1. Country and Sector Background

The Republic of Montenegro is located on the South eastern coast of the Adriatic Sea. It has a total area of about 13,938 sq. km and a population of about 631,000 people (2004 census). The Republic of Montenegro gained independence on June 3, 2006. Montenegro’s continental and Mediterranean climate, and its natural beauty and resources provide significant potential for development of the tourism industry, particularly along the Adriatic coast. The independent World Travel and Tourism Council have repeatedly ranked Montenegro as the top-growing tourism destination in the world. Montenegro’s, tourism sector however faces a number of issues moving forward, that will need to be addressed in order to achieve its full economic potential and to make it sustainable.

Key Issues: Coastal Montenegro faces a critical mixture of economic opportunity and environmental pressure that must be carefully managed if national growth targets are to be achieved and the environmental beauty is to be preserved. The coastal zone has long been known for its beauty, with the Bojana-Buna Delta exemplifying this. The delta -- with its 13 kilometers of almost unobstructed beach, the dunes and the hinterland with its mixture of wetlands, forests and pastures -- provides living space for many endangered birds. Dolphins can be observed swimming up the river and sea turtles can be observed in the area. The delta and other coastal areas attracted large numbers of tourists before the war, an industry now reviving but also creating pressures on local resources that need careful handling.

Tourism now contributes about 15 percent of GDP, accounts for 15 percent of employment, and is Montenegro’s second largest source of foreign exchange. The World Travel and Tourism Council sees opportunities for the country to increase the contribution of tourism to 21 percent of GDP by 2014, but only if natural resources and the industry itself are managed in a way that
attracts higher value-added tourism. A comparative study undertaken by Bearing Point shows that Montenegro is potentially an attractive destination for higher value-added tourism, but lacks sufficient high quality bed capacity\(^1\).

To address this challenge, Montenegro’s Government has embarked on a plan to rapidly develop the tourism potential of the country, particularly in its coastal areas, where about 95 percent of the country’s tourism is concentrated. Two main instruments frame this plan: (i) the **Tourist Masterplan for Montenegro** adopted in 2001, and (ii) the **Coastal Zone Act**, adopted in 1992. The Tourist Masterplan for Montenegro sets up an integrated regional approach to reorganizing and developing the tourism industry. The Masterplan explicitly protects sensitive environmental areas, with, for example, density limits and the requirement for building setbacks on the inland side of the Bojana-Buna Delta dunes to protect the beach area from development in line with the 1992 Coastal Zone Act regulations. The Coastal Zone Act is the guiding legislation for Montenegrin coastal areas. That legislation established the Coastal Zone Management Agency (Morsko Dobro) that is in charge of managing the beach areas, supporting planning activities e.g., for wastewater treatment, monitoring water quality, and financing coastal infrastructure. Morsko Dobro has 26 permanent staff members in one central and two local offices and an annual budget of approximately €6 million for the above mentioned activities. The Government is currently upgrading the Tourism Masterplan with support from DEG (Deutsche Investitions- und Entwicklungsgesellschaft mbH [German Investment and Development Agency]).

Despite these two instruments and Morsko Dobro’s work, significant shortcomings remain in the coastal zone legal framework, institutional setup, and local and central government enforcement. The Coastal Zone Act focuses on a too narrow strip of land and lacks important environmental criteria. This reflects the gaps in the national level coastal zone management policy, strategy and program. While the Coastal Zone Act provides the norms from a Republic perspective, enforcement capabilities are found primarily at the local level. There, updated urban master plans, cadastres, and integrated municipal management plans are often lacking. Another shortcoming is the general lack of adequate capacity to protect and manage natural areas of high ecological value, a shortcoming most visible in the Bojana-Buna Delta. There is also an inadequate protection status (limited to the coastal strip) and no unit is in charge of managing the entire area, which is under the immediate threat of inadequately controlled development.

**Government Strategy:** The Government of Montenegro (GoM) is currently moving ahead with a reform agenda which aims to protect the coastal zone, and at the same time develop high quality tourism to achieve much needed economic growth. The main elements of this reform agenda are:

- **Coastal Zone Spatial Plan:** The Coastal Zone Spatial Plan which was recently prepared and adopted by the Government (but still needs to be approved by the Parliament) through a public consultation process is a comprehensive planning tool which covers the entire coastal area of Montenegro, and will form the basis for environmentally sound coastal zone development. The sustainable tourism

\(^1\) International tour operators need a package of 500 to 1,500 high quality beds to start their operation. This is something Montenegro cannot offer currently.
development strategy defined in the Tourism Masterplan is integrated into the Coastal Zone Spatial Plan, and upon its adoption, it will became legally binding. The Coastal Zone Spatial Plan was approved by the Government and sent to the Parliament for confirmation.

Greenfield Developments: To address the main obstacle for higher value-added tourism development (shortage of high quality bed capacity), the Government is determined to support Greenfield developments of high quality tourist resorts by internationally reputable developers. A prerequisite for this was that the environmental standards, surpassing the standards used in EU countries bordering the Mediterranean and described in the Tourism Masterplan, were integrated into the Coastal Zone Spatial Plan, and, with the approval of the Coastal Zone Spatial Plan by the Parliament, will become legally binding. The GoM started with identifying reputable developers for the Greenfield developments. To further ensure environmental protection aspects in this procurement process, the Ministry of Tourism and Environmental Protection (MoTEP) has completed the “Guide to Investments and Developments in the Hospitality Industry of Montenegro”, which contains the same high environmental standards as foreseen in the Coastal Zone Spatial Plan. This Handbook will make the environmental standards mandatory for every developer. The Handbook includes a section with clear procedures to instruct investors to minimize and where possible avoid environmental impacts. Despite these initiatives, there are significant gaps in the legal and institutional framework for coastal zone management and also in implementation and enforcement of key elements. The Coastal Zone Act lacks specific environmental provisions and focuses only on a narrow beach and near-shore marine area, neglecting adjacent terrestrial areas which are essential parts of the ecosystem and also very vulnerable to development pressures. Ideally, a single integrated management plan should be developed for both coastal and connected inland areas, and a multi-stakeholder but cohesive institutional structure put in place to guide implementation of that plan. A regional master plan for Ulcinj region has been prepared. Together with the EIA for that master plan, this provides a potential model both in terms of coverage and in terms of the participatory and inclusive process through which they were prepared. However, the Regional master plan does not have legal standing, and the institutional structure for implementing it remains undefined.

Water Utility Reform Plan (WURP): The Government has initiated the development of a WURP with a support by USAID and the Italian Ministry of Environment and Territory to guide the legislative and regulatory transformation process to improve the performance of water supply and sewerage services sector in Montenegro. The preparation of the WURP started in August 2006 and will be completed and delivered for Government Approval in late 2007. A Water Sector Policy Framework has been defined and presented in the stakeholder workshop held in Podgorica in December 2006 to serve as a foundation of the WURP. Another workshop is scheduled for April 2007.
• **Implementation of the Government’s Strategy:** The GoM has the key strategies for coastal zone management and environmentally sound tourism development already in place, however it is facing significant problems to implement these strategies.

2. Objectives

The proposed Project Development Objective (PDO) is to assist Montenegro in better designing and implementing an integrated coastal zone management approach to reduce coastal degradation and in the same time foster environmentally sound tourism development through: (i) enhancing environmental protection, spatial development, institutional capacity and governance of the coastal zone, and (ii) initiating priority investments, such as the first phase of the regional water supply system for the coastal areas, to foster development of high-quality tourism.

Key indicators for achievement of the Project development objective are the following:

- Protected area status is granted to the Bojana-Buna Delta and a unit for managing the area is established and maintained.
- Illegal construction in the area of the Bojana-Buna Delta where detailed urban plans were conducted is halted during project implementation.
- Lack of sufficient water supply is not a constraint anymore for tourism development in the area of Bar.

3. Rationale for Bank Involvement

The Bank has for a long time supported sustainable tourism development on Montenegro’s coast. Under the Montenegro Environmental Infrastructure Project the Bank supported, among others, the construction of Montenegro’s first sanitary landfill, which serves three coastal municipalities. In a follow-up project, the Montenegro Environmentally Sensitive Tourist Areas Project, the Bank extended the lifetime of above mentioned landfill, and will finance a second sanitary landfill for the southern part of Montenegro’s coast. The main bottleneck for sustainable tourism development is insufficient water supply for the coast, and the most important longer term threat is the acceleration of environmental degradation at the coast. Both will be addressed under the proposed MSTDP 1 and the follow-up project, the intended MSTDP 2, and based on past experience, the Bank is well positioned to assist the Government in addressing these issues.

The Central and Local Governments recognize that they have several tools to shape coastal development. Regulatory interventions work best when complemented by physical investments that increase the attractiveness of the Government’s desired pattern of private investment. These investments can range from improvements to nature trails to such infrastructure services as water, wastewater, and transportation. In the proposed project, the Government has requested Bank assistance in some of these interventions. The Government seeks support for the institutional capacity to implement policy; for improving the policy itself; and for financing public infrastructure needed to implement coastal zone development plans.

While Montenegro has other development partners, the Bank is well positioned to assist the GoM to implement a comprehensive project that addresses the multi-sectoral planning and
management priorities and challenges of the coastal zone. Such a comprehensive approach will contribute to an effective implementation of priority measures, will promote close cooperation between line ministries and responsible authorities on the local and national level, and will help avoid overlapping efforts. This would complement the work of USAID, GTZ, KfW and other donors at the coast and could potentially leverage additional donor activities in the sector (possibly IFC, EBRD and EIB). These other donors are all working on specific aspects instrumental for coastal zone management such as urban planning in coastal cities (GTZ), coastal tourism development (DEG), greenfield development and coastal water supply (EBRD), coastal wastewater (USAID), coastal water utilities (KfW). The Bank will assist the Government in better coordinating these efforts and filling some critical gaps so that these efforts produce tangible results for Montenegro.

4. Description

The project has three components summarized below:

**Component 1: Integrated Coastal Zone Management Policy and Institutional Capacity Building Component:** This component will finance improvements in land-use planning and protection to guard against uncontrolled construction and development. In particular it will finance:

a) Consultancy services to carry out a Background Study on the Bojana Buna Delta which is needed before declaring it a protected area, and which will also help to develop an environmental management plan for the Delta, and to establish the Bojana-Buna Delta Management Unit to manage the protected area to be established under the project;

b) Consultancy services to translate the Coastal Zone Spatial Plan into detailed Urban Plans for the Municipality of Ulcinj.

c) Environmental monitoring of the Bojana Buna Delta;

d) Monitoring of illegal construction/land use activities in the Bojana Buna Delta;

e) Provision of an Information Center and Office Building for the Bojana Buna Delta Management Unit

f) Institutional Strengthening for the Regional Water Supply Company (PEW) and the Ministry of Tourism and Environment. As part of the institutional strengthening, this component will finance public awareness and dissemination activities for environmental protection measures in the Bojana Buna Delta and for water demand management on the coast, which will, among others, comprise the developing and implementation of a public awareness, communication and consultation campaign which includes the promotion of support groups.
**Component 2: Coastal Environmental Infrastructure Component:** This component will finance investments for the Continental and Southern part of the Regional Water Supply Scheme to provide water from Lake Skadar to the Municipality of Bar. Extension of water supply to the other cities under the Southern Branch (to Ulcinj and the tourist areas of Valdanos and Velika Plaza) is expected to be done under the subsequent project MSTDP2.

**Component 3: Project Management and Monitoring Component:** This component will finance consultant services, training, equipment and incremental costs for project management, coordination, monitoring and evaluation.

### 5. Financing

<table>
<thead>
<tr>
<th>Source</th>
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<tr>
<td>BORROWER/RECIPIENT</td>
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<td>INTERNATIONAL DEVELOPMENT ASSOCIATION</td>
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<td>PEW</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>41.1</strong></td>
</tr>
</tbody>
</table>

### 6. Implementation

Partnership arrangements: During project preparation, at the recommendation of the Bank, the Government has moved from bilateral to multilateral coordination between donors, national and local stakeholders, by convening the first joint donor/stakeholder meeting on Sustainable Tourism Development in March 2006. This donor/stakeholder meeting was a first step in coordinating activities and programs, promoting the development of an integrated and coherent donor approach to sustainable tourism development in Montenegro, and to share lessons learned. The Ministry of Tourism and Environmental Protection is committed to developing additional capacity and strengthening existing mechanisms for donor coordination. A representative from the Ministry of Tourism and Environmental Protection will be in charge of donor coordination, for convening donor meetings regularly and for communication and coordination between these meetings.

The Bank team participated in all the donor meetings on sustainable tourism development, and also in several donor meetings on water supply and sanitation, which is of utmost importance for the development of coastal tourism in Montenegro. In addition to many bilateral consultations with donors and NGOs, representatives from other donors (DEG and EBRD) participated in the Bank’s preparation missions. The EBRD and other donors together with a private investor, are planning to finance parallel activities that will complement the MSTDP1. In particular the EBRD proposes to finance together with the private investor, the Northern Branch of the Regional Water Supply Scheme that would eventually take water from the Continental Branch partly financed by the Bank, to the northern coastal municipalities of Budva, Kotor, Tivat and Herzeg Novi.

**Project Implementation**

The project will be implemented over four years, with a closing date of September 30, 2011.
Institutional Responsibilities

Ministry of Tourism and Environmental Protection: The Ministry of Tourism and Environmental Protection (MoTEP), on behalf of the GoM will have the overall responsibility for Project coordination and implementation. The MoTEP has assigned a Project Coordinator from inside the structure of the Ministry who is heading the Inter-Ministerial Committee (IMC, see paragraph below on IMC) and who will be in charge of overall project management and coordination. The Project Coordinator will also be part of the Project Coordination Unit in the MoTEP which will be in charge of implementing projects with IFIs. This unit is currently being established and is receiving Technical Assistance financed by the European Agency for Reconstruction (EAR).

Public Enterprise for Water Supply, Wastewater Drainage and Treatment, and Solid Waste Disposal (PEW): Procurement and Financial Management of the Project will be carried out by PEW (as it has been done successfully under the ongoing Montenegro – Environmentally Sensitive Tourist Areas Project (MESTAP)). The Republic of Montenegro created PEW, a fully GoM owned company, to improve water supply and sanitation services in the coastal region and in the municipality of Cetinje. As a GoM owned company, PEW reports directly to the Ministry of Tourism and Environmental Protection. PEW has an excellent track record for implementing Bank financed projects. PEW as a regional company for water supply and sanitation is well suited to implement this project in which most of the investment will be go to wastewater and water supply schemes. As carried out successfully under MESTAP, beneficiaries of the procured works, goods and services will participate in tender preparation and evaluation.

Inter-Ministerial Committee: The Bank gained very positive experience with an inter-ministerial unit composed of high-level decision makers (Deputy Minister level) in other projects, to solve sectoral and cross-sectoral issues during project preparation and implementation. This is of special importance in the area of coastal zone management and sustainable tourism development, which involves many cross-sectoral issues. The GoM has therefore created an Inter-Ministerial Committee for Sustainable Tourism Development and Coastal Zone Management (IMC). The IMC is composed of Deputy-Minister level staff from various line Ministries and is headed by the Project Coordinator from the MoTEP. Morsko Dobro, the Coastal Zone Management Agency, will also participate in the meetings of the IMC and, in addition, concerned municipalities will participate in these meetings whenever needed.

On-lending Arrangements: The share of the Project costs which the GoM will contribute to the Project will be passed on as a grant. Credit funds will be passed on to MOTEP via budget transfer, and to the Municipality of Ulcinj and PEW under the same modified IDA terms as received, with a 10-year grace period, a final maturity of 20 years, a service charge of 0.75 percent, and a commitment fee of 0.50 percent. The MOF will on-lend the credit to PEW, as a revenue earning entity, with modifications of two terms: (1) the interests will be capitalized and added back to the loan until the first year of operation of the regional water supply scheme, and (2) the 10 year grace period for the repayment of the principal will extend until 2017. The reason is to match the capacity of the credit repayment with the anticipated revenue stream of the PEW.
The following legal agreements will define the flow of funds and the respective parties’ roles and responsibilities:

(a) the Development Credit Agreement, between IDA and the Government of Montenegro;
(b) two Sub-credit Agreements, between the appropriate GoM Ministry and the Municipality of Ulcinj and PEW; and
(c) two Project Implementation Agreements between the Bank and the Municipality of Ulcinj and the PEW.

Under the above Sub-credit Agreements, the GoM will be providing sub-credits to these entities. These entities will be accepting the responsibility to repay the credit and to implement the Project. PEW will be performing the function of an implementing agency for the GoM and the Municipality of Ulcinj in terms of Project implementation, including procurement, financial management, reporting and other operational functions. These Sub-credit Agreements will define the following:

- The obligation of the GoM to on-lend part of the credit proceeds it receives from IDA to the Municipality of Ulcinj and PEW, and to contribute its share of the Project costs.
- The responsibilities and functions of PEW, as an implementing agency on behalf of the Municipality of Ulcinj and the GoM, such as: procurement and procurement procedures and limits, use of the special account, monitoring and reporting requirements in relation with the Bank, reporting to the GoM and the Municipality of Ulcinj.
- The responsibilities of PEW, as the final beneficiary of the Project, such as: to operate and maintain the Project financed assets, comply with financial/performance/financial management indicators, implement the Environmental Management Plan, and implement the results of the proposals developed under the provided Technical Assistance.
- The responsibilities of the Municipality of Ulcinj, as the final beneficiary of the project to enforce the detailed urban plans developed under the Project.

In order for the Development Credit Agreement to become effective, at least the Sub-credit and Project Implementation Agreement with PEW will need to be executed.

7. Sustainability

The strategies the GoM has already in place (Tourism Masterplan, Coastal Zone Spatial Plan) as well as the ongoing development of other strategies (such as the Strategy for Sustainable Development) demonstrate the Government’s commitment to the Project development objective, which is a good indicator for sustainability. In addition the Government has expressed its long
term commitment to the Project development objective by issuing a Development Policy Letter which is included as attachment 13 of the Project Appraisal Document.

The sustainability of the Project will mainly depend on achieving sustainable protection of the Bojana-Buna Delta, and on a sustainable and sufficient water supply for the coast. These are three key issues for sustainable tourism development and the project design addresses these factors as follows:

- The Bojana-Buna Delta will receive a permanent protection status and a management unit to protect the area. This is foreseen under the project. In addition the intended MSTDP2 will assist in developing the management plan which define specific protection and monitoring measures, and will also develop a long term finance mechanism for the protected area.

- An Inter-Ministerial Committee is in place and committed to work cross-sectoral to overcome any obstacle that might arise in improving coastal zone management and sustainable tourism development.

- The water supply scheme was designed to achieve low operation costs and adequate service provision to the coastal tourism industry, as well as local residents. The low operational costs would be directly related to the high quality of the raw water supply from the Bolje Sestre source, which would require minimal treatment. Measures will be taken to maintain this water quality through implementation of a Watershed Protection Plan to be implemented by PEW. A study for protection of the source (not only the catchment area but also the surrounding area, in particular the karstic hinterland that feeds the source) is to be commissioned by PEW. The Study will look at all possible pollution threats and define protection measures in each of three legally defined protection zones around the source. The study will be financed by PEW and will be executed in parallel with the finalization of the main design (in spring of 2007).

- The TA provided under the project though which PEW can assist the local water utilities to set up a tariff structure with hotel tariffs and peak summer tariffs, so that the tourism industry and not the permanent resident will have to bear the cost for the peak water supply needs in summer. This will be done in compliance with the cost recovery policy of the Government which is stipulated in the draft Water Supply Law, chapter VII, Article 66 & 67.

8. Lessons Learned from Past Operations in the Country/Sector

The key issues that have been identified from a review of other projects and initiatives for coastal zone management and environmentally sound tourism development have been included in the project as follows:

Intensive public awareness, consultation and communication: The project design stresses the importance of intensive public awareness, consultation and communication for implementing the project, especially for the environmental protection of the Bojana-Buna Delta. The target groups
are the permanent population as well as the tourists visiting the project area. The foreseen public communication and consultation strategy includes the creation of a public support group for the protection of the Bojana-Buna Delta.

**Consensus building among different stakeholders is a key to success:** Coastal Zone Management as well as Sustainable Tourism Development involves a broad array of stakeholders from very different sectors. Throughout project design intensive consultations have been carried out and during project implementation adequate opportunities for active involvement of stakeholders and civil society are integrated in the project design.

**Capacity building interventions, if not coupled with investments, do not lead to results:** Support for policy reform and institutional changes work best when complemented by physical investment which brings tangible benefits and catalyzes ownership of national and regional governments, as well as civil society groups. This ownership is instrumental when implementing challenging reforms like the environmental protection of the Bojana-Buna Delta.

**Co-ordination and partnership with donors is essential:** A large number of donors are engaged in assisting the Government in different aspects of Coastal Zone Management and Sustainable Tourism Development. Working in partnership with other donors is instrumental in ensuring that activities are compatible and complementary in order to maximize results. A Government-led process coordinating donor’s activities commenced during project preparation and a mechanism is in place (the Inter-Ministerial Committee for Sustainable Tourism Development and Coastal Zone Management) to continue and further intensify this process.

**Projects must be integrated within national and local Government institutions:** The Project is well integrated in existing national and local Government institutions, and has foreseen several mechanisms to strengthen and further integrate the work of these institutions towards sustainable tourism development and integrated coastal zone management.

9. **Safeguard Policies (including public consultation)**

<table>
<thead>
<tr>
<th>Safeguard Policies Triggered by the Project</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Environmental Assessment (OP/BP/GP 4.01)</strong></td>
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<tr>
<td>Natural Habitats (OP/BP 4.04)</td>
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<td>Projects in Disputed Areas (OP/BP/GP 7.60)*</td>
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<tr>
<td>Projects on International Waterways (OP/BP/GP 7.50)</td>
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</table>

*By supporting the proposed project, the Bank does not intend to prejudice the final determination of the parties’ claims on the disputed areas*
a) **Environmental Assessment:** The MSTDP Phase 1 falls under EA Category B. However, a full EA was prepared for the Regional Water Supply Scheme covering both Phase 1 and 2 (the currently proposed MSTDP 1 and intended MSTDP 2). The Natural Habitats policy is not triggered by Phase 1 of the project because investments under Phase 1 (including the water offtake infrastructure and operations) will not be located in or affect protected areas or other critical natural habitats.

b) **Resettlement Policy Framework:** Although no physical resettlement is expected, acquisition of land is likely. To be prepared for land acquisition required for some infrastructure investment, a Resettlement Policy Framework (RPF) was prepared by the GoM satisfactory to the Bank. The RPF sets out the policies, principles, institutional arrangements, schedules and funding mechanisms for any land acquisitions that may occur in the project areas as the result of the project. The RPF also provides guidelines to stakeholders’ participating in the mitigation of adverse social impacts of the project, in order to ensure that the social and economic well being of project affected persons (PAPs) will not be worsened as a result of the project. In order to ensure that new illegal settlers are not encouraged to encroach on the land, the RPF includes a cut-off date (December 14, 2006), after which compensation for involuntary resettlement will not be provided.

c) **Projects on International Waterways:** The Project triggers the World Bank’s Operational Policy on International Waters OP 7.50 because it involves the use of the Adriatic Sea and Lake Skadar, which are international waterways under OP 7.50. Internal and external notification requirements are applicable, and the requirements of OP 7.50 have been taken into consideration in processing the project. In accordance with the requirements of OP 7.50, on November 21, 2006, the Government of Montenegro sent letters notifying the Governments of all riparian countries of the Adriatic Sea and Lake Skadar, including Italy, Albania, Croatia and Slovenia, of the proposed project and its details. None of the riparian countries has raised any objection to the proposed project.

d) **Cultural Property:** Although there is no evidence of physical cultural objects or resources at the foreseen construction sites, like all projects involving infrastructure investments, the possibility of chance finds (defined as physical cultural resources encountered unexpectedly during project implementation), cannot be ruled out. The remote possibility of chance finds alone, does not trigger the OP 4.11. However mitigation measures how to deal with them, should they occur will be included in all construction contracts.

e) **Natural Habitats (World Bank OP/BP 4.04):** The Natural Habitats Operational Policy is triggered because the water offtake site lies within Lake Skadar National Park, which is also a Ramsar site. In addition, the Bojana-Buna delta, which will be affected more indirectly, includes important natural habitats and ecologically sensitive areas. However, as described above, the direct negative impacts are expected to be negligible to minor and will be mitigated through good construction practices, and the project will have a positive impact by supporting a variety of measures to improve protection and sustainable management of the Bojana-Buna delta.

10. **List of Factual Technical Documents**
1. Draft Letter of Development Policy

2. Draft Environmental Assessment category A for the Regional Water Supply Scheme

3. Environmental Safeguards Framework

4. Cost Benefits Analysis for the regional water scheme produced by the GoM

5. Draft Resettlement Policy Framework

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