

## CEPF Final Project Completion Report

<b>Organization Legal Name</b>	<i>The Network for Affirmation of NGO Sector – MANS</i>
<b>Project Title</b>	"Moraca – The New Way Forward"
<b>CEPF GEM No.</b>	65718
<b>Date of Report</b>	22/03/2017

**CEPF Hotspot:** Mediterranean Hotspot

**Strategic Direction:** Strategic Direction 2 -Establish sustainable management of water catchments in 4 priority corridors

**Grant Amount:** 39996.00 US\$

**Project Dates:** 2015/4/1 - 2016/11/30

### **1. Implementation Partners for this Project (*list each partner and explain how they were involved in the project*)**

The project was entirely implemented by NGO MANS. Project itself had six components, out of which two were additionally introduced during the project. Each component was solely implemented by MANS staff and externally employed experts working on development of analyses. During project implementation MANS cooperated with inspection authorities in filing the initiatives and reporting the irregularities discovered during field visits to Moraca River. We also communicated with Ministry of economy and Ministry of Sustainable Development and Tourism as they were requested to deliver public information about ongoing and planned developments on and around Moraca. In relation to Ulcinj Salina component of the project MANS cooperated with Center for Protection and Research of Birds (CZIP) and participated at their events. In this component we also communicated with the Office of the Special State Prosecutor in regards to submission of criminal appeal related to Ulcinj Salina legal status. MANS also had several meetings with Montenegrin Ecologists Society related to Buljarica Bay case and have agreed on joint campaign in the future as the plans for this location advance.

### **Conservation Impacts**

#### **2. Describe how your project has contributed to the implementation of the CEPF investment strategy set out in the ecosystem profile**

This project impacted the current practice of the Montenegrin authorities in charge for inspection control, particularly in regards to safeguarding the Moraca River and monitoring/reporting on illegal activities in that area. Also, discoveries made in case of Buljarica Bay site terminated or at least postponed Government plans for mass urbanization of that location and development of more than 11 million square meters of residential and business objects. Project also contributed to more information publicly available on river Moraca, Ulcinj Salina and Buljarica Bay project. Analysis developed

under this project that is related to River Moraca will be used to initiate public discussion once the Government jumpstart the plans for exploitation of the hydro-potential of the river. They will be later used as advocacy tool and hopefully contribute to more sustainable use of this valuable natural resource.

### **3. Summarize the overall results/impact of your project**

A year-long initiative implemented by NGO MANS raised public awareness on key issues related to unsustainable use of natural resources in Montenegro, namely river Moraca, Ulcinj Salina and Buljarica Bay. These three locations are especially endangered by Government plans to excessively use the space/water for profit activities without any consideration to environment protection or sustainable use of these valuable resources. In that manner, we have undertaken several legal steps in attempt to prevent violation of public interest and prevent Government from advancing with harmful plans, including initiatives to responsible inspections, appeals and criminal complaints to state prosecutor. In addition to that, we managed to put this issue high up the public agenda by implementing a media campaigns. Concrete impacts of particular components are provided in the later part of this report (Project components/Project Deliverables).

#### **Planned Long-term Impacts - 3+ years (as stated in the approved proposal)**

Eventually, the project will change the behavior of the public institutions in charge for inspection control to be more proactive in protecting the Moraca potentials, as well as the position of the decision-makers to plan more sustainable development of the Moraca river basin. Also, it is expected that improved enforcement of the laws protecting the river, will change the behavior of the citizens towards the river itself, and that they will be more responsible in using its resources, but also more interesting in actively participating in its protection. Regarding

### **4. Actual progress toward long-term impacts at completion**

The number of inspection controls over excavation sites was increased several times compared to period prior to project. Also, responsible inspection became more accustomed to their obligation to conduct such controls in more professional manner then before. Reports and analysis produced in this report will present and excellent starting point for any future advocacy for amending current legislative and policies, including public contracting, private-public partnerships, concession, but also planning documents and strategies. As added value, in cooperation with other NGOs we managed to raise public concern on targeted locations and to get international community interested, especially in case of Ulcinj Salina.

#### **Planned Short-term Impacts - 1 to 3 years (as stated in the approved proposal)**

This project will deliver better solutions for overall protection of the Moraca River in terms of the improved SEA and EIA documents, but also clearer picture on the current state of the river and how citizens can contribute to its better protection. The project will ideally lead to shutting down all illegal excavation sites and restoring the river bed. We also expect that it will led to better law enforcement and implementation of penalty policies, also leading to less new illegal excavation points. In addition to this, we expect

that interest and pressure of the international community on Government of Montenegro to stop the devastation and unsustainable exploitation of natural resources and include widest public in decision making.

## **5. Actual progress toward short-term impacts at completion**

During project implementation, we have recorded that responsible inspection started to more actively respond to our requests for inspection control and in that sense we can conclude that oversight on Moraca river bed is more meaningful than it was prior to this project. In total, MANS visited approximately 25 locations on the River Moraca, upstream and downstream from Podgorica. We also submitted 33 initiatives, out of which number we received 22 responses from responsible inspection authorities. Out of that number, in 10 cases inspection stated that they recorded existence of the illegal excavation site, but did not notice any new activity. Also, they stated that they will monitor this site for any future development. In 7 cases inspection found the excavation machines on site and their owners. In all of these cases, it turned out that the owners of the machines did not obtain permits for excavation required by the law and inspection immediately ordered removal of them and shutting down of the excavation site. In the later procedure, we have obtained a confirmation of the inspection that these sites were closed down. Remaining responses covered instances where inspection determined that subject of inspection had required permits but overstepped the limitations, and were ordered to adjust the activities in line with issued permit. In terms of remaining submitted initiatives, MANS will follow through complete administrative procedure until all initiatives are responded. During project implementation we did not record a single new illegal excavation site.

Project produced an analysis that was submitted to relevant institutions to serve as a starting point for changing the policy and practice in planning and designing the use of Moraca potentials, at least at level of sand and stone exploitation. This document will be used to advocate for change in the current legislation when the law is scheduled to be amended. Downside is that since October 2016, National Parliament is burdened by the continuous boycott of the oppositional parties, making close to impossible to suggest and/or plan any future law amendment and count on their support in the voting procedure. Nevertheless, these analyses will be kept and used when current political situation allows for a successful change of the legislation. Analysis of the documents related to valorization of the Moraca River hydro potential will be used as soon as the Government of Montenegro jumpstarts the plans for construction of cascade system of hydropower dams.

## **6. Describe the success or challenges of the project toward achieving its short-term and long-term impacts**

During implementation of the project we managed to get a lot of help from local communities in reporting and discovering the locations of illegal excavation sites. They were also our source of informal information about who is using those sites, which was reported to inspections and state prosecutor. Also, in terms of the media campaign, we communicated a lot with our partner CZIP, especially on case of Ulcinj Salina.

One of the key challenges was to force the inspection to start responding to our initiatives for inspection control and undertaking concrete measures. Continuous pressure and appeals that we submitted produced result and inspections started responding.

## **7. Were there any unexpected impacts (positive or negative)?**

In the final phase of the project we have experienced a setback in terms of sharing findings from the analyses with representatives of the Montenegrin parliament, as since the election in October they were boycotting the Parliament's work as well as work of the relevant parliamentary committees. Even before that, the majority of MPs were campaigning on the field and it was impossible to draw their attention to anything except the campaign. Nevertheless, MANS shared all the findings with representatives of relevant committees and MPs, while all studies were also posted online and shared with stakeholders via MANS listserv (described below).

### **Project Components and Products/Deliverables**

#### ***Component 1: Assessment of the state documents related to exploration of River Moraca hydro potential***

In the first component, we conducted an analysis on Spatial Plan for Moraca River, Government Energy Strategy – section on Moraca, and other documents related to valorization of Moraca hydro potential. The study was developed, shared with stakeholders and published at MANS website<sup>1</sup>. It was also shared to MANS contacts and MPs.

#### ***Component 2: Assessment of the legal framework and practice in granting concession contracts for excavation of minerals from river beds***

In addition to previous one, we conducted also a research whether there are legal incentives in granting contracts for excavation of gravel and other minerals from river beds. The report/analysis that we produced laid out need for legal framework improvements, but also more strict control over the implementation of such contracts. The analysis was shared and uploaded to MANS website<sup>2</sup>.

#### ***Component 3: Addressing issue of illegal excavation sites in the area of river Moraca***

Within this component we conducted field visits in order to report on illegal activities on Moraca, but also to raise public awareness on this issue. For that purpose we visited more than 25 locations, submitted 33 initiatives. At the same time we obtained 39 calls from citizens in relation to this issue. Using this information we have developed an online map showing locations, with photos, video, submitted initiatives and received responses. The online map is shared via MANS website<sup>3</sup>, but also promoted on MANS social network accounts and among stakeholders. Despite the fact that not all submitted initiatives were fully processed by responsible inspections, MANS will continue to create pressure towards them and demand that all reported violations on Moraca are properly processed.

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<sup>1</sup> <http://www.mans.co.me/wp-content/uploads/2016/08/KoncesijeElektraneMoraca.pdf>

<sup>2</sup> <http://www.mans.co.me/wp-content/uploads/2016/08/KoncesijeSljunakPijesak.pdf>

<sup>3</sup> <http://www.mans.co.me/mapa-moraca/>

#### **Component 4: Support to capacity building of key stakeholders for protection of river Moraca<sup>4</sup>**

In order to boost stakeholders' knowledge and ability to independently recognize different law and policy violations, MANS shared with them all analysis developed under this project through electronic listserv, containing contracts of more than 4000 stakeholders. Regarding other deliverables, MANS have amended this project component and developed two additional to reflect the need to address issues of Ulcinj Salina and Buljarica Bay (Described below).

#### **Component 5: Improved transparency of the government plans to urbanize protected locations of Buljarica Bay and Ulcinj Salina**

Within this component we have collected all available information on Buljarica Bay and Ulcinj Salina, but also submit and extensive amount requests for free access to information. Some of these information were obtained, while most of the requests were not answered by responsible institutions. Regardless to the end of the project, MANS will continue to pursue those answers and use all legal mechanisms in order to obtain them. Using findings obtained by analyzing so far obtained information we were in position to launch a media campaign and issue press releases<sup>5</sup> pointing out to violations that we recorded, related to Ulcinj Salina and Buljarica Bay.

#### **Component 6: Improved accountability of the institutions responsible for designing development plans for the Buljarica location and Ulcinj Salina**

Within this component MANS worked on improving accountability of the institutions responsible for making development decisions on Ulcinj Salina and Buljarica Bay by investigating their so far performance. In relation to Ulcinj Salina, we have noted that complete state property in that location was used as mortgage for taking several millions of euros worth loans from commercial banks in Montenegro. Those loans were not used to jumpstart the production of salt, nor protection of the Salina site, but for the other companies owned by the same person. In that light we submitted several criminal appeals against responsible individuals from state institutions. In the case of Buljarica Bay, MANS investigative time came into possession of secret Master Plan for development of the Buljarica site, envisioning massive urbanization. The future investor planned construction of over 11 million square meters of residential and commercial capacities, meaning complete devastation of this location. MANS used that document to inform the public on Government plans and to submit criminal appeals against responsible individuals..

### **8. If you did not complete any component or deliverable, how did this affect the overall impact of the project?**

Not applicable

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<sup>4</sup> Component 4 was restructured by Addendum to Project Proposal, so that two new components (5 and 6) were introduced

<sup>5</sup> <http://www.mans.co.me/kako-je-unistena-ulcinjska-solana/>  
<http://www.mans.co.me/firme-unistavane-zbog-vrijednih-nekretnina/>  
<http://www.mans.co.me/tender-za-buljaricu-korupcija-u-najavi/>  
<http://www.mans.co.me/mans-podnio-krivicnu-prijavu-specijalnom-tuzilastvu-zbog-tendera-za-buljaricu/>  
<http://www.mans.co.me/kako-je-pripremana-betonizacija-buljarice-ukanovicevi-partneri-gradice-preko-40-000-stanova/>  
<http://www.mans.co.me/ministar-gvozdencovic-ponovo-uhvacen-u-bezocnoj-obmani-crnogorske-javnosti/>

**9. Please describe and submit any tools, products, or methodologies that resulted from this project or contributed to the results**

During implementation of this project MANS have developed several tools and analysis that were used both for capacity development of stakeholders as well as advocacy and campaign means, as follows:

- Online Map <http://www.mans.co.me/mapa-moraca/>
- Analysis - <http://www.mans.co.me/wp-content/uploads/2016/08/KoncesijeElektraneMoraca.pdf>
- Analysis - <http://www.mans.co.me/wp-content/uploads/2016/08/KoncesijeSljunakPijesak.pdf>
- Analysis - <http://www.mans.co.me/wp-content/uploads/2016/08/KoncesijeKomentariZakonPraksa.pdf>
- Press releases and studies:
  - <http://www.mans.co.me/kako-je-unistena-ulcinjska-solana/>
  - <http://www.mans.co.me/firme-unistavane-zbog-vrijednih-nekretnina/>
  - <http://www.mans.co.me/tender-za-buljaricu-korupcija-u-najavi/>
  - <http://www.mans.co.me/mans-podnio-krivicnu-prijavu-specijalnom-tuzilastvu-zbog-tendera-za-buljaricu/>
  - <http://www.mans.co.me/kako-je-pripremana-betonizacija-buljarice-dukanovicevi-partneri-gradice-preko-40-000-stanova/>
  - <http://www.mans.co.me/ministar-gvozdenuvic-ponovo-uhvacen-u-bezocnoj-obmani-crnogorske-javnosti/>

## Benefits to Communities

### 10. Please describe the communities that have benefited from CEPF support

*Please report on the size and characteristics of communities and the benefits that they have received, as a result of CEPF investment. Please provide information for all communities that have benefited from project start to project completion.*

Community Name	Community Characteristics							Nature of Socioeconomic Benefit												
	Subsistence economy	Small landowners	Indigenous/ ethnic peoples	Pastoralists / nomadic peoples	Recent migrants	Urban communities	Other*	Size of Community				Increased access to clean water	Increased food security	Increased access to energy	Increased access to public services	Increased resilience to climate	Improved land tenure	Improved recognition of traditional	Improved representation and	Improved access to ecosystem
								50-250 people	251-500 people	501-1,000 people	Over 1,001 people									
Podgorica						X				X								X		
Ulcinj						X				X								X		
Buljarica		X				X				X								X		

## Lessons Learned

### 11. Describe any lessons learned related to organizational development and capacity building.

During implementation of this project, MANS project staff gained additional knowledge related to locations of Moraca, Ulcinj Salina and Buljarica Bay. This knowledge ranges from getting to know physical location of these sites via conducted filed work, through analysis of different legal aspect that are defining their development and protection. We learned a lot from cooperation with other CSOs engaged in these issues, especially working with CZIP on Ulcinj Salina issues. Our analytical, media and advocacy skill-base is significantly enriched during implementation of this project. Also, we have explored different legal aspects of these projects, which enabled us to recognize and report violations.

### 12. Describe any lessons learned related to project Design Process (aspects of the project design that contributed to its success/shortcomings)

As described above, we have amended the component 4 of the original project design in order to accommodate issues that emerged during project implementation and created components 5 and 6. It was needed as Government of Montenegro progressed with plans for Ulcinj Salina and Buljarica Bay. So our decision to replace one activity with another and move funds to a better use have proved as justified and well executed. The campaign and legal steps that we implemented as integral part of those project components contributed to postponing Government plans and increased public awareness and concern on these issues.

**13. Describe any lesson learned related to project Implementation (*aspects of the project execution that contributed to its success/shortcomings*)**

Implementation of this project was done under different influences, both organizational and external. We encountered difficulties with paralyzed National Parliament, national elections, media overloaded with different issues, government unpredictable dynamics, etc. The up side of these is that we managed to navigate around them and still achieve a solid impact in public, while undertaking several legal steps and bringing more solid information to the citizens of Montenegro. Quick response and assistance from the CEPF's representatives helped us to successfully and timely adjust project components for the benefit of best possible project results.

**14. Describe any other lessons learned relevant to the conservation community**

N/A

**Sustainability / Replication**

**15. Summarize the success or challenges in ensuring the project will be sustained or replicated**

As described previously, MANS will continue to maintain administrative procedure for all legal initiatives that were submitted during project implementation, including submitted requests for information and criminal complaints. In addition to that, we have already seeking funds to continue monitoring of the government plans for the Moraca, Ulcinj Salina and Buljarica Bay and created an informal coalition with CZIP and CDE to work on these issues in the future.

**16. Summarize any unplanned activities that are likely to result in increased sustainability or replicability**

Nothing to add here

**Safeguards**

**17. If not listed as a separate Project Component and described above, summarize the implementation of any required action related to social and environmental safeguards that your project may have triggered**

Not applicable



### **Additional Funding**

**18. Provide details of any additional funding that supported this project and any funding secured for the project, organization, or the region, as a result of CEPF investment**

As described previously, MANS will seek, together with other CSOs to secure funds in order to continue to monitor targeted locations.

### **Additional Comments/Recommendations**

**19. Use this space to provide any further comments or recommendations in relation to your project or CEPF**

Nothing to add here.

### **Information Sharing and CEPF Policy**

CEPF is committed to transparent operations and to helping civil society groups share experiences, lessons learned, and results. Final project completion reports are made available on our Web site, [www.cepf.net](http://www.cepf.net), and publicized in our newsletter and other communications.

Please include your full contact details below:

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