorica is not mentioned here, why?	Because it is not a hydrotechnical facility, it is already used to deposit red mud from the Aluminium Plant.
110	3.1 0	152	Is the classification in line with actual regulations?	Yes, classification is in line with national regulation. New National Regulation on water status provide normative definitions and assessment described in detail in Section 6 is harmonized with those normative definitions.

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111		154	Table 3.30 ...what parameters are monitored at the stations?	Monitoring parameters are listed in Tables 3.31 and 3.32...However, text will be added to clarify....”, as follows: The following stations in the Adriatic River Basin (Table 3.30) are monitored regularly by IHMS (monitoring parameters are listed in Tables 3.31 and 3.32), which conform only to 10 out of the 41 surface water bodies designated in Section 2.3, Table 2.5.
112		157	Table 3.34 ...needs revision, what are the pressures, what are the monitoring categories?	The table is clear, the title is not. Do not agree with revision of table but will change the title of the table instead. NOTE: Translation to local language should be corrected in the table – „Prioritetne supstance“ not „Prioritet supstanci“
113		161	Cijevna river: there is gravel extraction to large extent, for instance in the downstream section of the river. Why is it not mentioned here as a pressure?	This will be included and referred to in a separate section of text for gravel extraction.
114		162	Table 3.36: It is not clear on what information the assessment is based on, and how credible the information is (monitoring data, expert judgement, models...???)	Based mostly on expert judgement, knowledge and field observations of the team members. In most cases, monitoring data is very weak and does not provide enough evidence or information. Many of the PoMs describe the need for further studies to validate.
115		162	Table 3.36: what does it mean if fields are empty in the table. Is there no pressure, or is there no data available?	Exactly. This will be clarified in the table.
116		141 & 171	Table 3.23 shows the Water availability from springs in the Adriatic River Basin for municipalities with a total availability of approx. 470,000 m ³ /day. Table 3.37 presents Groundwater Sources used for water Supply in the Adriatic River Basin, separated for wells, well/spring, and springs. The total amount used from springs and spring/well is	Clarifications will be provided in the name of tables and references. Table 3.37 is just capacity potential but not actual use.

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			at least 6135 l/s, or approx. 530,000 m ³ /day. The difference is approx. 60,000 m ³ /day, i.e. higher use than availability. Data needs to be verified and eventually corrected.	
117	171 & 110		Table 3.37: Total population in the Adriatic basin according to this table is 454,278, not including Kolasin. Table 3.10: Total population here is 442,193 inhabitants, including 8,380 inhabitants from Kolasin. Data needs to be verified and eventually corrected.	This will be corrected and clear references will be added, i.e. statistic sources
118	172		Table 3.37: Footnote 1 for Karuč, Volač, Trebjesa, Blaca, and Studenačka springs; and footnote 2 for Bolje Sestre spring, within the table are missing, and not explained Bolje Sestre is mentioned twice: for Podgorica, and for the regional water supply. Is the total yield split; or is it doubled in the table?	Footnote 1: „potential water source“; and footnote 2: „Bolje Sestre Spring is located at the territory of Podgorica municipality, but it is used for the water supply of Montenegrin cost“. Footnote 1: „Potential water sources according to the Decision on Determination of Sources for Regional and Public Water Supply and Determination of their Boundaries ("Official Gazette of the Republic of Montenegro", No. 36/08)“; and footnote 2: “Bolje Sestre Spring is located at the territory of Podgorica municipality but it is used for the water supply of Montenegrin cost” (we put Bolje Sestre spring two times by mistake; the total yield is 1500 l/s).
119	177 ff		Tables 3.38 and 3.39 Data sources not clear. Is it based on GW monitoring data, or estimation?	It is explained that GW monitoring is weak, practically does not exist. Here in text to clearly state that most of data is an assessment based on temporary observations. If we add all tables for GW bodies in every is written level of confidence, which is RA (Rough Assessment)
120	187		According to collected and interpreted data ... is that data presented in the document? Where?	We will reformulate and make a reference to annexes for water quality and data obtained from waterworks and CETI.

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122		202 & 203	Table 3.46 and Table 3.47: The vulnerability categories (classes) in the two tables are not identical, e.g. red: very high vulnerability (table 3.46) and extremely high vulnerability (table 3.47)	We will correct table 3.47 and use classes from table 3.46. Also correct table 3.52 on p. 210.
123		213	Polluters: the facility nearby Ulcinj is a former salt plant. Is there still pollution risk from that?	Not sure, probably not there is no data to determine this.
124		214	Figure 3.23 The size of the circles in the map does not correspond with the size of circles in the legend/key: circles in the map are bigger than the biggest circle in the legend, this should be corrected	We will adapt /equalize circles
125		218	Figure 3.25 The size of the circles in the map does not correspond with the size of circles in the legend/key: circles in the map are bigger than the biggest circle in the legend, this should be corrected	We will correct as above
126		220	Table 3.56 shows well a comprehensive summary; it would need to be updated, after consideration of previous comments to the chapter	No comment and no corrections will be applied.
163	4.1	227	Protected areas: in the definition of PA, reference should not be made to WFD only, but also to national legislation	Agreed. This will be included.
164	4.2	230 & 173	The first two paragraphs on p 230 are just copied from page 173; here in chapter 4, the use by the aluminium plant is of no interest at all	Text will be removed and referenced to previous section. Agreed, the reference to the aluminium plant will be removed.
166		230	According to our information, there are 24 wells at Plantaze	Ok, but if „24“ is different than „more than 20“. It is matter of actual operation, not the existence (number).

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167		230	...completed during before ... during OR before?	During. The text will be corrected.
168		230	Table 4.2 is listing springs and assigns them to protection zones. The descriptor of the table could be improved. A characterization of the springs in the text is missing: are these for abstraction of water for human consumption that provide an average of more than 10 m ³ per day, or that serve more than 50 people?	Table 4.2 is listing of all springs (tapped and non-tapped). Table 3.37 includes just tapped springs. All springs from Table 4.2 have discharge more than 10 m ³ /day except of periodical springs where Q _{min} =0 m ³ /s.
169		230	Table 4.2: It would be helpful to have in addition, the municipality assigned to springs, where they are located	Table 3.37 presents municipalities too. Reference will be in footnote to Table 4.2
170		230	Table 4.2: Are rural springs included?	Just some of the more important ones, not all is possible!
171		230	In Table 4.2, it is not specified what type of protection a particular spring has. Is the first, second or third zone designated? WA water protection project can be consulted here	We will clarify with reference to the following: „Delineated protection zones“ means delineated according to the Rulebook on determining and maintaining zones and belts of sanitary protection of water sources and limits in those zones (Official Gazette of Montenegro, No. 66/09, 2 October 2009). All springs which are included in water supply system must have delineated three protection zones. WA will be consulted.
172	4.4	233	A list of the bathing waters should be provided. What about the rivers in the Basin?	No inland waters are currently designated. This will be a topic for the next project in Montenegro, which includes the identification and designation of all coastal and inland bathing waters.
173		233	bathers ???	Bathing locations. The text will be changed.
174		233	Sensitive areas in the Adriatic basin are.... how are they defined?	Reference to the decision for determination of sensitive areas

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			Monitoring? In the Danube basin there are no such areas?	will be provided. All of the Danube river basin is classified as a sensitive area. This will be made clear in the text.
182		246	The lack of understanding the cause of conflicts... this highlighted sentence is not clear: lack of understanding by whom? Is it really the main reason of conflicts?	This complete sentence will be removed. It is controversial.
185		247	Figure 4.1: in the legend, strict and special reserves (A), and regional and nature parks (D) are indicated as spots. Are they not rather areas to be mapped?	Strict and special reserves (A) are too small to be represented as area in this scale. Regional and Nature parks (D) were presented in the table as a point.
196		255	Chapter 4.6.3 belongs to pressures (chapter 3). Other pressures on protected areas have not been mentioned in this chapter either.	The inclusion of SHPPS in the PA section is not referring to pressures, but rather to the location.
211		269	Table 5.3 is listing proposed monitoring stations; but where are the existing ones? We would expect a list of the existing ones, first, and then an analysis of location and parameters measured; based on that analysis new stations can be proposed	Table 5.3. contains the information whether the station is existing or new (proposed for the future routine monitoring) – column No. 9. Existing stations, which are covered by routine monitoring in Montenegro are not sufficient to provide the WFD compliant monitoring data for the confident assessment water status. Therefore, a new network is proposed, based on the combination of existing and newly proposed sites. In order to provide an optimal monitoring network, the existing monitoring network was taken into the consideration, in order to provide continuation of historical measurements.
213		273	Figure 5.1, the ID number of the monitoring stations (see table 5.3, page 234ff) should be indicated for easier identification	For clarity, it is not possible to add the names for the monitoring stations
214		273	Figure 5.1: the monitoring stations in Budva and Bar (Table 5.1)	The figure refers to the inland surface water only

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			cannot be found on the map; map is not valid, needs verification	
215		274	Table 5.3 according to the table, there is only level flow measurement on Skadar lake stations; does it mean, all other stations do also flow measurement? In chapter 2 (page 75), on Bojana river (Fraskanjel station), there is also level measurement only.	This comment refers to Table 5.4. All other station have flow and level measurement. All current knowledge about the Bojana flow is based on flow measurements in the territory of Albania, where this river belongs entirely to Albania. The boundary line of the Bojana River is in the middle of the watercourse, so it is not possible to measure the flow by the river profiles.
216		275	Table 5.3, Figure 5.1: Gornjoepoljski vir	This will be corrected
217		275	Figure 5.1: Fraskanjel not visible	This will be corrected
219		279	Table 5.7: there are existing and planned GW monitoring stations. It should be explained how the planned monitoring stations have been selected, and how they contribute to a more complete monitoring network	We will improve the table and the text to clarify
225		280	Figure 5.3 (MNE) Groundwater monitoring station locations in the Adriatic basin - image and legend should be translated into Montenegrin language	This will be corrected
226	6 6.1	284	Chapter 6.1.1 refers to monitoring results from apparently existing stations. Is there a reference, where the data can be found? Can the stations be referred to a description in chapter 5?	The data for chemical status assessment presented here are obtained based on 2018 survey on a limited number of sites – data for water and biota. The data is available in the project Report (Table 6.1.). Furthermore, the assessment provided in the text and tables in Chapter 6.1.4 is based on the combination of monitoring data and risk assessment, as stated in the text: „...An initial assessment of the pressures was completed, as shown in Section 3, which was based on the principles of risk assessment according to the EU WFD CIS

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				guidelines. Furthermore, during 2018, surveillance monitoring was carried out on a number of key surface water bodies in order to serve three purposes...”
227		284	Table 6.1: for the evaluation of the status, the results of analysis should be compared to the threshold in the respective standards.	In order to make the presentation consistent and clear, here we presented the assessment of the chemical status with note on exceedance of EQS (last column).
228		281 ME	Table 6.1, MNE document: the last column of the table is highlighted in yellow, why?	Highlight will be removed
229		281 ME	Table 6.1, MNE document: content of the table should be in Montenegrin	This will be corrected
238		287	6.1.2 Ecological status/potential approach and assessment ... this chapter describes only the approach, but there is no assessment	The assessment procedure is presented in Annex 2, which is indicated in the text
243		289	Hydromorphological pressures have not been assessed for transitional and coastal Wbs. Then, how was the status of those WB defined?	With lower confidence, which is indicated in the text. This is the usual approach.
246		256 ff ME	Table 6.2: WB should be translated into Montenegrin, e.g. Piva reservoir, Plavso lake, ...	This will be corrected
247		291	Table 6.2: second column should say „No. in the map“ instead of Map No.; more appropriate would be the ID of water body	This will be corrected
248		291	Table 6.2: the last column presents confidence levels. How are these levels obtained? How can results be used, when the confidence level is low?	It is the usual approach to have the evaluation of confidence level of status assessment, albeit high, medium or low. An explanation of the confidence level is provided in Table 7.2

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249		291	Table 6.2: area or length for a number of WB is missing	Missing data was not provided by GIZ
250		291	Table 6.2: according to chapter 2, delineation, there are 5 coastal WB, and 5 transitional WB. In table 6.2, only 2 coastal and 1 transitional are presented, why?	Data for 3 coastal and 4 transitional delineated WBs are not available.
251		292	Table 6.2: The status of water bodies Gračanica_2 and Morača_6 is evaluated due to „substantially altered by gravel extraction“ Why is gravel extraction not considered in chapter 3 (pressures)?	Thank you for this comment. Consistent data on the intensity of gravel extraction is not available. Gravel extraction will be added to Chapter 3 (pressures). We suggest to incorporate collection of data on gravel extraction as measure for the consequent period.
252	6.2	293	The maps in this chapter are part of the characterization of GWB, but they do not provide information on the status of GWB. Thus, they rather belong to chapter 2 and should be moved.	We will move all figures for GWBs, and to include them in common annex along with tables showing GWB characterization
253		293	A proper summary of the status of groundwater bodies, like done for the status of surface water bodies within table 6.1, would definitely help reading, rather than the copy and paste sections of sub-chapters 6.2.1 ... and following.	A new table will be added to summarise. All information from the Section 6.2.1 onwards will be placed in an annex.
261		319	Chapter 6.3 Summary of pressures on groundwaters and surface waters ... instead of a summary of pressures (which belongs to chapter 3), here a summary of the status of water bodies is necessary, including the transitional and coastal waters for the Adriatic, which are missing in table 3.54	This will be corrected accordingly
262		319	Table 3.54 is wrongly numbered, or it belongs completely to another chapter	Wrongly number. This will be corrected

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263	6/7	321/314	There is an error in page numbering, between chapter 6 and 7, the document jumps back from page 321 (MNE 316) to 314	This will be corrected
265	7.1	315	Water services is translated to “usluge vodosnabdjevanja” in the MNE document – which is water supply services. It should be rather translated as „vodna djelatnost“. This term is not transposed in Law on water, but WA aims at including the definition from WFD into Law on financing water management.	The translation has been corrected
270		322	Table 7.7 includes farmers. They should belong to agricultural use of water (sub-chapter 7.2.1). The methodology of obtaining the data is therefore questionable	It's a typo and will be corrected. The estimates of water use of ICI sector does not include agricultural use of water. It is estimated under the appropriate section above (7.1.3)
271		322 ME	U tabeli 7.8 prikazani su agregatni trendove – sentence is incorrect and not clear	The comment is unclear. Please reformulate
272		322	Table 7.8: Industry* consumption... what does the asterisk stand for? KAP, TPP to be explained and included in List of abbreviations	Asterisk is a typo. It will be deleted. KAP is already included in the figures.
273		322	Table 7.8: Industry* consumption: The table ends 2013, but in table 7.10, the figures are given for 2014. Should be included here. Interesting to note, that the figures for 2014 are 21.9 Mm3 in the Adriatic, and 3.4 Mm3 in the Danube, which together makes 25.2 Mm3. Comparing this figure with table 7.8, which indicates the industrial use for all Montenegro, shows, that industrial water-use jumped up again from 2013 to 2014. Should be discussed in the text as well.	The sources of data for table 7.8 (overall consumption) and for estimation of the consumption by municipality in 2014 (table 7.10) are different. The first was borrowed from the WB IWRM study and plan for Drina RB, while the later was taken from the latest (i.e. 2016) annual report on water use in Montenegro. The inconsistency cannot be reconciled due to low data quality. Table 7.8. will be deleted to avoid confusion.
274		?	Why is there no mentioning of bottled water companies for the Adriatic, like in the Danube?	There are no relevant bottled water companies in ARB

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275			<p>...specific per capita consumption indicated by our calculation was 217 l/c/d which corresponds to the figures indicated by the Montenegro Water Management Strategy. However, these are rather high values compared to many European countries and reflect the level of water losses...</p> <p>this statement seems to be not so precise. Specific consumption DOES NOT include water losses. According to IWA/AWWA (International water association/American water works association) standardised water balance, total water system input = water losses + water consumption</p>	<p>It is true that technical losses should be excluded here, since, according to IWA definition, the specific consumption includes authorized consumption (billed and unbilled) and commercial losses (theft and metering inaccuracies). However, quality of data did not allow for elimination of technical losses.</p> <p>Clarification will be added in the text.</p>
276		325	Data are taken from an annual report. More recent data should be available then.	At the time of assessment, the most recent report was the one from 2016 with 2014 data.
277		325	Table 7.10 does not belong to sub-chapter tourism (7.1.5), but industrial water use (7.1.4)	Correct. The table will be moved to the appropriate section above.
278		326	Table 7.11	Will be corrected
279		326	Table 7.11 information given in this table is given again in Table 7.12. Hence, there is no need for this table.	Agreed. Table 7.11 will be deleted.
281		327	Table 7.12 Domestic water use in Adriatic Basin is from 2011 and Table 7.12 Domestic water use in Danube River Basin is from 2014. Why is there no recent information? That information could be provided by all water supply companies.	Population refers to 2011 census, water supplied refers to 2014 (from doc informacija 2016). The year in the title of the tables will be deleted to avoid confusion. No information was obtained from the water companies.
283		328	according to the figures in Tables 7.12, and 7.13, the amount of water consumed by households ranges from a minimum around 90 l/d in Šavnik or Plužine, to a maximum of more than 1,400 l/d	The variation comes from the differences in the NRW across municipalities.

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			in Berane + Petnjica (or 30 l/ person*day to 420 l/person*day). Is there an explanation for the huge variation? It should be discussed here	
284	7.2	328	Sub-chapter needs updating	This will be updated
287		328	For the Danube RBMP a list of hydro power plants is provided in Table 7.14, why not for the Adriatic?	The only relevant HPP in ARB is Perucica. Since it is the only one, there was no need for a table. It is mentioned in table 7.20, p.337
291		329	Sub-chapter Fish farming needs updating; double check with Directorate for fishing in MARD	MARD contacted by our fisheries consultant for updating
296		334	The use of natural resources is subject to fees, which, according to the Law on Nature Protection. Why are the Law on Nature Protection, and natural resources fees recognised here, but not the Law on financing water management and the water fees?	The Law on Financing water management is assessed under section 7.17 in DRB (page 31) and section 7.20 in ARB (page 359).
298		334	Table 7.17 The value of water for domestic use in the Adriatic Basin, and Table 7.18 The value of water for domestic use in the Danube River Basin are from 2014. Updated information can be obtained from supply companies easily	According to the advice given from colleagues from Water Directorate, this does not seem to be quite true. The team was advised to use the Annual report on water use in Montenegro from 2016.
300		335	The service is provided at a price of 0.004€/m ³ . The footnote says that this data is from „Montenegro: Environmental Performance Review (Third Review) – 2015 – UNECE“. The data can only be from „Decision of calculating water fees... (No 29/09 from 24. April 2009.)“. This is not a price for service, but the amount of water use fee for irrigation (0,004€ / m ³ of abstracted water); This Decision and especially Law on financing water management should be	The reference is corrected. The second part of the comment implies again a semantic issue. What is meant is precisely the water use fee which helps calculate revenue from the water used for agricultural (mainly irrigation) purposes.

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			much more present and explained in this chapter 7.	
302		337 ME	Sub-chapter 7.5.4 zasnovan na Rješenju o iznosu i načinu obračunavanja troškova – In MNE document Decision on the amount and method of calculating water charges and the criteria and method of determining the degree of water pollution should be translated correct. It's not Rješenje, it is Odluka...	Translation will be corrected.
303		337	Table 7.20 (A), and Table 7.21 (D) The annual income from hydropower... the data reference are strategies and plans. Are there no real income data available?	HPP Perućica and HPP Piva, as well as TPP Pljevlja, are part of EPCG. However, there is no financial data that refers to each PP. The financial data for EPCG are not disaggregated to each HPP.
304		338 ME	Figure 7.3 (A) and Figure 7.2 (D) should be translated into Montenegrin	Translation will be provided.
309		342	<p>It should be more explicitly explained:</p> <ul style="list-style-type: none"> - why the base year is taken to be 2011 (8 years ago!) - how big the investment cost for 100% water supply coverage will be - why per capita consumption shall be constant over the next 40 years - why agricultural and industrial demand shall be constant in future. <p>In a scenario based forecast, at least potential futures should be included</p> <p>In the projections, it is not explained, how the increased coverage rate will impact water demand. Typically, a consumer connected to central water supply is consuming more than a consumer only supplied by a private well (standpipe)</p>	2011 is the only relevant source since last census was done in 2011. The consumption data was held constant in the lack of official projection or the base for producing our own. It would be useful to point to references on the details and specifics about differences in consumption of consumers connected to central supply and those using wells.

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310		344	No trend is visible, no projection period is mentioned for hydro power plants	There is no water use so the assumptions about future trend is provided in descriptive form only
311		344	No trend is visible, no projection period is mentioned for fish farming	There is no water use so the assumptions about future trend is provided in descriptive form only
326		357 ME	zahvatanje	This will be corrected
327		360 ME	Veliki troškovi gubici u sistemu vodosnabdijevanja. Trenutno kruže oko 61%.	This will be corrected
328		360	Table 7.31 (A) and Table 7.32 (D) – Revenue collection are pretty surprising for MNE standards (Danilovgrad 99.34%, Herceg Novi 99.73%, Pljevlja 100%, Plav+Gusinje n/a). Are these numbers from water supply companies?	These data are taken from the latest (2016) Annual report on water use in Montenegro
329		363	The conclusions are not based on recent and valid data. The financing (revenue part) does not consider the Law on financing water management. If there is a gap noticed between revenues and cost, this should be stated here. Are new tariff calculations necessary? Additional sources of financing are not mentioned.	The Law is assessed in the chapter 7.17. We believe that the issues with cost recovery (gap between cost and revenue) is not the one of low or wrongly set tariffs (Law on financing water management...), but the large losses incurred by the system. The conclusions are based on the most recent data available at the time of assessment (i.e. almost 2 years ago)
340	9.2	378	Table 9.3 and table 12.2 are partly redundant	Agreed. The sections will be changed, i.e. PoMs removed from the annex into the main body of the text.
342		378 ff	Table 9.3 should be organised by types of measures (which impact is addressed?), and not by location	The table provides continuity with water bodies, i.e. measure applied to each water body shown in the same order as listed in Section 3.
343		378 ff	Table 9.3: it is not explained, how the priorities (1, 2, 3) of the	A footnote will be added to Table 9.3 to indicate what the

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			measures are defined	priorities mean (as determined by the GIZ for the Adriatic RB).
344		378 ff	Table 9.3: we suggest to include the municipality within the field „measure“	Municipality is added as a separate column. The addition of the competent authority in this table would not be of value. The competent authority is provided in each of the table of the measures.
345		378 ff	Table 9.3: instead of the column „municipality“ we suggest to include the competent authority here	
346		378 ff	Table 9.3: how are the indicative costs estimated, in particular when we do not have valid monitoring and status evaluation for water bodies of only medium and low confidence levels?	Where costs are proposed they are either from official plans, i.e. WWTP or for conducting studies in order to understand exact actions to invest in. The latter costs are calculated based on experience of the project team members.
347		378	Is it necessary to separate table 9.3 and table 9.4?	For now, these tables remain separated since they are the product of the GIZ. However, if acceptable, these would be best if they were combined.
348		378 ff	We could not recognise any measures to implement Art.9 WFD (cost recovery)	It is not possible to calculate cost recovery with any accuracy at this stage. This will be included in a future update of the RBMPs.
352		387 ff	Figure 10.1 the structure of the organigramme, and the entire list of public administrative institutions is not clear and incorrect. It should be updated according to the by-law (Decree on organization of the state administration).	On December 31, 2018, a new REGULATION ON THE ORGANIZATION AND OPERATION OF STATE ADMINISTRATION was adopted, which results in the fact that the organization chart is incorrect. All subsequent comments will be taken into consideration in accordance with the new regulation. An updated organization chart has been prepared.
353		387	The Geological Survey of Montenegro is not recognised, though they play a role in groundwater monitoring	This will be corrected. The Geological Survey of Montenegro and more specifically its Department of Hydrogeology, Engineering Geology and Water Concessions, performs

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				hydrogeological research for the purpose of water supply, protection of groundwater and construction of hydro-power plants and in this respect, it develops related maps as well as studies and reports; it also prepares documentation for the purpose of granting water concessions.
354		387	IMB is not listed in Figure 10.1	This will be corrected
355		387	Public company for management of marine & coastal areas (JPMD as of PoM AB MNE 01) is not listed in Figure 10.1	This will be corrected
356		387	Figure 10.1 in the MNE document should be in Montenegrin (p.384)	This will be corrected
357		387	Figure 10.1 The organigramme shows WA being part of the MARD. It should be changed	This will be corrected
359		389	Description of the MARD is fine but it should be with more focus on their role in the development of RBMPs	This will be revised.
360		389	Water Administration (WA) is an independent administrative body under supervision under the auspice of MARD	The text will be corrected
361		389	WA's role in the development of RBMPs according to the Law on Water should be outlined	This will be outlined as follows: The organizational units of the WA are: 1. Water Management Sector 2. Danube and Adriatic basin water management department 3. Department of Water Information System and Water Monitoring 4. General and Financial Affairs Department The Danube and Adriatic basin water management department

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				<p>carries out the tasks related to: preparation of the documentation basis and establishing the concept of long- and medium-term development plans for the management of the Danube and Adriatic Basin waters; preparation of the expert basis for the Water Management Plan and the Flood Risk Management Plan for the Danube and Adriatic catchment areas, as well as modification of the plans; informing the state of development of the plan, including a preliminary overview of significant elements of water management in the preparatory river basin district; monitoring and studying the situation, proposing and taking measures to improve it; preparation of technical documentation for individual water management issues in the respective river basin district; participation in the process of public relations in the preparation of plans; the process of making a strategic environmental impact assessment for water management planning documents.</p>
362		389	MSDT's role for water management (Urban water, marine water, Natura2000) and the link to RBMPs should be outlined	<p>This will be outlined as follows: MSDT is responsible for the activities relating to inter alia the system of utility operations and coordination of regional water supply systems, which requires the transposition and implementation of EU legislation regulating, collection and treatment of urban wastewaters (Directive 91/271/EEC), and transposition of the Directive 2008/56/EC (Marine Strategy Framework Directive) and Directive 2014/89/EU (Maritime Spatial Planning) as well as the implementation and monitoring of implementation of relevant national regulations on these issues.</p>
363		390	EPA is organizing and implementing the monitoring of all segments of environment, except for water quality, which is	<p>It is not. This the responsibility for water monitoring is with IHMS. In Article 83, paragraph 5 of the Water law. 'Monitoring</p>

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			under the responsibility of MARD. Where is it prescribed that MARD is responsible for monitoring of water quality?	of surface and groundwater and protected areas is carried out by the body responsible for hydrometeorological affairs.’ Text will be corrected.
364		391	Through the Food Directorate the MH is responsible for identifying water bodies suitable for consumption and recreation... What is Food Directorate???	This is worded incorrectly. It will be altered to remove the reference to the Food Directorate. (which in itself is not fully correct). Text will be added as follows: The Ministry of Health (MOH) has a major role to play in implementing the Drinking Water Directive. The collaboration of MARD and MH provides a link between water management and human health protection. Through the Directorate for Public Health and Programmatic Health Care, MH is responsible for the health safety of water for human consumption and for providing opinions on its safety. He is involved in the field of water protection to create the above link between the Institute of Public Health and, in the area of enforcement, the State Sanitary and Health Inspectorate.
365		391	A clearer distinction between responsibilities of MH and IPH would be necessary in the process of sanitary protection zones	This will be included. MH is responsible for the transposition and implementation of Directive 98/83/EC on drinking water and preparation of the national legislation. The Institute of Public Health (IPH), responsible for physical and chemical analysis of water and microbiological testing of drinking water, is responsible for control and monitoring of water safety (Directive 98/83/EC).
366		392	The Ministry of the Interior (Directorate for Emergency Services). Within the Directorate for Emergency Situations there are two organizational units: Division for human protection and humanitarian help and Division for Preventive Affairs – Department for natural disasters management and technical	It will be corrected in accordance with the new Regulation on the organization and operation of state administration. MI is competent for implementation of obligations stemming from the Decision 1313/2013 (establishment of the Union Civil Protection Mechanism) and the

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			and technological risks. It should be explained what are the responsibilities of this Directorate for RBMPs, with references to the respective legal documents	Commission Decision 2014/762/EU laying down rules for the implementation of Decision No 1313/2013/EU on a Union Civil Protection Mechanism. One of the secondary competences of MI is transposition and implementation of Directive 2007/60/EC on the assessment and management of flood risks with participation of MARD as primary competent institutions. References to respective legal documents will be included.
367		392	In the Ministry of Finance (MF), there are three institutions dealing with the acquis on environment and climate change. These are the Customs Administration, Real Estate Administration and Statistical Office. How are these institutions dealing with the acquis on environment and climate change? Are these institutions in MF or there are independent bodies? What is the role of MF in investment measures and budget for PoM?	The paragraph relating to the MF will be deleted.
368		393	Enforcement level: the sub-chapter deals with inspection only. Enforcement is going beyond that. Title to be changed to Inspection?	Agreed.
369		393	Water Council and a Water Working Group, will be established as specified in the amended Water Law (OG. 84/18). Water Council is established already, and it is not written in a Law on water about establishing Water Working Group. This Group is established according to NEAS	Agree. Text will be amended
370		393	Water council should be recognised as a consultative body with all its responsibilities and duties as described in the law	Agreed. Text will be included as follows: The Water Council has been formed in accordance with Article 151a of the Water Law. The Water Council has an advisory role to the MARD. It reviews and provides opinion on the most important matters related to

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				waters regarding regulations, planning documents and proposals for improving the situation in this field. The Council has its President and ten members appointed from among the eminent scientific and professional institutions in the field of water, economy, finance, local self-government units, water rights holders, service users, non-governmental organizations in the field of water and environment.
371		394	Policy and Legal Framework in Montenegro Reference should be made to the original documents for all strategies and Laws, with updated name and last valid version; and a link to the specific role for RBMPs would be needed	Agreed. Text will be added to reflect the comment.
372		394	Policy and Legal Framework in Montenegro Strategy for water management is missing	In the chapter 10.1.4 Policy and Legal Framework in Montenegro text will be added as follows: Strategy for water management by 2035 The Water Management Strategy for 2035 was adopted in July 2017. This document should be a long-term planning document that sets out the vision, goals and objectives of national policy in water management and in the development of the water sector. Strategic decisions, commitments and guidelines in all segments of the economy and society depend on this document, since the water sector is most closely linked to all other components of the state's development policy. In accordance with the Law on Water, the Strategy in particular contains: an assessment of the current situation in the field of water management; water management goals and guidelines; measures to achieve the identified water management objectives and project the development of water management.
373		399	The Law on Water Management Financing - (OG 65/08) Needs	This will be corrected: OG 65/08, 074/10, 040/11

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			correction of OG number and date	
374		399	The funds provided through annual programmes are allocated to local self-governments, which prepare relevant project documentation. – not correct, needs adjustment	In the first paragraph the sentence that reads “The funds provided through annual programmes are allocated to local self-governments, which prepare relevant project documentation” will be replaced with. “The use of the funds provided for in this Law shall be made in accordance with the programs, water management plans and programs of measures provided for by the law”.
375		399	10.2 Primary Legislation It is not needed within the RBMPs to explain and interpret the Law on water to that extent (10p!!), if there is no link how the Law transposes the WFD. RBMP shall be implementation plans.	Accepted. The text will only be shortened to the part it refers to RBMP.
376		406	Seventy per cent of the revenue from fees is allocated to the national budget; 30% to the budget of the local self-government units. – not correct, needs adjustment	This will be adjusted as follows: 30% of the revenue from fees is allocated to the national budget; 70% to the budget of the local self-government units.
379		415	Table 11.1 and Table 11.2 have certain overlaps and repetitions; competent authorities are not exactly in accordance with the Montenegrin legislative system;	The difference between Tables 11.1 and 11.2 is the timeline for activities is shown in the latter for each institution. Corrections will be made based on the legislative system.
380		418 ME	Obezbijediti specifične funkcije i kapacitete svih javnih institucija vezanih za vodu u skladu sa strategijom za vodu MPRR i Uprava za vode. Institucija vezanih za vodu – rephrase!	This will be rephrased.
381		418	Drought management plans – according to what?	Drought monitoring in Montenegro was established as part of the IPA project DMCSEE (Center for Drought Management for the Region of South East Europe www.dmcsee.org , www.dmcsee.eu) co-funded by the European Union through

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				the Southeast Europe Inter-State Cooperation Program.
382		419	Comments to Table 11.2 are to be considered in Table 11.1 identically	The difference between Tables 11.1 and 11.2 is the timeline for activities is shown in the latter for each institution
383		419	Ensure all relevant daughter directives of the WFD are transposed into national legislation responsibility MARD – there are more institutions responsible, if all relevant daughter directives are included here; to be corrected (e.g. drinking water - MH)	This will be corrected according to the current legislative responsibilities.
384		419	Develop structured on-going educational and training programmes for staff in all public institutions involved in water management activities as per national regulations - is it development or implementation? For all?	Development with a plan of implementation. For all institutions who have statutory responsibilities.
385		419	Establishment of all water protection zones (1,2, and 3) of the water springs for public water supply. The Law on Water provides that the protection of surface and groundwater sources shall be carried out in the manner determined by the decision on the protection of the source, preceded by investigative works. The decision is made by the authority responsible for issuing water acts (WA), with the prior opinion of the ministry responsible for health (MH). Therefore, the Water Administration and the Ministry of Health, more specifically, the Institute of Public Health (IPH), should be recognized here.	Recognition of WA and IPH will be included.
386		419	The designation of a 'reference laboratory' with respect to sampling and chemical analysis to meet the EQS Directive requirements to gain international accreditation. Why are MARD and WA recognized here?	MARD and WA will be removed.

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387		419	Undertake further technical training for sampling, analysis and reporting of biological according to WFD guidelines – biological what? parameters?	To be reworded – biological quality elements. Trainings on all 5 BQEs.
388		420	Improve regulatory enforcement capacity – is it inspection capacity?	It is inspection only. Text will be changed.
389		420	Undertake environmental flow analysis on all surface water bodies between 2021 and 2017 (2022 and 2027?) if it is 2027, why are not all years indicated?	This is misleading. 2021 to 2027 will be removed.
390		420	Risk management: does it refer to floods only? Then the heading should be changed. If it refers to risks in general, more details must be given, e.g. health	This refers to ultimate risks. The Government and other ministries will be added – Ministry of the Interior and Ministry of Health.
391		420	Implementation of EU floods directive... reminder: should the steps for implementation be mentioned here, and who is doing what? To quote the Law strictly, there is the Government and WA mentioned	
392		420	Capacity building and the provision of funding for designing and implementing plans ...what plans, RBMPs, or Flood Risk Management Plans	This refers to Flood Risk management plans. Municipalities will be added to the list.
395			Proper references (book, article,...) e.g. for (Zelinka & Marvan) and (Shannon-Weaver) should be added	This will be corrected: (Zelinka and Marvan, 1961); (Shannon and Weaver, 1964); BMWP and ASPT - (Armitage et al., 1983) Armitage, P.D., Moss, D., Wright, J.F., Furse, M.T., 1983. The performance of a new biological water quality score system based on macroinvertebrates over a wide range of unpolluted running-water sites. Water Res. 17, 333–347.

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				<p>https://doi.org/10.1016/0043-1354(83)90188-4</p> <p>Shannon, C.E., Weaver, W., 1964. The Mathematical Theory of Communication, 10th ed, The mathematical theory of communication. The University of Illinois Press, Urbana.</p> <p>Zelinka, M., Marvan, P., 1961. Zur Präzisierung der biologischen Klassifikation der Reinheit fließender Gewässer. Arch. Für Hydrobiol. 389–407.</p>
396			<p>Acronyms used in the tables of the chapter (e.g. BMWP, ASPT, EPT, IPS, CEE, CYA, Chl a) should be explained, and/or be included in the list of abbreviations</p>	<p>This will be corrected:</p> <p>BMWP – Biological Monitoring Working Party is a tool for assessment of water quality using groups of macroinvertebrates (mostly families) as biological indicators;</p> <p>ASPT – Average Score per Taxa - The average sensitivity of the families of the organisms present is known as the Average Score Per Taxon and can be determined by dividing the BMWP score by the number of taxa present;</p> <p>EPT – Ephemeroptera, Plecoptera Trichoptera index;</p> <p>IPS – "Pollution Sensitivity Index" (Coste in CEMAGREF, 1982),</p> <p>CEE – "Commission for Economical Community metric" (Descy and Coste, 1991)</p> <p>CYA – Cyanobacteria</p> <p>Chl a – Chlorophyll a</p> <p>Coste in CEMAGREF (1982). Etude des méthodes biologiques quantitative d'appréciation de la qualité des eaux. Rapport Division Qualité des Eaux Lyon – Agence financière de Bassin Rhône–Méditerranée–Corse, Pierre-Bénite, 218 pp.</p> <p>Descy, J.P. and M. Coste (1991). A test method for assessing</p>

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				water quality based on diatoms. Verhandlung Internationale Vereinigung de Limnologie 24, 2112-2116.
398	12.2	443 ff	We suggest that the PoM of both RBMP will undergo major revision (see general comments)	See the response to the general comments
399		443 ff	For all measures, the competent water authority is MARD (see general comments to the structure)	See the response to the general comments
400		443 ff	In every measure, as one other relevant authority, WA is recognised. (see general comments to the structure)	See the response to the general comments
401		443 ff	In many measures, as a project investor the local municipality is mentioned, but not recognised as competent or other relevant authority. (see general comments to the structure)	Municipalities have been included as main authorities where relevant
402		443 ff	For competent and relevant authorities, we suggest to introduce notions like: Ministry responsible for waste water management, or Ministry responsible for water management or for spatial planning etc.	The term competent water authority is used simply to highlight the main authority for water management responsible for all decisions. ~it would be more confusing to change this to different 'notions'.
403		443 ff	Description of measure throughout the PoM tables in this field, potential impacts are described, rather than the measure itself. It is therefore suggested to change the field name to „impact of measure“	Not agreed. This is clearer with a description of the measure, particularly when supplementary measures are included
404		443 ff	The individual measures should be linked to pressures, that are the result of monitoring, for instance DB MNE 13, the key aspect/pressure: Due to natural erosion processes and anthropogenic factors the sediment and organic material are rapidly depositing in Plavsko Lake, cannot be found in the entire document and it is therefore not yet properly backed up by the	The individual measures follow the KTM. The measures correspond in both draft RBMPs to the pressures outlined in Table 3.36 (surface waters) and 3.56 (groundwaters)

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			RBMP. This link could perhaps be included in the description (better: impact) field.	
405		443 ff	Individual measures need to be double-checked for potential synergies, for instance: DB MNE 07 and DB MNE 11 look very similar and being in a very nearby location	Agreed, although these are within two different municipalities. It would possibly be best to have one common measure for grouped municipalities in each river basin
479		443	AB MNE 01 from the description, it is not clear what the measure is: 2 MEURO for what: construction of the sewer pipes? A wastewater treatment plant? Impermeable septic tanks?	The measure is related to construction of sewer pipes with wastewater treatment or for impermeable septic tanks depending on the solution for which stakeholders find best.
480		443	AB MNE 01 competent authority questionable, municipality not included	Competent authority is MSDT. The Ulcinj municipality will be added
481		444	AB MNE 02 ...title does not refer to a geographic area	This title refers to whole lowland area in Ulcinj hinterland. Text will be amended to reflect this.
482		444	AB MNE 02 ...chemical compounds enter this SWB either by surface or by ground water ... it is not clear how chemical compounds enter the SWB by groundwater	Although the chemical compounds enter into ground water from the surface, the compounds can return into SWB through many springs (surface and underwater) within this area.
483		444	AB MNE 02 ...what exactly is the measure? From the description it is not clear, only in Other remarks there is a comment on some kind of ID. Therefore, the investment costs remain unexplained. For a similar measure at Skadar Lake (SL MNE 15), it shows that there are no investment or maintenance cost. Here it says 30,000 EURO. What is the difference of the measure?	The measure is related to regulation on usage of chemical in agriculture and implementation of register of those who buy and use chemicals for treatment of soil and plants. As a first step we have in mind the controlling of usage of those chemicals. The investment cost reflects the setup of the administrative scheme at the municipal level. In SL MNE 15 the similar costs are to be borne by the user. We will amend the measure to reflect the SL measure for maintenance costs.
484		445	AB MNE 03 The measure is identical to DB MNE 07, and, DB MNE 11, and DB MNE 25, and DB MNE 36 is it necessary to do	Refer to response to comment 413

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			the study several times? Illegal fishing is main cause of low number of fish... Is that proofed to be the main pressure? Is there adequate biological monitoring in this WB?	
485		447	AB MNE 04 The location of the measure is in Bar, but investor is Cetinje municipality.	Cetinje municipality use the water of the Orahovštica river for their water supply while some part of this SWB is also placed in Bar municipality. The location will be changed by adding Cetinje as a location of this measure.
486		447	AB MNE 04 Is it the only source of water supply Cetinje is utilizing? Is the measure to find another water source in Cetinje? Or in Bar for Cetinje? The definition of the measure is tricky. For instance, if we want to improve the Bolje Sestre spring, we will improve it by finding another source of water for regional supply?	In our opinion, the best situation would be for Cetinje municipality to diversify their water supply sources. Whether it would be in Cetinje or in Bar municipality is far above our project framework. This measure is not related to improvement of the water source, it is about improving the SWB by reducing of water extraction, especially during the summer months.
487		447	AB MNE 04 this pumping station pumps water almost 500 m	500 m in altitude, from sourcing region of Orahovštica river to Cetinje which is placed at more than 600m of altitude.
488		448	AB MNE 05 water protection zones are required for all springs used for water supply, by Law on water. Why splitting that for single springs, but rather making one general measure, by compiling a list of all supply sources indicating the status of protection zones, which defines then the need of zoning.	This is exactly what we have suggested, that is why it is highly important to define the whole catchment area of this water supply zone.
489		448	AB MNE 05: the source shall be protected in this measure, but in AB MNE 04, we want to close it down and finding an alternative source of water?	This was not mentioned. The aim is to diversify the water supply in order to have more water in this SWB during summer months when this river (Oarhovštica), due to water extraction, almost dries out.

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490		449	AB MNE 06 What is the measure, removing the barrier? Forbidding irrigation? What is the alternative for irrigation? Is there a responsibility of inspection? If so, why are they not recognised as relevant authority?	The irrigation system has not functional for a few decades so there is no need for barriers which are constructed with aim to fill the irrigation system with water.
491		449	AB MNE 06 Crmnicka Rijeka is not a river of state importance; the responsibility is with Bar municipality, they should be considered competent authority	By MNE law all rivers are under the authority of the Ministry of Agriculture and Rural Development (MARD) and all measures on any river have to be carried out under the authority and permission of this Ministry. The Bar municipality will be included as competent authority
492		449	AB MNE 06 Are 100,000 EURO realistic for the removal of those stones?	By our opinion yes since it is not only removal of “stones” or concrete construction, there is also need for restoration of river banks and river bottom.
493		450	AB MNE 07 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this case WA and the Bar municipality should be recognised competent authority.	We completely agree with this comment.
494		450	AB MNE 07 Water efficiency: what does it mean exactly?	Refer to response to comment 448
496		451	AB MNE 08 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this case WA and the Herceg Novi municipality should be recognised	We completely agree with this comment.

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			competent authority.	
497		451	AB MNE 08 Water efficiency: what does it mean exactly?	Refer to response to comment 448
498		452	AB MNE 09 In this case WA should be recognised competent authority. Among other relevant authorities, Herceg Novi municipality should be recognised	Accepted
499		453	AB MNE 10 Is renaturation the measure? Is the local situation sufficiently analysed for such a measure? Interventions for 2.5M are vague.	Yes it is since putting of river into concrete channel causes a change in the WB status. This situation has not been analysed in detail since the frame of our project does not include such study. We recognise the reason why this river is classed as HMWB and suggest the measure to improve the WB status. 2.5M is a broad estimation of the cost of this intervention.
502		454	AB MNE 11 Competent authority: Podgorica municipality and MSDT should be recognised	Yes, it will be added
503		456	AB MNE 12 Abbreviation DUP not explained, and not in the list of abbreviations	DUP – Detaljni Urbanistički Plan (Detail Urban Plan). It will be added
504		456	AB MNE 12: is expected to be completed by summer 2019. Is it done by today, and what is the result? With the feasibility study completed, investment cost estimates should be available. Why is Podgorica municipality the investor? What is the role of MARD?	The results of this study are not known. This information will be updated. MSDT is the competent authority not MARD, which will be corrected.
505		457	AB MNE 13 Is this barrier recognised in the pressures on the WBs? Podgorica municipality is investor but not relevant authority? MARD?	Yes it is since it breaks riverine connectivity. The Consultant do not know what is written in contract between the private owner and the government of Montenegro. However, we believe that Podgorica municipality could be the investor for this measure. This will be checked.

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506		458	AB MNE 14 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this case WA and the Podgorica municipality should be recognised relevant authority.	We agree with this comment.
507		458	AB MNE 14 Water efficiency: what does it mean exactly?	Refer to response to comment 448
509		459	AB MNE 15: Identification of PHS in Aluminium plant waste waters There should be continuous monitoring by analysis of wastewater discharges. Why is IHMS not considered relevant authority?	IHMS does not have adequate knowledge and technical know-how for this task.
510		460	AB MNE 16: looking at the activities under „Investment costs“ (establish kadastre, chemical analysis, study) we do not see herein the effect of the measure as described before (load decrease). Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. The competent authorities with include MARD, WA and MSDT.
511		460	AB MNE 16: the measure is a basic one. The similar measures DB MNE 45 and AB MNE 27 are supplementary ones. What is the difference?	This a supplementary measure. It will be changed.
512		462	AB MNE 17 The description of measure lists a lot of facilities that have been built, but does not explain the need of the new cells listed under investment costs. Is it a basic measure? Role of MARD? Podgorica municipality should be recognised relevant authority	Livade landfill is not used only for communal waste from Podgorica but also for other musicality and therefore there is strong need for construction of new cells within. It is marked as basic measure and Podgorica municipality will be added as relevant authority.
513		463	AB MNE 18 The measure is identical to many others before, e.g.	Refer to response to comment 413

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			AB MNE 03; is it necessary to do the study several times? Illegal fishing is main cause of low number of fish... Is that proofed to be the main pressure? Is there adequate biological monitoring in this WB?	
515		464	AB MNE 19 construction of WWTP capacity of 103,000 ES is it PE?	Yes. Text will be changed.
516		464	AB MNE 19 construction works were completed; for what are the 6.7M EURO investment costs? Maintenance costs are approx. 15% of investment costs, per year. For the same measure in Podgorica, maintenance costs are about 4% of the investment costs per year. What is the difference here?	The 6.7M were the investment costs. The maintenance costs are taken from the official document. The same is true for the Podgorica investment costs.
518		466	AB MNE 20: Identification of PHS in Aluminium plant waste waters There should be continuous monitoring by analysis of wastewater discharges. Why is IHMS not considered relevant authority?	See response to comment 509
519		466	AB MNE 20 Investor: Aluminium plant???	The responsibility for this measure lies with the industry (Steel Plant) and not the State.
521		468	AB MNE 21 Improvement of communal waste management in Nikšić the measure aims at improvement of waste management not only in Niksic municipality, but it includes Savnik and Pluzine	The regional landfill in Nikšić is planned for the deposit of solid waste from Nikšić, Šavnik and Pluzine.
522		468	AB MNE 21 Role of MARD? Niksic municipality should be recognised relevant authority	Agreed.
523		468	AB MNE 21 The expected lifetime of object is 20 years. For Phase I of the object, or the entire landfill?	For the entire lifetime of the operation of the landfill.

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524		469	AB MNE 22 ...title does not refer to a geographic area	We will add "in Nikšić municipality" in order to refer to exact geographic area.
525		469	AB MNE 22 ...chemical compounds enter this SWB either by surface or by ground water ... it is not clear how chemical compounds enter the SWB by groundwater	Refer to response to comment 482
526		469	AB MNE 22 ...is it a vulnerable zone?	This has yet to be determined.
527		469	AB MNE 22 ...what exactly is the measure? From the description it is not clear, only in Other remarks there is a comment on some kind of ID. Therefore, the investment costs remain unexplained. For a similar measure at Skadar Lake (SL MNE 15), it shows that there are no investment or maintenance cost. Here it says 150,000 EURO. What is the difference of the measure?	Refer to response to comment 483
529		470	AB MNE 23Does the mine have a regular water act? In that case, the mine should have regular monitoring of discharge water quality. Are the results available? Competent authority, then is WA.	Unknown. This is under the water inspection jurisdiction. . We will determine and update competent authority if required.
530		471	AB MNE 24 Gračanica is a river under responsibility of the municipality, therefore Nikšić municipality should be a competent authority	MARD is in charge for all rivers in MNE but we will add Nikšić municipality as other relevant authority.
531		472	AB MNE 25 How has the ecological flow been assessed, are there results from monitoring? Are the investment costs only for the recalculation? How will the calculation change the status of WB?	This accumulation was formed for the needs of Steel plant and in that time, there was no regulation for ecological flow. Nowadays the regulation mechanism of water discharge from this dam is not functional and the cost is mainly related to the repairing of this mechanism. Calculation of the minimum

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				ecological flow is the first step toward improvement of this HMWB.
532		473	AB MNE 26 The investment costs of 2M EURO seem to be very high for cleaning and a not clearly specified remediation activity (what is the length of riverbed affected, for instance?).	This is by our opinion the lower boundary for this investment since almost all watercourse Gračanica through the Nikšić field is heavily destructed and requires remediation (not only cleaning but also some works its banks).
533		473	AB MNE 26 Gračanica is a river under responsibility of the municipality, therefore Niksic municipality should be a competent authority	Refer to response to comment 530
534		474	AB MNE 27: looking at the activities under „Investment costs“ (establish kadastre, chemical analysis, study) we do not see herein the effect of the measure as described before (load decrease). Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. The competent authorities with include MARD, WA and MSDT.
535		475	AB MNE 28 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this case WA and the Niksic municipality should be recognised relevant authority.	We completely agree with this comment
536		475	AB MNE 28 Water efficiency: what does it mean exactly?	Refer to response to comment 448
538		477	AB MNE 29 The measure is identical to many others before, e.g. AB MNE 03 or AB MNE 18; is it necessary to do the study several times? Illegal fishing is main cause of low number of fish... Is that proofed to be the main pressure? Is there adequate	Refer to response to comment 413

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			biological monitoring in this WB?	
539		478	AB MNE 30 Maintenance costs are between 10 and 20% of investment costs, per year. For the same measure in Podgorica, maintenance costs are about 4% of the investment costs per year. What is the difference here? Competent authority: Danilovgrad municipality and MSDT should be recognised.	The costs for this facility are according to official information. Danilovgrad municipality and MSDT should will be recognised.
540		480	AB MNE 31 ...chemical compounds enter this SWB either by surface or by ground water ... it is not clear how chemical compounds enter the SWB by groundwater	Refer to response to comment 482
541		480	AB MNE 31 ...is it a vulnerable zone?	This has yet to be determined.
542		480	AB MNE 31 ...what exactly is the measure? From the description it is not clear, only in Other remarks there is a comment on some kind of ID. Therefore, the investment costs remain unexplained. For a similar measure at Skadar Lake (SL MNE 15), it shows that there are no investment or maintenance cost. Here it says 200,000 EURO. What is the difference of the measure?	Refer to response to comment 483
543		481	AB MNE 32 Are investment cost of 50,000 EURO realistic for design and construction? Competent authority WA?	It is difficult to judge this correctly without an initial study. The figure is provided as an estimate only. WA will be added as a competent authority
544		482	AB MNE 33 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this	We agree with this comment.

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			case WA and the Podgorica municipality should be recognised relevant authority.	
545		482	AB MNE 33 Water efficiency: what does it mean exactly?	Refer to response to comment 448
547			AB MNE 34: Identification of PHS in Aluminium plant waste waters There should be continuous monitoring by analysis of wastewater discharges. Why is IHMS not considered relevant authority?	Refer to response to comment 509
548		485	AB MNE 35 is this being a basic measure, or a supplementary? Competent authority for communal solid waste is MARD? Danilovgrad municipality not recognised as relevant authority	See response to comment 430. MSDT and Danilovgrad municipality will be recognised as relevant authorities.
549		486	AB MNE 36 Is MARD going to invest into that measure of improving the fish production of a company?	MARD will be removed.
550		487	AB MNE 37 What exactly is the measure, removing the concrete, and then? Podgorica municipality should also be considered competent authority	Removal of structure followed by river rehabilitation. Podgorica municipality will be recognised as competent authority
551		488	AB MNE 38 no improvements to be expected, since it is only a feasibility study. Therefore, the title is misleading. WA should be recognised competent authority	Agreed. The title will be changed and WA added as competent authority in place of MARD.
552		489	AB MNE 39 Golubovci Town is the translation appropriate? In measure SL MNE 10, it is translated Municipality within the Capital - Golubovci	This will be corrected.
553		489	AB MNE 39 The title suggest improvement, but the measure is only a feasibility study for 30,000 EURO. The study itself will not improve the treatment of wastewater.	Agreed. The title will be changed

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555		489	AB MNE 39 Shall the study include only the five settlements mentioned?	These settlements have been identified by GIZ as the main settlements that required waste water improvements. The feasibility study can be extended to further settlements according to the agglomerations.
556		489	AB MNE 39 ecological remediation solutions... what does that mean?	Reed beds
557		490	AB MNE 40 Title should be Study on the Prevention and control the adverse impacts of invasive alien species and introduced diseases and the geographic area should be mentioned in the title	Agreed
558		491	AB MNE 41 ...chemical compounds enter this SWB either by surface or by ground water ... it is not clear how chemical compounds enter the SWB by groundwater	Refer to response to comment 482
559		491	AB MNE 41 ...is it a vulnerable zone?	This has yet to be determined.
560		491	AB MNE 41 ...what exactly is the measure? From the description it is not clear, only in Other remarks there is a comment on some kind of ID. Therefore, the investment costs remain unexplained. For a similar measure at Skadar Lake (SL MNE 15), it shows that there are no investment or maintenance cost. Here it says 20,000 EURO. What is the difference of the measure?	Refer to response to comment 483
561		492	AB MNE 42 What is the measure, removing the barrier, or concrete? Why is inspection not recognised as relevant authority?	Both

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562		492	AB MNE 42 Sitnica is not a river of state importance; the responsibility is with Podgorica municipality, they should be considered competent authority	Agreed
563		492	AB MNE 42 Are 50,000 EURO realistic for the removal of those stones? Cost estimate in measure AB MNE 06 is 100,000 EURO, what is the difference?	See response to comment 543. The difference in costs is proportional to the length of the river requiring restoration.
564		493	AB MNE 43 Is the measure reducing pollution, or is it groundwater monitoring? For what period shall the groundwater monitoring be done? What will be the expected effect on fertilizer and agrochemicals usage? What exactly is the investment of 100,000 EURO for?	This measure is for investigative groundwater monitoring and determination of the residual chemical loading to the groundwater.
565		494	AB MNE 44 The WA does not have any information about any barrier near the Nijagara. The waterfall itself is natural, to our knowledge. If the waterfall is natural, and the fish can't climb, then they never did. What exactly are the 300,000 EURO for?	The barrier is natural. However, the fish pass will allow for improved ecosystem connectivity regarding fish spawning.
566		495	AB MNE 45 a water cadastre should be developed not only for one municipality, or one water body, but for entire basins, and the country as a whole. There is no benefit in such isolated approach. It is prescribed in Law on water, and its by-law dealing with water cadastre that it is the responsibility of WA. In this case WA and the Tuzi municipality should be recognised relevant authority.	We agree with this comment.
567		495	AB MNE 45 Water efficiency: what does it mean exactly?	See response to comment 448
568		496	AB MNE 46 What is the measure? Do the investment cost include both, the sewer network and the treatment plant? Is	

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			there a design already? Are the septic tanks described already there?	
569		496	AB MNE 46 Maintenance costs are 10 of investment costs, per year. For the same measure in Podgorica, or Cetinje (SL MNE 01) maintenance costs are about 4% of the investment costs per year. What is the difference here? Competent authority: Danilovgrad municipality and MSDT should be recognised.	Refer to response to comment 539
570		497	AB MNE 47 Title should be Study on the Prevention and control the adverse impacts of invasive alien species and introduced diseases and the geographic area should be mentioned in the title	Agreed
571		497	AB MNE 47 Is this measure relevant for Skadar Lake? The investor is NP Skadar Lake, why is it then not in the list of measures for the Skadar sub-basin?	Only the measures proposed by the GIZ are in the list from SL MNE onwards. This is relevant also for Skadar Lake.
572		498	AB MNE 48 The measure is identical to many others before, e.g. AB MNE 03 or AB MNE 18, or AB MNE 29; is it necessary to do the study several times? Illegal fishing is main cause of low number of fish... Is that proofed to be the main pressure? Is there adequate biological monitoring in this WB?	Refer to response to comment 413
573			AB MNE 48 Is this measure relevant for Skadar Lake? The investor is Ulcinj municipality, the location is Tuzi, and NP Skadar Lake is mentioned in the description but not recognised as investor or authority; why is it not in the list of measures for the Skadar sub-basin?	Only the measures proposed by the GIZ are in the list from SL MNE onwards. This is relevant also for Skadar Lake. Tuzi and Ulcinj municipalities are involved, Tuzi will be added to the investor list, Ulcinj to the municipality and both will be added to the competent authorities.
574		501	SL MNE 01 For the construction of a WWTP in Cetinje, here we have two competent authorities, which is not the case for the	Please refer all questions to the GIZ since SL MNE 01 to SL MNE 16 are produced by the GIZ an included without comment. The

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			same measures before.	Consultant cannot comment on these measures.
575		503	SL MNE 02 there should be maintenance costs being considered.	Refer to response to comment 574
576		503	SL MNE 02 What is the role of MARD in the construction of a sewer network?	Refer to response to comment 574
577		505	SL MNE 03 Not included in measure SL MNE 01, because it is located in the same municipality ?	Refer to response to comment 574
578		507	SL MNE 04 Why for Tuzi only?	Refer to response to comment 574
579		508 - 516	SL MNE 5 ... SL MNE 9 The IDs of the measures are not identical with those of the table on page 500, where it is written SL MNE 05 ... SL MNE 09	Refer to response to comment 574
580		508	SL MNE 5 Initiative is already completed, the study is completed. What is the measure, and what are the investment costs for?	Refer to response to comment 574
581		510	SL MNE 6 The measure is not clear. What exactly shall be built?	Refer to response to comment 574
582		512	SL MNE 7 Project investor: Municipality of Bar status? Timeline? What does the question mark and timeline mean? Is a feasibility study a basic measure?	Refer to response to comment 574
583		514	SL MNE 8 Title and description should be: Study on the Rehabilitation of the Wastewater Treatment Plant, Virpazar	Refer to response to comment 574
584		516	SL MNE 9 Is a feasibility study a basic measure?	Refer to response to comment 574
585		516	SL MNE 9 The subject area is mostly covered by? the Spatial Plan	Refer to response to comment 574

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586		518	SL MNE 10 This measure should be subject to discussion.	Refer to response to comment 574
587		518	SL MNE 10 Municipality within the Capital – Golubovci - is the translation appropriate? In measure AB MNE 39 , it is translated Golubovci Town, please cross-check	Refer to response to comment 574
588		520	SL MNE 11 What type of measure according to WFD is it?	Refer to response to comment 574
589		520	SL MNE 11 Why is this measure only relative for Skadar Sub-Basin. Even the title doesn't mention the geographic area (Skadar Sub-Basin).	Refer to response to comment 574
590		522	SL MNE 12 Why is the designation of Natura 2000 sites limited to Skadar Lake area? Shouldn't it be considered for the whole country? It is fine here, if this sub-chapter on Skadar Lake is separated from the Adriatic.	Refer to response to comment 574
591		522	SL MNE 12 Ulcinji	Refer to response to comment 574
592		523	SL MNE 12 The process is expected to be completed by December 2019. - Will this be completed?	Refer to response to comment 574
593		524	SL MNE 13 WA and MH or Institute of Public Health (IPH), should be recognized here as a competent authority	Refer to response to comment 574
594		524	SL MNE 13 Project investor: Shouldn't IPA, or EU be recognised as well? Like GIZ in the previous measure	Refer to response to comment 574
595		526	SL MNE 14 Does this measure focus on water quality, or on the water balance (quantity) at Bolje Sestre? It is not clear from the description. WA should be competent authority	Refer to response to comment 574

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596		528	SL MNE 15 This measure is a general measure, not necessarily limited to Skadar Lake sub-basin, which is fine; it can and should be applied at once in the entire country, for both, Danube and Adriatic basin. The geographic area is not even mentioned in the measure.	Refer to response to comment 574
597		528	SL MNE 15 This measure is very fine and similar to AB MNE 02, AB MNE 22, AB MNE 31, and AB MNE 41, with the difference only, that those measures are limited to smaller areas, and associated with investment costs; whereas here, the cost shall be covered by the users, or ID owners.	Refer to response to comment 574
598		530	SL MNE 16 It's the only cost recovery measure in both documents (there is not any in the Danube RMBP). There should be more.	Refer to response to comment 574
599		530	SL MNE 16 The regulation for wastewater charges is already implemented, according to the Law on financing water management. This should be considered here.	Refer to response to comment 574
600		530 and 535 ME	SL MNE 16 „Charge“ here, is translated as „naknada“ in this measure in the MNE document; and „fee“ is translated as „tarifa“. On pages 121 and 359, the term „naknada“ is translated as „fee“. There may be confusion because of that. In practise, we are using the English word „fee“ for „naknada“ in Montenegrin, and „tarifa“ is used for „tariffs“. This dilemma of translation / use of terms should be solved, and preferably considered in a glossary (for both, the English, and the Montenegrin documents).	Refer to response to comment 574

No. ¹	Ch.	Page	Comment	Response
601		530	SL MNE 16 The concept of this measure is not clear, partly due to the language issue. The Law on financing water management is already dealing with the implementation of a wastewater charge/fee (naknada). We suggest further discussion, and bringing the measure in line with the revision of the Law on financing water management.	Refer to response to comment 574

4 Institute for Public Health (IPH)

No.	Comment	Response
1	Drafts River Basin Management Plans for the Danube and Adriatic Basin do not specify applicable legal acts in the introductory part of the description of the Drinking Water Quality Directive	For all EU Directives only a summary of the legal acts are provided (Section 1.1).
2	We believe that the document should also mention the fact that analyses of water for human consumption are carried out in laboratories that are authorized by the Ministry of Health. Supervision of the implementation of the Law on the Provision of Healthy Water for Human Use is the responsibility of sanitary inspection, which is a requirement in accordance with the Law on the Protection of the Population from Infectious Diseases.	This has been outlined in Table 2.1
3	The law defines the obligation to carry out water monitoring for human consumption and defines that the Institute of Public Health conducts monitoring of water for human use. The law also defines the obligation to inform the public about the quality of water both after the results have been obtained and in the sense of drafting annual reports.	Footnote added to Table 2.1 to include this text
4	The document states that “Monitoring is carried out by 4 national accredited laboratories in Montenegro”, but it is necessary to clearly define to what monitoring the statement relates.	This sentence has been removed since it is not required by the RBMP to provide such detail.
5	The responsible institutions for the implementation of Council Directive 98/83/EC are the Ministry of Health and the Institute of Public Health of Montenegro.	This has been added to the text

No.	Comment	Response
6	The Law on providing healthy water for human consumption defines that monitoring of water for human use is carried out by the Institute of Public Health.	This has been added to the text
7	In the main part of the document “Political and Legal Framework”, the regulation concerning the health safety of water for human consumption is not covered.	This is included in Section 2.1

5 Tuzi Municipality

No.	Comment	Response
1	<p>On 21/11/2018, the Municipal Assembly of Tuzi adopted a Resolution on the conservation of the Cijevna River with justification.</p> <p>Montenegro and the Republic of Albania are signatories to many international conventions in the field of environmental protection and management of international waters, and in July 2018 they are signatories to the Framework Agreement for the Management of International Waters, which provides, inter alia, the following:</p> <p>Article 3, item 6, states: “Damage caused by the transboundary impact” concerns any damage caused by the interference, which had or has an impact on life, property, object security, environment or water structure in the territory of the other Party or through which some of rights or interests have been infringed.</p> <p>Article 7, paragraph 5, states: the Parties shall be consulted on the granting of water permits and other water acts concerning the new objects or reconstruction of existing ones in the territory, that is the subject-matter of this Agreement, they shall apply the most advanced technology for the treatment of water discharged in water bodies of shared interest and they shall mutually respect the adopted limit values of quality standards of these water resources.</p> <p>Article 8, paragraph 1, states: The Parties shall take the necessary measures to protect water resources of shared interest from harmful effects: they shall not act unilaterally and</p>	<p>The text will be added to Section X.X for clarity.</p> <p>With respect to the effect of small hydropower plants (sHPPs) on the environment, where sHPPs have caused discontinuity to specific water bodies then the RBMP provides the designation of water bodies as ‘heavily modified’. The possible mitigation measures are outlined for all small HPPs. Section 10 provides essential measures for small HPPs in HMWBs. The decision or promotion of the suspension of construction for SHPPs can only be made based on the future results of the ecological status or ecological potential for specific water bodies.</p>

No.	Comment	Response
	<p>they shall not refrain from taking measures which may cause negative effects on water resources of transboundary impact on the territory of the other Party.</p> <p>Article 9, paragraph 4, states: shall consolidate all the planned actions that will be taken in the territory of the other party, which may affect the sustainable management of waters of the other Party, by approving the act on management of water resources, conditions of water resources management, and other relevant acts and after the building of water objects, by approving the permit for the water resources management, for the party in the territory where transboundary impact is expected to occur.</p> <p>Article 13, paragraph 1, states: The Parties must take all proper measures to prevent considerable damage to the other party, when they use water resources of shared interest in their territories, after having agreed in advance with the other party of having received the approval by the competent authority.</p> <p>Based on the above and the information we have, construction of several hydropower plants on Cijevna have started in the Republic of Albania, which, in our opinion, will certainly have a negative impact on the natural habitat of the river Cijevna in the territory of Montenegro, especially in terms of water level, water quality, environmental impact and all the negative impacts associated with such constructions.</p> <p>Aware of the fact that the project of construction of hydropower plants by some parameters has economic justification, we must emphasize that environmental protection is the primary goal of all of us, therefore, it is necessary to react in a timely manner to suspend the construction work as well as</p>	

No.	Comment	Response
	<p>further activities that would harm the environment and the negative impacts mentioned above.</p>	
2	<p>The Cijevna River Canyon was proclaimed the MONUMENT OF NATURE 2017. The decree defines three protection zones: protection zone I, protection zone II and protection zone III. Protection Zone I imply a strict protection regime that prohibits the use of natural resources and the construction of facilities.</p> <p>in our opinion, the construction of the section of the road Gusinje-Dinosa has a very significant impact on the environment, i.e. the ecosystem of the Cijevna River Canyon, because its entire length extends across the protection zone I.</p> <p>We believe that this should be included in the Water Management Plan for the reason that the permit for construction of such a facility in the protected area could be reviewed and, if necessary, the protected area revision may be initiated.</p>	<p>The Cijevna River Canyon has been included in the register of protected areas (Table 5.3) and in the proposed EMERALD network Figure 5.5. The surface water body (SWB No. 34) of the Cijevna, which cover 22km is designated to be possibly at risk (Table 5.5). The road section of the road Gusinje-Dinos has been indicated as a diffuse source pressure on the groundwater in Table 4.57. The construction is not regarded as a direct priority and has not been included in the programme of measures. Further monitoring, when initiated by IHMS, will clarify the potential pressures on the waterbody and the subsequent remedial measures required, if any.</p>
3	<p>The highest concentration of endemic, relict and ornamental plant species are found in the sites of Sumica and Lemaja and especially Smedec, which is said to be one of the most representative sites of Europe.</p> <p>The River Cijevna Canyon is rich in flora and fauna and is home to rare plant communities of Adianto-Pinguiculetumhirti florae (site Sumice). This plant community grows is a rock right next to the road that is in danger of being damaged if this part of the road is widened.</p> <p>We hope that the permit to perform works in protected areas</p>	<p>The proposed solution to the problem is not in the scope of the RBMP but does however lie in the area of responsibility of the Warer Administration.</p>

No.	Comment	Response
	<p>provides guidance on how to deal with this case and that the contractor is aware of this fact and will do the job so as not to damage the locality in which this very important plant community grows, by which this locality is known and makes the canyon special.</p> <p>We believe that the solution to this problem would be to plan this section as a one-way, one-lane road with alternate movement with special signaling.</p>	
4	<p>One part of the River Cijevna Canyon is placed under protection and is listed in the Central register of protected areas and areas under preventive protection as a MONUMENT OF NATURE “River Cijevna Canyon “under ordinal number 64. The Central Register of Protected Areas and Areas under Preventive Protection is managed by the Agency for Nature and Environmental Protection.</p>	<p>The management of the Central Register of Protected Areas and Areas under Preventive Protection is included in Section 2.1.1</p>
5	<p>The River Cijevna is a group of waters of national importance. In this regard, the local government does not have the legal authority to adopt some specific acts relating to these waters. However, when it comes to protection, the first address to report irregularities is the local government, which in these cases has no legal authority to initiate any proceedings against the perpetrators.</p> <p>Namely, the municipality of Tuzi-Secretariat for Agriculture and Rural Development was designated as the manager of the Monument of Nature “River Cijevna Canyon “, until the establishment of the company to be entrusted with the</p>	<p>The comment is noted but the RBMP only provides summary information on the role ministries and structures under the ministries (Section 2.1.1). The definition of state institutions and local government in the process of water and environmental protection goes beyond the scope of the RBMP.</p>

No.	Comment	Response
	<p>management.</p> <p>The manager has, among other things, an obligation, in particular, to adopt an annual management program. The Rulebook on Internal Organization and Systematisation provides for the Office which will manage this Monument of Nature, therefore any intervention in the field should be carried out with the assistance of the competent municipal service.</p> <p>In this regard, we believe that the role of state institutions and local government in the process should be precisely defined. We believe that local governments are responsible because such objects are a guarantee for community development and that for these reasons the local governments will preserve their goods.</p> <p>We are of the opinion that the management of such objects should be given to the local government, with the supervision of the profession by state institutions.</p>	

6 Regional Water Supply Montenegrin Coast

No.	Comment	Response
1	<p>Sand and gravel exploitation</p> <p>The source “Bolje Sestre” is a karst source for which, in view of the specifics, special protection regimes apply, which need special attention with regard to the configuration of the terrain. In the Decision on sanitary protection zones for the Bolje Sestre spring issued by the Water Administration (No. 060-327 / 08-02014-249 of 12/12/2008) , it is especially emphasized that in zone II, sand and gravel from the alluvium of Morača river and from glacial-fluvial sediments of Grbavac on the course from Lekic to Vukovac bridge, except for the purpose of river flow regulation.</p> <p>However, uncontrolled exploitation of sand and gravel has been recorded many times in this area, which has been regularly reported by the competent authorities by the regional water supply company, because this action may affect the quantitative and qualitative characteristics of the groundwater streams of the area concerned, and therefore the source Bolje Sestre. That is why we emphasize that this issue needs to be given particular importance in the management plans in question and further elaborate the possible consequences of the continuation of uncontrolled (illegal) exploitation at the source, as well as the possible consequences of the works on the project of regulation of the Moraca River flow in the subject area.</p>	<p>The Government of Montenegro adopted an Action Plan for the Suppression of Illegal Exploitation of River Sediments from the 2019 - 2021 Watercourse, which will achieve more efficient monitoring of illegal exploitation activities, ensure continuous monitoring and implement criminal measures policies in sanctioning offenders. The planned measures and activities through the Action Plan elaborate the set operational objective, define activities for the implementation of key measures, their carriers, dynamics, as well as indicators of results that will monitor the degree of their realization.</p> <p>The baseline study for the Implementation of a Third Water Protection Zone “Bolje Sestre”is necessary to define the catchment area of the natural reservoir and identify the possible impacts to the water quality. This is included as a measure in Section 10 (ID SL MNE 13).</p> <p>Improving longitudinal continuity on Morača_5 WB is also suggested as a priority basic measure which would address and alleviate further problems of uncontrolled exploitation of sand and gravel.</p>
2	<p>WWTP Golubovci</p> <p>According to the Spatial Plan of the City of Podgorica by 2025,</p>	<p>A feasibility study on improving waste water treatment in municipality within the Capital – Golubovci is proposed in the</p>

No.	Comment	Response
	<p>the WWTP is planned to be constructed in Golubovci, with a capacity of up to 12,000 PE. The plant is located upstream of the Bolje Sestre spring and there is a possibility that, due to the cessation of the plant's operation during exploitation, the discharge of water to the accidental discharge of the unprocessed faecal wastewater from this facility affects the waters of the Bolje Sestre spring. In this sense, this aspect also needs to be further elaborated with the RBMP.</p>	<p>programme of measures (IDAB MNE 39).</p>
3	<p>Bar - Boljare Highway</p> <p>Bar-Boljare highway is planned in the road network of Montenegro. According to Spatial Plan of Pogdorica, within the boundaries of the road corridor, three sections with a total length of about 164 km and a width of 2 km are defined. Parts of section I (11 settlements) and section II (8 settlements) pass through the territory of the capital city Podgorica. Section I (observed by cadastre municipalities) covers the following settlements: Djurmani, Mala Gorana, Tomici, Gluhi Do, Bonji Brceli, Sotonici, Orahovo, Virpazar, Braceni and Krusevica (Municipality Bar):- Vranjina, Bistrice, Ponari, VUKOVICI, Lekici, Gornji Kokoti, Farmaci, Beri, Tolosi, Velje Brdo and Rogami (the capital city Podgorica).</p> <p>It is necessary to examine the impact of the future highway on the Bolje Sestre source, given that there is a possibility that the planned highway will pass through the narrow or wide sanitary protection zone of the Bolje Sestre source.</p>	<p>Examination of the impact of the future highway on the Bolje Sestre source would be covered by an Environmental Impact Assessment.</p> <p>With respect to the sanitary protection zone, a baseline study for the Implementation of a third water protection zone “Bolje Sestre” is included in the programme of measures (ID SL MNE13). The baseline study is necessary to define the catchment area of the natural reservoir and identify the possible impacts to the water quality.</p>

7 World Wildlife Foundation (WWF)

No.	Comment	Response
1	<p>In the Adriatic Basin Management Plan, Chapter 4 Protected areas require the recognition of the lower course of the Zeta River as a protected area. The Government of Montenegro has decided to declare the lower course of the Zeta River a nature park in December 2019</p>	<p>Zeta (lower stretches) Nature Park added to the register of protected areas in Table 5.3</p>
2	<p>In the River Basin Management Plans for Adriatic and Danube basins in Table 8.1 <i>Proposed environmental objectives, actions and indicators for the Adriatic/Danube River Basin</i> environmental objective states <i>“To promote the sustainable use of water resources, their fair distribution among users, maximizing economic benefits in respect of environmental conditions and sustainable management principles”</i> and activity proposes <i>“Sustainable small-scale hydropower production”</i></p> <p>In order to prevent further devastation of the Montenegrin rivers, the activity <i>“Sustainable small-scale hydropower production”</i> must be excluded from the plans.</p> <p><u>Explanation:</u></p> <p>For many years, we have witnessed unsustainable planning and uncontrolled construction of small hydropower plants in Montenegro, which has an extremely large negative impact on</p>	<p>This action has been removed from Table 9.1</p>

No.	Comment	Response
	<p>both nature and citizens while contributing negligibly to electricity production. Specifically, in 2018, sHPP produced only 4.3 GWh of electricity in Montenegro, which represents a 0.1% share in total production. Not only is the negligible electricity produced in small hydropower plants but also due to the negative impact on nature, diversion of rivers and construction of ancillary infrastructure contributes to the increase of greenhouse gas emissions, reduce the ability of freshwater systems to adapt to climate change, destroy or fragment habitats and adversely affect many species, including endemic ones. Also, the cumulative impact of small hydropower plants on the wildlife in one river ecosystem is extremely high, since in some cases 90% of the river flow is completely separated and diverted into pipes. Under such conditions, the survival of the flora and fauna cannot be expected and the river itself loses its environmental and ecosystem value completely. Because of all this, the common belief that hydropower is green energy does not stand, and sHPP are economically unprofitable and cause disproportionate damage to nature and local communities.</p> <p>Small hydropower plants have a particularly negative impact on local communities, endangering their sources of drinking water, the potential for irrigation of agricultural land and livestock feed, the potential for the development of sustainable tourism and their overall well-being.</p> <p>Most sHPP has dams for water abstraction and each dam represents a barrier on the river and causes the water body to deteriorate. As the purpose of the Water Framework Directive is to preserve the good status of the waters, it is necessary to first</p>	

No.	Comment	Response
	<p>determine the status of the waters, in order to begin construction of any infrastructure that inevitably worsens the hydromorphological status of the rivers. Also, it has been proven from practice that there is no sustainable production of small hydropower plants because they cause significant environmental, social and economic damage.</p> <p>Considering all of the above, the construction of small hydropower plants cannot contribute to the sustainable use of water resources, equitable sharing of water resources among users, nor can it generate economic benefits. On the contrary, SHPPs create direct financial damage to the citizens of Montenegro. In Montenegro, in 2018, citizens through electricity bills paid over 4 million euros to investors in small hydropower plants, while the social benefit amounted to about 2.7 million euros. According to this, the social loss in 2018 was over 1.3 million euros.</p>	
3	<p>Instead of the proposed activity <i>“Sustainable small-scale hydropower production”</i> from Table 8.1. in both Plans in order to achieve the Objective <i>“To promote the sustainable use of water resources, their fair distribution among users, maximizing economic benefits in respect of environmental conditions and sustainable management principles”</i> and activity proposes <i>“Sustainable small-scale hydropower production”</i>, the following activities need to be defined: <i>“Improved enforcement of protection measures on water bodies that already represent protected areas”</i> and <i>“protection of rivers and other water bodies in accordance with the national legislation”</i>. The same</p>	<p>Both activities have been added to Table 9.1.</p> <p>Improved enforcement of protection measures on water bodies that already represent protected areas has been added to environmental objective 1.</p> <p>Protection of rivers and other water bodies in accordance with the national legislation has been added to environmental objective 2.</p>

No.	Comment	Response
	<p>activities need to be defined for the objective <i>“Preservation and achievement of minimal “good” ecological and chemical status for surface water bodies that have “less than good”, “poor” or “very poor” status. (rivers, lakes and highly modified water bodies).</i></p> <p><u>Explanation:</u></p> <p>The main mechanism for river protection currently in force is the Nature Protection Law. There are no formal obstacles to applying provisions of the Nature Protection Law on the categorization and zoning of protected areas to entire rivers. Theoretically speaking, this means that the Nature Protection Law provides the basis for permanent protection of rivers (if / when they deserve the status of a protected area). In accordance with the Nature Protection Law, river protection is precisely a mechanism that ensures the sustainable use of water resources, their equitable distribution among users and the maximization of economic benefits.</p> <p>Strengthening protected area management is another area where significant improvements are needed. There are problems in the management of protected rivers or parts of rivers that are protected in accordance with the regulations on nature protection. The example of the River Cijevna, the governing body has not yet been formed and there is no enforcement of protection measures in practice.</p>	

