



The 7 Most Endangered 2023

Programme run by **Europa Nostra**, the European Voice of Civil Society
Committed to Cultural Heritage,
in partnership with the **European Investment Bank Institute**

Cultural Landscape of Sveti Stefan Paštrovići, MONTENEGRO

Technical Report July 2024



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0 Summary

Sveti Stefan and Miločer Park are cultural heritage sites of high significance and beauty. The islet is often considered the symbolic image of Montenegro. Sveti Stefan is a 15th century fortified town, built as the cultural and administrative heart of the Paštrovići region where it enjoyed four centuries of autonomy under the Venetian rule. The 1.2 hectare islet, with its stone houses and churches, streets, squares, and gardens, is connected by a low causeway to the mainland at Miločer Park. Sveti Stefan is an inseparable part of Paštrovići's both tangible and intangible cultural heritage.

Miločer Park was used as the summer residence of the Yugoslav kings in the 20th century, in the 1930s. It was developed by the best architects and landscape designers of the time and has a great cultural and natural value with its royal buildings, beautiful beaches, and a forest with grown trees coming from many geographical regions.

Today, however, the on-going overdevelopment of the hotel complex has become a problem. Despite Sveti Stefan having national cultural heritage classification, in recent years the Montenegrin State has almost privatised this most prized national treasure, and essentially disenfranchised its citizens from their own public domain and heritage. Under a 2007 Government's lease contract for Sveti Stefan and Miločer Park signed with a multi-national development company, several unauthorised building and site changes have taken place. A partially built, inappropriate and large-scale condo-hotel sits just inside Miločer Park, already causing significant harm to the cultural and natural value of the site. The popular public summer theatre has been closed and dismantled. Furthermore, public access to the site and the waterfront has been essentially forbidden in recent years, so that locals and non-hotel guest tourists can no longer enjoy this prized cultural landscape.

The Paštrovska Gora mountains, known for their historical and environmental worth, serve as a backdrop to these two exceptional places. These mountains and their archaeological sites are also threatened by the pressures of tourism growth. However, they are not the focus of this report (see Annex 2).

The report urges protecting Sveti Stefan and Miločer Park in accordance with Montenegro's laws, constitution, and ratified international conventions.

The Bankada Foundation nominated and obtained the selection for the 7ME programme to raise awareness about the threats to Sveti Stefan and Miločer Park. The problems are a result of poor management and a lack of resources. The goal of this report is to summarise the situation as discovered during the EN and EIBI experts' visit, draw conclusions, and make recommendations.

1. Purpose, Scope, and Methods

The purpose of this '7 Most Endangered' Technical Report is twofold, first to describe the current situation of the listed cultural heritage monument site of Sveti Stefan and its adjacent buffer zone and Miločer Park, and second to encourage the Montenegrin government in its stated goals to protect the iconic national symbol of Sveti Stefan, and surrounding sites of Miločer Park.

The report follows a methodology established throughout the 7 Most Endangered Programme using a combination of detailed questionnaire, desk research, site visits and stakeholder meetings. It should be emphasised that the EN and EIBI expert team was unable to interview the current operator and the responsible for the tourism complex, as well as visit Sveti Stefan islet, which remained closed during the mission.

In the period from June 2023 to February 2024, three site visits took place to better understand the situation and issues concerning this site. The first visit was on 19 June 2023 by Dr Višnja Kisić, during which it was not possible to visit the islet of Sveti Stefan, despite announcements and attempts, but a detailed visit to the buffer zone and Miločer Park took place.

The second visit took place in [August 2023 by Sneška Quaedvlieg Mihailović¹](#), Secretary General of Europa Nostra, which included a visit to Sveti Stefan through a guided tour operated by Aman Resorts, as well as a visit to the buffer zone and Miločer Park.

The third site visit was prepared as a part of the formal mission from [20-24 February 2024, when the EN/EIBi Expert team visited Miločer Park²](#), the buffer zone of Sveti Stefan, as well as to the Paštrovska Gora mountainside rural settlements. This visit also went without access to behind the walls of the Sveti Stefan islet.

During her visit in August 2023, Sneška Quaedvlieg Mihailović, Secretary General of Europa Nostra, had a meeting with the President of Montenegro, Mr Jakov Milatović.

During their mission in February 2024, the EN/EIBI Expert team met several stakeholders, including the Office for the Protection of Cultural Goods, the State Secretary for Urbanism, the Deputy Prime Minister, the Advisor to the Prime Minister for Culture and Youth, a Member of the Parliament, three Advisors to the President of Montenegro, the EU Delegation in Montenegro, and the European Bank for Reconstruction and Development office in Montenegro, as well as groups of local activists and cultural workers.

A list of the names of all stakeholders met and their institutions can be found in Annex 3.

2 General Context – Location, Economy, and Politics of Montenegro

Montenegro is a small country located in Southeast Europe along the Adriatic Sea, located between Croatia, Bosnia and Herzegovina, and Albania. The capital city of Montenegro is Podgorica; the city of Cetinje, also home to several national institutions, was the former royal capital and cultural centre of the country.

Montenegro is known for its diverse geography, including rugged mountains, its Adriatic coastline, and picturesque lakes including the large Skadar Lake bordering Albania, which is set within a large flat plain south of Podgorica. The country has 293.5 km of coastline, 5% of that of Croatia. The Bay of Kotor, a UNESCO World Heritage site, is a very notable natural and cultural attraction. Montenegro, part of former Yugoslavia since 1918, declared its independence from the State Union of Serbia and Montenegro on June 3, 2006, following a referendum.

The population of Montenegro was 633,158³ people in 2022. Montenegro has a relatively urbanised population, with a significant portion residing in cities and towns along the coast and in the capital city, Podgorica. However, there are also rural areas, particularly in the northern part of the country. There is a great contrast between the rural and urban areas in all indicators, social and economic. The main developed areas are in the south and on the coast.

The economy of Montenegro is mostly service-based and is in late transition to a market economy. Tourism is a significant sector, with the country attracting visitors to its coastal areas, historic sites,

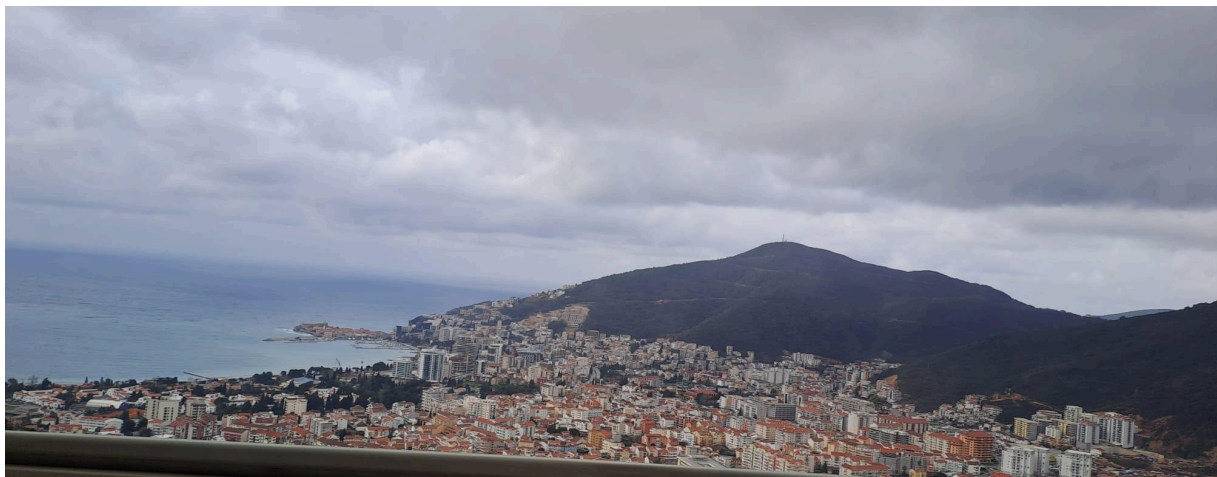
¹<https://www.europanostra.org/secretary-general-of-europa-nostra-and-president-of-montenegro-discuss-ways-to-save-endangered-sites-of-sveti-stefan-milocer-park-and-bay-of-kotor/>

²<https://www.europanostra.org/europa-nostra-and-eib-institute-experts-implement-mission-to-sveti-stefan-in-montenegro/>

³ <https://en.wikipedia.org/wiki/Montenegro>

and natural beauty. Besides the Bay of Kotor, popular tourist destinations include Budva, Sveti Stefan, and the Durmitor National Park.

The Montenegrin economy highly depends on tourists and associated sectors, such as the development of real estate. Total (direct and indirect) contribution of the tourism and travel sector to GDP was 30.9%, total contribution employment was 31.9%, and the share of tourism in exports was 52.6%.² Over 90% of tourists' visits are carried out in the coastal region and mainly during the short summer period (June-September).⁴ The municipality of Budva, where Sveti Stefan and Miločer Park are located, receives approximately 45% of the country's tourists. The number of visitors more than triples the Montenegrin population in season. This puts pressure on the real estate market and has produced a high level of real estate development in coastal areas, including around Budva, where the endangered site is located. Hence, Budva's historical centre is surrounded by buildings and tourist infrastructure that do not always follow a rational, well-planned, or managed urban development, and are increasingly moving up the surrounding mountain slopes.



View of Budva coastline from the mountains.

Montenegro has been a candidate country for European Union (EU) accession since 2010. The country has been working on fulfilling the necessary criteria for EU membership. The negotiations are ongoing, and many chapters are still under discussion. Overall progress in the accession negotiations depends on progress in the rule of law, in line with the requirements set out in the Negotiating Framework, as well as the revised methodology formally accepted by Montenegro at the Intergovernmental Conference held on 22 June 2021. Progress towards meeting the interim benchmarks set in the rule of law in Chapters 23 (Judiciary and fundamental rights) and 24 (Justice, freedom, and security) will be key to achieving further progress in the negotiations overall. No further chapters will be provisionally closed before this milestone is reached.

Cultural heritage normally falls under Chapter 27 (Environment) of the Acquis of the European Neighbourhood Policy and Enlargement Negotiations. However, in the case of protecting Sveti Stefan and Miločer Park, much of the dangers to which they have fallen prey and threats that they still face, also fall under the aforementioned rule of law chapters. In the Commission's report⁵ assessing the country's progress in the way forward to be a full EU member, it is noted that Montenegro continues to maintain a regular dialogue and cooperation with international human rights organisations and monitoring bodies, but there are several conventions not signed, inter alia, the 2019 Framework Convention on Tourism Ethics sponsored by the UNWTO. Among its nine ethical principles, it includes "Tourism - a factor in environmental sustainability", and "Tourism - a user of cultural resources and a contributor to their enhancement". As well, the issue of the lack of citizens' access to their ancestral

⁴ Tourism Development Strategy of Montenegro 2022-2025 with the Action Plan:

<https://www.gov.me/dokumenta/db71ea87-f50f-4aca-98ae-91d8af502816>

⁵ <https://op.europa.eu/en/publication-detail/-/publication/66f8eded-7eee-11ee-99ba-01aa75ed71a1/language-en>

heritage sites and traditional practices on the islet of Sveti Stefan, is in direct contradiction to, and falls under the Council of Europe's Convention on the Value of Heritage for Society (Faro Convention), which the State of Montenegro ratified in 2008.

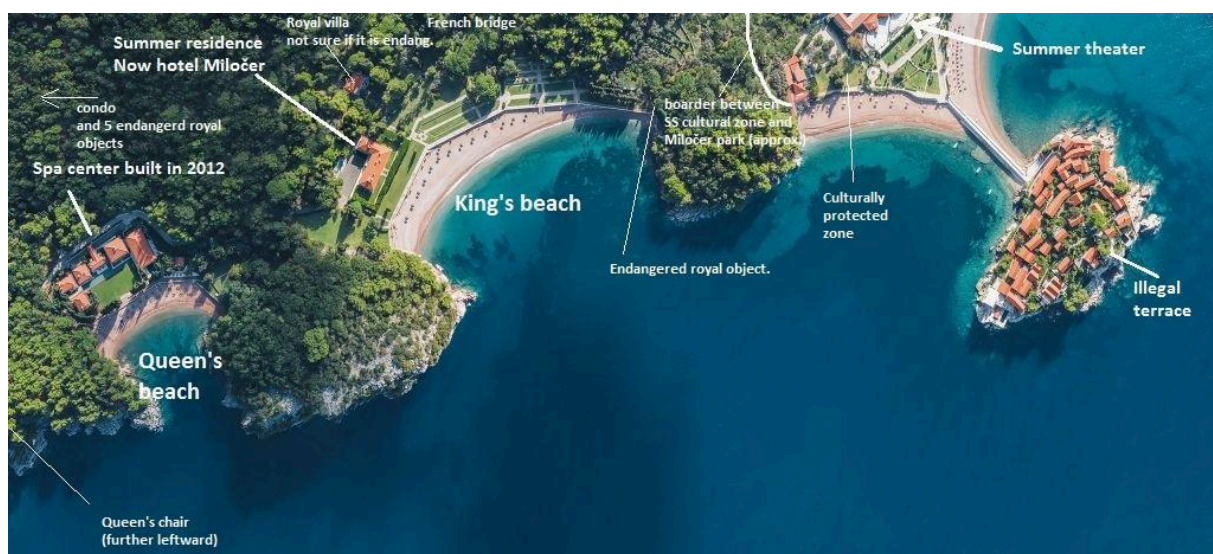
In 2017, the Parliament of Montenegro adopted a new Law on Planning and Construction, whose main provisions declare urban planning to be the responsibility of the state government, thereby taking significant power and resources away from local municipalities. Contrary to contemporary European policies of empowering local communities and decentralising urban planning decision-making processes, this legislation represents a sharp turn towards consolidating state power in all matters related to spatial development, with consequences still to be fully realised and comprehended. In summary, it concentrates on the competencies and ambitions of the parties in power and disenfranchises its citizens. For instance, the status of certain 'special zones', such as Sveti Stefan and Miločer Park, was removed and the obligations to follow the surrounding spatial planning requirements were cancelled.

Since the beginning of the Wars of Yugoslav Succession in the early 1990s, Montenegrin politics was dominated by Milo Đukanović (six-time Prime Minister and twice President). After more than three decades in power, Đukanović was voted out of office and in May 2023, the pro-western candidate Jakov Milatović, then of the 'Europe Now' movement, became President of Montenegro.⁶ The 'Europe Now' party also won the highest number of seats in the 2023 Montenegrin parliamentary election, and at the end of October 2023, Miloško Spajić of the same party, became Montenegro's new Prime Minister, leading a coalition of both pro-European and pro-Serb parties.⁷

3 Sveti Stefan and Miločer Park: Location, Description, History, and Management

3.1. Site location

Sveti Stefan and Miločer Park are located in the Municipality of Budva, and together with the adjacent population nucleus, they make up the small town of Sveti Stefan, approximately 6 kilometres southeast of the city of Budva.



Schematic map of the affected sites

⁶ https://en.wikipedia.org/wiki/2023_Montenegrin_presidential_election

⁷ https://en.wikipedia.org/wiki/2023_Montenegrin_parliamentary_election

See Annex 1 for maps of the wider area, the condo-hotel, and of property ownership designations.

3.2. Site description

The site in danger consists of three main components:

- **The Sveti Stefan islet** is a small, fortified island that was converted into a luxury hotel in the 1950s. There are four churches and about sixty homes on the islet. The houses appear sturdy from the outside and are constructed of stones. Although the town has undergone two significant renovations to date (in the 1950s and in 2007), it is estimated that between 60 and 70 percent of the town's exterior is original. The houses are part of the luxury hotel, and the churches but for one, are used for religious purposes. As from 2017, the islet was protected as a Cultural Good of National Significance, according to Montenegro's classification.

Initially, the island, with its fortress, had twelve families. In the 1800s, a village was established on the island with a population of about 400 people. The population of the island declined in the first half of the 20th century, and by 1954 there were only 20 residents remaining. From 400 inhabitants in the 19th century, there were just 20 remaining by 1954. The Yugoslav government converted the small town into a luxury hotel and moved the remaining inhabitants to the mainland, and the island village became an exclusive resort frequented by high-profile elites from around the world. During this period public access to the islet was guaranteed, and there were regular public tours organised within Sveti Stefan.

The site was damaged during the 1979 earthquake and was restored with international support, including funds raised via UNESCO. Since 2011, the islet became a hotel operated by the multinational company Adriatic Properties (tenant); there have been changes in the interiors of the houses, as well as new unsuitable constructions implemented without respect of the protection guidelines issued by the Office for the Protection of Cultural Goods. Furthermore, the public access to the islet has been limited to attending occasional church services, or visiting through organised tours.

- **The buffer zone of Sveti Stefan islet:** According to the status of Sveti Stefan islet, the protection status allows for a surrounding area with similar real estate development restrictions.

This zone, on land across and east of the causeway, has an open-air theatre above a small shopping strip. It was built in the 1980s and has been a part of the public cultural and festival life of locals and tourists for decades. It is currently not operating due to the pressures from the tenant and is at risk of demolition due to the current tenant's plans. A low not-to-style 1000m² building was constructed behind this strip by the current tenant of Sveti Stefan, without legal permission and construction permit, to accommodate laundry services. Further, there is a large parking lot to accommodate day visitors to the park and immediate beach.



View of the theatre when in use and recently

- **Miločer park** is located next to and north-west of the buffer zone. It is currently not listed as a protected cultural good or cultural landscape, despite its obvious natural and cultural values. The application for starting the protection process for the Park and its buildings and infrastructure was submitted years ago by citizens, but the process of valorisation and protection still has not taken place. Even though the Park does not enjoy protection as a cultural good, the Spatial plan of coastline named the Park as a protected zone of importance.

Miločer Park covers an area of 18 hectares. It is laid out in the French style, with a sharp tree line, bright colours, and the beauty of various plants of the tropical flora. The park has plants imported from distant continents. The royal residence buildings were built surrounded by terraced orchards of 800 olive trees, of which a number of old trees remain. The park, as well as the royal palace located on the King's beach and smaller affiliated villas were built in the 1930s and served the Royal Karađorđević family, who ruled the Kingdom of Yugoslavia. The ownership of the park, palace and villas was nationalised in 1947, together with all other royally owned properties across Yugoslavia. The royal palace became a hotel and was also used in the summers and as a diplomatic reception place for Josip Broz Tito, the president of SFR Yugoslavia. The whole park and its beaches were opened with public access allowed throughout the year.

The palace was refurbished into 8 hotel suites as part of the Aman Sveti Stefan Resort that opened in 2008–2009 under the tenancy of Adriatic Properties. During that refurbishment, no collection of interior items was formed or protected in a systematic way. Further north along the coast from the former Royal Palace is an exclusive Spa with pool facilities overlooking Queen's Beach, constructed by the tenant in 2012, but with the style and layout that fits the landscape and matches the other park buildings.



View of the hotel located at King's beach.

Since the contract with Adriatic Properties as a tenant and Aman Sveti Stefan Resort as an operator of the Sveti Stefan and part of Miločer Park, a series of steps, decisions and constructions have taken place to increase the exploitation of the park, palace, and beaches for luxury tourism as well as real estate development. As a result, public access to the beaches and large parts of Miločer Park has also been halted.

In 2015, the Government, having all spatial planning competences, approved the DUA decision, an Urban-Architectural Solution for Hotel Resort Miločer in Budva Municipality. The

DUA allowed the construction of a 6-storey condo-hotel. The construction of the condo-hotel was halted in 2021 at the start of the London arbitration cases. The unfinished structure stands in the northern park entrance gate where the royal garage used to be situated.



View of the structure of the condo hotel

The planned building's size and architecture do not appear fitting for the location. There was a design competition, but the actual design, now partially built, does not follow, and exceeds the awarded design's plans and volume. Its form and large scale are inappropriate to the park and already causes significant harm to the cultural and natural value of Sveti Stefan and Miločer Park, and detracts from the beauty of the coastline.

The DUA has also allowed out of view extensions to various smaller buildings along the north-south road through the park to accommodate hotel facilities. Several important historical villas are currently threatened with unsuitable modifications and additions to make way for mid-rise condominiums.

- **Wider surroundings of the site:** see Annex 2.

3.3. Site History

The Sveti Stefan islet and Miločer Park have a long history, closely tied to the region. It reflects the broader historical developments in the area that is a contact point of the Balkans and the Adriatic sea. Here is a summary of its different periods:

Mediaeval Period: Sveti Stefan has ancient roots, with evidence suggesting that it was settled well before the 15th century, as evidenced by numerous tumuli in the hills above. In nearby Budva, Roman mosaics, artefacts and building foundations were uncovered in the reconstruction of the old city after the devastating earthquake of 1979. The islet was originally a fishing village and later became a fortified town during the 15th century to protect its inhabitants and Venetian ships from pirate attacks. Settled by 12 Paštrovići clan families, it was the heart of the community's cultural and social life. The settlement was connected to the mainland by a causeway.

Venetian Period: According to the local legend, Sveti Stefan was founded in the XV century by 12 families (clans/tribes) of Paštrovići out of the treasure seized from the Ottomans after the battle for Kotor. During the Venetian rule from the 15th century Sveti Stefan served as a strategic fortress. The Venetians rebuilt and fortified the island several times, and it played a crucial role in defending the Paštrovići region against potential invasions from the Ottoman Empire.

Throughout their history, the island's 12 families (clans/tribes) followed the tradition of 'katuni', migrating between their high mountain villages above and Sveti Stefan below, depending on the seasons and the state of security of the seas around. In 1423 Paštrovići (representatives of 12 clans) signed the agreement with the Venetian Republic according to which they joined the Venetian Commonwealth of the Overseas (Stato da Mar) and stayed under Venetian patronage until 1797.

Paštrovići never fell under Ottoman rule, but from time to time their territory was raided by the Ottoman army or pirates. In 1539, walls of Sveti Stefan were crushed down by the powerful fleet of the Ottoman navy commander Heyrudin Barbarossa. After that it was rebuilt. In 1571, during the war at Candia, after which Venice lost Bar and Ulcinj and much of the lands in Albania and Greece, Ottomans attacked Sveti Stefan again and made significant damage to its defence walls. One of the deadliest raids occurred in 1785 by Mahmut Pasha Bushatlia when many inhabitants were killed with their houses being robbed and burned down.

Napoleonic period: After 1797 and the collapse of the Venetian Republic, Sveti Stefan came under the French (Napoleonic) rule. During this time, a well-known "French bridge" in Miločer park was built. On one occasion, after a local rebellion, the French army raided Paštrovići and nearby Monastery Praskvica and burned it down, along with the huge archive of documents from the monastery. According to the people witnessing the event, the entire bay was turned into white due to the documents floating around.

Austro-Hungarian period: After several years of unstable political rule, with the periodic shift of French, Austrian and Russian rule, in 1815 Sveti Stefan and Paštrovići became part of the Austro-Hungarian empire until 1918. Sveti Stefan became an Austrian fortress, but they did not make efforts in reinforcing and rebuilding it since, as stated in one Austrian military report, Sveti Stefan was " a reef fortified by a good wall ...", and that "... additional costs for its reinforcement are not needed.". In 1837, Austrians made the very precise cadastral map of Sveti Stefan and the nearby lands.

Kingdom of Yugoslavia: Some parts of Montenegro gained independence from the Ottoman Empire in the late 19th century. After the WWI, Montenegro became part of the Kingdom of Serbia, Croatia, and Montenegro. At this time, the Miločer Park was the summer palace of Yugoslav royal family Karađorđević.

The best Yugoslav landscape architects, master gardeners, botanists, stone masons, etc. were involved in the design and construction of the palace and its surroundings. The main architect was Dragomir Tadić. Items were coated in a well-known 'Brač stone', which originates from the Croatian island of Brač. The Karađorđević family chose Miločer because of the view of Sveti Stefan. The Karađorđevićs also bought a house on Sveti Stefan, and they also bought the church of St. Mary and renamed it to St. Alexander Nevsky, who was the favourite patron saint of Queen Marija Karađorđević. She often went to that church to pray after King Alexander was killed in 1934.

20th century and the Yugoslav Era: After the Second World War, when Sveti Stefan became part of the Socialist Federal Republic of Yugoslavia, the inhabitants of Sveti Stefan were expropriated and relocated onto the mainland. The Yugoslav government became the only owner of the islet. In the 1950s, Sveti Stefan underwent a significant transformation when it was turned into an upscale exclusive resort. The entire islet was converted into a luxury hotel and one of the ancient churches

was converted into a casino. The resort featured a unique blend of mediaeval architecture and modern amenities. Sveti Stefan became then a symbol of the country's tourism industry and attracted international celebrities and high-profile visitors. It was an instant hit among the world's rich and famous. It also served as a venue for political conferences and chess championships.

Post-Yugoslav Period: With the dissolution of Yugoslavia in the 1990s, Sveti Stefan remained a luxurious destination, catering to upscale tourists seeking a unique and historic experience. However, the turmoil that raged the region during that decade caused the decline in the number of visitors.

Recent Developments: After the independence of Montenegro in 2006, the national government approved and signed a lease agreement for the maintenance and operation of the whole area of the Sveti Stefan islet, its buffer area, and Miločer Park, and for the exploitation of the luxury hotel complex spread across it. The lease was awarded to Adriatic Properties LLC Budva, and Aman Resorts won the contract to manage the hotel resort complex. Despite Sveti Stefan's national cultural heritage status, the Montenegrin State has partially privatised this most prized national treasure, and public access has been restricted on Sveti Stefan and on the beaches of Miločer Park, preventing locals and tourists from enjoying the site. Recent overdevelopment of the complex has, with unauthorised building and site changes, and a partially built, inappropriate and too large-scale condo-hotel, caused significant harm to the cultural and natural value of the site. The popular public summer theatre has been closed and dismantled.

3.4. Site Significance

Sveti Stefan, an islet of immense beauty and aesthetic value, is a unique example of the 15-18th century fortification and town planning on the Adriatic Sea, on a small islet. The site testifies of the transformations and changes in the area of central Adriatic Sea. This area has witnessed the influences of numerous cultures, empires, and political powers, including the Venetian, Ottoman, French, Austro-Hungarian and Yugoslav.

Miločer Park is a royal botanical garden and public park, with two beautiful beaches (Queen's and King's beach), a previous summer residence of a Yugoslav royal family and an old French bridge from 1808. It represents the most important historical park on the coastline of Montenegro and has unique environmental, historical, and architectural values.

Sveti Stefan, with Miločer Park are national symbols of Montenegro, appearing on numerous documentary movies, postcards and publications as an iconic site worth protecting for the future generations.

3.5. Site Ownership and Management

Ownership

The whole site has two different owners:

- Sveti Stefan Hoteli AD Budva, a corporation jointly owned by the Montenegrin state, 58%, and by the private sector, 42%, is the owner of the islet, the buffer zone with its buildings including the summer theatre, and a major part of the Miločer park, including land around King's beach, royal palace, two royal villas above condo hotel and surrounding land.

The above company was completely public until the late 2000s, when its shares were put on the stock market. In 2022 the new Government stopped the privatisation following the local

population complaints. The majority of the 42% privately owned stocks belongs to the MK Group, owned by Serbian businessman Miodrag Kostić.

- HTP Miločer, 100% state-owned Limited Liability Company is the owner of the land on which the condo hotel is located, the SPA centre building, two royal constructions and their land, and the park area around Queen's Beach, including Queen's chair.

Lease to Adriatic Properties LTD and operation of the facilities.

Initial contract

The original contract lease with Adriatic Properties, signed in 2007 for thirty years, established that the hotels should be functioning eleven months a year at 80% of its capacity. It also established a EUR 110m minimum investment in the complex and that the company had to pay an EUR 1.6m yearly rent to the owners.

Requests for changes and extensions of lease

In 2012, Adriatic Properties' legal representatives, who were closely allied to the authorities of the time, requested the government for an extension of the lease period for thirteen years and a discount of 30% on the rent. The reasons alleged were the extremely critical situation of the company due to losses generated by the economic crisis effects and the reduction of the accommodation capacity and accompanying facilities due to the impossibility to transform some buildings into accommodation facilities. The government sent two annexes of the lease contract to the parliament that were not approved until 2015, when the government obtained the necessary support.

Annexes of initial contract

The annex for Sveti Stefan allowed a twelve-year extension of the lease period until 2049, and a **reduction of the rent from EUR 1.6 m to 1.2 m**. The Queen's Beach annex was adopted half a year later and meant an extension of the **lease period from 30 to 90 years**. In addition, **the lessee was allowed to build a condo hotel**, half of the surface for apartments for sale and half for hospitality activity, the construction of which has been allowed following a problematic breach of existing planning and protection documents via the Governmental Decision on the Urban-Architectural solution for the Miločer hotel resort (DUA), approved in December 2015. This will be discussed in more detail in the section related to key issues the site is facing. Adriatic Properties financed the construction of the condo hotel and the refurbishment of the Sveti Stefan and Miločer Park luxury hotels.

Operation under Aman Resorts

Aman Resorts, a company known for the management of exclusive hotels all over the world, operates the hotels and has an operation contract with Adriatic Properties. The hotel managed to remain open during the Covid pandemic, but in 2021 a conflict arose regarding public access to the public path at Queen's Beach. Then, the Montenegro Government and the Adriatic Company initiated cases in the London arbitration, which resulted in the closing of the hotels, and all construction stopped on the condo-hotel.

Sveti Stefan's economic impact in the local economy is thought to be rather low. The hotel employs relatively few locals, and the guests hardly make any purchases outside its walls. Since Aman's business model is based on a 'closed community', its visitors mostly take advantage of its amenities. Nonetheless, the neighbourhood believes that the 'Aman' brand projects a positive image. This shows

a big contrast to the impact of the hotel in previous times when around 60% of the local population worked in the hotel and it was open all year round.

London Arbitration Case

At the moment of writing, the Montenegrin Government and the tenants, Adriatic Properties, are embroiled in an arbitration case taking place in London UK, where since 2021-22 both parties are suing each other for breach of contract and other matters. The legal issues regarding this case, the causes that brought it about, and its procedures, go beyond the scope of this report.

It is the intention of the 7ME Expert team, however, that the contents of this report will be of use and benefit to those active in saving, protecting, and valorising the cultural and heritage values of the sites of Sveti Stefan, its buffer zone and Miločer Park, as outlined in the report.

4 Key Issues Endangering the Site

4.1. Illegal constructions and additions to the sites

Sveti Stefan

Before the restoration of any cultural asset can take place, the Montenegro Office for the Protection of Cultural Goods is required to issue the Conservatory Conditions to follow for the restoration. Adriatic Properties seems to have started rebuilding the luxury hotel before the necessary Conservatory Conditions were issued. In 2014, the same Office carried out some official cultural heritage assessments of the site and found several infringements of the Conservatory Conditions and the law.

During the official reconstruction that took place between 2007-2011, the Adriatic Properties company made changes to enlarge the size of the suites reducing the number of beds from 182 to 75; they turned many houses into service and staff rooms, and demolished interior walls to make spaces bigger. There are worries that some of these works may have compromised the structural integrity of the exterior fortification walls. The art gallery's dimension was likewise diminished, and it is unclear if this area has been used as a gallery lately.

In 2021, evidence emerged that two new terraces for the restaurant café near St. Steven's church were secretly built without permission, conservatory conditions, and in violation of the protection status of the islet. Photos and videos from 2017 show the area without terraces, while evidence from 2020 features the terraces, indicating that they were built between these dates. Apart from the new terraces (which can be seen from the exterior but only from the back of the islet, thus not from the mainland and beaches), there is no clear evidence of other changes since the expert team could not access the islet and did not have access to the official documents.

Buffer zone

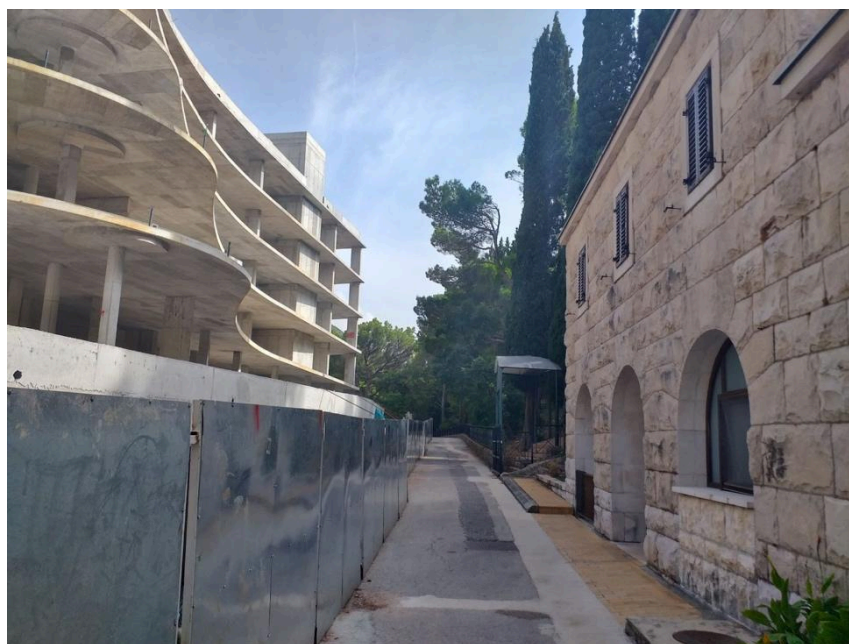
Each protected area must be surrounded by a buffer zone which is subject to the same limitations and maintenance conditions as the protected area. A summer theatre from 1982, that had hosted various cultural events and theatre festivals ever since was shut down in 2015. It was turned into a storage place for beach sets and similar. Two tennis playgrounds, built in 1970 as hotel sport facilities, were destroyed and used as plots for two new buildings: laundry service of 1000 m² and administrative building for the tenant company - both built illegally and without any permissions. The latter was built

to the style of the existing royal estate buildings, the former was built in a rather inappropriate utilitarian style.

Miločer Park

The royal palace in Miločer Park was refurbished into 8 hotel suites as part of the Aman Sveti Stefan Resort that opened in 2008–2009 under the tenancy of Adriatic Properties. The exterior was properly restored, but no collection or classification of interior items was performed or protected in a systematic way. A helipad was built by the tenant in the south-eastern edge of Miločer Park, without permits for construction.

The condo hotel, allowed by the DUA, deviates from the awarded design's plans and volume, as defined through a design competition for condo hotel.



View of the structure of the condo hotel with regards the old royal buildings

Without authorization, the tenant in 2018 destroyed the former royal garage located in the Miločer Park royal complex in order to construct the condo hotel. The Office for the Protection of Cultural Goods imposed Conservatory Conditions, which required the tenant to maintain this structure as "part of the architecture of XX century" in addition to integrating the new condo building into the surrounding area and atmosphere. The semi-built condo-hotel's design deviates greatly from the other park buildings in style and scale, and shows expansive and curved floor slabs which extend a long distance along the park's north-south road. The tenant continued to develop despite the violations of these agreements because they did not follow the Conservatory conditions, or the requirement to create a Conservatory project for the Condo hotel.



Royal garage demolished to build the condo hotel.

4.2. Lack of public access to heritage, beaches, and culture

The islet of Sveti Stefan was accessible to the public before the lease agreement. Once the Aman Resort opened, the only permitted visits to the islet, except for the resort's guests, were churchgoers on Sundays all year round, or via paid guided tours during the hotel's opening season from May to October. The church on the islet is permitted to open on the priest's request for half a dozen church services per year for special religious holidays and dates, and the faithful are then allowed access to the islet to attend the service.

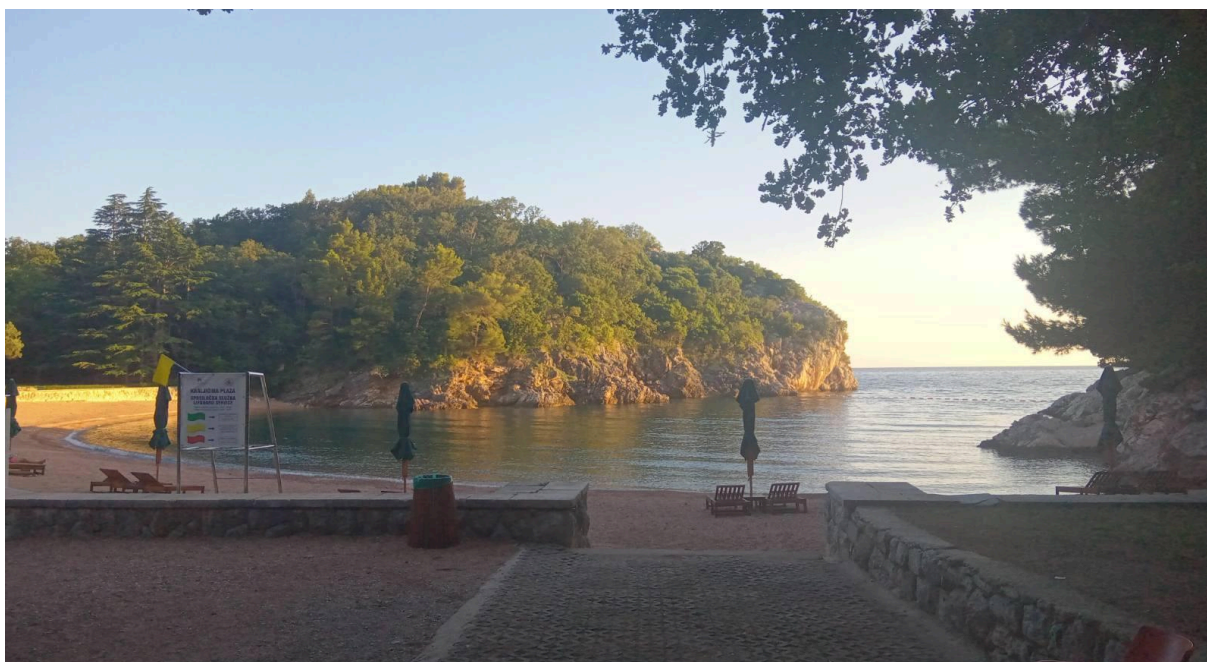
The natural environment of the islet implies green areas and gardens, as well as rocks and cliffs around the islet. The beaches and coastal areas are of exclusive use to the hotel. Nowadays, the islet appears closed to everyone, behind a locked gate. According to Montenegrin legislation, the coast is considered a public good and should be accessible to all.

In the buffer zone, there was an open-air theatre: the Summer Theatre built in the 1980s. It represented a cultural offer beyond the typical Sun&Beach tourism, and especially to the local population. It attracted high-calibre performances and performances and was a draw for locals and the whole region. It halted its operations due to the pressure from the tenant and the operator of the Aman Resort, who considered the theatre incompatible with their guest experience. Its closure has had a negative economic and cultural impact on the municipality, decreasing access to culture and cultural offer to both the locals and tourists in the area. In addition, due to the DUA, the tenant plans to build a new apartment and a congress centre on the spot of the summer theatre, again of an incompatible style and scale for the area.



View of the entrance to Sveti Stefan locked.

Miločer Park's green area is publicly accessible. However, both the Queen's and the King's beaches are essentially closed to the public. During the summertime, anybody wanting to enter the beaches must pay a large fee (EUR 200) if they are not guests of the hotel resort.



View of Queen's beach closed to the public.

4.3. Problematic spatial planning

Since the contract with Adriatic Properties as a tenant and Aman Sveti Stefan Resort as an operator of the Sveti Stefan and part of Miločer Park, a series of steps, decisions and constructions have taken place to increase the exploitation of the park, palace, and beaches for luxury tourism as well as real estate development.

Prior to the lease with Adriatic Properties, the spatial plans of the coastline did not allow for new constructions in Miločer Park. However, given the centralisation of urban planning, the Government changed this protection through the DUA, the governmental Decision about Urban-Architectural Solution of Hotel Resort Miločer, Budva Municipality, approved in December of 2015.

Based on the governmental decision, the tenant plans the development of further unsuitable modifications and extensions of the royal villas and constructions in the buffer zone of Sveti Stefan, without the necessary Conservation Guidelines provided by the Office for the Protection of Cultural Goods. In the buffer zone, the DUA permits the demolition of the summer theatre, and the construction of a block of apartments and a congress centre. All this is not in line with the official protection of Sveti Stefan and the buffer zone.

4.4. Lack of inspection and monitoring of the sites condition and maintenance

Despite Sveti Stefan being listed as a cultural good of national importance, there is no on-going systematic inspection and monitoring on the condition and additions to this site and its buffer zone. As a tenant in the complex, Adriatic Properties bears responsibility for the proper upkeep of the islet.

It is impossible to determine whether the tenant is meeting its responsibilities, since the last time the Office for the Protection of Cultural Goods (OPCG) staff monitored the islet was in 2019. It took them two weeks to arrange access with the tenant. No report appears to have been made of the findings of this visit.

In 2021, the representatives of the owner, Sveti Stefan LTD Budva, issued a report on the unsuitable additions and new constructions in Sveti Stefan islet and the buffer zone. It was signed by Sveti Stefan LTD Budva and the director of Aman Resorts Sveti Stefan. This report has been submitted to the Office for the Protection of Cultural Goods but without further steps taken by the institution or inspection bodies.

The EN and EIBi specialists are concerned about the condition of the site, particularly the interiors of buildings and churches. The windows in each room of the house should be opened every day to avoid humidity and allow air circulation and light, but there is no evidence that this is done, and all reports indicate that all window shutters remain always closed. This creates circumstances for long-term harm to the buildings (humidity, mould, rot), and violates the tenant's and operator's contractual responsibilities and obligations. At the time of writing, OPCG staff are carrying out monitoring and condition assessments of Sveti Stefan and the buffer zone, which will result in a much-needed report.

4.5. Lack of legal protection for Miločer Park

Despite its beauty and historical value, Miločer Park is not under cultural, natural, or mixed goods protection. Several actors have submitted numerous requests in the last decade to the Office for the Protection of Cultural Goods for the initiation of the protection procedure for Miločer Park.

During the 7ME mission, the Office for the Protection of Cultural Goods informed about the implementation of an expert team to begin the official valorisation and protection procedure for Miločer Park. This official inspection would occur concurrent to the same for the structures on the Sveti Stefan islet. The mission members appreciated this initiative. The Office recognised Miločer Park's natural and cultural merits and emphasised its need for conservation. However, the park will not receive "preliminary protection" until the official process is completed. The EN and EIBI specialists underlined that the Park's condition is sensitive, that the park and its buildings are already endangered, and that it is important to act and establish preliminary protection.

5 Conclusions

Meetings with governmental bodies, the EU delegation, the EBRD delegation, and civil society, together with information provided by the Bankada Foundation and the site visit, enabled the team to make the following conclusions.

- Preserving the natural and cultural treasures of Sveti Stefan and Miločer Park, maintaining the natural mountainous background, is crucial for Montenegro's citizens and future generations.
- The value of these sites extends beyond the borders of modern-day Montenegro and reflects historical links across Europe, making it a true European heritage that should be safeguarded and managed wisely, and be developed sustainably.
- The 2007 leasing deal between the Montenegrin government and Adriatic Properties resulted in the degradation of Sveti Stefan islet, unregulated real estate development in Miločer Park, and restricted access to the islet and its beaches for the local and tourist public who are not direct Aman Resort guests.
- The local and National public administration has failed to address these issues and concerns, leading to the deterioration of cultural assets due to insufficient allocated resources and competing government objectives. There does not appear to have been a coherent plan to preserve Montenegro's cultural and natural heritage. As of this writing, however, the Montenegrin Government is gathering input for the creation of the 'Spatial Plan Montenegro for 2040' which is meant to address this lack of attention.
- The 7ME mission expert team, during the multiple discussions with various authorities, highlighted the above noted issues and concerns, and have helped raise the awareness of the need to safeguard the important heritage sites of Sveti Stefan and Miločer Park. The publication of the 7ME Technical Report will underline and reinforce their impact.

6. Recommendations

A general recommendation would be to dedicate enough resources to guarantee the adequate preservation of the cultural and natural resources, which are the base of the sustainable development of Montenegro's tourist sector.

Given the above conclusions and the urgent need to act, the EN and EIBI give the following recommendations:

- I. **Organise as soon as possible an official inspection by the expert team selected by Office for the Protection of Cultural Goods in Sveti Stefan and Miločer Park into the state of condition.**

In order to complete a report, in March and April 2024 the Office for the Protection of Cultural Goods started the monitoring and condition assessment of the site. A report on the

state of condition has to be issued as soon as possible stating the problems encountered and the possible solutions. This report will also be important for the upcoming London arbitration case, as well as future actions towards the sites' long-term protection.

The Montenegrin government must provide necessary support, including additional staff and resources, to the Office for the Protection of Cultural Goods and other government departments responsible for heritage protection, spatial planning, and economic and environmental sustainability.

II. Repeal the DUA as quickly as possible and establish appropriate spatial planning for this area.

This will bring Sveti Stefan and Miločer Park under suitable cultural and natural zoning protection. Several members of the Montenegrin government, including the Minister of Culture, Minister of Urban Planning, Minister of Environment, and the Head of Government have the authority to repeal the DUA on the grounds that it endangers Montenegro's cultural and natural heritage, as well as its protected zones.

III. Ensure the rule of law, including public access and intergenerational enjoyment of cultural assets, as outlined in Montenegro's constitution, laws, and international treaties.

The Montenegrin Law on the Protection of Cultural Goods (article 5) and the Faro Convention, which Montenegro has ratified, ensure public access and intergenerational enjoyment of cultural heritage. Montenegro has to respect and apply these rules, in particular with regard to Sveti Stefan and Miločer Park.

The Montenegrin laws guarantee public access to beaches and coastlines. These should be observed so that people can freely access the beaches, especially if they are of exceptional historical value and natural beauty, such as King's and Queen's beaches. However, the access to these valuable sites should be managed and controlled to ensure the protection of the historical, cultural, and natural values of these places.

The studies on Carrying Capacity Assessments for Heritage Sites guarantee a suitable management of cultural and natural goods. These studies research and provide recommendations on suitable numbers of visitors and public mechanisms for ensuring access.

IV. Declare Miločer Park as a national protected area, with immediate provisional protection measures in place and seek international recognition of Sveti Stefan.

The official listing of Miločer Park requires a rigorous valuation study and procedure, which could take long to complete. To ensure full legal protection for Miločer Park as a cultural good, the EN and EIBI urge the Office for the Protection of Cultural Goods to implement the Preliminary Protection, as outlined in Article 20 of Montenegro's Law on the Protection of Cultural Goods.

V. Pave a strategic sustainable development path for Montenegro based on safeguarding and sustainable use of its cultural and natural heritage.

The growth of Montenegro's economy, when focussed on long-term protective and sustainable goals, will bring a more prosperous future to its citizens where they benefit from the fruits of their labour. This in contrast to an economy based on short-term financial gains, where fast-track developments mainly benefit foreign investors.

Montenegro has a chance to protect and promote its unique cultural and natural heritage and landscapes, rather than build more bland, ubiquitous and rushed development projects, interchangeable with other overdeveloped Mediterranean seaside destinations. The former path is one which attracts more high-end visitors to spend their time in the unique setting of Sveti Stefan and Milocer Park, as is evidenced by the original choice made by Aman Hotel and Resorts luxury brand to establish their resort at this location.

VI. **Support valorisation and protection of the Sveti Stefan and Miločer heritage sites through International lists and programs.**

A strong recommendation from the heritage experts of the team is for Sveti Stefan to be placed on Montenegro's Tentative List to be presented as a **UNESCO World Heritage site**, which would ensure its preservation, as well as public access. The valorisation of the whole area of Sveti Stefan, where Miločer Park and its hinterland of Paštrovska Gora would be considered as the close and extended buffer zones respectively, has great potential for the nomination to the World Heritage List. The whole can be significantly better understood together by interlinking their tangible and intangible heritage values.

This type of protection would foster a local economy based on hospitality, cultural and eco-tourism, instead of directing the area towards more real estate development which endangers the beauty, health and heritage of this area.

Furthermore the cultural landscape of the Paštrovska Gora mountains should be submitted by the Ministry of Tourism, Ecology, Sustainable Development and Northern Region Development as a **EU Natura 2000 landscape**, whose regulations will reinforce the cultural heritage protection being sought.

When considering the visual buffer zone for a potential application for World Heritage status, a more rigorous Spatial Planning and zoning regime for the whole coast of the Municipality of Budva would be beneficial in keeping the views of it from distant points, such as Sveti Stefan and Miločer Park, more focused on the beauty of the landscape, and not on the constructions climbing the surrounding hills.

VII. **Encourage public participation in developing a vision and management plan for Sveti Stefan and Miločer Park, as well as its natural surroundings.**

The government should involve civil society, local authorities, and stakeholders in establishing a management plan for the islet, buffer zone, and Miločer Park. This strategy must assure the long-term preservation of the complex, by proposing an economically feasible solution for the site and preventing overexploitation for tourism and other purposes. The solution must also ensure access for both locals and tourists.

Annex 2: The Paštrovska Gora mountainside above Sveti Stefan and Miločer Park.

Sveti Stefan and Miločer Park are located at the foot of the steep mountains of the Paštrovići region. Known for their historical and environmental worth, the Paštrovska Gora mountains create a protective and embracing setting for the two exceptional heritage sites at the sea. The lower mountain slopes have terraced ancient olive groves, and further up the mountains are many old villages, monasteries and archaeological sites which are threatened by the pressures of tourism growth and inappropriate development. As the visual backdrop to Sveti Stefan, the Paštrovska Gora mountainside needs to have a high level of protection in order to protect the integrity of the heritage of the Sveti Stefan islet.

The Immediate and wider surroundings of Sveti Stefan and Miločer Park:

Surrounding on all sides of the Sveti Stefan and Miločer Park heritage sites, are the connected coastline and the high coastal mountains of the Paštrovska Gora, enclosing the shallow bay on either side of the city of Budva. Besides being of great significance and beauty itself, the mountains of Paštrovska Gora form the indispensable cultural landscape for understanding the Sveti Stefan islet. The mountains are intrinsically connected to the site in historical, ancestral and environmental terms, through the historical practices of the Paštrović families. These mountainsides are the traditional home to the close-knit cultural group which has roots to the 12 family clans historically connected to the immediate area, who followed the tradition of 'katuni', migrating between their high mountain villages above and Sveti Stefan below, depending on the seasons and the state of security of the seas around.

This changed in the 1950s when the Yugoslav government expropriated the homes of the families on the islet to build the hotel on Sveti Stefan, and it compensated these families with land on the mainland just up from the coast. Many of the families still maintain their sea level properties and their houses up the mountain in small traditional villages carrying their family names. These picturesque villages are built on the steep slopes with ancestral stone houses and barns, as well as here and there new locally and foreigner-funded small scale rental property constructions. Dotted through the hillside are multiple small scale monasteries, as well as public projects such as an open-air theatre and park spaces with spectacular views onto Sveti Stefan.

Paštrovska Gora is also closely linked to Sveti Stefan historically with respect to historical political and strategic defence lines: a network and system of small fortifications and towers, served as a part of the Venetian defence system against pirate and naval attacks. These towers, together with the fortress of Sveti Stefan, served as part of the "antemurale" defence rings of Venice, and were sometimes maintained and rebuilt by the city-state. The numerous defence towers of 3 to 4 story height, are thought to have been built to enable visual communication signals between each other and with Sveti Stefan and Budva fortifications.

Also present from much earlier eras, a number of ancient burial 'tumuli' have been found and recorded on the hillsides of Paštrovska Gora, indicating prehistoric settlements and cultures. These finds point to a continuous and developed culture and natural heritage of the Paštrovići region, with during the last 500 years, established traditions and structures, and with their social and cultural centre concentrated on the islet of Sveti Stefan.

There is an extensive network of hiking trails on the mountain slopes which link up to further trails beyond in other parts of Montenegro and neighbouring countries. The rich variety of native

vegetation, fauna and a loud cacophony of bird song, attest to a natural ecosystem which has remained healthy and undisturbed for centuries. Further down the slopes, not far above the seashore, are ribbons of olive groves with some trees dating back more than 1000 years.

The landscape of the Paštrovska Gora mountains should be submitted by the Ministry of Tourism, Ecology, Sustainable Development and Northern Region Development as a **EU Natura 2000 landscape**, whose regulations will reinforce the cultural heritage protection being sought.

As a whole, this is a prime example of European cultural heritage with all its multiple social and historical layers. Damage to the integrity of the Paštrovska Gora mountainside would severely and negatively impact the heritage uniqueness and thus value of the Sveti Stefan and Miločer Park sites. There already exists and there is a great potential to expand on small-scaled sustainable tourism enterprises, funded and created by the local population.

Current situation and present threats

Historic evidence, ancestral ties of the local population, and uses of the land, all suggest that the Sveti Stefan islet and Miločer Park have to be understood and protected within the wider context including Paštrovska Gora. A holistic valorisation and research is therefore urgently needed of the wider visual context of the sea level heritage site. The Paštrovska Gora potential as a visual background for Sveti Stefan and Miločer Park, should be protected against uncontrolled construction and building development. This is especially relevant having in mind that further damage to the landscape of Paštrovska Gora and its slopes would endanger the ambient values and unique vistas surrounding Sveti Stefan and Miločer Park.

Of these, there have been announcements and Budva municipality meetings regarding a controversial N-S highway running high along the mountainside too close to ancient villages and monasteries above Sveti Stefan.

As well, there have been numerous reports regarding a potential 'Brajići wind farm' to be built along the mountain tops. These would not only mar the mountain crests and views, but their construction would cause considerable damage to the mountains from the new access roads that would be needed for securing these wind turbines. There are many other locations for these development oriented projects elsewhere in Montenegro that would not endanger the beauty, historical value and integrity of Sveti Stefan as a national icon, symbol and heritage monument of national importance. These underline the urgency of taking action to safeguard the wider cultural landscape of and around Sveti Stefan.

Visible from another angle, namely from Miločer Park's Queen's Beach (and probably from Sveti Stefan and from the sea edge at the condo-hotel section of the park, but the Expert team had no access to check), is the continuous and continuing construction and development of high-rise apartment and hotel towers in the city of Budva - in the city centre near the water's edge, and also climbing up the hills surrounding the city. These are actually visible from many points within this shallow scalloped bay, but they are especially detracting from the heritage sites in question, Sveti Stefan and Miločer Park. They form a disturbing contrast to the historical value of Sveti Stefan especially, and devalue the sites' heritage uniqueness. It invites obvious comparisons to the overdeveloped and ubiquitous coastlines of other Mediterranean seaside destinations.

This discussion is outside of the scope of this report, but it is something for the Budva Spatial Planning Departments to consider, in how far they will allow future developments of their tourist infrastructure to continue in the current uncontrolled and rapidly growing manner.

Along and above the main north-south highway through the municipality of Budva coastline near the town of Sveti Stefan, was seen evidence of how indiscriminate apartment buildings construction, mid-height and overlooking the sea, are causing significant destruction of traditional terraced olive

groves (with 1000+ year old trees) on the lower slopes of the mountains. When these olive groves are uprooted and replaced by mid-height apartment buildings, as is currently happening at quite a pace, the sea-level sites of Sveti Stefan and Miločer Park will become visually disconnected from their background mountainous setting, and their heritage value will be irreparably damaged. The slopes above the town of Sveti Stefan will come to resemble those of the city of Budva, to its great detriment.

Unlike in some other Mediterranean countries, in the municipality of Budva there is a lack of appreciation of and protection for these heritage trees, their ancient terraces, and their olive oil making traditions. Listing and protecting these ancient olive groves would be a way to also directly protect the wider heritage site of Sveti Stefan and Miločer Park.

Historic evidence, ancestral ties of local population and uses of the land of the Paštrovići region above Sveti Stefan, all suggest that the islet and Miločer Park have to be understood and protected within the wider context including the Paštrovska Gora mountain slopes behind them.

This is especially relevant having in mind that further damages to the landscape of Paštrovska Gora and its slopes, could limit a possible sustainable future for the area by degrading and endangering the ambient values and vistas surrounding Sveti Stefan and Miločer Park. The current threats which are still in the planning stages, but are being seriously considered by the government, are the construction of a possible N-S highway running high along the mountainside too close to ancient villages and monasteries, and a possible wind farm to be built along the mountain tops. As well, though perhaps less attention getting but equally dangerous, the continuing construction of more and more hotel and apartment towers along and creeping up the mountain slopes, can quickly destroy that which makes the Sveti Stefan and Miločer Park heritage sites so unique, their setting.

Annex 3: Summary list of 7 Most Endangered (7ME) mission participants and officials visited

Name	Institution
Dr. Višnja Kisić	EN - 7ME Advisory Panel member. Academic, art historian, heritage management specialist
Laure Neale	EN - 7ME Advisory Panel member. Architect, heritage assessment expert, artist
Lourdes Llorens Abando	EIBI – consultant. Economist, planner
Blažo Kažanegra	Bankada Foundation ⁸ . Lawyer, 7ME site nominator
Dragana Kažanegra-Stanisić	Bankada Foundation. Budva City Councillor
Srdjan Kuljaca	Bankada Foundation. Entrepreneur
Dušan Medin	Bankada Foundation. Academic, author
Balša Perović,	Acting Director of the Office for the Protection of Cultural Goods
Dr. Petra Dracović Zdravković	Office for the Protection of Cultural Goods, Archaeologist, Deputy Director
Andreja Mugoša	Conservation Architect, Office for the Protection of Cultural Goods
Mirsad Drić	Montenegrin State Secretary of Urbanism
Leila Toković	Director Promotion and Development of Architecture
Aleksa Bečić	Deputy Prime Minister of Montenegro
Vučić Četković	Advisor to PM for Culture and Youth
Vasilije Čarapić	Member of Parliament
Biljana Papović	Political Advisor to the President
Milena Pejović-Eraković	Deputy Chief of the President's Cabinet
Olivera Vukajlović	Advisor to the President for sustainable development
Riccardo Serri	Deputy Head of EU Delegation for Montenegro
Remon Zakaria	Head of EBRD in Montenegro
Vasilije Jauković	Principal Banker – EBRD in Montenegro

⁸ Bankada Foundation is a “zoon-politikon” civil activism platform that includes NGOs and individuals from the territory of Paštrovići, that aims to protect the natural and cultural heritage of Paštrovići and surroundings. One of the constituting members of Bankada is the citizens ‘Initiative for Sveti Stefan’.