The European Union's Programme for Montenegro

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

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Danube River Basin Plan

Annex 3: Consultations

This project is funded by The European Union

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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 Bijelo Polje on 19 December 2019 as part of a public debate on the Draft River Basin Management Plan for the Danube Basin and the Draft Strategic Environmental Impact Assessment for RBMP for Danube 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 Bijelo Polje 19/12/2019

List of participants:

Name	Institution
Damir Gutic	Water Administration
Milo Radovic	Water Administration
Irhan Tahirovic	Municipality Rozaje
Muhamed Dacic	Municipality Rozaje
Ismet Softic	Fishing-sport club ,,Sinjavac''
Omar Basic	Sport fishing association of Montenegro
Bela Casani	Project Team
Momir Paunovic	Project Team
Zoran Stevanovic	Project Team
Dusan Rakic	Project Team
Patrick Reynolds	Project Team
Maja Krivokapic	Project Team
Milan Maras	SEA Team

2 Ministry of Agriculture and Rural Development (MARD)

No.	Page	Comment	Response
1	16	According to the risk factors defined by the Floods Directive (and the Water Act) it should read: “Reducing the adverse effects of floods on human health, the environment, cultural heritage and the economy.	Corrected in the text
2	18	There should be a "household wastewater mix with industrial wastewater"	Corrected in the text
3	19	Alignment with the UWWT Directive has not just begun, but this Directive has largely been transposed (95%).	Corrected in the text
5	19	- 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 have been determined by the Decision on 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
6	19	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
7	20	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	Corrected in the text

No.	Page	Comment	Response
		Rescue.	
8	20	Amendments to the Law have been finalized and the Rulebook is: Rulebook on the Contents of the Preliminary Flood Risk Assessment and Flood Risk Management Plan (Official Gazette of Montenegro 69/15).	Corrected in the text
	20	New Plan for the Next 6-Year Cycle - General Plan for the Protection from the Harmful Effects 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) The Operational Plan is not a "successor" to the General, but a specific plan that is adopted every year.	Corrected in the text
	20	The preparation of the Preliminary Flood Risk Assessment (PFRA) is not prescribed by the Water Basis but by the Water Act. There are data in the Water Basis that can be used when designing a PFRA.	Corrected in the text
	20	It should read: "Montenegro has stated that it intends to coordinate the preparation of flood risk management plans and river basin water management plans as required by the WFD."	Corrected in the text
	22	The areas designated under Directive 91/676 / EEC (and the Water Act) are vulnerable zones, and under Directive 91/271 / EEC sensitive areas.	The text in Section 2.1 refers only to the generic contents of the EU RBMP.

No.	Page	Comment	Response
	322	See comment no. 1	Corrected in the text
	360	Given that the assignment states the development of a PFRA, the maps and plans should read: "Collaboration on flood risk management", and the subject: "Collaboration and adoption of strategic documents on flood risk management related to international river basins"	Corrected in Table 2.2
	360	The responsibility for the preparation of the Flood Risk Management Plans and all steps that precede the preparation of the Plans (preliminary assessment and maps) is in accordance with the Water Act, and the Water Directorate should be added.	Corrected in the text
	367 i 370	Correct the name of the strategic objective (Water Risks ???)	Corrected to risk management
		'Water Management Authority'. Also, 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, citing MORT, AHPWH and other institutions.	Corrected in the text

3 Water Administration (WA)

No.	Ch.	Page	Comment	Response
2		title	Plan upravljanja Dunavskim slivom ili Plan upravljanja vodnim područjem Dunavskog sliva?	Danube River Basin Management Plan (Draft) (in Montenegrin)
3		title	The period for which the RBMPs are valid needs to be indicated on the title	The decision on the validity of the RBMPs is not the responsibility of the Consultant
6	0,2	9, 34, 50	There are apparently data inconsistencies: page 9: Alipašini springs (Qmin = 2000 l/s…) page 34: Alipašini springs (Qmin = 2000 l/s, …) page 50: Alipašini Springs (Qmin = 2.5 m3/s;...)	Correct value on p. 50 changed to 2.0 m3/s
14		26	Sub-catchment limitations: the map seems to be a sketch, and it does not look realistic. Rivers do not typically spring/originate in one catchment, and then flow suddenly into another (see the areas marked by red circles). Need for clarification. References for the maps (data sources) are required.	Layer Small Sub-catchments was officially received data from the Ministry of Agriculture and Rural Development and it was used without corrections.
15		26	The map that is based on a shape file is obviously not correct. A correction is necessary before adoption.	Please specify more precisely what is not correct on the map, other than sub-basins from the point 14?
18		29	Table 2.2: the grey shading of rows is not explained (apparently it is because of being the HMWB)	This is Table 2.5. Yes, greyed out areas indicate HMWBs. These will be removed
19		32	Figure 2.3: Lake WB are mentioned in the legend, but do not show any key for it	Lakes WBs are indicated as either natural or HMWBs.
20		32	Figure 2.3: the following river sections in the map are not assigned to any surface water bodies: - between 34 and 36; - between 40 and 41;	General comment is that this is a picture, not map and it is not possible to present everything clearly and without repetition.

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			- 11 not clear (two WB? or one?); - 10 not clearly assigned - 1 not clearly assigned - between 28 and 24 - between 27 and 28 - around 23 Maybe there is more, or maybe the resolution of the image needs to be improved for better reading.	
34	2.4	36	Figure 2.4 what are the blank areas? If these are areas without groundwater, it should be included in the key, nevertheless.	Will add blank areas in legend of Fig.2.4: Aquiclude or impervious rocks.
35		36	Figure 2.4 Data provided in the figure should be presented in a table (population, Qmin)	Will insert Table with GW bodies incl. population and Qmin.
36		41	...Gvozdenovića Spring (Q = ?)	We will look for Q data. If no data to exclude spring.
37		44	... (Q = ?)	As above
38		45	...amounts to 1,555 mm...	Text will be corrected (English version)
39	2.5	59	Table 2.5: subscript sr is not defined/explained	This will be corrected - Qsr- average discharge, Qav
40		59	Table 2.5: the periods of analysis differe; some end in 2006, the last ones in 2014. Does it mean monitoring stoped in 2014? Are there no newer data available?	It is a set of data available. Some stations have been interrupted due to equipment failure. These are stations whose sequence is shorter than 2016. 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.
41		59	Table 2.5: Rivers Piva and Ibar are not included in the table. Is	The available data did not allow for an objective analysis of

No.	Ch.	Page	Comment	Response
			there no monitoring data available? Even if not available, this should be stated here.	these two rivers at the time the document was drafted. There were many breaks in the data string without filling the array properly. We believe that in the meantime, updates and new stations on these flows will provide quality data for future analysis. Additions will be made to the RBMPs
42		59	Tara river: ...srednjih = mean/average	Yes, "srednjih" means mean/average
44		60 - 62	Figures 2.19 – 2.21: The titles of figures are not clear. - „Average monthly flow" requires the indication of the period of investigation (for example: 1948-1983) - „Minimum/maximum annual flow" requires an indication of the period measured. What are the measurement intervals? Is there a continuous monitoring gauge?	Yes, these are continuous observations and measurements made by the Hydrometeorological Institute. The annual average monthly as well as the minimum and maximum annual water flow (interannual distribution) for each hydrological station (HS) are presented in Table 2.7. The same table shows the analysis period.
45		63	The accurate determination of the water balance in the Danube River Basin, which is ultimately essential to the RBMP, is highlighted as a supplementary measure in the PoMs in Section 9 to be carried out in full during the 2021-2027 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
46		63/ 64	The accurate determination of the EF measurements in all surface water bodies and downstream of water storage facilities in the Danube 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.

No.	Ch.	Page	Comment	Response
53	2.5 2.6	65	2021-2017 27 (?) Chapter 2.6 is not referenced at all	This information, which will be referenced is derived from the National Communication of Montenegro to UNFCCC.
60		68	The content of this page would nicely and logically fit under Chapter 2.3	This will be considered.
62		70	...several thousand of such water bodies… Reference?	It is clear from the number of the springs in MNE and their discharges vs. required 10 m3/d. However, one or two references could be added.
63	3.2	73	The reporting to the water information system in Europe (WISE)...	The text will be altered in the title to read, WFD reporting requirements. The definition of WISE will be placed in the text before the parenthesis.
68		76	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		82	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.
73	3.5	91	Legend: Density Inhabitants per km2	This will be altered to include the word inhabitants in the legend.
74		92	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.
88		93	Table 3.11 … Maximum Capacity of Agglomeration (PE) not	Yes, this is equal to WWTP requirements for future planning.

No.	Ch.	Page	Comment	Response
			clear; is it the capacity of wastewater facilities?	
89		96	Table 3.15 …. Berane: Finalisation in June 2019 …. is it done by today?	Yes, this was completed at the end of April 2019 when the WWTP was put into operation. The table will be changed.
90		97	Table 3.15 …. Rožaje: figures‘ accuracy is unrealistic	The figures will be deleted in table for Rozaje. New data: Design Capacity (PE) 20.000; Start Date 2020.
91		99	Table 3.16 … difficult to read, columns need to be switched; is gravel mining missing?	Gravel extraction will be added to the table. Ministry of Agriculture and Rural Development, on 04/07/2017. introduced a Moratorium on the exploitation of river beds, indefinitely. In order to continue with further activities during the Moratorium, 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.
92		100	Neither the EPA nor the Water Administration has established a pollutant cadastre. In order to form a database, it is necessary to prepare and send questionnaires to operators in order to collect data on the discharges and the quality of discharged water. It is necessary to prepare and send questionnaires to operators …. This process is already ongoing from WA. RBMP development should actually have included this.	The exact situation on what has been collected by the WA will be included.

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93		103	Table 3.18 …. the detailed figures are constructed in a way that the reader feels an accuracy which is not given	Do not agree – please provide explanation.
99		104	Incomplete key to the figure. What does the size of pie charts indicate?	A further description will be added to provide explanation.
110	3.10	128	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.
127	3.8	115	Paragraph 3: The high rates of soil erosion... What is the classification for high/medium/low rate of soil erosion?	The words 'high rates of' will be removed rather than over complicate the section with relative rates, which are expressed as categories.
128	3.9	115	Chapter 3.9 Water use and demand … the chapter does logically not fit in here. Within the DPSIR, water use and demand is a „driving force", whereas the chapters before and after are describing „pressures". Note: In this context, water use is a driving force; but water abstraction, or withdrawal is a potential pressure. Due to the inconsistent use of terms (see below), it is not exactly clear what the chapter refers to.	The title of this section has been changed to include the word 'abstraction', which along with the water demand is a pressure.
129		115	Table 3.20 Table 3.23 shows the actual water demand for … the title of the table says abstraction, not demand; within the table it says water use, not demand. What is correct?	Water use. The title of the table has been changed
130		116	Table 3.23: The title indicates that these figures are for abstraction, whereas in the text it says „...actual water demand..." What is correct? If it is abstraction (is that equal to	Water demand. The title of the table has been changed

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			use or consumption, or water supplied?), then the year or period of reference must be added. Is it for one year? Or the average per annum for several years? What is the source of data?	
131		116	Table 3.24: second column is probably water use, not demand. If the table compares water use with water availability, the title would be misleading	The second column is water availability
133		119	There are two sub-chapters 3.10.1, numbering is doubled	This will be corrected.
134		120	which will produce resulting in a further capacity of 29 MW installed Table 3.25: Annual production expected (MWh) the figures are unrealistic, is it rather GWh?	Yes, it is GWh. Text will be corrected.
135		125	Table 3.27: What are the thresholds within the analysis (impact assessment), and how have the effects been measured/estimated? When are adverse effects significant, and when are they moderate?	All definitions of effects are derived form , and are detailed in 'Guidance on the requirements for hydropower in relation to Natura 2000, European Commission (2018)'.
137	3.11	128ff	Chapter 3.11 (A) or Chapter 3.12 (D) does not really fit in here. It actually belongs rather to monitoring and evaluation (status). Only table 3.34 refers to pressures	This section provides a clarification on the actual monitoring and the physio-chemical status which indicates the pressures. This information may well be distracting in the monitoring section as it is not compliant WFD monitoring.
139		135	These data show… There are no data shown from the reference (67) given, hence the conclusion is not obvious: It sounds contradictory, if on one hand side „the negative effect of municipal discharge of urban discharges are clear", whereas in the next sentence this fact „is mirrored with phosphate	Data is provided in Table 3.33. The text will be clarified

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			pollution, (…) being derived from erosion and agriculture...“	
140	3.12	136 ff	Table 3.35 and table 3.36 would require a more precise positioning of the pressures (co-ordinates or addresses) the source of assessment is not clear, what is the baseline?	The title of both 3.35 and 3.36 will be changed to include the world ‘identified’ and a footnote will be added to explain this, i.e. identified by local knowledge, team members observations, prior reports etc. .
141	3.13	151	page number is missing Margat & van der Gun van der does not fully recognises the specificity	Will correct order in case of Gun surname
142		152	...(see List of References) … there is no list !	Complete list of references will be added as an annex
143		153	Table 3.37: population requires source and year of reference (census, year)	Reference will be added from Table 3.23
144		154	As regard the average volume… language revision required	
145		155	Ief … LTA… both not in the list of abbreviations demanded (extracted) …. Does it mean demanded OR extracted? Both at the same time seems not being possible and should not be used synonymously	Will add to list of abbreviations Ief. LTA...Use Demanded and remove Extracted
146		157	(total, autogenic and allogenic) …. the terms need to be explained in the context	Will add a footnote with explanation of the terms
147	3.14	167	dH … not in the list of abbreviations	Will add in list of abbreviations
149		169	PE needs not to be explained in a footnote, if it is in the list of abbreviations already. Other acronyms used in chapter 3.14.3 need to be included in	Will add in list of abbreviations

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			the list of abbreviations: AT, IA, EPIK, PI, HG, and more	
151		169ff	the assignment of categories and weights in the procedure is not clear and would need further explanation. Is there any reference? For example, Table 3.44 Weight factor (D) - Depth to the groundwater table it is not clear, why the limits are set like this (which is the same for all tables and figures in this chapter). For further use and reference, it is essential to mention the source/author of the weights and categories, or to give a procedure at hand, how the weights and thresholds can be determined.	We will add reference from RBMP in Bosnia & Herzegovina, also method IZDAN, and Marinovic & Stevanovic EES (2019)
153		171	For each of the parameter … ...factors are in a range …	Not clear. There is a sentence that factors are in range 1-10
154		171	The acronym SODA consists of the following parameters….(Footnote 105): The conference paper by Stevanovic et al. (2015) does not refer to the SODA acronym. A valid reference should be added.	Will replace reference with RBMPs from Bosnia & Herzegovina
155		176	Table 3.45 header: Typical TF: TF is not explained	Will replace TF by „Typical weight factor“
156		177	iU not explained, is it intrinsic vulnerability? After creating a conceptual model and calibrating the results …. Where is the conceptual model, and against which data is it calibrated?	Will explain iU and add in List of abbrev. Change sentence with conceptual model...change to only „calculations of factors“.
157		178	Table 3.74…is partly repeating the content of table 3.46, which is therefore redundant; by the definition of classes with unequal ranges (for example 50-60, then 60-80), it is very likely, that the result is biased. The definition of classes requires explanation	Will adapt names of classes in table 3.47 and also 3.52 as per table 3.46. To provide explanation of classes, use references and accept the fact that we partly did bias corrected ranges, „expert's opinion“. References will be provided on the issue

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				(categorization).
158		183	Table 3.50… It is very difficult to understand this section. First, a linear function is introduced for the calculation of a radius as a function of population equivalent r = k·PE. The radius is then used to draw circles (areas) representing the PE over a groundwater basin; area is not a linear but quadratic function of the radius (F = π·r2), that‘s why the procedure presented here looks confusing.	We will provide an explanation to clarify
159		184	Chapter 3.14.6: Difficult to understand the risk concept. Can I read it like this: vulnerability x hazard = risk ?	Yes, that's correct. We will include such equation in an adequate place
160		185	...vulnerability degree. Is degree = class (in the table heading)?	Yes, exactly. If need to be clear, we will change „degree“ in text with „classes“
161		186	Table 3.53: Similar to the above mentioned comment (p169): the definition of classes is not obvious, and no reference is given	We will clarify and provide more references
162		189 & 192	Figure 3.23 & 3.25: The size of the biggest 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	These two legends will be adapted
163	4.1	198	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.
167		201	...completed during before … during OR before?	During. The text will be corrected.
168		201 ff	Table 4.2 is listing springs and assigns them to protection zones. The descriptor of the table could be improved. A	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

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			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 m3 per day, or that serve more than 50 people?	have discharge more than 10 m3/day except of periodical springs where Qmin=0 m3/s.
169		201 ff	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		201	Table 4.2: Are rural springs included?	Just some of the more important ones, not all is possible!
171		201 ff	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.
174		204	Sensitive areas in the Adriatic basin are…. how are they defined? Monitoring? In the Danube basin there are no such areas?	Reference to the decision for determination of sensitive areas will be provided. All of the Danube river basin is classified as a sensitive area. This will be made clear in the text.
175	4.3	203	The main recreational use of water in the Danube River Basin is rafting. However, there are currently no water bodies in the Danube River Basin that have been classified for bathing or recreational status. This aspect probably needs to be addressed in more detail, e.g. what needs to be done to define sites used for swimming and recreation.	This issue for the identification of bathing/recreational areas for inland waters will be tacked in the new water management project.

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176	4.4	204	Nutrient Sensitive Areas (MNE) - This chapter discusses the Nitrate directive and does not address vulnerable areas but sensitive areas. Later, whether due to translation or error, the terms vulnerability and sensitivity are mixed	The section describes the actions to be undertaken in designated nutrient sensitive areas (the whole of the Danube RB) in relation to the Nitrates Directive, which includes the designation of vulnerable zones. If there is a mistake in the translation it will be corrected.
178		208 ff	Table 4.3 The table starts with 2. National parks, continues with 4. Regional parks and 5. Natural monuments. Where and what are 1. and 3.?	According to the resister of protected areas, 1 is strict nature reserves and 3 , special nature reserves. These are not present in the Danube RB but are in the Adriatic. A footnote will be added to clarify their omission.
179		208 ff	Category and other information for Orjen regional park is missing.	This will be updated.
180		208 ff	What are central co-ordinates used for? It seems that the map (Figure 4.1) would support understanding	A footnote to the table will be added to indicate this.
181		210	Labelling of monuments and areas according to Table 4.3 is recommended in the map	On page 211 is Figure 4.1 Registered Protected Areas in the Danube River Basin is prepared according to the Table 4.3. Objects on the Figure have no label but it can be added, if necessary
182		211	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.
184		211	In the event of the proposed EMERALD network… this paragraph is a judgement, which would belong to chapter 7, economic analysis of measures, but not necessarily here in the description of protected areas	Disagree. It has value in this section to clarify the current situation, .i.e. in the process of adoption.

No.	Ch.	Page	Comment	Response
185		212	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		220	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.
207		230	A battery of hydrobiological and chemical methodologies … it is recommended to list the methodologies, or to give at least reference, where the „battery of“ hydrobiological and chemical methodologies can be found	This is related to the WFD – general methods and related parameters are listed in the Directive
211		234	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		239	Figure 5.1, the ID number of the monitoring stations (see table 5.3, page 234ff) should be indicated for easier identification	It is not possible to attach the id to the monitoring points and retain a clear figure..
218	5.3	243	...an optimal groundwater network... Not clear. Is it ...an optimal groundwater monitoring network...?	Yes, that's the point. To correct

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219		246	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
221		248	Table 5.8: what does it mean „old“ and „new“ borehole? Which period is new?	We will clarify – “New “ refers to boreholes drilled during 2018
222		248	Footnote 160: Number reference is for Montenegro	We will correct
230		250	Table 6.1: the result from chemical analysis for the stations in Danube basin could be presented within the table and set into comparison to the standard values	Table 6.1 only indicates location of the sites. The text below provides an assessment of the results.
238		251	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
239		251	What are candidate chemicals? Needs clarification	To be added in the text – candidate chemicals for the River Basin Specific Pollutants for the Danube River Basin in Montenegro.
240		251	What are LC-MS and GC-MS methods? Needs clarification	This will be amended in the text:: Liquid chromatography–mass spectrometry (LC-MS) Gas chromatography–mass spectrometry (GC-MS)
241		251	Splitting the content of Ecological status/potential approach and assessment into chapter 6.1.2 and Annex 1 makes reading a hassle	This was also our dilemma. Having in mind that document is intended to be used by experts, but also wide audience, we selected the approach to put technical details in Annex, i.e. not to overload the main text with details that are not relevant for wide audience.

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245		253	The confident hydomorphological assessment involves detail survey once per six years on each identified WB, applying methodology. The sentence is not clear	The text will be changed to: The hydomorphological assessment involves a detail survey once per six years on each identified WB, applying standardised methodology.
247		255	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		255	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.
253		257	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.
258		259	Like for the characterization of the pressures (chapter 3), for groundwaters the chapter is much more detailed than for surface waters. It is immediately detailing the risk assessment. It would be necessary here to explain what the status is, what the risks and uncertainties are, and to explain that the status cannot be determined because no monitoring has been carried out recently. Why is there no level of confidence of the status assessment for the groundwater bodies, as is the case for surface water bodies?	We will adapt text for each GWB following this recommendation. To make a reference to characterization tables which would be now annexed! There exists level of confidence for all GWBs.
259		259	...at c.4000, … what is c.?	c. is circa (around)
261		266	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	This will be corrected accordingly

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			necessary, including the transitional and coastal waters for the Adriatic, which are missing in table 3.54	
266		272	...Šavnik, Plužine and Žabljak have either negligible or no irrigation activity	That is what the available official data shows. See Agricultural census 2010, p. 406 (Žabljak), p. 409 (Plužine), p. 413 (Šavnik) and Rožaje should be at 2.4 instead NA (p. 411)
267		272	Drop (or drip) irrigation methods	This will be corrected
268		273	Footnote 168: Support to water resources management in the Drina River Basin: Montenegro – IWRM study and plan – background paper -volume 1 – Main report- 2016 This is not a proper reference (Who is the author? Who published?, Where?)	The reference is to the document titled „Montenegro – IWRM study and plan –background paper -volume 1 – Main report“ by Cowi under the project financed by the World Bank. The reference will be updated
269		273	Table 7.3 Daily animal water use Reference?	The data type was taken from the same study done in Albania recently for the World Bank/Sida (2018-19)
270		276	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)
272		276	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		276	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	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.

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			be discussed in the text as well.	
274		277	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
275		277	...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... 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	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. Clarification will be added in the text.
276		278	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.
279		279	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.
280		280	Table 7.12 is using the population census data of 2011 (see table 7.11), and compares it to water consumption in 2014. That is incorrect	Census is a population survey carried out every 10 years. The latest one in Montenegro dates back to 2011.
281		280	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.

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282		280	average NRW is 58%: according to which reference? What is the tendency over the last years (decade?)	The reference for it was the annual report on water use in Montenegro from 2016 (the latest available one at the time of assessment)
283		281	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 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	The variation comes from the differences in the NRW across municipalities.
284	7.2	281	Sub-chapter needs updating	This will be updated
285		281	EPCG: not in list of abbreviations	This will be added
286		282	...the existing power plants... For the TPP Pljevlja: are there any figures about water sources and consumption for cooling, water losses due to cooling; or temperature changes of water in the river/reservoir after the cooling process?	There are no such data available.
287		283	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
288		283	The Consultant It has been assumed there … What is the basis of that assumption? Reference needed	It is a simplifying assumption. There are no available data about water losses from fish farming, anyway.
289		283	There are concerns from excessive nutrients entering … Reference!	There is no reference since only a concern is expressed. However, the sentence will be deleted to avoid misguidance.

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290		283	All Ffish farms in the DRB are mostly …	Will be corrected
291		284	Sub-chapter Fish farming needs updating; double check with Directorate for fishing in MARD	MARD contacted by our fisheries consultant for updating
292		284	Table 7.15: column 1, Name of farm; What is the difference between names labelled (owner), or not? Are others not owner?	They are. The table will be corrected – (owner) will be deleted.
293		285	A summary…. This needs to be a new section; it cannot go under the sub-chapter 7.3.2 Fish farming	New subchapter will be created.
294		286	Figure 7.1 The Structure of water use (m3/year) … there are no m3/year but only % in the figure	m3/year will be deleted
295	7.4	287	Table 7.17 Supplied versus invoiced … for Žabljak: if the table shows supplied versus invoiced water, and the definition of NRW is NRW = (invoiced/supplied)*100 %, then NRW for Žabljak is 0.	In the main source of information (Annual report on water use in Montenegro from 2016) there is no information about losses in Zabljak municipality.
296		287	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).
297	7.5	287	7.5 The Value of Water …. this sub-chapter is focussing on the cost of water, rather than its value; for reference, e.g. FAO water reports 27 (2004): Economic valuation of water resources in agriculture	Thank you for the reference. This seems to be a semantic issue. The content of the chapter corresponds exactly to what needs to be done in order to arrive at financial and economic cost recovery rates at the end of the assessment.
298		288	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	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

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			obtained from supply companies easily	from 2016.
299		288	Table 7.18, and 7.19: The figures in the table cannot be found in the reference given (UNECE report). Correct reference is required	Correct reference was provided - Annual report on water use in Montenegro from 2016.
300		289	The service is provided at a price of 0.004€/m3. 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€ / m3 of abstracted water); This Decision and especially Law on financing water management should be much more present and explained in this chapter 7.	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.
301		290	Table 7.20... reference needed	It is MONSTAT - Agricultural census. The reference will be added.
302		ME np	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		291	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.

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304		Ch 7.6	Figure 7.3 (A) and Figure 7.2 (D) should be translated into Montenegrin	Translation will be provided.
305	7.6	292	Figure 7.2 illustrates the structure of water in the … The figure does not illustrate anything. What is the definition of „the structure of water?“ The heading says: Figure 7.2 The structure of water uses values , inside the chart the title is: Structure of water uses, and in the chart itself, a value for water is given in %.	This will be clarified in the text. The legend will be adjusted.
306	7.7	293	In administrative terms, … this, and the following three paragraphs are dealing with a general description of DRB characteristics, and therefore it would belong to chapter 2	Although providing general information, the purpose of these paragraphs is to give contextual introduction to the subsections that follow.
307		293	Gusinje and Petnjica are new newly created …	This will be corrected
308		293	According to an estimation … here, three different sources of data are used to make a demographic projection. This cannot be valid, if the data is not collected by identical methodologies. Can that be shown?	Demographic projection is based only on data provided by MONSTAT publication – Montenegro population projections until 2060 – with structural analysis of Montenegro population. Three sources were mentioned only in the descriptive part.
309		296	It should be more explicitly explained: - 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. In a scenario based forecast, at least potential futures should be included	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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			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)	
310		298	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		298	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
312	7.11	302	Figure 7.8: water losses are not equal to NRW (there is NRW, which is not a water loss, for instance for fire-fighting, or water utilities own consumption)	Clarification is included to reflect the fact that NRW contains the "authorized unbilled consumption" which is not a water loss.
313	7.12	303	Figure 7.9: y-axis should start at 0 - numbers in the figure are not all readable	This will be corrected
314		304	As we expected, the … This is a comment. Comments are not needed here, in this report it would be more appropriate presenting facts	The syntax "As we expected" will be removed.
315	7.13	306	Table 7.28 indicates 11 municipalities, of which 4 are indicated to have no water service company (NA = not available/not applicable?). - Footnote 197 on page 305 is indicating for ten municipalities the water service enterprise, including those four. This information is inconsistent. - For the municipality of Rožaje, the company name is given in table 7.28, but it is not mentioned in footnote 197. It needs to be explained why. - three fields are empty (no company, no NA). What about	According to CRPS (centralni registar privrednih subjekata) in these 4 municipalities there are no WW or WS companies. Most of PU mentioned in footnote 197 are related to Housing Utility services

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			wastewater services in Bijelo Polje, Žabljak, and Pljevlja? No reference is made in the text to table 7.28; it is therefore not clear to which data it corresponds. Is it linked to footnote 195 at all?	
316	7.14	308	Table 7.30 stands isolated without link from the text. Interpretation of data is recommended.	This will be corrected
317	7.15	309	...by assuming that 60 percent … on what basis is that assumed? Reference is needed	The rest of the sentence implies the source of assumption.
318	7.16	311	Fish farms Fish farms have ...	This will be corrected
319		312	Fish farms Fish farms have … repetition/copy from page 311	This will be corrected
320	7.17	314	Large losses… for the financial analysis, not the losses but NRW are of interest, which are estimated to be around 68% of water system input	This will be corrected. Due to lack of data, the terms are used interchangeably. What is meant here is the NRW. See comment 312.
321		315	...corrected for the tariffs in force. Revenues need also to be corrected for the % of tariff collection	They already are. Clarification will be added
322		315	The overall cost recovery of costs ...	This will be corrected
323	7.18	316	It is clear that tThe financial cost recovery is very high – 94%.	This will be corrected
324	7.19	317	(i.e. the difference between the volume of water supplied and invoiced to the customers) stands at 68.1%. The % is not the difference, but the ratio of water invoiced over water supplied	This will be corrected
325		317	...represents the main underlying reason for the lack of financial and economic sustainability There is no proof given for this	Statement will be corrected accordingly.

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			statement. Only if the variable costs of water services are taken into account for an estimation of the potential cost savings by reducing losses, a statement about financial sustainability may be validated	
326		312 ME	zahvatanje	This will be corrected
327		314 ME	Veliki troškovi gubici u sistemu vodosnabdijevanja. Trenutno kruže oko 61%.	This will be corrected
328		314	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		317	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)
331	8.2	320	Footnote 206 Strat Tegija Upra Vljanja...	This will be corrected
332		320	Table 8.1: Where is the reference for the base year 2021? Where are the targets defined? It would be helpful to mention the status-quo for all measurable units.	The reference to the base year, which reflects the current situation, will be reworded in footnote 2017, i.e. not to reflect the RBMP cycle. The current situation is a calculation by the project team based on all information received and the known situation. The 2027 and 2033 targets are arbitrarily defined and can be altered.

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336		326	Table 8.4 Reference is needed for the content of the table. What is the basis for the assessment and where was it agreed upon?	Table 8.4 has not yet been agreed. The basis of the assessment is on the current situation and the estimated costs required to reach good status within a specified timeframe.
337	9 9.1	329	In chapters 9.1.1 and 9.1.2, the concept of key types of measures (KTM) is introduced, and they are characterised; but no further use of the KTM concept is visible within the RBMP document before Annex 2. Some reference on how KTM are used in the development of the programme of measures should be provided	KTM measures applied to each proposed measure will be added as a separate column in Table 9.3.
340	9.2	332	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		332 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		332 ff	Table 9.3: it is not explained, how the priorities (1, 2, 3) of the measures are defined	A footnote will be added to Table 9.3 to indicate what the priorities mean (as determined by the GIZ for the Adriatic RB).
344		332 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		332 ff	Table 9.3: instead of the column „municipality“ we suggest to include the competent authority here	
346		332 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.

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348		332 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.
349		333	DB MNE 13 indicative cost _213 not clear: what other measures?	Such a measure is dependent on other measures such as the implementation of WWTP, water regulation, afforestation.
352		340 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		340	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 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		340	IMB is not listed in Figure 10.1	This will be corrected
355		340	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		340	Figure 10.1 in the MNE document should be in Montenegrin (p.384)	This will be corrected

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357		340	Figure 10.1 The organigramme shows WA being part of the MARD. It should be changed	This will be corrected
359		342	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		342	Water Administration (WA) is an independent administrative body under supervision under the auspice of MARD ….	The text will be corrected
361		342	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 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

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				process of public relations in the preparation of plans; the process of making a strategic environmental impact assessment for water management planning documents.
362		342	MSDT's role for water management (Urban water, marine water, Natura2000) and the link to RBMPs should be outlined	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.
363		343	EPA is organizing and implementing the monitoring of all segments of environment, except for water quality, which is under the responsibility of MARD. Where is it prescribed that MARD is responsible for monitoring of water quality?	It is not. This the responsibility for water monitoring is with IHMS. In Article 83, paragraph 5 of the Water law. 'Monitoring of surface and groundwater and protected areas is carried out by the body responsible for hydrometeorological affairs.' Text will be corrected.
364		344	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

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				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		344	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		344	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 and technological risks. It should be explained what are the responsibilities of this Directorate for RBMPs, with references to the respective legal documents	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 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		344	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?	The paragraph relating to the MF will be deleted.

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			Are these institutions in MF or there are independent bodies? What is the role of MF in investment measures and budget for PoM?	
368		345	Enforcement level: the sub-chapter deals with inspection only. Enforcement is going beyond that. Title to be changed to Inspection?	Agreed.
369		345	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		345	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 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		345	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.

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372		345	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		350	The Law on Water Management Financing - (OG 65/08) Needs correction of OG number and date	This will be corrected: OG 65/08, 074/10, 040/11
374		350	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		351	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	Accepted. The text will only be shortened to the part it refers to RBMP.

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			implementation plans.	
376		357	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.
377	11	364	It needs to be clarified, for which period the RBMP presented is valid. See also our comment on page 1, very first paragraph. In case, the first RMBP cycle ends in 2021, the entire chapter needs to be re-written with reference to a two years period, after clarification.	Text will be altered to reflect the correct cycle.
378		364	SDG the Acronym is not explained in the Montenegrin document	This will be added to the list of acronyms
379		365	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		368 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		368	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 the Southeast Europe Inter-State Cooperation Program.
382		369	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

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383		369	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		369	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		369	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		369	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.
387		369	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.

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388		370	Improve regulatory enforcement capacity – is it inspection capacity?	It is inspection only. Text will be changed.
389		370	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		370	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		370	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		370	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.
394	12.1	377 ff	Chapter 12.1.2 all tables: source of data should be added, tables should be numbered	The reference for source of data will be added. Tables will be numbered.
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. https://doi.org/10.1016/0043-1354(83)90188-4

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				Shannon, C.E., Weaver, W., 1964. The Mathematical Theory of Communication, 10th ed, The mathematical theory of communication. The University of Illinois Press, Urbana. Zelinka, M., Marvan, P., 1961. Zur Präzisierung der biologischen Klassifikation der Reinheit fließender Gewässer. Arch. Für Hydrobiol. 389–407.
396		377 ff	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	This will be corrected: BMWP – Biological Monitoring Working Party is a tool for assessment of water quality using groups of macroinvertebrates (mostly families) as biological indicators; 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; EPT – Ephemeroptera, Plecoptera Trichoptera index; IPS – "Pollution Sensitivity Index" (Coste in CEMAGREF, 1982), CEE – "Commission for Economical Community metric" (Descy and Coste, 1991) CYA – Cyanobacteria Chl a – Chlorophyll a 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. Descy, J.P. and M. Coste (1991). A test method for assessing water quality based on diatoms. Verhandlung Internationale

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				Vereingung de Limnologie 24, 2112-2116.
398	12.2	386 ff	We suggest that the PoM of both RBMP will undergo major revision (see general comments)	See the response to the general comments
399		386 ff	For all measures, the competent water authority is MARD (see general comments to the structure)	See the response to the general comments
400		386 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		386 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		386 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		386 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		386 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 RBMP. This link could perhaps be included in the description	The individual measures follow the KTMs. 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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			(better: impact) field.	
405		386 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 but for the purpose of this RBMP it is preferred to list out the individual measures, which can be aggregated in due course.
406		386	DB MNE 01 Production of study and action plan the study and the action plan are not measures that reduce soil erosion; afforestation activities are mentioned under „maintenance cost“ only	This measure is not under the maintenance cost. Section. It is a supplementary measure in need of being conducted in order to define the basic measure
407		387	DB MNE 02 Study/research on Veruša and other regional settlements impacts on this WB. Improvement of solid waste management, improvement of waste water management, strict enforcement of construction related regulation. It is not clear at all what is going to happen under this measure	More information will be added to justify this supplementary measure
408		368 - 388	The first three measures are all located in Podgorica municipality, but the Capital is not well recognised in the Danube RBMP with these pressures.	The reason they are first, second and third is that they follow the measures required to be undertaken in the order of the surface water bodies. Whether or not this is recognised for the Danube river basin, they are in the defined area of the Podgorica municipality.
410		390	DB MNE 05 competent authorities should be MSDT and Kolasin municipality	Agreed
411		390	DB MNE 05 in remarks it says increased groundwater and surface water protection. The groundwater body should be mentioned in Location – Water body, and not only the surface	This will be included

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			water body	
412		392	DB MNE 06 Construction of communal waste transfer station for Kolašin municipality how can this be a basic measure, and not a supplementary? Competent authority for communal solid waste is MARD?	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT
413		393	DB MNE 07 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?	This pressure is reflected in Table 3.36. Studies are required to be undertaken independently for each WB. All fishery related research in Montenegro have noticed a constant decrease of fish abundance. In the past years, illegal fishing (poaching) is one, if not the main, reason for it in the past years. With the new Law on freshwater fishery and completely new by-law regulation this probably will be improved (reduce poaching) but this law is only in power from 2019 so the positive effects hopefully would come in one or two years. There is no regular and adequate biological monitoring in this WB. However, the FWD is excellent platform to establish it, at least those related to bacteria, algae, macrophytes, macro invertebrates and fish.
414		395	DB MNE 08 competent authorities should be MSDT and Mojkovac municipality	Agreed
415		397	DB MNE 09 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). The groundwater body should be mentioned. Competent authority is questionable.	A measure on response to the identified pressure in Table 3.36. The title of the supplementary measures will be changed to reflect the actual investment costs, which will ultimately lead to the identification of the basic measure(s).
416		399	DB MNE 10 Construction of communal waste transfer station for Mojkovac municipality how can this be a basic measure, and not a supplementary? Competent authority for communal solid	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT

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			waste is MARD?	
417		401	DB MNE 11 The measure is identical to DB MNE 07, is it necessary to do the study twice? 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
418		403	DB MNE 12 competent authorities should be MSDT and Plav and Gusinje municipality, because they are recognised as investors; the groundwater body should be mentioned	Agreed. Groundwater bodies will be added.
419		405	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 RBMP.	It is not specifically mention in the text but it is included in Table 3.36.
420		406	DB MNE 14 competent authorities questionable	Will replace with MARD, WA and MSDT since it is an integrated measure
421		408	DB MNE 15 Construction of communal waste transfer station for Andrijevica municipality how can this be a basic measure, and not a supplementary? Competent authority for communal solid waste is MARD?	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT.
422		410	DB 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). Is this supplementary measure linked directly to a specific pressure? Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. Will replace competent authority with both MARD and WA.
423		412	DB MNE 17 Production of study and action plan the study and	Yes, it is the same description but for a different SWB and area

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			the action plan are not measures that reduce soil erosion; afforestation activities are mentioned under „maintenance cost“ only. Description is identical to DB MNE 01	of the DRB.
424		414	DB MNE 18 There is a description of a SHPP, and its capacity, but no description of a measure. Is there no fish pass so far? This should be stressed in the water act by WA. What is the role of MARD, and should Water inspection, and Ministry of Economy be there as other relevant authority?	An explanation of the proposed measure will be included. The competent authority will be changed to MoE, with WA and MSDT as other relevant authorities.
425		415	DB MNE 19 see comment above for DB MNE 18	An explanation of the proposed measure will be included.
426		416	DB MNE 20 Construction of communal waste transfer station for Plav municipality how can this be a basic measure, and not a supplementary? Competent authority for communal solid waste is MARD?	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT.
428		418	DB MNE 21 Key aspect/Pressure: not Andrijevica, but Berane	Agreed, will change
429		418	DB MNE 21 competent authorities questionable, Berane municipality not recognised as relevant authority	Berane municipality will be included
430		419	DB MNE 22 Construction of communal waste transfer station for Berane municipality how can this be a basic measure, and not a supplementary? Competent authority for communal solid waste is MARD? Berane municipality not recognised as relevant authority	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT. Berane municipality will be included as other relevant authority.
431		421	DB MNE 23 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). Is this supplementary measure linked directly to a	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. Will replace competent authority with both MARD and WA.

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			specific pressure? Competent authority is questionable.	
432		423	DB MNE 24 Production of study and action plan the study and the action plan are not measures that reduce soil erosion; afforestation activities are mentioned under „maintenance cost“ only. Description is identical to DB MNE 01 and DB MNE 17	Yes, it is the same description but for a different SWB and area of the DRB.
433		424	DB MNE 25 The measure is identical to DB MNE 07, and, DB MNE 11 is it necessary to do the study three 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
434		426	DB MNE 26 There is a description of a SHPP, and its capacity, but no description of a measure. The fish pass should be defined in the water act by WA. What is the role of MARD, and should Water inspection, and Ministry of Economy be there as other relevant authority?	An explanation of the proposed measure will be included. The competent authority will be changed to MoE, with WA and MSDT as other relevant authorities.
435		428	DB MNE 27 see comment above for DB MNE 26	Refer to response to comment 434
436		429	DB MNE 28 the description of what shall be done is found under investment costs, but not in the description of measure. The activities would be described in the water act, why the competent authority should be WA. What is the foreseen technical measure? The implementation of the technical measure is only one third of the total investment cost, the other 2/3 goes into studies?	This measure will be changed to supplementary since it is not possible to deduce the actual basic measures until the studies are carried out. The costs for foreseen technical measures will be removed.
437		431	DB MNE 29 see comment above for DB MNE 26, or 18	Refer to response to comment 434
438		432	DB MNE 30 see comment above for DB MNE 29, 26, or 18	Refer to response to comment 434

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439		434	DB MNE 31 competent authorities questionable	The competent authority will be changed to MSDT
441		434	DB MNE 31 in remarks it says increased groundwater and surface water protection. The groundwater body should be mentioned in Location – Water body, and not only the surface water body	Groundwater body will be included
442		436	DB MNE 32 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). Is this supplementary measure linked directly to a specific pressure? Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. Will replace competent authority with both MARD and WA
444		438	DB MNE 33 in remarks it says increased groundwater and surface water protection. The groundwater body should be mentioned in Location – Water body, and not only the surface water body. Is it basic, or supplementary measure? Competent authority is questionable. The Bijelo Polje municipality is not considered as a competent authority.	The groundwater body will be included. Bijelo Polje municipality will be added as a competent authority.
446		440	DB MNE 34 in remarks it says increased groundwater and surface water protection. The groundwater body should be mentioned in Location – Water body, and not only the surface water body.	The groundwater body will be included.
447		442	DB MNE 35 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 Bijelo Polje municipality should be recognised	Agreed. One cadastre is required. The measures are repeated deliberately (per SWB). Bijelo Polje municipality will be added as a competent authority.

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			competent authority.	
448		442	DB MNE 35 Water efficiency: what does it mean exactly?	The standard meaning of this phrase can be described as: "Water efficiency is reducing water wastage by measuring the amount of water required for a particular purpose and the amount of water used or delivered". Water efficiency in this case may also refer to the smart use of water resources, i.e. the most cost-effective and immediate way to ensure that the available water is fit for its intended purpose (drinking water supply, industry, irrigation). The standard meaning of this phrase can be described as: "Water efficiency is reducing water wastage by measuring the amount of water required for a particular purpose and the amount of water used or delivered". Water efficiency in this case may also refer to the smart use of water resources, i.e. the most cost-effective and immediate way to ensure that the available water is fit for its intended purpose (drinking water supply, industry, irrigation).
449		444	DB MNE 36 The measure is identical to DB MNE 07, and, DB MNE 11, and DB MNE 25 is it necessary to do the study four 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?	Complete analysis of the 5 BQEs has not been carried out to date but research has been conducted by the author of the PoM, which leads to this conclusion and is reflected in Table 3.36.
450		445	DB MNE 37 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 Bijelo Polje municipality should be recognised competent authority.	Refer to response to comment 447

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451		445	DB MNE 37 Water efficiency: what does it mean exactly?	Refer to response to comment 448
452		445	DB MNE 37 and DB MNE 37 are identical. Are there possibilities of synergies?	35 and 37 are the same but for different areas. Yes, synergies are certainly possible and would be expected using a template for study to determine, propose and implement water efficiency guidelines
453		447	DB MNE 38 The title says Improvement of aquaculture... In the table 12.2 on page 385, it says: Reduce nutrient pollution (Improvement…) what is correct?	This will be reworded. Reduction of nutrient and organic matter loading in fish farms.
455		449	DB MNE 40: 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). Is this supplementary measure linked directly to a specific pressure? Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. The replace competent authority will be replaced with both MARD and WA
456		451	DB MNE 41: Construction of communal waste transfer station for Rozaje municipality is this being a basic measure, or a supplementary? Competent authority for communal solid waste is MARD? Rozaje municipality not recognised as relevant authority	Included as a basic measure to meet the requirements of Article 7 of the WFD. Competent authority is MSDT. Rozaje municipality will be included as other relevant authority.
458		455	DB MNE 43 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 the study five 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
459		456	DB MNE 44 competent authorities questionable	The competent authority will be changed to MSDT

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460		458	DB MNE 45: 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). Is this supplementary measure linked directly to a specific pressure? Competent authority is questionable.	This supplementary measure on proposed in response to the identified pressure shown in Table 3.36. Will replace competent authority with both MARD and WA
461		460	DB MNE 46: stooping the of emission … stopping emissions? Identification and reduction of emissions, discharges and losses … who is going to loose what? And where? The Coal Mining, Thermo Plant … Coal mine, Thermal power plant	Text will be altered.
462		460	DB MNE 46: how will this measure reduce pollution? The result will be a study, and then? Last step is implementation of solutions, but there is no cost implication of it. See for example DB MNE 28, where there is cost for technical measures included.	This measure provides for an action plan for control of emissions and discharges. Until this is carried out, implementation of solutions would not be known. In comment 436, the costs for technical measures will be removed.
466		464	DB MNE 48 Is the measure realistic? Does mining activity end within the RBMP periods? Is 20M Euro sufficient for that ambitious idea?	Measure will be removed. This does not fall in the timeframe of the RBMP cycle. However, with shifting emphasis on the use of coal, the measure will be required at some stage. The financial burden will obviously need to be calculated carefully when the need arises.
467		464	DB MNE 48 groundwater bodies affected are missing	The affected groundwater bodies will be added
470		465	DB MNE 49 how will this measure reduce pollution? The result will be a study, and then? Last step is implementation of solutions, but there is no cost implication of it. See for example DB MNE 28, where there is cost for technical measures included. An estimation of cost from the treatment at similar plants should be possible.	The supplementary measure is only part of the whole solution. In comment 436, the costs for technical measures will be removed.

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472		467	DB MNE 50: The measure is very similar to DB MNE 47; but the cost for the chemical analysis is 20,000 EURO here (compared to 25,000 EURO for DB MNE 47), and the cost for the study of mitigation measures is 30,000 EURO here (compared to 10,000 EURO for DB MNE 47).	Less analysis required for DB MNE 50 than 47. It is expected that mitigation measures for the ore processing dumped waste would be higher than for the illegal small industrial dump sites in DB MNE 47.
474		468	DB MNE 51 The measure is very similar to DB MNE 47; but the cost for the chemical analysis is 20,000 EURO here (compared to 25,000 EURO for DB MNE 47), and the cost for the study of mitigation measures is 30,000 EURO here (compared to 10,000 EURO for DB MNE 47).	The answer is similar to comment above, i.e. a specific mine versus small industrial dump sites
475		468	DB MNE 51 There is no measure but analysis and a study. From what investment, or from which facility do the maintenance cost of 50 to 100,000 EURO arise?	This is a calculation of the maintenance costs for the future treatment
477		470	DB MNE 52 Is it correct, that after the measure (which is not described in the description of measure) will still be a by-pass tunnel, and thus a HMWB? How will it improve then the status of the WB?	The measure will be included above in the correct section. The maintenance of longitudinal river connectivity will improve the river ecosystem ecological potential.

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	This has been added to the text

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	Directive 98/83/EC are the Ministry of Health and the Institute of Public Health of Montenegro.	
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 Green Home NGO

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	General Notes – *The comments below refer to the SEA for the Danube RBMP. However, they have been included in the Annex because they are also directly to the RBMP. The reference to section, page numbers etc. are all related to the SEA*.		
1		The report and plan do not evaluate the carrying capacity of catchments, river basins and carrying capacities with cumulative impacts, so it does not give extreme limitations in terms of the use and protection of surface and groundwater	It was not possible to perform a full carrying capacity of catchments since the monitoring data and essential modelling of the surface and groundwaters has not been developed to an adequate stage to perform this assessment. The requirement for this would be to have several years of precise monitoring in order to estimate the upper boundary of river ecosystem carrying capacity. Risk-based assessment has been used as a surrogate, which is the normal approach for the WFD. Further work on the evaluation the carrying capacity of catchments, is included in the future tasks outlined in the RBMP for HMZ to undertake.
2		Water management minimums have not been calculated when it comes to general and specific water use according to the priorities of the Water Law and with the given development projections	For all delineated water bodies this is required. However, the data were not readily available. The report contains data that was provided by HMZ. Further work is included in the future tasks outlined in the RBMP for HMZ.
3		The plan should have been preceded by the creation of a cadastre of pollutants in order to assess the pressures more comprehensively and in more detail and provide measures to reduce / address them	Agreed, this would be wise. However, a cadastre of pollutants would only be possible if measurements according to the WDF and EQS Directives for priority pollutants were to have taken place prior to the development of the RBMPs. This was not the case.
5		The report does not analyze the pressures on surface and groundwater from excessive and uncontrolled exploitation of gravel on Tara, Lim and other watercourses, non-structural measures to prevent flood risks,	The exploitation of gravel on Tara, Lim and other watercourses has been included in the designation of specific water bodies as heavily modified. The exact analysis is not shown in the

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	such as the revitalization and conservation of rare absorption floodplains		document, only the final results in terms of water classification according to the WFD. The RBMP has also been updated to include pressures on surface and groundwater from exploitation of gravel. Non-structural measures to prevent flood risks have not been included at this stage in the RBMP development. These latter measures will be included a part of the new EU project, 'Support to Implementation and Monitoring of Water Management', which includes the implementation of the Floods Directive.
5	The report is full of subjective, often unnecessary, explanations, especially in the part of a small hydroelectric power plant and a large one (Tara, Morača, Komarnica), which have no basis in scientific facts and should not form part of the document in question		This opinion is very clear. However, the examples could be provided to justify the comment.
	Special Notes		
1	The management plan report does not mention or isolate groundwater bodies with sources where there are or are planned pressures for the construction of small hydroelectric power plants (e.g. Ljestanica, Kutska, Mojanska, Šekularska reka)		In the RBMP where measures are proposed in relation to existing SHPPs the related groundwater bodes are listed.
2	During the study of anthropogenic impacts on the quantitative status of groundwater bodies (p. 35), the water balance was applied to only 13 marked bodies and groups of groundwater bodies, which prevents any significant assessment of anthropogenic impacts on a large number of water bodies (as the author states up to several thousand), at least the most vulnerable (waste water, planned construction of hydroelectric power plants) should be included according to a certain criterion		The delineation of the groundwater bodies or groups of groundwater bodies cover all groundwater in the DRB and were estimated using the WFD guidelines. The use of the word 'only' supposes that the pressures on many groundwater bodies have not been taken into account. This is not the case.
3	Seasonal migration and population variations (tourism, diaspora influx)		Seasonal migration and population variations do of course

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	should be included in the section Concentrated sources of surface water pollution		influence the potential pollution maximum and minimum loading of BOD on both surface and groundwaters when adequate treatment is not available. The official data used does not recognise this fact. The RBMPs infer this but do not provide seasonal data variation but rather total loading on an annual basis.
4	The table “Main types of businesses and recipient rivers in the Danube Basin” (p.44) lacks a number of companies, for example. Ćehotina (cooperative of Dairy, Gradir cement plant and Montenegro Cement company, Žitoprodukt, Aroma warehouse of building material, etc.). The data must be more detailed and revised with an overview of the capacity, the amount of discharge, otherwise it is not clear how to adequately assess pressures		The names of all businesses and industries were deliberately not included in the RBMP. Agreed, the data must be more detailed in the future. Many of the PoMs refer to the collection of such data as essential ‘supplementary’ measures. The cadastre of potential polluters should be updated regularly by the Water Administration, which will in turn works to allow for an update of the definition of the pressures.
5	Concentrated source of pollution relevant to groundwater sun a p. 45 only listed as categories but not listed exhaustively, narrative names with locations (not just on the map) and quantities must be given		The summary of pressures in each of the 13 groundwater bodies or groups of groundwater bodies are provided as Table 3.56 of the Danube RBMP, which lists all point and diffuse source pollution locations together with an assessment of the GW qualitative and quantitative status. The maps of hazard and risk assessment for groundwaters take all of this information into account.
6	An estimate of the type and amount of minerals and fertilizers used in agriculture on an annual basis must be made (p. 54), because without this it is impossible to estimate the diffuse pressure of pollution sources in surface water, illustrations such as Figure 27 may not be sufficient for a serious plan such as this		This was not possible to undertake. It is to be covered in the new project, ‘Support to Implementation and Monitoring of Water Management’, which includes the implementation of the Nitrates Directive.
7	In section 1.7.4. Water use is given a free estimate "that 26.6 mm3 of water is needed annually to cover the needs of households, industrial		All data used were provided by Monstat. The recognition of water usage per river basin cannot be directly correlated to the

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		and agricultural sectors belonging to the Danube Basin municipalities". Reference and methodological presentation for such assessment is needed as well as a quantitative assessment for the use of water for agricultural and other purposes. Tables 19 and 20 do not mean much because they do not provide a description, methodology and estimate of water use by river basin	data available. This is in part due to the fact that some municipalities cover more than one sub-basin and also by the fact that the reported data may not be accurate enough to provide a clear measure of water use per river basin.
8		Main hydroelectric power plants and dams on p. 61 - it is not clear what the purpose of this section is, and it should be to look at existing plans and solutions and to provide clear guidelines and restrictions. E.g. if we know that the SEA Plan and Report have been completed for HPP at Komarnica then the guidelines for the conservation of good ecological status should be clearly stated or the project limited, depending on the expert judgment	Taking in mind the size and volume of the future HPP Komarnica, there is not any mitigation measures which could be applied in order preserve the good ecological status of this river, especially the part of the river which will be flooded by the water accumulation lake.
9		In section 1.7.6. Small hydro - it is not clear what the purpose of this part is, but it should be to look at existing plans and solutions and to provide clear guidelines and restrictions. The plan should state that the planning of SHPP was accompanied by a number of shortcomings. where the largest number of concessions issued (2008 - 2016) lacked a water management strategy, water management plans, a water cadastre with ecological bases (which should include data on the characterization and typology of watercourses, hydrological data, data on biodiversity and water use) and water information system. The first Concession Plan for the use of watercourses for the construction of small hydropower plants (2016) did not carry out a Strategic Environmental Impact Assessment, and according to the Law on Strategic Environmental Impact Assessment, neither did there exist an action plan for the development of small hydropower plants between 2012 and 2016 (more information Annex 1 - Unplanned and unsustainable construction of small hydropower plants in Montenegro,	This comment is clear, and this issue will be mentioned in the modified SEA. The RBMPs focus is only on the present problems caused by the operating SHPPs and the potential mitigation measures that can be applied. The RBMPs do not detail the potential effects of planned SHPPs.

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	Green Home, 2018)		
10	Table 21. The National Register of Mini-Hydro Power Plants in the Danube Basin lacks HPPs at Lještanica (Bijelo Polje)		Information was provided by the Ministry of Economy. According to our knowledge Lještanica SHPP is only planned and there is a strong debate about this plan.
11	1.7.7. Water channelling and modified water bodies ecological potential cannot be managed		This statement is not fully correct. This depends on the purpose of the river channelling. All such surface water bodies that have been identified as 'heavily modified' have been estimated in terms of restoring their ecological status. All actions are contained within the programme of measures of the RBMP.

6 World Wildlife Foundation (WWF)

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1	In the River Basin Management Plans for Adriatic and Danube basins in Table 8.1 *Proposed environmental objectives, actions and indicators for the Adriatic/Danube River Basin* environmental objective states *"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"* and activity proposes *"Sustainable small-scale hydropower production"* In order to prevent further devastation of the Montenegrin rivers, the activity *"Sustainable small-scale hydropower production"* must be excluded from the plans. <u>Explanation:</u> 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 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	This action has been removed from Table 9.1

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	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. 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. 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 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.	

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	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.	
2	Instead of the proposed activity *"Sustainable small-scale hydropower production*" from Table 8.1. in both Plans in order to achieve the Objective *"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"* and activity proposes *"Sustainable small-scale hydropower production" ,* the following activities need to be defined: "***Improved enforcement of protection measures on water bodies that already represent protected areas"*** and ***"protection of rivers and other water bodies in accordance with the national legislation".*** The same activities need to be defined for the objective "*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).*	Both activities have been added to Table 9.1. Improved enforcement of protection measures on water bodies that already represent protected areas has been added to environmental objective 1. Protection of rivers and other water bodies in accordance with the national legislation has been added to environmental objective 2.

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	Explanation: 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. 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.	