

GOVERNMENT OF MONTENEGRO

n / r Zdravko Krivokapić, Prime Minister

RESPONSE TO THE LETTER

Dear Mr. Krivokapić,

We would like to thank you most kindly for the answer you sent us on the occasion of our invitation to join us at the civil gathering in Sinjajevina, location Margita, held on Saturday, October 16, 2021 starting at 11am. Although we regret the missed opportunity, we understand that due to numerous and pre-planned commitments you were not able to attend this event.

We highly appreciate your answer, as well as the answer received from the Ministry of Defense, as these are the first official mutual contacts between the Government of Montenegro and the NGO Civic Initiative Save Sinjajevina, given the fact that we never received answers to numerous letters we sent in recent years.

The letter we received from the Ministry of Defense points out that the ministry is determined to "approach the issue of the military training ground in Sinjajevina in a professional and responsible manner, i.e. to consult the scientific and professional public and determine all facts relevant to resolving the issue". Given this position of the Government of Montenegro, and in anticipation of the promised revocation of the decision on the military training ground in Sinjajevina made in September 2019, we use this opportunity to once again point out the most important facts related to this issue:

1. The planned military training ground is located within the internationally protected UNESCO area - the transition area (zone) of the Biosphere Reserve "Tara River Canyon". Please note that for the transition zone - the area of the Biosphere Reserve, it is defined as an area in which communities nurture socio-culturally and ecologically sustainable economic and human activities.

2. Due to the intention of the Ministry of Defense and the Government of Montenegro to use Sinjajevina as a military training ground, the legal procedure for establishing a protected natural area in Sinjajevina has not been completed so far, as expected in the Spatial Plan of Montenegro until 2020.

It is generally known that the "Study of protection and establishment of a protected natural area in Sinjajevina" was done by the Agency for Nature and Environmental Protection in July 2016 within the project "Sinjajevina". For the realization of this project, the municipalities of Mojkovac, Kolašin, Žabljak,

Šavnik and Danilovgrad received funds from the Delegation of the European Union in Montenegro through the Inter-Municipal Development Grant Program. The "Sinjajevina" project was implemented by the Municipality of Mojkovac in partnership with the municipalities of Kolasin, Zabljak, Savnik and Danilovgrad. In accordance with the activities and goals within this project, the area of Sinjajevina should have been placed under protection in 2016/2017 and no later 2020.

3. Within the IPA project "Establishment of Natura 2000 in Montenegro", which is also funded by the European Union with three million euros, the area of Sinjajevina, based on EU standards in the field of nature protection (EU Directive on the conservation of wild birds - Directive 2009/147 / EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds), is identified as a potential area of special interest for birds - SPA with an area of 39,240 ha (source: Rubinić, B., Sackl, P. & Gramatikov, M., 2019: Conserving of wild birds in Montenegro. The first inventory of potential Special Protection Areas in Montenegro. AAM Consulting. Budapest xiii +328 pp).

4. Also, during the preparation of the "Study of protection and establishment of a protected natural resource in the area of Sinjajevina", in 2015 and 2016, in the area of Sinjajevina, a total of 10 habitat types and 32 species from the annexes of the EU Habitats Directive (therefore of great value) were identified (Council Directive 92/43 / EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora).

5. Montenegro is obliged to implement the obligations from the Bern Convention, considering that the area of Sinjajevina, more precisely Babji zub (Torna) and Gradište, have been identified as one of the areas within the Emerald network in our country.

6. The decision to establish a military training ground in Sinjajevina was made without any relevant study on the social and environmental impact of such action, without open and public discussion and substantive negotiations with the directly affected population. The decision to inaugurate a military training ground in the heart of inhabited and ecologically invaluable pastures is arbitrary, and represents violation of the Montenegrin Constitution and International Environmental Laws, as well as the UN Aarhus Convention, to which Montenegro is a signatory.

7. As the second largest mountain pasture in Europe, Sinjajevina represents an extremely rare agricultural (livestock) potential, and its unique biodiversity is the product of a millennium of coadaptation of traditional human activities and the dynamics of the natural world. Sinjajevina is a place where the centuries-old pastoral identity and culture of unique value have been maintained to this day. Today, this mountain is an area of rapid development of sustainable eco-tourism, ethno-tourism and hiking. At the same time, the snows of Sinjajevina are the main source of water for the rivers Tara and Morača, which belong to the Black Sea

and Adriatic basins.

In this context, the research project "Inspiring rural heritage: Sustainable practices to protect and preserve mountain landscapes" (IRIS), funded by the European Union, and whose implementation involves several European universities as well as the University of Montenegro, included Sinjajevina. Namely, the project is being implemented in five countries in the period from 2020 to 2024, and Sinjajevina is one of the five European research points because it is internationally known for its exceptional natural and cultural value.

The IRIS project, from its experience on similar mountain pastures in different countries of Europe and the Mediterranean, aims to examine in Sinjajevina the impacts that katuns and traditionally extensive livestock have on the environment and society (locally, nationally and internationally), and to compare them with places where they are disappearing or have already disappeared. The conclusions of this independent study will point to the main ways that could guarantee the most productive future for this type of territory, from which other countries in the wider region of interest to the European Union will also be able to learn.

We are sure that the Government of Montenegro and the Ministry of Defense will take into account international and independent experiences when it comes to such a specific area as Sinjajevina, and that they will work closely with the European scientific team that manages the IRIS project.

8. Civic Initiative Save Sinjajevina, which mostly brings together local livestock communities from Sinjajevina and other citizens of Montenegro, has become a member of the prestigious international organization ICCA Consortium, dedicated to the promotion and support of ICCA areas (Indigenous Peoples and Community Conserved Areas and Territories) on regional, national and global level.

What is a persistent and minimal request of local communities and other citizens of Montenegro (a request that is massively supported both in the country and abroad, a support that is growing unstopably day by day), is to officially repeal the decision of the Government of Montenegro to establish a military ground in Sinjajevina, which was inaugurated in September 2019. In contrast, the vast majority wants Sinjajevina to become a protected area in whose creation and management the inhabitants of local communities will be actively involved - cattlemen, residents of katuns and residents of the villages neighboring Sinjajevina.

The practice of the previous government where party gatherings of a handful of like-minded people and political henchmen was the way of presenting that there was agreement with the military plan, but this should not be accepted as a substitute for a truly democratic process and public debate. This is why the local communities were forced to start the public debate by expressing civil disobedience and to demand through continuous protests that the truth come to light and that the natural and cultural values and resources of Montenegro be protected from irresponsible destruction.

In anticipation of the announced moves of the Government in resolving this extremely important issue for Montenegro, Europe and the world - because Sinjajevina is a several times millenary heritage that belongs not only to us but to Europe and the world - we invite you to organize a meeting of representatives of the Government of Montenegro and the Civic Initiative Save Sinjajevina, and to jointly discuss possible solutions that will benefit Sinjajevina and Montenegro.

With due respect,

Civic Initiative Save Sinjajevina

Podgorica, 26.10.2021.