KOTOR MONTENEGRO

GSTC DESTINATION ASSESSMENT

July 2024

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ACKNOWLEDGEMENTS

Figure 1 : Kotor Destination Assessment Officials

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ACRONYMS

ALH		Adriatic Luxury Hotels
AOG		Association of Guides
AOTC		Association of Technical Culture
AOTG		Association of Tourist Guides
BLPB		Blue Line Public Bus
CBM		Central Bank of Montenegro
CEM		Chamber of Economy of Montenegro
CLIA		Cruise Lines International Association
COVID-19		Corona Virus 19
DMC		Destination Management Company
DMO		Destination Management Organization
EA		Eco Association
EAM		Employment Agency of Montenegro
EBRD		European Bank for Reconstruction and Development
EC		Entrepreneurship Center
EIA		Environmental Impact Assessment
EIB		European Investment Bank
EPCG		Electric Power Industry of Montenegro
EU		European Union
EUROSTAT		Statistical Office of the European Union
EUSAIR		EU Strategy for the Adriatic-Ionian Region
GEF		Global Environment Facility
GSTC		Global Sustainable Tourism Council
GSTC-D		GSTC Destination Criteria
HMP		Heritage Management Plan
HUK		Hotel Union of Kotor
ICOMIA		International Council of Marine Industry
ILS		International Life Saving Federation
IMO		International Maritime Organization
IPA		Cross-border Cooperation Program Interreg MED Program
IPARD		EU Support Program for Agriculture Development
IPH		Institute of Public Health of Montenegro
ISME		Institute for Standardization of Montenegro
IUCN		International Union for Conservation of Nature

LKC	I Love Kotor Card
MAFWM	Ministry of Agriculture, Forestry and Water Management
MC	Med Cruise
MED	Ministry of Economic Development
MESCS	Ministry of Education, Science, Culture and Sports
MESPU	Ministry of Ecology, Spatial Planning and Urbanism
MGX	Montenegro Airlines
MICE	Meetings, Incentives, Conferences, and Exhibitions
MoH	Ministry of Health
MoK	Municipality of Kotor
MONSTAT	Statistical Office of Montenegro
MOT	Ministry of Tourism
MSLI	Montenegro Shipping Lines, Inc.
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organization
NTO-M	National Tourism Organization of Montenegro
OECD	Organization for Economic Co-operation and Development
PECZM	Public Enterprise for Coastal Zone (PECZM) of Montenegro
PENPM	Public Enterprise National parks of Montenegro
POK	Port of Kotor
PPP	Public Private Partnership
RAC	Regional Activity Center
SBA	Small Business Act
SDGs	Sustainable development goals
SME	Small and Medium-Sized Enterprises
UNDP	United Nations Development Program
UNEP	United Nations Environment Program
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNICEF	United Nations Children's Fund
UOM	University of Montenegro

EXECUTIVE SUMMARY

Kotor 2023

City of Kotor, a UNESCO World Heritage site known for its cultural and natural significance, spans approximately 335 square kilometers in Montenegro. This destination serves as a gateway to outdoor activities, with Lovćen National Park offering diverse hiking opportunities and rich flora and fauna. Kotor's tourism sector in 2023 demonstrated significant growth and resilience, solidifying its position as a premier destination in the region. The city welcomed over 500,000 tourists, marking a 15% increase from the previous year. This influx was primarily driven by a robust cruise ship industry, with more than 350 ships docking at the Port of Kotor, bringing an estimated 700,000 passengers. Additionally, overnight stays in Kotor surged to 1.2 million, reflecting a 20% rise compared to 2022. The majority of visitors hailed from Western Europe, particularly Germany, France, and the United Kingdom, contributing significantly to the local economy.

The average tourist expenditure also saw an uptick, with visitors spending approximately 12% more per day than in the previous year. This increase in tourism activity has had a positive impact on local businesses, particularly in the hospitality and retail sectors, further boosting Kotor's economic vitality. The city's cultural and historical heritage, coupled with its enhanced infrastructure and sustainable tourism practices, continues to attract an increasingly diverse and high-spending tourist demographic. These trends underscore Kotor's growing appeal as a year-round destination, with off-season tourism also showing promising growth.

Kotor faces several critical issues as a tourism destination, primarily centered around sustainability. The rapid growth in tourism, particularly from cruise ships, has led to overcrowding, straining the town's infrastructure and natural resources. This influx has raised concerns about the preservation of Kotor's cultural heritage and the environmental impact on its delicate ecosystem, including the Bay of Kotor. The concentration of tourism along the coast has also contributed to economic disparities, with insufficient benefits reaching the less-visited central and northern regions of Montenegro. Sustainability is paramount for Kotor's future as a viable tourist destination. There is a pressing need for comprehensive assessments to evaluate the environmental, economic, and social impacts of tourism. Such assessments would help in developing strategies that balance tourist demand with the preservation of Kotor's unique cultural and natural assets. This includes managing visitor numbers, promoting responsible tourism practices, and ensuring that the economic benefits of tourism are more evenly distributed throughout the region. Addressing these issues is essential to maintaining Kotor's appeal as a destination while safeguarding its heritage and environment for future generations.

To diagnose and begin addressing some of the stress points and plan for more sustainable management, the Municipality of Kotor commissioned a Global Sustainable Tourism Council (GSTC) Destination Assessment of the City, applying the GSTC Destination Criteria (Version 2, 2019). The GSTC Destination Assessment was co-funded by the Cruise Lines International Association (CLIA), as part of CLIA's support to collaboratively address tourism sustainability in the City and the Port of Kotor. CLIA appreciates GSTC's requirement that, as co-founder, CLIA is not allowed any editorial input into the content of this report.

GSTC conducted the Destination Assessment in September - December 2023, working closely with the Municipality of Kotor and the Port of Kotor. Applying GSTC's Assessment methodology, GSTC reviewed law and policy documentation governing City management, and consulted about 64 key stakeholders and leading organizations from national and local government, private sector, NGOs and academia, and residents, through extensive meetings to evaluate the City's performance against the GSTC Destination Criteria.

The GSTC standard covers four main pillars of destination sustainability: (1) destination policy and planning, (2) community involvement and benefits, (3) management of cultural and natural assets, and (4) environmental and natural resource management. The GSTC Destination Assessment of Kotor found that of the 38 Criteria in GSTC-D standard, 3 (7.9%) were rated excellent, 11 (28.9%) were rated good, 7 (18.4%) were rated as good with some improvements needed, 10 (26.3%) identified in moderate risk, and 7 (18.4%) were flagged as high-risk. The total score that the Destination achieved was 60.18, which is equal to 65.82% of the Excellence Limit.

In December 2023, based on GSTC's initial findings of the City's performance in these areas, 27 stakeholders participated in a workshop to prioritize their most urgent and important six issues to focus on in the coming period. Participants designed action projects to address the following issues they flagged as priorities:

- Infrastructure & Legislation Implementation: Transportation, Parking, Traffic Control, Sewage, Access to all
- Transport means, alternatives and Green Solutions, low impact transportation
- Connecting Research Outcomes and Local Needs, including Private Sector priorities
- Cultural Intellectual Property & Protection of Local Culture against others
- Differentiation of Tourism offer, including tour operators, DMCs, Cruises and Alternative Activities Priority, for minimizing seasonality
- Sustainability Standards & SMEs
- Resident Satisfaction and Public Participation in Destination Decision Making

This report presents GSTC's findings of Kotor's performance along the GSTC Destination Criteria, and the community-designed roadmap to address stakeholders' priority risks. Nevertheless, improving Kotor's Infrastructure & Legislation Implementation (Transportation, Parking, Traffic Control, Sewage,

Access to all) was defined as the most important priority for local stakeholders. The overall findings and pilot action plan for the most important priority according to the stakeholders from the GSTC Destination Assessment can inform future initiatives to ensure sustainable management of the Municipality of Kotor. GSTC applauds the City for taking this step and urges the City to continue monitoring the progress in adopting the GSTC standard, using these GSTC Assessment findings as a baseline.

Figure 2 : A 20th century photograph of the Port of Kotor

INTRODUCTION

Global Sustainable Tourism Council

The Global Sustainable Tourism Council (GSTC®) is an independent and neutral organization, legally registered in the USA as a 501(c)3 non-profit organization that represents a diverse and global membership, including national and provincial governments, leading travel companies, hotels, tour operators, NGO's, individuals and communities – all striving to achieve best practices in sustainable tourism.

The GSTC is managing the GSTC Criteria, global standards for sustainable travel and tourism; as well as providing international accreditation for sustainable tourism Certification Bodies. It is a virtual organization without a main office, with staff and volunteers working from all six populated continents. Financial support from donations, sponsorship, and membership fees allows us to provide services at low costs and to create, revise, and make available the GSTC Criteria. GSTC is an ISEAL Community Member.

The GSTC establishes and manages global standards for sustainable travel and tourism, known as the GSTC Criteria. There are two sets: Destination Criteria for public policy-makers and destination managers, and Industry Criteria for hotels and tour operators. They are the result of a worldwide effort to develop a common language about sustainability in tourism. They are arranged in four pillars: (A) Sustainable management; (B) Socioeconomic impacts; (C) Cultural impacts; and (D) Environmental impacts. Since tourism destinations each have their own culture, environment, customs, and laws, the Criteria are designed to be adapted to local conditions and supplemented by additional criteria for the specific location and activity.

The GSTC Criteria form the foundation Accreditation for Certification Bodies that certify hotels/accommodations, tour operators/transport providers, and destinations as having sustainable policies and practices in place. GSTC does not directly certify any products or services; but provides an accreditation program to accredit Certification Bodies.

GSTC Destination Assessment

GSTC Destination Assessment is designed to introduce the destination management team to the core elements required to develop sustainable policies and practices by applying the GSTC Criteria to the destination. The Assessment process allows a destination to participate directly in GSTC application of the Criteria to the destination, to understand the destination's sustainability status against the world's leading standard, and to identify areas for improvement based on the GSTC Criteria.

The GSTC Criteria aims to address sustainability from a holistic perspective—reviewing overall governance, socio-economic benefits to the destination, cultural and heritage preservation, and environmental performance. These factors all lead to a positive investment climate, strong sense of place, and high quality of life for both residents and visitors in the destination. The GSTC destination assessment is **not an audit** and does not constitute any kind of verification or endorsement of the destination's policies, practices, or status by GSTC. The objective of the assessment is to provide the destination with an overview of current good practices and risk areas, a demonstration of practical application of the [GSTC Destination Criteria (GSTC-D)](#) for stakeholder capacity-building purposes, and a tool for internal use to improve destination policy and practice to align with international best practice and the GSTC Criteria.

The GSTC-D has been built on decades of prior work and experience around the world, and they consider the numerous guidelines and standards for sustainable tourism from every continent. The GSTC-D v2.0 is the first revision to the GSTC Destination Criteria. The GSTC-D v2.0 includes performance indicators designed to provide guidance in measuring compliance with the Criteria. Application of the Criteria will help a destination to contribute towards the 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals.

In selecting the GSTC Destination Criteria as a guide for Kotor's strategic development, the destination joins a group of forward-thinking destinations that are prioritizing international best practices. As Kotor follows steps to adopt all the GSTC Destination Criteria, the destination can better market itself to individuals who believe in and adopt sustainability practices. Based on the GSTC Destination Assessment, Kotor cannot claim GSTC's endorsement of the destination or its policies. However, it would be appropriate for the destination to market that it participated in the GSTC Destination Assessment, and is committed, if true, to adopting the world's leading sustainability criteria for tourism development.

It is recommended that findings and recommendations resulting from this GSTC assessment be used:

- to inform action on destination sustainability planning and project work
- to catalyze decision maker support for a destination tourism sustainability agenda
- as a training and education tool
- for monitoring and evaluation of destination performance
- as an input into the strategic planning process that the Kotor's Tourism Authority has underway for sustainable tourism development in Kotor

About the Destination

Nestled on the Adriatic coast, Kotor is a captivating town celebrated for its medieval charm and stunning surroundings. At the heart of Kotor lies its UNESCO World Heritage-listed Old Town, a living testament to centuries of history. The narrow cobblestone streets wind their way through a maze of medieval architecture, reflecting influences from the Illyrians, Romans, Byzantines, Venetians, and Ottomans. The Cathedral of Saint Tryphon, a Romanesque masterpiece, stands as a sentinel, narrating tales of Kotor's ecclesiastical past. The town's maritime legacy is encapsulated within the walls of the Naval Museum, offering a glimpse into Kotor's seafaring history. This cultural richness is further accentuated by a calendar dotted with events such as the Kotor Carnival and the KotorArt Festival, providing visitors with immersive experiences of local traditions and artistic expressions.

Figure 3 : An outlook of the Kotor City Location and View

Kotor's geographical setting amplifies its appeal. The Bay of Kotor, often likened to a fjord, is framed by towering mountains, creating a breathtaking panorama that captivates all who visit. The bay's azure waters gently caress the town's shores, and the surrounding peaks provide a dramatic backdrop. The allure of Kotor extends beyond its historical confines, beckoning visitors to explore the natural wonders that envelop the town. The proximity of Lovćen National Park adds another layer to Kotor's natural allure. Hiking trails offer adventure enthusiasts an opportunity to explore the diverse flora and fauna of the region while relishing panoramic views of the town and its surroundings.

Kotor's population stood at approximately 13,500 residents. This relatively modest population contributes to the town's intimate atmosphere, creating a sense of community that is often absent in larger, more bustling destinations. The residents of Kotor, deeply connected to their town's rich history, contribute to its charm through their warm hospitality and preservation of local traditions.

However, the delicate balance between preserving the town's authenticity and managing the increasing influx of tourists presents a challenge. Striking this equilibrium is crucial to ensuring the sustainability of Kotor as a destination that retains its character while welcoming visitors.

Kotor's economy is significantly bolstered by tourism, driven by the town's historical significance and natural beauty. The Old Town, with its array of boutique shops, traditional restaurants, and charming accommodations, serves as the epicenter of tourist activity. Cruise ships regularly dock in the bay, unloading throngs of visitors eager to explore Kotor's cultural and natural wonders. While tourism brings economic prosperity, it also poses challenges. The delicate balance between preserving the town's historical integrity and meeting the demands of a growing tourism industry requires thoughtful planning. Sustainable tourism practices and community engagement are essential to safeguarding Kotor's unique identity and preventing issues such as overcrowding and environmental degradation.

Kotor, Montenegro, stands as a jewel along the Adriatic coast, beckoning travelers with its rich history, natural splendor, and vibrant cultural scene. The town's unique blend of medieval charm, maritime legacy, and stunning landscapes make it a destination that resonates with both history enthusiasts and nature lovers. However, as Kotor continues to attract a growing number of visitors, the delicate equilibrium between preservation and development must be maintained. Sustainable tourism practices, community involvement, and thoughtful planning are essential to ensure that Kotor retains its allure for generations to come. As this coastal town navigates the currents of progress, the preservation of its historical and natural treasures remains paramount, safeguarding Kotor as a timeless destination where the past and present harmoniously coexist.

In this context, to help advance Kotor's strategic objective of pursuing balanced and sustainable tourism development, the Municipality of Kotor, with the support of its Tourism Board, commissioned the Global Sustainable Tourism Council (GSTC) Destination Assessment to assess Dubrovnik's compliance with the GSTC Destination Criteria (Version 2.0).

The GSTC Destination Assessment facilitated systematic analysis charting a roadmap to meet GSTC's global standard for sustainable destinations, the GSTC Destination Criteria and Indicators:

The GSTC standard covers the four main categories of destination sustainability:

- Sustainable management
- Socio-economic sustainability
- Cultural sustainability
- Environmental sustainability

The GSTC Destination Assessment is not a certification program but is widely recognized as a critical tool for helping destinations improve their management practices—and prepare them, should they choose, to undertake certification by a GSTC-accredited destination certification program. This report presents the GSTC Destination Assessment findings and Kotor stakeholder designed action plan for sustainable destination management of the city.

Introduction

The Port City of Kotor is situated in one of the most idyllic bays in the Mediterranean, Boka Kotorska Bay. The City has impressive and deep cultural and historical heritage attractions as a UNESCO protected site.

The City of Kotor is reliant on tourism economically speaking, and specifically on cruising due to the relative inaccessibility of Kotor through other means of transport. The City's diversity and plethora of natural assets presents significant potential for a unique and extensive tourism ecosystem. Developing the many individual components into cohesive products and experiences as part of a well-organized tourism value chain, however, has proved challenging to destination managers to date. Despite local and national management authorities' efforts, the Port of Kotor is mainly seen as a summer destination, which adds to difficulties in management regarding tourism flows and congestion. However, cultural tourism development in the Town of Kotor has been on the rise in recent years. This is due to the rich history and cultural events and artifacts available to tourists.

Kotor is at a crossroads facing a series of critical questions. What are the impacts of tourism on its natural and cultural sites and attractions? How well is the City currently managing these impacts to protect the integrity of the resources on which tourism is built? What are the policies and actions needed to more effectively manage the City to mitigate negative impacts and ensure long-term destination health?

In this context, and to help advance Kotor's strategic objective of pursuing balanced and sustainable tourism development, the Municipality of Kotor and the Port City of Kotor, commissioned this GSTC Destination Assessment to assess Kotor's compliance with the GSTC Destination Criteria (Version 2.0, 2019). The GSTC Destination Assessment was made possible by funding from the Cruise Lines International Association (CLIA), as part of CLIA's partnership with the Municipality of Kotor and the Port city of Kotor for improved sustainable tourism management.

The GSTC Assessment took place from October - December 2023 and builds on the City's robust foundation of initiatives to assess and improve the sustainability of the tourism sector in Kotor. The

objective of the GSTC Destination Assessment is to assess the destination's current and future capacity to sustain tourism in the long term.

The holistic and participatory process addresses such questions as:

- How compliant is Kotor today with internationally recognized indicators for sustainable destination management?

- What current good practices and key initiatives are improving Kotor's environmental, social, and economic sustainability, and what high-priority destination risks are undermining sustainability?

- What are the implications of risks for the visitor, resident, and business community experience?

- Of the risks identified, which do Kotor stakeholders prioritize as most urgent and important?

- What practical actions and initiatives can address the high-priority risks identified?

The GSTC Destination Assessment facilitates systematic analysis charting a roadmap to meet the GSTC Destination Criteria (see Annex D).

Figure 4 : An illustration of a gate towards the old city fortress

Tourism Status

The city of Kotor is situated at the south end of Kotor Bay on the Adriatic coastline of Montenegro. Kotor is a walled town with a rich history and impressive mountainous geography, as it lies at the foot of Mount Lovćen. The city of Kotor is also set with the background of the Dinaric Alps, a rugged and awe-striking mountain line that stretches the eastern Adriatic coast, giving it a spectacular backdrop (*Cook, 2018*). Considered the jewel of Kotor bay, Old Town of Kotor consists of 4.5 km of encircling fortifications which reach up to 20 m high (*Cook, 2018*). The fortifications have a characteristic look emblematic of Venetian architecture and were built from the 9th century till the 18th.

Figure 5 : Kotor Old Town Map

Path to Fortress of St. John
Church of Our Lady of the Health

more sea

1. Gradske zidine (IX–XVIII v.)
2. Glavna gradska vrata
3. Sat kula (XVI v.)
4. Katedrala Sv. Tripuna (XII v.)
5. Pomorski muzej Crne Gore
6. Gradska česma " Karampana"
7. Crkva Sv. Luke (XII v.)
8. Crkva Sv. Nikole (XX v.)
9. Kneževa palata
10. Crkva Sv.Ane
11. Crkva Sv. Mihaila
12. Crkva Sv. Marije Koladate(XII v.)
13. Sjeverna vrata (XVI v.)
14. Južna vrata (XII–XVIII v.)

1. The Town Ramparts (IX–XVII century)
2. The Main Town Entrance
3. Clock Tower (XVI century)
4. St. Tryphon Cathedrale (XII century)
5. The Montenegrin Naval Museum
6. The Town Fountain " Karampana"
7. St. Luca's Church (XII century)
8. St. Nicola's Church (XX century)
9. Duke's Palace
10. The Church of St. Ana
11. The Church of St. Mihailo
12. The Church of St. Maria (XII century)
13. The Northern Entrance (XVI century)
14. The Southern Entrance (XII–XVIII century)

KOTOR OLD TOWN

Kotor can be considered a ria as it used to be an ancient river valley which was flooded with rising sea levels as well as Europe's southernmost fjord, which makes it an excellent natural harbor (*Cook, 2018*). Hugged by the sea and the mountains, visitors arrive at Kotor primarily by cruise or by plane to the nearby Tivat Airport, 10 km outside the Old Town of Kotor.

Montenegro as a whole has an unemployment rate of 10.5% and a high youth unemployment rate of 20.2% which may be explained by the country's dependence on temporary/seasonal employment which makes up 30.6% of total employment (*Eurostat, 2023*).

Montenegro has a growing economy with a 4.5% annual GDP growth in 2023 (*IMF, 2023*). Tourism is a driving sector of this economic growth accounting directly for 9.5% of Montenegro's GDP in 2019 and 9% of the total employment of the country (*OECD, 2022*). Moreover, accounting for the tourism sector's indirect contribution to Montenegro's GDP, the value is much higher than 9.5% and was reported to be as high as 21.6% in 2018 (*Bobic & Akhavan, 2022*). The services industry, which tourism is a part of, accounts for the largest employment sector in Montenegro followed by Industry and Construction (*Eurostat, 2023*).

Figure 6 : Employment by main Sector Montenegro 2021 (Eurostat, 2023)
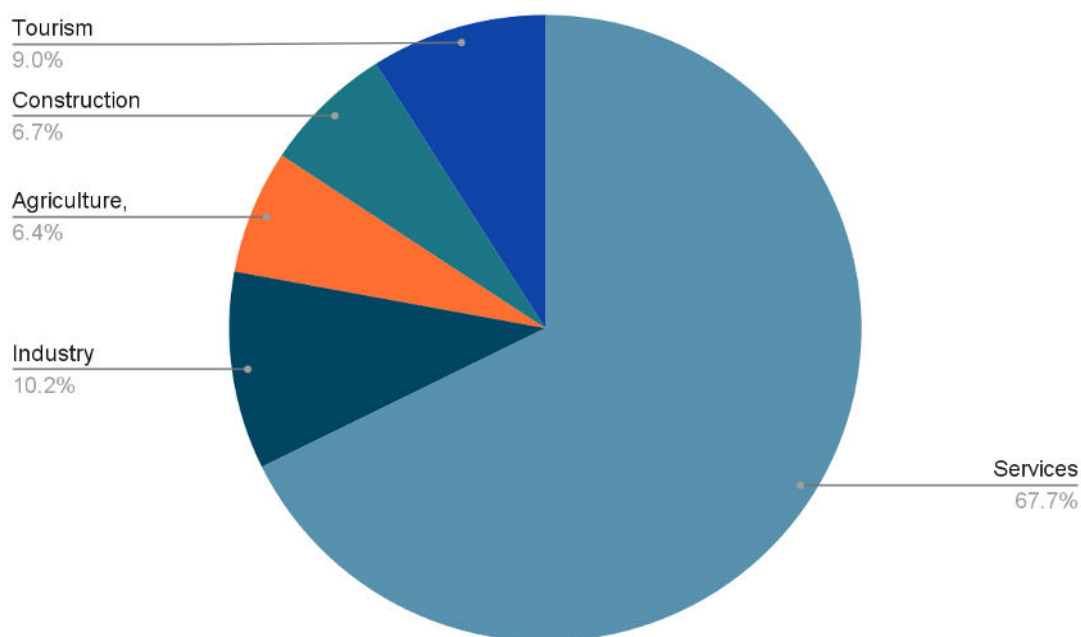
There is a high inequality of tourism distribution in the country, where 95% of tourists visit the coast and only 2-3% visit the Central and North region (*Ministry of Economic Development and Tourism, 2022*). Thus, the government of Montenegro aims to grow its tourism sector through an increase in jobs by equally distributing tourism flows throughout the country so that North to South job migration

is limited by 2025 through their National Employment Strategy of 2021-2025 (*Ministry of Economic Development and Tourism, 2022*).

According to the last census in 2022 by the Statistical Office of Montenegro, Kotor Municipality has 22,540 inhabitants, which accounts for 3.65% of the total Montenegrin population.

Figure 7 : Gender Statistics Montenegro 2011 (Monstat)
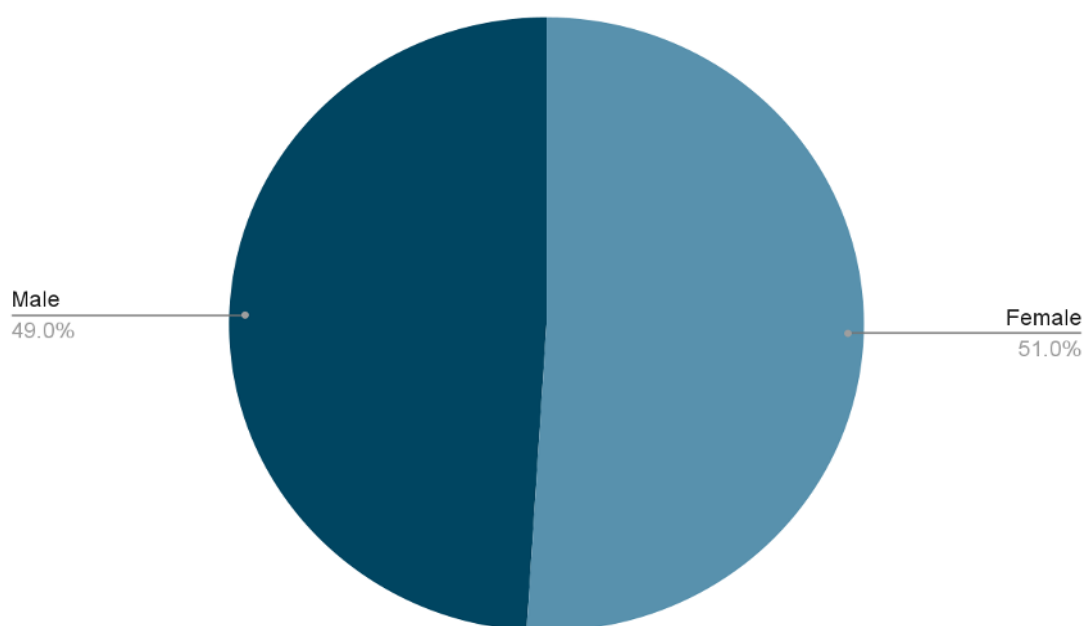
After the COVID-19 crisis, overnight stays in Kotor skyrocketed 68.33% from 2019 and 281.58% from 2020 (*Konjevic et al., 2023*). During the COVID-19 crisis Montenegro suffered in the tourism sector, much like the rest of the world, due to health concerns and governmental limitations on travel. However, in 2021 the Government of Montenegro issued a rehabilitation policy to establish the recovery of the tourism industry by strengthening their institutional frameworks, supporting tourism SMEs, intensifying destination promotion, and reducing the gray informal economy of tourism (*Ministry of Economic Development and Tourism, 2022*). These efforts led to the total figures of overnight tourist visitors for 2022 in Kotor being almost 1.1 million, not taking into account the considerable number of cruise visitors (*MONSTAT, 2022*).

Figure 8 : Age Distribution in Montenegro 2020 (*Index Mundi*, 2020)

Figure 8 : Age Distribution in Montenegro 2020 (*Index Mundi*, 2020)

65 years and over:
16.0%

0-14 years:
18.1%

55-64 years:
13.4%

15-24 years:
12.8%

25-54 years:
39.7%
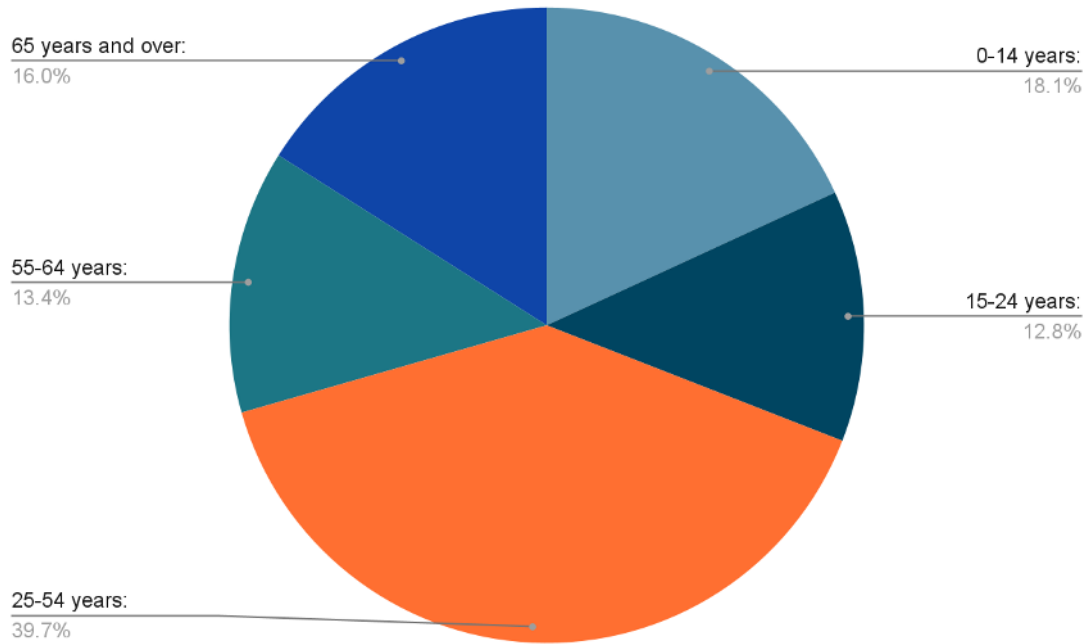
Figure 9 : Number of Foreign Overnight Tourist Arrivals in Kotor 2018-2022 (*Monstat*)

Year 2018   567,216
Year 2019   672,684
Year 2020   119,851
Year 2021   669,394
Year 2022   1,074,829

Number of Foreign Overnight Stays
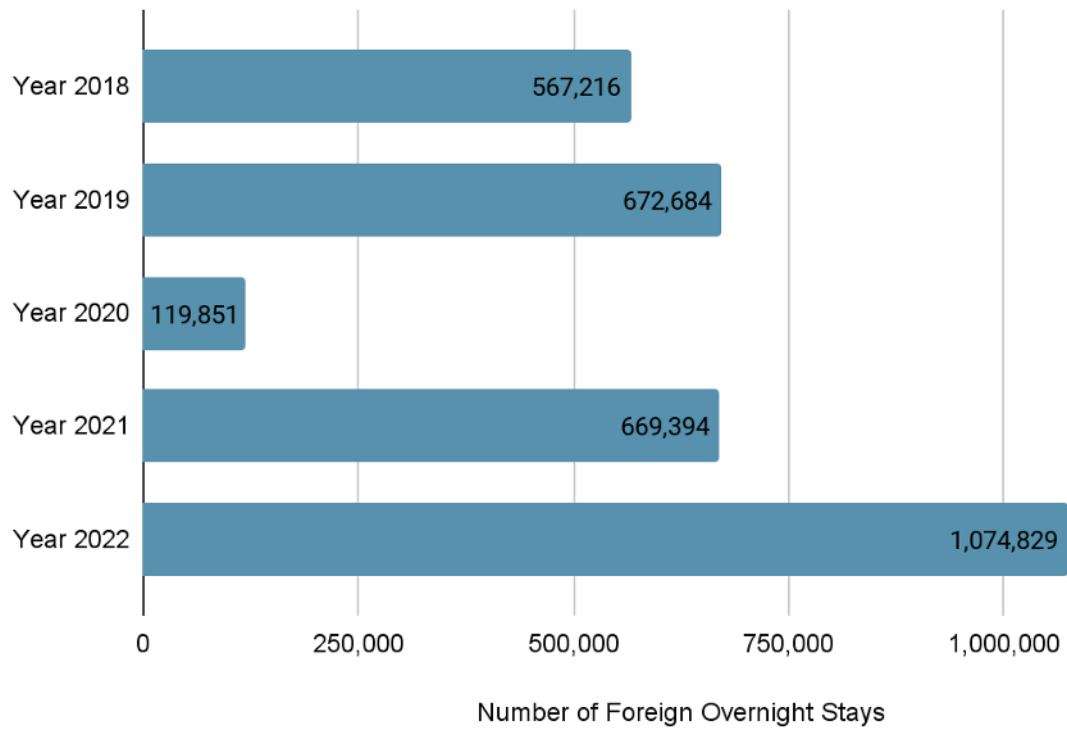
Due to its ideal position being in a beautiful bay, the port of Kotor is a distinguished cruising destination with 400 - 500 cruise visits annually (*Nikcenic, 2019*). The port of Kotor is reporting constant growth of cruiser traffic, as shown by the trends from 2011 to 2018, with small negative variation from 2017-2018 (*Nikcenic, 2019*). However, numerous sources indicate that high numbers of cruise tourists lead to negative effects in Kotor such as overloading the city center and increasing congestion due to lack of capacity (*Zupanovic & Zecevic, 2020*). This is why the newest Montenegro Tourism Development Strategy of 2022-2025 aims to significantly improve infrastructure in the port of Kotor in order to expand capacity and quality (*Ministry of Economic Development and Tourism, 2022*). Yet, there are other negatives such as port pollution and the devastation of naturally shaped areas and cultural heritage which are inherent to cruise tourism that especially affect Kotor as a culturally and historically important location with UNESCO protection (*Nikcenic, 2019*).

The Municipality of Kotor and the port of Kotor is collaborating with the Cruise Lines International Association to manage cruise tourism more sustainably in the city by:

- Undertaking this GSTC Destination Assessment to identify sustainability risks and create a roadmap to better destination stewardship

- Engaging stakeholders, including the local community and international organizations, in establishing a dedicated working group for sustainable destination management

Figure 10 : Chronology of the number of Cruise Ships visiting the Port of Kotor (Nikcenic, 2019)
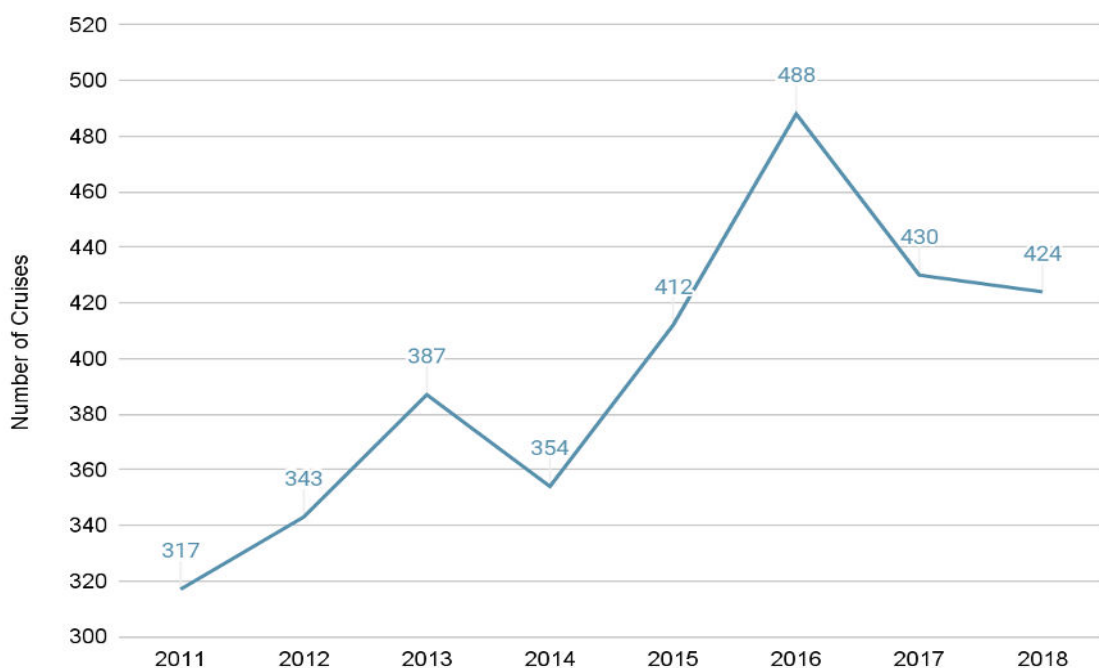
Montenegro as a whole is plagued with the issue of high seasonality in the tourism business, where on average 70% of tourism revenue is generated from June-August (*Ministry of Economic Development and Tourism, 2022*). The main reason for this high seasonality is due to the reasons tourists visit Montenegro in general. According to the Guest Survey 2017 conducted by NTO Montenegro, the main reasons for going to Montenegro are holidays and entertainment (*Ministry of Economic Development and Tourism, 2022*).

The popularity of the summer season reflects these reasons directly. Additionally, a study surveying the satisfaction of tourists regarding Montenegro found that the destination is mainly perceived as a summer destination, as seen in the chart below (*Jaksic Stojanovic, 2012*). This seasonality results in a huge pressure on the infrastructure of Montenegro as a whole but a larger pressure on Kotor specifically in the form of traffic congestion, beach capacities and environmental strain, since the majority of tourism is focused on the coastline of Montenegro.

Figure 11 : Tourist Survey Results Regarding Seasonality of Montenegro (Jaksic Stojanovic, 2012)
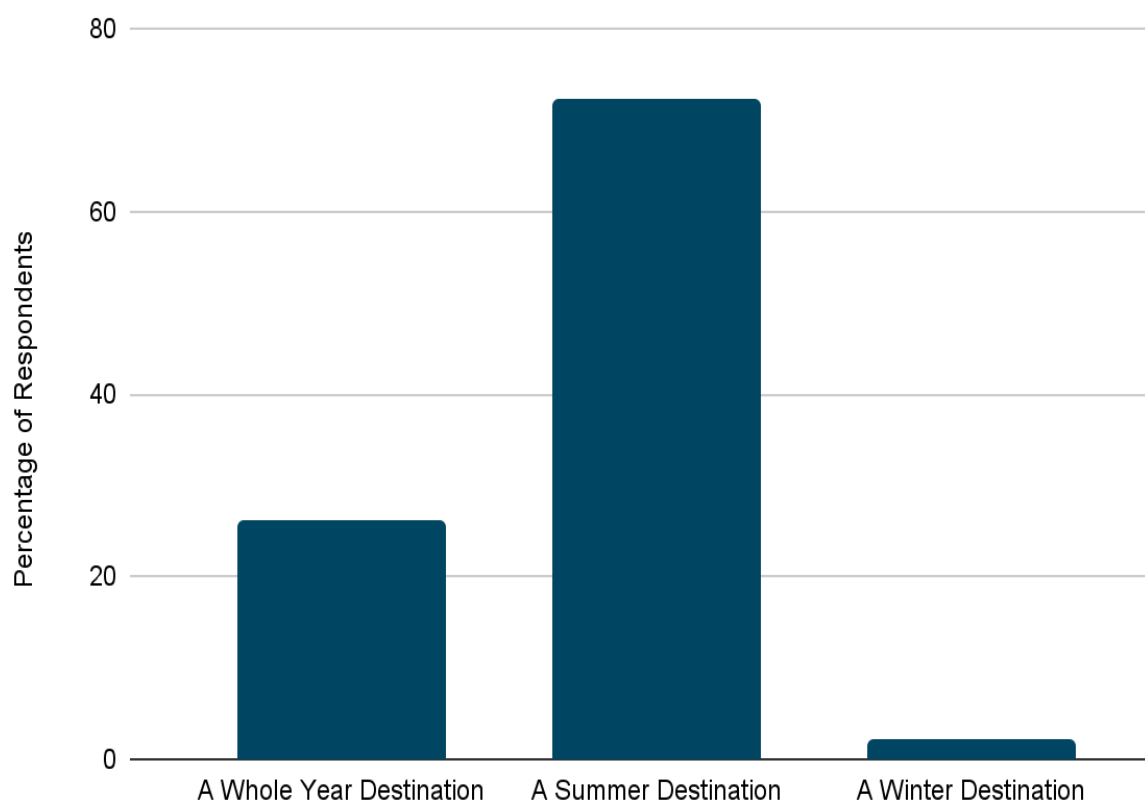
Table 1 : Disturbances During Stay in Montenegro experienced by Tourists (*Jaksic Stojanovic, 2012*)

Disturbances During Stay in Montenegro	%
Poor Infrastructure	86
Crowding, Noise and Dirtiness	60
Low Quality of Services	60
High Prices	39
Unkindness of Staff	35
Lack of Facilities	35
Unkindness of local people	8

The climate of Kotor is Mediterranean and classified as Cfa according to the Köppen climate classification, meaning that it experiences mild and rainy winters and sunny and hot summers (*Climate data*). The average temperature of January, the coldest month, is 7.5 degrees Celsius and of August, the warmest month, is 24.9 degrees Celsius (*Climates to travel*).

Figure 12 : An outlook of the Port of Kotor
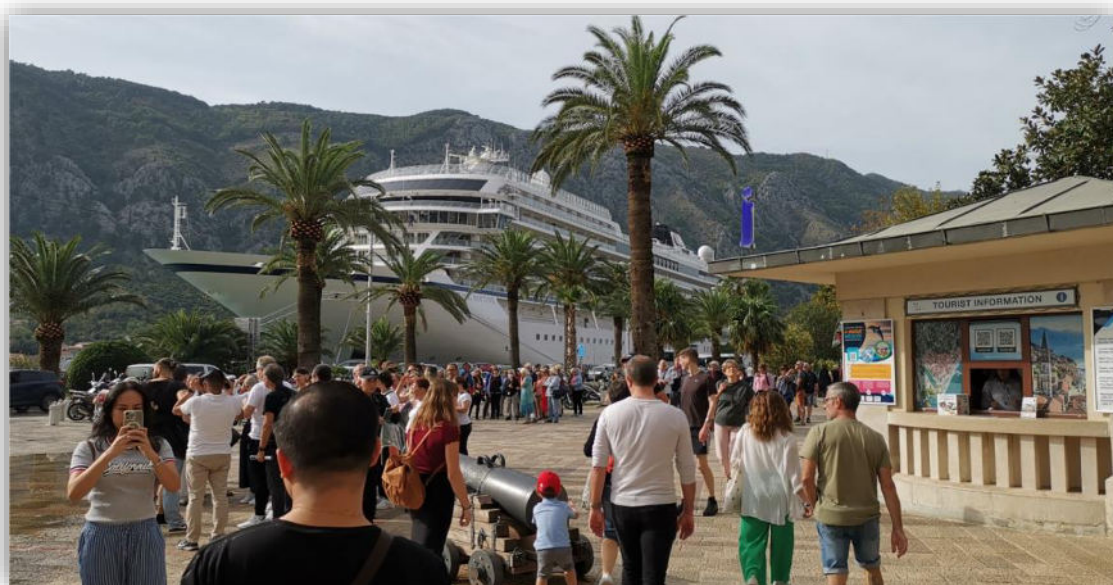
Tourism Products and Attractions

Kotor has become a popular tourist destination in recent years, and developing a strategic approach to accommodation is essential for managing tourism growth sustainably. The accommodation strategy for Kotor should balance the needs of tourists with the preservation of its cultural and natural heritage and for this reason the Montenegrin government, as well as numerous Organizations, have drawn up strategic plans for the management of tourist flows.

With an increasing rate of tourist flows, more than 1 million arrivals are hosted in the Town of Kotor, which has 17 small hotels, 6 hostels, 5 Boutique hotels, 4 Garni hotels, 4 hotels and 1 campsite (*MONSTAT, 2019*).

Figure 13 : Accommodation types available in Kotor (Monstat, 2019)
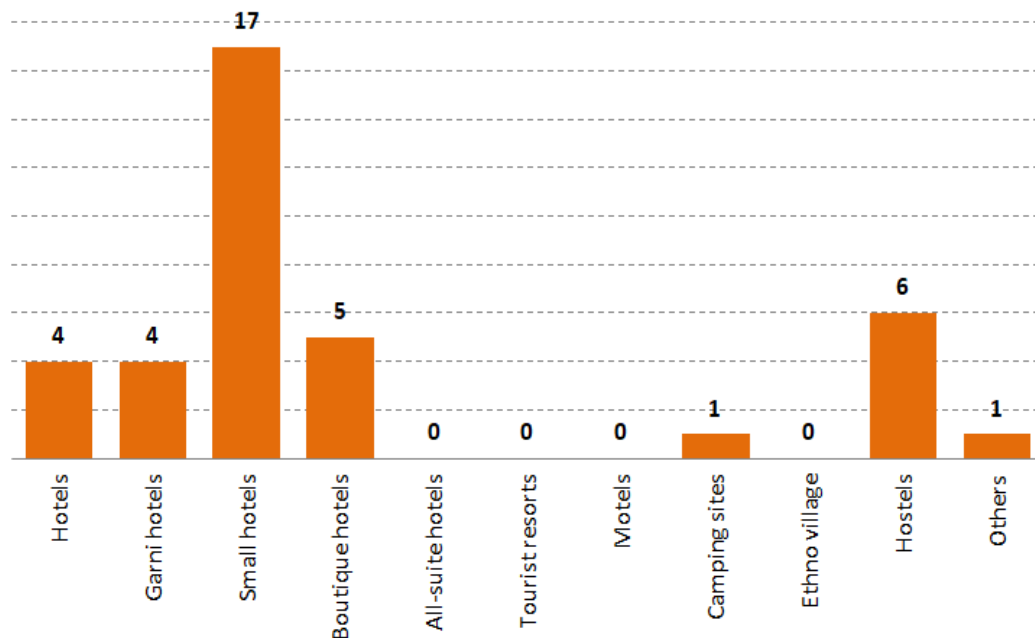
The Port of Kotor is one of the most important tourist sites and every year the majority of visitors to Kotor approach the area from this port, which has won awards over the years, while in 2023 it was nominated with the award "Europe's Best Cruise Destination" (*World Cruise Awards*).

Kotor is a popular cruise destination, and most visitors arrive from May to October mostly from Serbia, then from Bosnia and Herzegovina, Russian Federation, Germany and Kosovo (*MONSTAT, 2022*). Visitors arrive primarily by sea, as Kotor has no airport of its own (apart from the one in Tivat 10 km away) and this has contributed to Kotor being considered one of the main Cruise destinations today. Yet, this puts socio-economic and environmental pressures on the place, as it appears that the number

of day visitors from cruise tourism is higher from the number of overnight stays in the same period, placing the destination in those with high rates of overcrowding (*Snezana Bobic & Mina Akhavan, 2022*).

Figure 14 : Arrivals in Montenegro per country (Monstat, 2022)
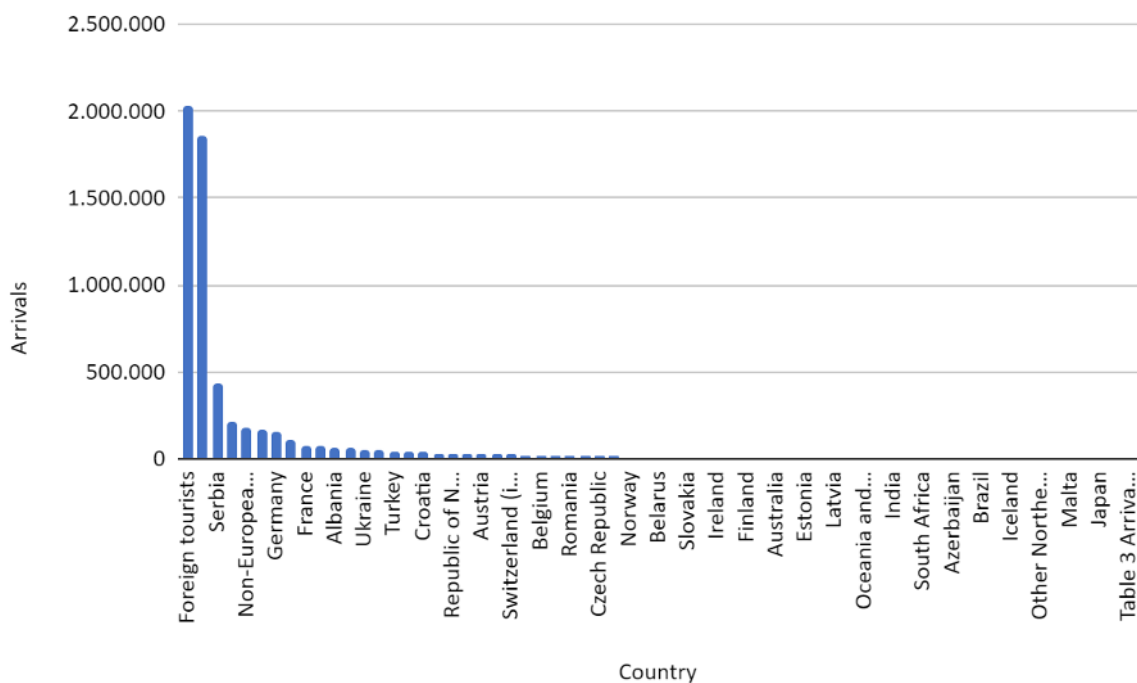
Kotor offers opportunities for outdoor activities, wildlife observation, and appreciation of Montenegro's stunning landscapes. The Old Town of Kotor has been under UNESCO's World Heritage site protection from 1979 (*UNESCO, 2018*), which encompasses the historic old town and the natural beauty of the Bay of Kotor, including the entire old town of Kotor for its well-preserved medieval and Renaissance architecture, narrow winding streets, squares, and historic buildings. Part of UNESCO is also the city walls of Kotor and these fortifications date back to the Venetian period and played a crucial role in the defense of the city, offering a panoramic view of Kotor and the bay.

The Bay of Kotor, often referred to as Europe's southernmost fjord, a magnificent inlet surrounded by high cliffs and lush mountains, with clear waters, perfect for swimming and sailing, is also included in the UNESCO World Heritage listing and is recognized for its outstanding natural beauty, dramatic coastal landscapes, and the harmonious coexistence of nature and human settlement (*Iva Bulatovic & Roberto Micera, 2018*).

Kotor also has some key protected natural areas and features in and around, such as Tivat Salina (Tivatska Solila), a protected salt pan area in the Bay of Kotor, near Tivat, an important habitat for migratory birds and a site of ecological significance (*Bird Life International*). Some kilometers after, Lovćen National Park features rugged mountains, deep canyons, and hiking trails leading to the summit of Mount Lovćen. The Njegoš Mausoleum at the top offers breathtaking vistas of the Bay of Kotor. A

charming nearby town, Perast boasts stunning baroque architecture and two picturesque islands, Our Lady of the Rocks and St. George, which can be visited by boat. Every July 22 there is a ritual procession where boats go around the island of Our Lady of the Rocks in Perast and locals throw stones around the island to make its foundations stronger, accompanied by traditional songs and a fish dinner (*Visit Montenegro*).

Figure 15 : An illustration of the Kotor Old City Entrance Instructions for Visitors

Back to the Old Town of Kotor, behind its walls are located many of the current main attractions. This UNESCO-listed site is full of medieval architecture– churches, cathedrals and museums. Trg od Oružja, the largest square in the Old Town, is one of the main gathering centers in Kotor. Located in central Old Town, the Cathedral of Saint Tryphon was consecrated in the 12th century. It also has a gilded silver bas-relief altar screen – one of Kotor's most valuable treasures. Each 3rd of February, Kotor celebrates the day St. Tryphon. The celebration started 12 centuries ago stretches for days and the whole Kotor takes in the festive spirit. While the bells from the cathedral and basilica solemnly ring, the proud Boka Navy performs the original routine at the city square - lining up and reporting, dressed in beautiful black costumes with golden embroidery perform their dance (*Visit Montenegro*).

Sea Gate, the main entrance to Kotor, constructed in 1555, the Sea Gate is one of three that people use to access the Old Town. The date of liberation from Axis powers is commemorated above the gate. The River Gate is also worth a visit (*Cook, 2018*).

The Maritime Museum celebrates Kotor's naval history, which is housed in an 18th century palace. The original collection was started by the Boka Marine Fraternity back in 1880, before being opened to the public in 1900. Also, the Cats Museum is something slightly different to indulge. A range of cat-inspired items, from postcards to jewelry and adverts, are on display. There are also plenty of cat-related souvenirs to purchase around town.

Figure 16 : The entrance of the Maritime Museum in Kotor

Table 2 : Top Tourism-Related Attractions

Top Tourism-Related Attractions
The Old Town and its sites
Local restaurants and eateries serve Montenegrin cuisine, including seafood and dishes influenced by Mediterranean
Guided walking tours, especially a private tour with wine and food tasting (Taste Vranac, the most famous wine from a black-skinned variety native to mountainous Montenegro and accompany it with a Prsut which is the national sausage of Montenegro)
Boat tour, especially to Blue Cave and Lady of the Rocks

The local cultural sector also organizes international performing arts events (e.g: International Fashion Festival, Boka's night), exhibitions (e.g., Pro Kotor Arte, Maritime Museum), concerts (e.g., International Klapa Festival) and it should be noted that August is carnival time in Kotor.

In addition to the magnificent scenery to be seen in Kotor, tourists can visit one of the many souvenir shops and take a bite of the local tradition (see below).

Table 3 : Most Famous National Souvenirs

Most Famous National Souvenirs (*Montenegro.in*)
Local alcohol, like "Rakija" or some of the delicious locally produced wines
Local flavors such as cured meats, cheeses, nuts, naturally dried mushrooms and figs or jujube
Tablecloths with folk embroidery
Wood crafted works of art
Folklore Hat (Kapa), a black and red cap (Black represents the past and red the battles with the Ottomans, which now forms part of the National Costume of Montenegro)
Gusle, a single-stringed musical instrument of the Montenegro
Cat-Related souvenirs (Because Kotor loves cats!)

As seen above, the destination has a huge cultural history, so it is time to move away from the stereotypical "sun and sea" model and invest in other types of tourism, more quality and sustainable, that promote the place holistically (*Iva Bulatovic & Roberto Micera, 2018*). One of the main issues that concern is the strong seasonality it exhibits in its tourism. It is therefore important to emphasize the creation of new tourism infrastructure and competitive projects that enable the development of Kotor.

Figure 17 : An old map of the City of Kotor

ASSESSMENT METHODOLOGY

GSTC Assessment Process

The process of the GSTC Destination Assessment consists of the following phases as summarized below.

Figure 18 : GSTC Assessment Process
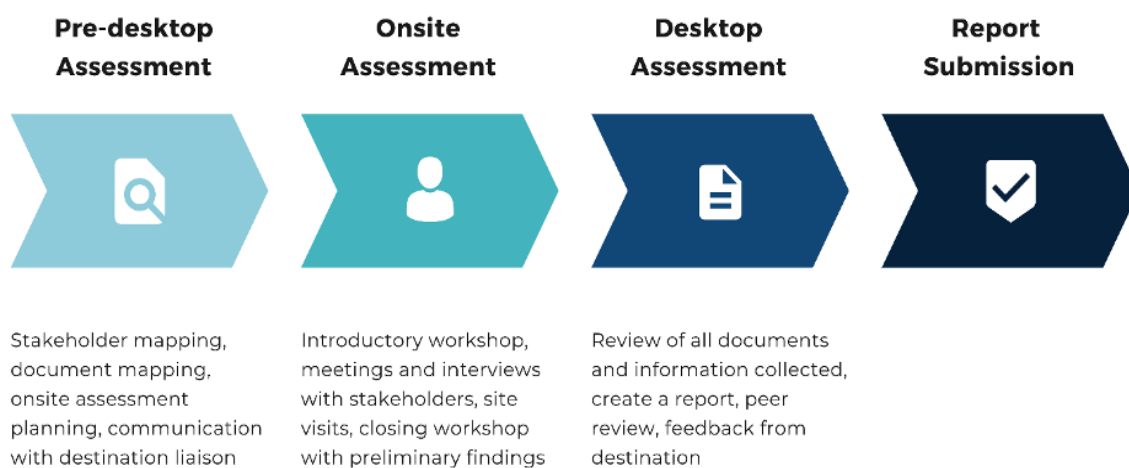
Pre-desktop Assessment

Two main tasks for pre-desktop assessment are stakeholder mapping and document mapping. These tasks are executed through close communication with a destination liaison. The ideal destination liaison consists of a team of local experts, particularly with tourism, environmental, social and cultural expertise, or an individual from the public or private sectors. The liaison supports the GSTC Destination Assessor(s) to collect relevant information and arrange on-line and offline meetings with stakeholders.

Stakeholder Mapping: Identify the key stakeholders who should be involved in the assessment, among those who represent all stakeholders from both the private and public sectors.

Document Mapping: Identify the policy documents that address the GSTC Destination Criteria. This includes relevant legal data such as laws, regulations, or guidelines.

On-site Assessment

The on-site work may begin with an introductory workshop if this has not previously occurred. The destination's operation, management, and cooperation systems are assessed based on the GSTC-D by interviewing various stakeholders and visiting the destination's major sites. Interviews are planned in advance and based on previous stakeholder mapping and the desktop assessment. The places visited are also chosen to represent the destination's tourism and have an impact on sustainability. The on-site assessment may conclude with a meeting/workshop where preliminary findings from the GSTC assessor(s) are shared, and stakeholders voice their opinions. In some cases, depending on the location, the assessor(s) may return with a summary of results at a later time. This is dependent on factors such as location and travel.

Desktop Assessment

During the desktop assessment, a report is created based on the results of the on-site assessment and additional secondary data analysis. A peer review is conducted internally at GSTC to enhance the objectivity and rationality of the evaluation results. The GSTC assessor(s) will analyse the destination's feedback once again before finalizing and submitting the destination's sustainable tourism assessment report.

GSTC Assessment Tools

Evaluation Criteria Compliance

The destination is assessed against all GSTC Destination Criteria, and the results are shown with different colors and scores. The evaluation starts with individual indicators. The compliance level of each criterion and pillar is calculated based on the average of the indicators and criteria respectively.

Figure 19 : Design of Scoring process in GSTC Destination Assessment

Compliance with pillars (5 levels)	Average score of criteria per pillar
Compliance with criteria (5 levels)	Average score of indicators per criterion
Compliance with indicators (4 levels)	Score between 0-3 per indicator
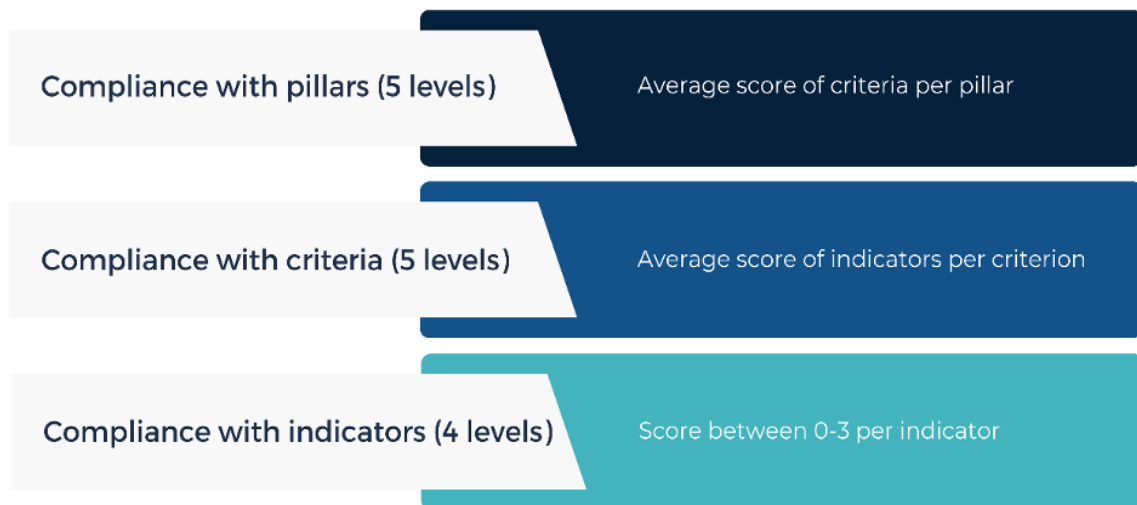
Indicator Scoring: Each indicator is evaluated based on evidence discussed, produced, or observed. Indicators are scored "0" if no documents or evidence exist, "1" suggests that documentation exists, but there is no evidence of implementation or ongoing work, "2" suggests there is evidence and implementation, and "3" states that there is evidence and implementation, as well as improving trends.

Criterion Scoring: Once indicators are reviewed, a score is calculated for each criterion. The criterion score provides an overview of performance, ranging from "Areas of Risk" <1, "Areas of Moderate Risk" 1.00-1.49, "Needs Improvement" 1.50-1.99, "Good Performance" 2.00-2.49 and "Excellent Performance" ≥ 2.5.

Pillar Scoring: Each pillar score is calculated based on average criteria scores. The pillar score provides an overview of performance, ranging from "Level 1" < 1 to "Level 2" 1.00-1.49, "Level 3" 1.50-1.99, "Level 4" 2.00-2.49 and "Level 5" ≥ 2.5.

In the following figures, the detailed traffic – type color-based scoring system is given, for indicators, criteria, pillars and destination, concluding to the overall scoring structure illustration.

Table 4 : GSTC Indicator Performance Levels and Associated Color & Score Scheme

Green	Yellow	Pink	Red	White
Documentation of policy exists, and it is being implemented in an exemplary manner- on par with best practice.	Documentation of policy exists, and it is being implemented in an acceptable manner, with some improvements identified.	Documentation of policy exists, and it is not being implemented or vice versa.	No documentation of policy exists, and it is not being implemented.	The indicator is not applicable to the destination.
3	2	1	0	N/A

Table 5 : Criteria & Pillars Evaluation Score and Colors Coding

Criterion Scoring		Pillar Scoring	
Areas of Risk	< 1	Level 1	< 1
Areas of Moderate Risk	1.00 – 1.49	Level 2	1.00 – 1.49
Needs Improvement	1.50 – 1.99	Level 3	1.50 – 1.99
Good Performance	2.00 – 2.49	Level 4	2.00 – 2.49
Excellent Performance	≥ 2.50	Level 5	≥ 2.50

Figure 20 : Overall Scoring process illustration in GSTC Destination Assessment

DESTINATION (AVERAGE OF PILLARS SCORE, 5 LEVELS)

<1	1st level
1.00 - 1.49	2nd level
1.50 - 1.99	3rd level
2.00 - 2.49	4th level
≥2.50	5th level

PILLARS (AVERAGE OF CRITERIA SCORE, 5 LEVELS)

Sustainability improves

PERFORMANCE PROCESS

CRITERIA (AVERAGE OF INDICATORS, 5 LEVELS)

AREAS OF RISK	<1
AREAS OF MODERATE RISK	1.00 - 1.49
NEEDS IMPROVEMENT	1.50 - 1.99
GOOD PERFORMANCE	2.00 - 2.49
EXCELLENT PERFORMANCE	≥2.50

INDICATORS (0, 1, 2, 3)

NO DOCUMENT EXISTS	0
DOCUMENT EXISTS	1
DOCUMENT & EVIDENCE EXISTS	2
DOCUMENT, EVIDENCE & IMPROVING TRENDS EXISTS	3
NOT APPLICABLE IN DESTINATION	not appl.

KOTOR Assessment Process

Due to the character of the Kotor Assessment, a detailed preparation should be designed in order to arrange the co-financing model between the Municipality of Kotor and the Port of Kotor and CLIA. Thus, a number of pre-contract meetings have taken place, mostly online, with the final meeting between the parties concluding on the 10th of July 2023, where the official request of proposal was given to GSTC. After the proposal was approved by the financing parties, a contract was signed on the 31st of August 2023 and a detailed schedule was agreed at the meeting (in person) of the parties' representatives in Seatrade Europe 2023, in Hamburg, on September 2023. After that, the GSTC Destination Assessment of Kotor started on execution, with the detailed schedule to be given in the below figure.

Figure 21 : Timeline of the implemented Assessment Process for Kotor

In every Assessment, destinations that undergo a GSTC Destination Assessment must appoint a Destination Liaison to serve as coordinator of the assessment details on behalf of the destination. The Destination Liaison should be individuals who are familiar with the destination stakeholders, and the policies and procedures of the destination. This is because the destination liaison will be expected to walk the GSTC Assessor through the relevant portions of the destination policies and procedures that apply to the GSTC Destination Criteria, and also to help interpret feedback collected from destination stakeholders about the implementation of destination policies and practices. The Destination Liaison will be responsible for the tasks including, but not limited to:

- Preparation for the Destination Assessment (stakeholders map, documents map, on-site schedule)
- On-site Assessment (on-site visits, stakeholders consult, group meetings)
- Post-Assessment Reporting Support

Throughout the assessment process, the Destination Liaison is responsible for managing information, files, documents and deadlines of tasks.

Figure 22 : Initial Discussions between GSTC, Municipality of Kotor, Port of Kotor and CLIA (10/07/2023)

Figure 23 : Meeting of the Representatives for work arrangement at Seatrade Europe in Hamburg (01/09/2023)

In the case of the GSTC Destination Assessment of Kotor, the Liaison Team was structured with officials from the Municipality of Kotor and from the Port of Kotor, performing at a great level in the preparation and execution of the needed steps towards a successful assessment.

During the pre-desk assessment phase, the most important issue that was identified related to the language barrier of most of the official documents that were available. This took a long time to translate and understand the texts in many cases, causing some delays on the process of the assessment.

In addition, the biggest challenge in a Destination Assessment is often scheduling of the onsite phase, where a number of meetings, working groups consultations, workshops and site visits should be organized and scheduled, engaging a large number of officials, stakeholders and residences. In the case of Kotor, this was also a challenge given that it is located on the borders of the country, creating a number of barriers of transportation for many governmental officials on the days of the on-site activities.

Figure 24 : Introduction meeting of GSTC Assessor with Mayor of Kotor as Kick Off of On-Site activities.

In the case of Kotor, 4 days were available for all the activities on-site. The execution included:

- **Kick off meeting** with the Mayor
- **2 workshops** (opening, closing)
- **8 Stakeholders Group Meetings**

- **20 on-site visits** on specific pre-defined areas of interest

Figure 25 : Illustration of on-site Stakeholders Engagement, in Opening, Workshops & Working Groups

Figure 26 : Examples of evidence and meetings executed during the on-site visits and meetings
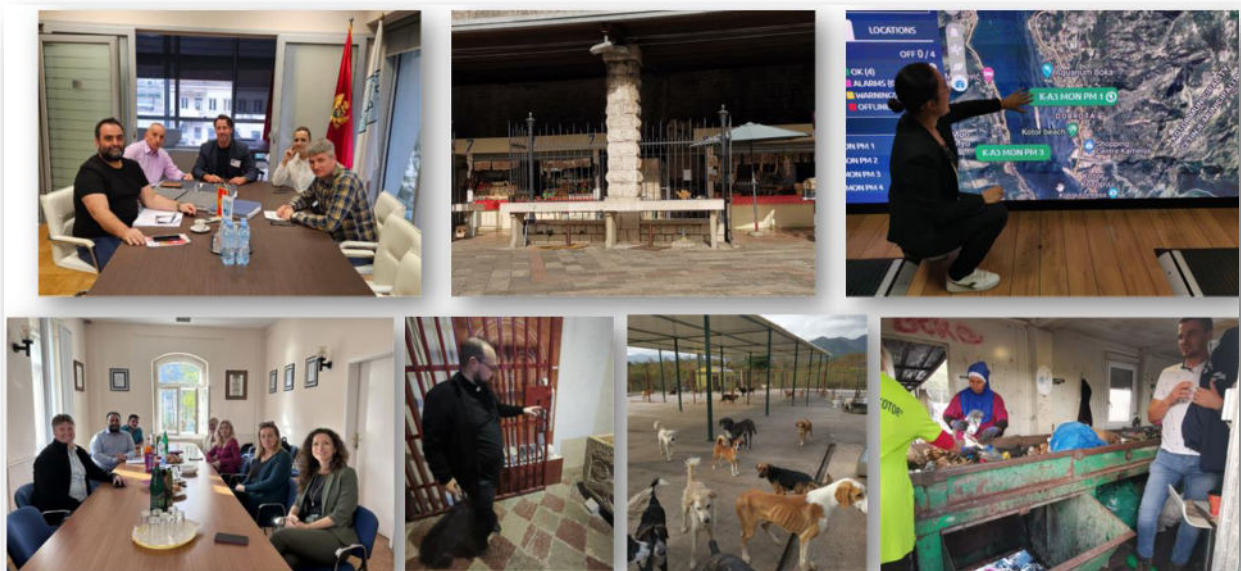
Figure 27 : Presentation of Assessment draft outcomes to Municipality and Port of Kotor Officials

Due to the fact that some important stakeholders were unable to participate during the days of the on-site visit of the Assessor, 2 more online meetings were organized (total participation of 15 stakeholders separated into 2 groups), and one Action Planning Workshop (participation of 27 stakeholders). The 3 events were:

A.   02 11 2023 | Private Sector / Tourism Group (ZOOM) | 7 Participants
B.   02 11 2023 | Transportation Group (ZOOM) | Duration 1.00 h | 8 Participants
C.   24 11 2023 | Pilot Action Planning Workshop (ZOOM) | Duration 2.00 h | 27 Participants

In total, at the on-site plus the additional A-B-C activities, **more than 120 participants of over 64 organizations (stakeholders)** have been participated and contributed to the Destination Assessment process. Details on the stakeholders, the actual schedule of the on-site activities and documents mapping outcomes are presented in the Annex.

Figure 28 : On-line follow-up meeting with Tourism Industry of Kotor Reps (Group A)
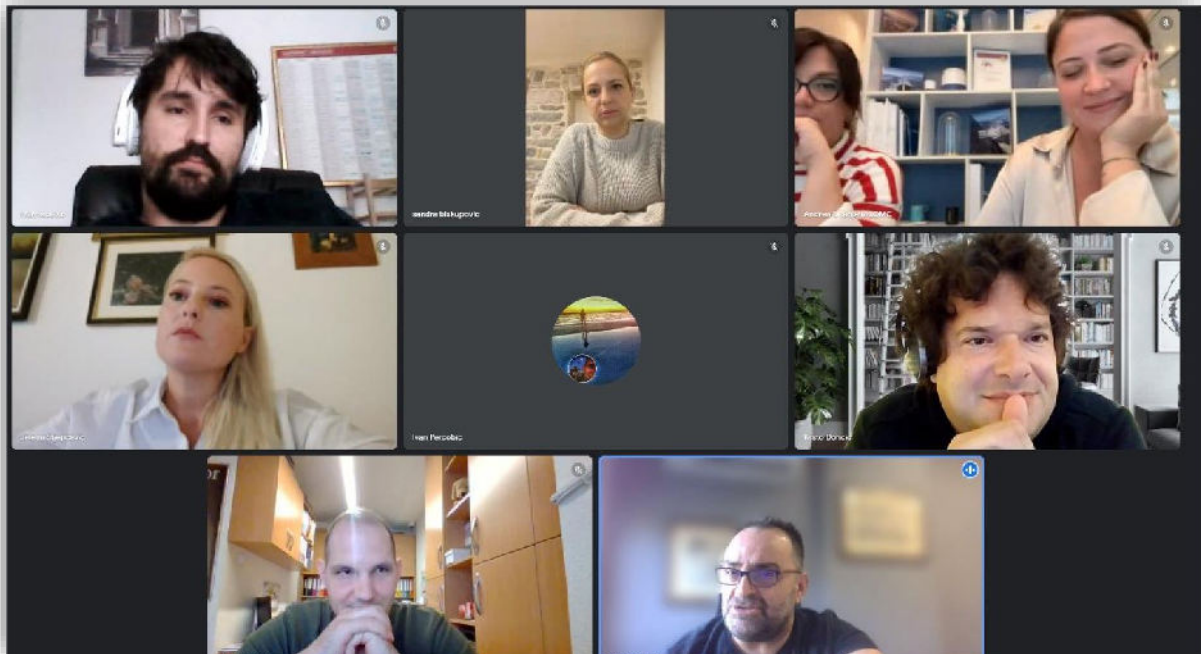
Figure 29 : On-line follow-up meeting with Kotor Transportation Sector Reps (Group B)

ASSESSMENT RESULTS

Summary of Assessment Results

GSTC conducted the Destination Assessment for Kotor between September to December 2023, in collaboration with the Municipality of Kotor and the Port of Kotor. Using GSTC's assessment methodology, the team reviewed legal and policy documents related to city management and consulted with approximately 64 key organizations / stakeholders, including representatives from national and local government, the private sector, NGOs, academia, and local residents. These extensive consultations helped evaluate the city's performance against the GSTC Destination Criteria. Below, the detailed table of the indicator scores illustrate the Sustainability Performance on Indicators for Kotor.

Table 6 : Summary of GSTC Destination Sustainability Performance via Indicators' Score

GSTC sections	A Sustainable Management	B Socio-Economic Sustainability	C Cultural Sustainability	D Environmental Sustainability	Total # indicators
Total Indicators Scored Red	9	5	1	13	28
Total Indicators Scored Pink	21	9	6	25	61
Total Indicators Scored Yellow	15	9	7	16	47
Total Indicators Scored Green	6	9	12	11	38
Total Indicators NA	0	0	0	0	0
TOTAL	51	32	26	65	174

Of the 174 indicators analyzed, 38 (21.8%) were rated "green", 47 (27.0%) were rated "yellow", 61 (35.1%) were rated "pink", 28 (16.1%) were rated "red". Indicators marked in red, or pink represent gaps or risks to the sustainable management of the destination.

In the analysis for indicators with the higher numbers of Risk areas, the worse performance comes from the Environmental Pillar (#13) and then the Management Pillar (#9). It must be stated also that the 5 indicators in risk for Social Economic pillar is not a small number.

Figure 30 : Performances of each sustainability pillar for indicators in High Risk
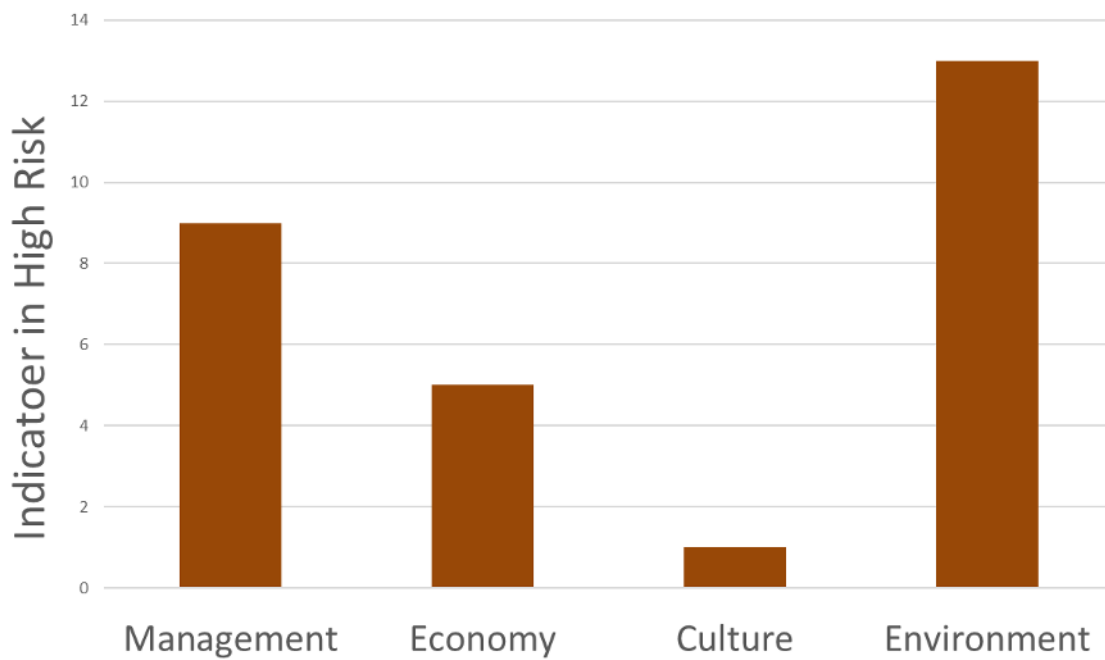
The following pie charts show the distribution of indicators for each sustainability pillar (Management, Socio-Economic, Cultural and Environmental) according to their performance (color). This representation provides an easy reference and overview of performance across the four pillars and graphically illustrates that Kotor performs well across all pillars. The following charts show the destination's performance in each sustainability pillar.

Figure 31 : Pillars Performance with number and percentage of indicators
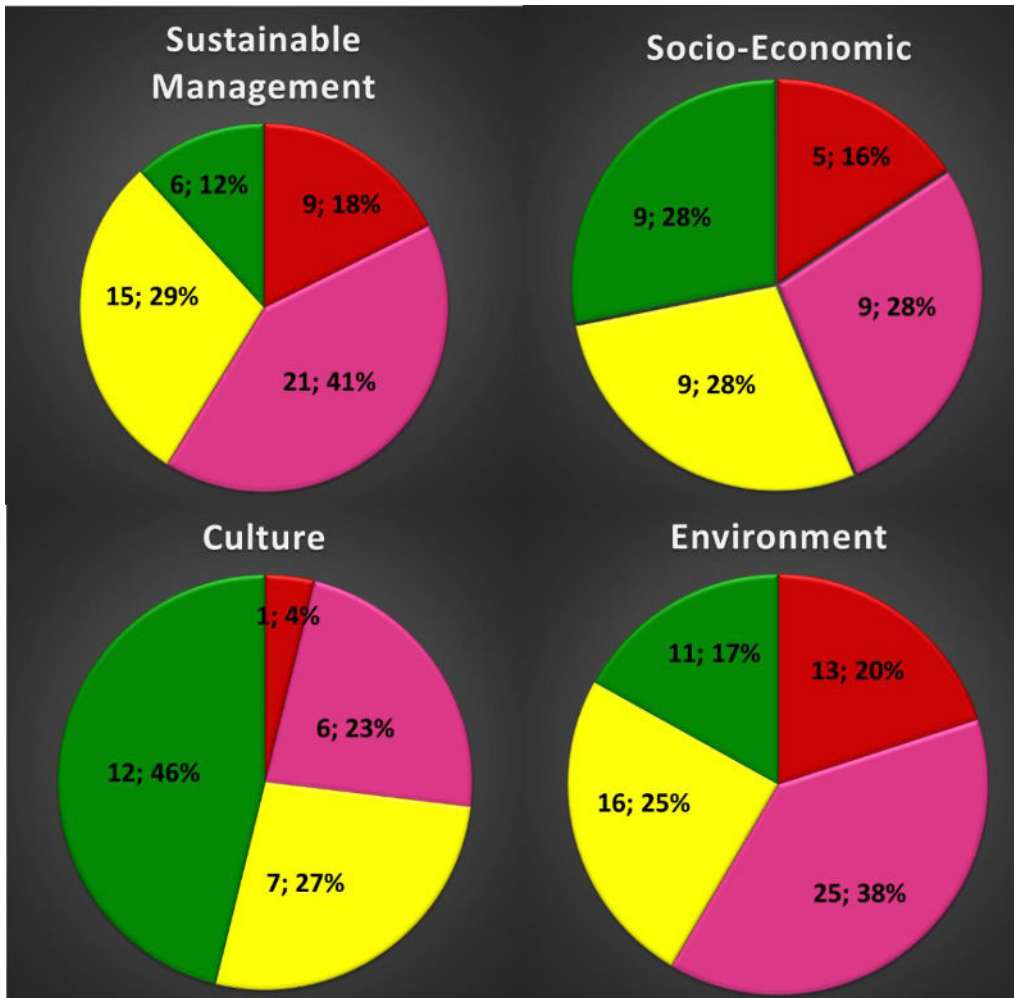
Figure 32 : Overall performance for all indicators
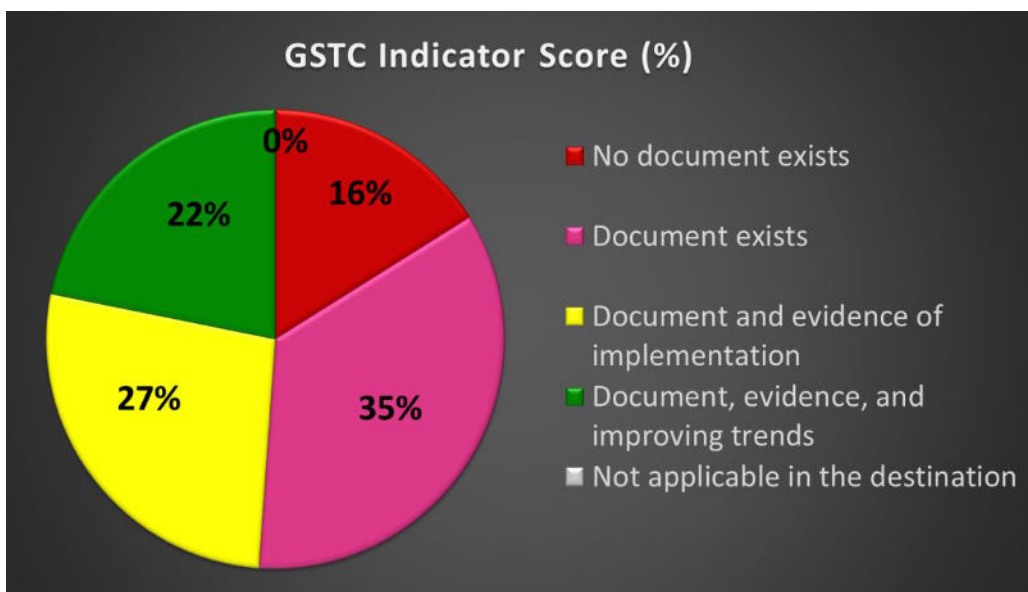
The table below presents the full list of GSTC Criteria and the criteria, pillars and overall scores that Kotor received from the GSTC Destination Assessment.

Table 7 : Average Scores for GSTC Destination Criteria

Scoring per CRITERIA based on the # of INDICATORS					
CRITERIA NUMBER	CRITERIA NAME	SCORE	PILLAR SCORE	PILLAR MEAN SCORE	% OF MIN EXCELLENCE
A1	Destination Management responsibility	1.80	14.98	1.36	54.48%
A2	Destination management strategy and action plan	1.20			
A3	**Monitoring and reporting**	0.50			
A4	**Enterprise engagement and sustainability standards**	0.40			
A5	Resident engagement and feedback	1.80			
A6	Visitor engagement and feedback	1.75			
A7	Promotion and information	2.33			
A8	Managing visitor volumes and activities	1.00			
A9	Planning regulations and development control	2.00			
A10	Climate change adaptation	1.20			
A11	Risk and crisis management	1.00			
B1	Measuring the economic contribution of tourism	1.33	13.62	1.70	68.08%
B2	Decent work and career opportunities	1.75			
B3	Supporting local entrepreneurs and fair trade	2.20			
B4	Support for community	1.33			
B5	Preventing exploitation and discrimination	1.25			
B6	Property and user rights	2.25			
B7	Safety and security	2.33			
B8	Access for all	1.17			
C1	Protection of Cultural Assets	2.67	14.90	2.13	85.14%
C2	Cultural artefacts	1.67			
C3	Intangible heritage	2.50			
C4	Traditional access	2.67			
C5	Intellectual Property	1.00			
C6	Visitor management at cultural sites	2.00			
C7	Site interpretation	2.40			
D1	Protection of sensitive environments	2.00	16.68	1.39	55.58%
D2	Visitor management at natural sites	1.00			
D3	Wildlife interaction	2.00			
D4	Species exploitation and animal welfare	2.00			
D5	**Energy Conservation**	0.75			
D6	**Water stewardship**	0.80			
D7	Water Quality	2.40			
D8	Wastewater	1.75			
D9	**Solid waste**	0.88			
D10	**GHG emissions and climate change mitigation**	0.60			
D11	**Low-impact transportation**	0.83			
D12	Light and noise pollution	1.67			
	DESTINATION LEVEL TOTAL	**60.18**	**60.18**	**1.65**	**65.82%**

At the level of criteria, the assessment revealed that, out of the 38 GSTC-D criteria, Kotor excelled in 3 (7.9%) areas, was rated good in 11 (28.9%) areas, received a rating of "good with some improvements needed" in 7 (18.4%) areas, was identified as a moderate risk in 10 (26.3%) areas, and flagged as high-risk in 7 (18.4%) areas.

Figure 33 : Number of Criteria per Performance Category
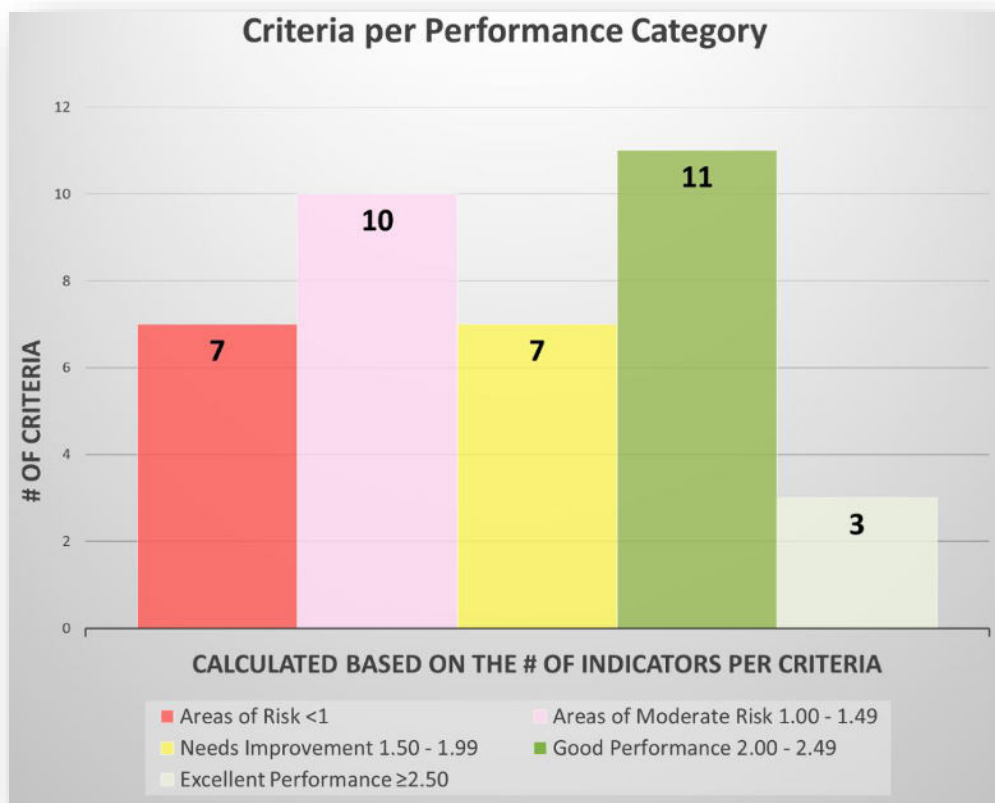
Based on the assessment results in the following table, the lowest scores (Red) are:

- Management Pillar
    o   A3 – Monitoring and Reporting
    o   A4 – Enterprise engagement and sustainability standards
- Environment Pillar
    o   D5 – Energy Conservation
    o   D6 – Waster Stewardship
    o   D9 – Solid Waste Management
    o   D10 – GHG emissions and climate change mitigation
    o   D11 – Low Impact Transportation

The highest scores at the criteria level were assessed in:

- Cultural Pillar
    - o C1 – Protection of Cultural Assets
    - o C3 – Intangible Heritage
    - o C4 – Traditional Access
    - o C7 – Site Interpretation
- Social-Economic Pillar
    - o B3 – Supporting Local Entrepreneurs and Fair Trade
    - o B6 – Property and User Rights
    - o B7 – Safety and Security

Figure 34 : GSTC Criteria Score using the evaluation limits
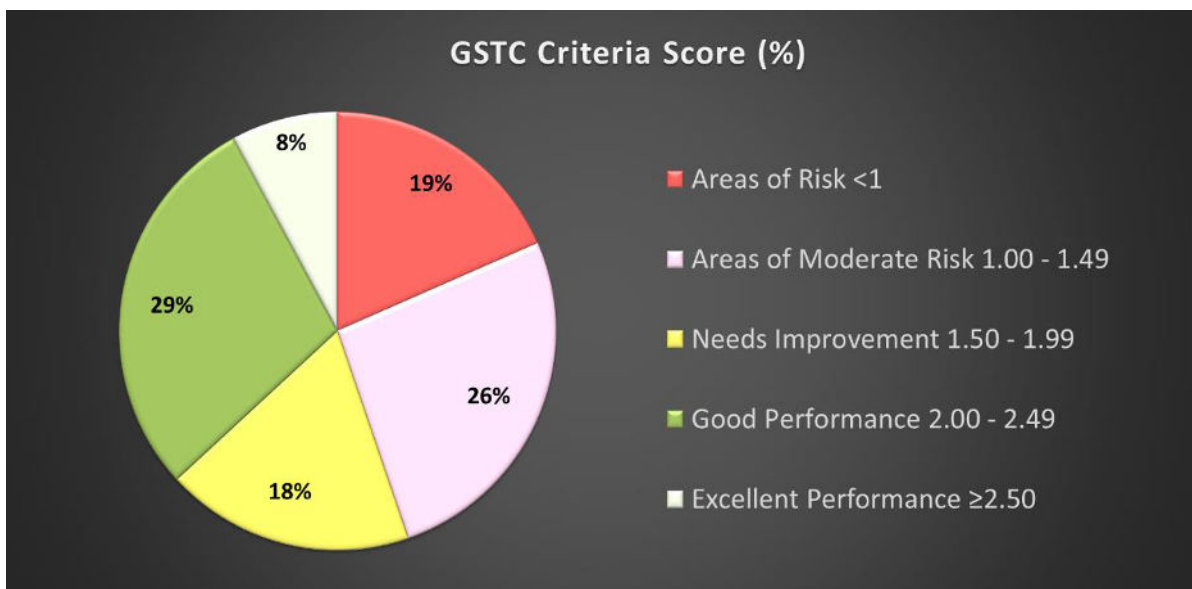
Of the four categories of destination sustainability, the GSTC Assessment showed that Kotor performs greater in the Culture Sustainability, which is logical due to the character of the destination and the status of protection under UNESCO that demands specific steps. However, the Management and Environment pillars are not performing in the best way, and most of the open issues / criteria under risk, could be found in these two pillars. In the middle of performance, the Socioeconomic pillar, which is performing pretty well.

Based on the scoring results per criterion, the overall mean score per pillar is:

- ✓ Sustainable Management: 1.36 | 54.48% of the minimum excellent performance limit

- ✓ Social - Economic Sustainability: 1.70 | 68.08% of the minimum excellent performance limit

- ✓ Cultural Sustainability: 2.13 | 85.14% of the minimum excellent performance limit

- ✓ Environmental Sustainability: 1.39 | 55.58% of the minimum excellent performance limit

Figure 35 : Performance of each pillar via criteria mean score
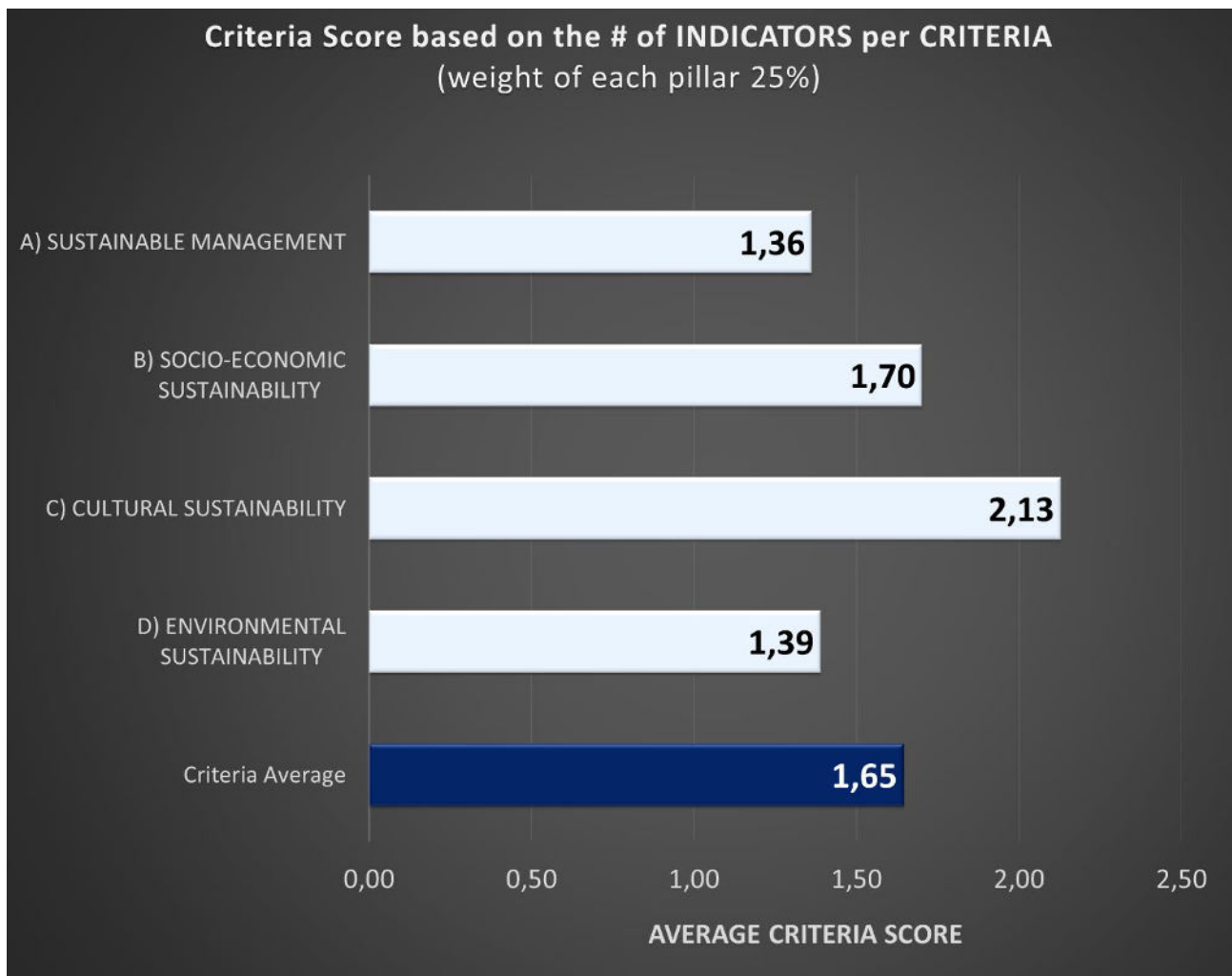
The overall mean Destination Score is 1.65 | 65.82% of the minimum excellent performance limit.

A. SUSTAINABLE MANAGEMENT

A1. Destination Management Responsibility

Introduction to Criterion A1 : Destination Management Responsibility

Criterion A1 of the GSTC Destination Criteria v2.0 emphasizes the need for an effective organization, department, group, or committee responsible for a coordinated approach to sustainable tourism management in a destination. This group should involve the public sector, private sector, and civil society, with clearly defined responsibilities, oversight, and implementation capabilities. The group must be adequately funded, staffed with personnel experienced in sustainability, and operate transparently in its activities, ensuring it adheres to sustainability principles.

Criterion & Indicators Score

Table 8 : A1 – Destination Management Responsibility

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
A1	A1 Destination management responsibility	a	Documentary evidence showing relevant make-up and responsibilities of the group.	2		1,80	
		b	A financial plan and budget showing current and future funding sources	3			
		c	Evidence of links and engagement with other bodies	2			
		d	Records of permanent staff and contracted personnel, indicating relevant experience.	2			
		e	Management guidelines and processes, which demonstrate awareness and adherence to sustainability principles and transparency in operations and letting of contracts.	0			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Establishment of a Coordinated Management Group:** The City of Kotor has successfully established a coordinated tourism management group that includes representatives from the public sector, private sector, and civil society. This group is tasked with overseeing the sustainable development and management of tourism within the city. The group meets regularly to discuss and implement strategies that balance the needs of tourism with the preservation of Kotor's cultural and natural heritage.

- **Integration of Sustainability Principles:** The management group in Kotor has integrated sustainability principles into its operations and decision-making processes. This includes the adoption of policies that promote responsible tourism, minimize environmental impact, and support the local economy. The group's efforts have been crucial in maintaining Kotor's status as a UNESCO World Heritage site while accommodating growing tourism numbers.

- **Transparent Operations:** Kotor's tourism management group operates with a high level of transparency. The group regularly publishes reports on its activities, including financial statements and summaries of its meetings. This transparency builds trust with stakeholders and ensures that the community is informed about decisions affecting the tourism sector.

Challenges

- **Ensuring Adequate Funding and Resources:** One of the key challenges for Kotor's tourism management group is ensuring adequate and consistent funding to support its activities. While the group is effective in its current operations, the growing demands of tourism management require increased resources, both in terms of funding and staffing. Without these resources, the group may struggle to implement more extensive sustainability initiatives or respond to emerging challenges.

- **Balancing Diverse Stakeholder Interests:** The group faces ongoing challenges in balancing the sometimes conflicting interests of different stakeholders, including government bodies, local businesses, and residents. This is particularly challenging when making decisions about tourism development that may impact the local community, such as infrastructure projects or regulations on visitor numbers.

- **Capacity Building for Sustainability:** While Kotor's tourism management group includes personnel with experience in sustainability, there is a need for ongoing capacity building to ensure that the team can effectively address new and evolving sustainability challenges. This includes training in areas such as climate adaptation, waste management, and community engagement.

Conclusion

The City of Kotor has made significant progress in establishing a coordinated and transparent tourism management group that integrates sustainability principles into its operations. However, challenges related to funding, stakeholder management, and capacity building need to be addressed to ensure the continued effectiveness of this group. Kotor faces governance and transparency issues due to lack of efficient coordination and clear responsibilities between local authorities, tourism enterprises, and other stakeholders.

Recommendations for Improvement

1. **Increase Funding and Resource Allocation:** Kotor should explore additional funding sources, such as grants, public-private partnerships, or tourism taxes, to ensure that the tourism management group has the necessary resources to expand its activities and address new challenges.

2. **Enhance Stakeholder Engagement Mechanisms:** The city should strengthen mechanisms for stakeholder engagement to better balance diverse interests. This could involve more frequent public consultations, the creation of advisory committees, or the establishment of a formal conflict resolution process.

3. **Invest in Capacity Building:** Kotor should invest in ongoing capacity building for the tourism management group, focusing on emerging areas of sustainability. This could include specialized training programs, partnerships with sustainability experts, or participation in international conferences and workshops.

Relevant References

- Local Government and Tourism Policies, Kotor Municipality, 2023/2024.
- Montenegro Tourism Development Strategy 2022-2025 with the Action Plan, Montenegro Ministry of Economic Development, 2022.
- Rješenje o imenovanju predsjednika i deset članova savjeta za upravljanje područjem kotora, Government of Montenegro, 2024.

A2. Destination Management Strategy and Action Plan

Introduction to Criterion A2 : Destination Management Strategy and Action Plan

Criterion A2 of the GSTC Destination Criteria v2.0 emphasizes the importance of having a multi-year destination management strategy and action plan that is publicly available and developed with stakeholder engagement. This strategy should be based on sustainability principles and include an assessment of tourism assets, addressing socio-economic, cultural, and environmental issues and risks. The strategy should also relate to and influence broader sustainable development policies within the destination.

Criterion & Indicators Score

Table 9 : A2 – Destination Management Strategy & Action Plan

Criteria			Indicators		No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A2	A2 Destination management strategy and action plan	a	A published document setting out the current destination strategy and action.		2		1,20
		b	The strategy/plan clearly visible and available on-line.		2		
		c	Evidence of stakeholder consultation, meetings etc. in developing the plan.		1		
		d	Reference to sustainability principles and an assessment of assets, issues and risks, contained in the strategy and action plan.		1		
		e	Specific references in the strategy/action plan to wider sustainable development policy (including pursuit of the SDGs), and vice versa		0		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Development of a Comprehensive Strategy:** The City of Kotor has successfully developed a multi-year destination management strategy that aligns with sustainability principles. This strategy includes detailed assessments of the city's tourism assets, as well as the socio-economic, cultural, and environmental challenges that need to be addressed to ensure sustainable tourism growth. The strategy has been instrumental in guiding the development and

management of tourism in Kotor, particularly in balancing the needs of the tourism sector with the preservation of the city's cultural heritage.

- **Stakeholder Engagement:** Kotor's strategy was developed with significant input from a wide range of stakeholders, including local businesses, residents, cultural heritage experts, and environmental organizations. This collaborative approach has helped to ensure that the strategy reflects the diverse interests and concerns of the community, leading to stronger support and more effective implementation.

- **Public Accessibility and Transparency:** The destination management strategy for Kotor is publicly accessible, ensuring transparency and accountability. The strategy is available online and in public offices, allowing residents, businesses, and visitors to understand the city's approach to sustainable tourism management. This accessibility has also helped to foster greater community engagement and awareness of the city's sustainability goals.

Challenges

- **Implementation and Monitoring:** While the strategy provides a solid framework for sustainable tourism, Kotor faces challenges in the implementation and ongoing monitoring of the strategy's effectiveness. Ensuring that all aspects of the plan are carried out requires continuous effort, resources, and coordination among various stakeholders, which can be difficult to maintain over time.

- **Adapting to Emerging Issues:** The city's strategy needs to be dynamic and adaptable to emerging issues, such as climate change impacts, changes in tourism trends, and evolving socio-economic conditions. However, there is a challenge in ensuring that the strategy is regularly reviewed and updated to address these new challenges effectively.

- **Integration with Broader Policies:** Although Kotor's strategy aligns with sustainability principles, there is still room for improvement in integrating the tourism strategy with broader sustainable development policies at the regional and national levels. This integration is crucial for ensuring that tourism development supports overall economic, social, and environmental objectives.

- **Lack of Capacity for EU Projects management:**
  https://www.montenegro.travel/uploads/2_BUSINESS/Analiti%C4%8Dke%20kartice%20i%20putni%20nalozi/Strateska%20dokumenta/montenegro-tourism-development-strategy-2022-2025-with-the-action-plan.pdf

Conclusion

The City of Kotor has made significant progress in developing a comprehensive destination management strategy that aligns with sustainability principles. However, challenges related to the implementation, adaptation, and integration of the strategy need to be addressed to ensure its long-term effectiveness, including the finalization of the new Tourism Strategy. Also, there is limited transparency in how public participation influences the existing strategy, with no consistent online visibility, while stakeholder consultation processes are not adequately documented.

Recommendations for Improvement

1. **Strengthen Implementation and Monitoring Mechanisms:** Kotor should enhance its mechanisms for implementing and monitoring the strategy by establishing a dedicated team or committee responsible for overseeing progress. This team should regularly review the strategy's implementation and adjust actions as needed to ensure that goals are being met.

2. **Regularly Update the Strategy:** The city should establish a regular review cycle for the strategy, incorporating new data, stakeholder feedback, and emerging issues. This could involve annual updates or revisions to ensure that the strategy remains relevant and responsive to changing conditions.

3. **Improve Integration with Broader Policies:** Kotor should work on better integrating its tourism strategy with broader regional and national sustainable development policies. This could involve closer collaboration with regional authorities and participation in national initiatives aimed at promoting sustainable development across sectors.

4. **Increase Stakeholder Engagement in Implementation:** While stakeholder engagement in the development of the strategy was strong, there is a need to maintain and even increase this engagement during the implementation phase. This could be achieved through regular stakeholder meetings, public updates on progress, and opportunities for the community to contribute to ongoing projects.

Relevant References

- Montenegro Tourism Development Strategy 2022-2025 with the Action Plan, Montenegro Ministry of Economic Development, 2022.
- Strateški plan razvoja opštine Kotor 2020-2024, Municipality of Kotor, 2020

Figure 36 : The new Tourism Strategy (in draft version during the assessment)

A3. Monitoring and Reporting

Introduction to Criterion A3 : Monitoring and Reporting

Criterion A3 of the GSTC Destination Criteria v2.0 focuses on the importance of establishing a system for monitoring and reporting on the destination's tourism performance, particularly in terms of sustainability. This criterion emphasizes the need for destinations to collect data on key indicators related to economic, social, cultural, and environmental impacts, and to use this data to inform decision-making, improve management, and report to stakeholders.

Criterion & Indicators Score

Table 10 : A3 – Monitoring and Reporting

Criteria			Indicators		No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A3	A3 Monitoring and reporting	a	Specific quantifiable socio-economic, cultural and environmental indicators and targets identified.	1			0,50
		b	Measurement against these indicators, with results recorded and publicised at least annually.	0			
		c	Written evidence of monitoring and reporting of actions and outcomes.	0			
		d	Previous reviews of monitoring system and schedule for future reviews.	1			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Data Collection Systems:** The City of Kotor has established systems for collecting data on key tourism indicators, including visitor numbers, economic impact, environmental pressures, and cultural heritage conservation. These systems have enabled the city to track changes over time and understand the impacts of tourism on various aspects of the destination.

- **Regular Reporting:** Kotor has implemented a process for regular reporting on tourism performance, including sustainability indicators. Reports are made available to stakeholders, including local businesses, residents, and government bodies, helping to ensure transparency and accountability in tourism management. This regular reporting has been crucial in maintaining stakeholder engagement and informing ongoing management decisions.

- **Use of Data in Decision-Making:** The data collected through Kotor's monitoring systems is actively used to inform decision-making processes. For example, data on visitor numbers and environmental impacts have been used to adjust visitor management strategies, such as implementing limits on the number of cruise ships allowed to dock at the port during peak season to reduce overcrowding and pressure on the city's infrastructure.

Challenges

- **Comprehensive Data Coverage:** While Kotor has made progress in collecting data on key tourism indicators, there are gaps in data coverage, particularly in areas such as social impacts on the local community and detailed environmental monitoring. Comprehensive coverage of all relevant indicators is necessary to fully understand the impacts of tourism and to address emerging issues effectively.
- **Integration of Data Across Sectors:** Another challenge is the integration of data across different sectors, such as tourism, environment, culture, and infrastructure. Currently, data collection and reporting efforts may be siloed, leading to missed opportunities for a more holistic understanding of tourism's impact on the city. Integrating data from various sources could enhance the city's ability to manage tourism sustainably.
- **Resource Allocation for Monitoring:** Maintaining and expanding the monitoring and reporting systems requires significant resources, including funding, technology, and trained personnel. Kotor faces challenges in ensuring that these resources are consistently available, particularly as tourism continues to grow and the demands on monitoring systems increase.

Conclusion

The City of Kotor has made some strides in establishing systems for monitoring and reporting on tourism sustainability. However, challenges related to comprehensive data coverage, integration across sectors, and resource allocation need to be addressed to enhance the effectiveness of these systems, including anything related with risk evaluation and management. Also, there is insufficient monitoring and reporting on social and environmental impacts of tourism, with data gaps in visitor behavior and sustainability practices. While economic metrics are captured, the cultural and environmental impacts are underreported.

Recommendations for Improvement

1. **Expand Data Collection to Cover All Key Indicators:** Kotor should work on expanding its data collection efforts to cover a broader range of indicators, particularly social impacts on the local community and more detailed environmental data. This could involve collaborating with academic institutions or external experts to design and implement new data collection methodologies.
2. **Enhance Integration of Data Across Sectors:** The city should develop mechanisms for better integrating data from different sectors, such as tourism, environment, and culture. This could

involve the creation of a centralized data platform that allows for the aggregation and analysis of data from multiple sources, providing a more comprehensive view of tourism impacts.

3. **Secure Resources for Ongoing Monitoring:** Kotor should explore additional funding sources and partnerships to ensure the ongoing availability of resources needed for monitoring and reporting. This could include applying for grants, forming partnerships with international organizations, or establishing public-private partnerships that support sustainability monitoring.

4. **Regularly Review and Update Monitoring Processes:** The city should establish a process for regularly reviewing and updating its monitoring and reporting systems to ensure they remain effective and relevant. This could involve periodic assessments of the systems' performance and making adjustments based on feedback from stakeholders and changes in tourism trends.

Relevant References

- Integrated Monitoring Programme Montenegro, GEF Adriatic, 2021.
- Tourism – Releases, Montenegro Statistical Office, 2010-2023.

Figure 37 : Study in Adriatic Project in the Impact of contamination in Kotor and other areas
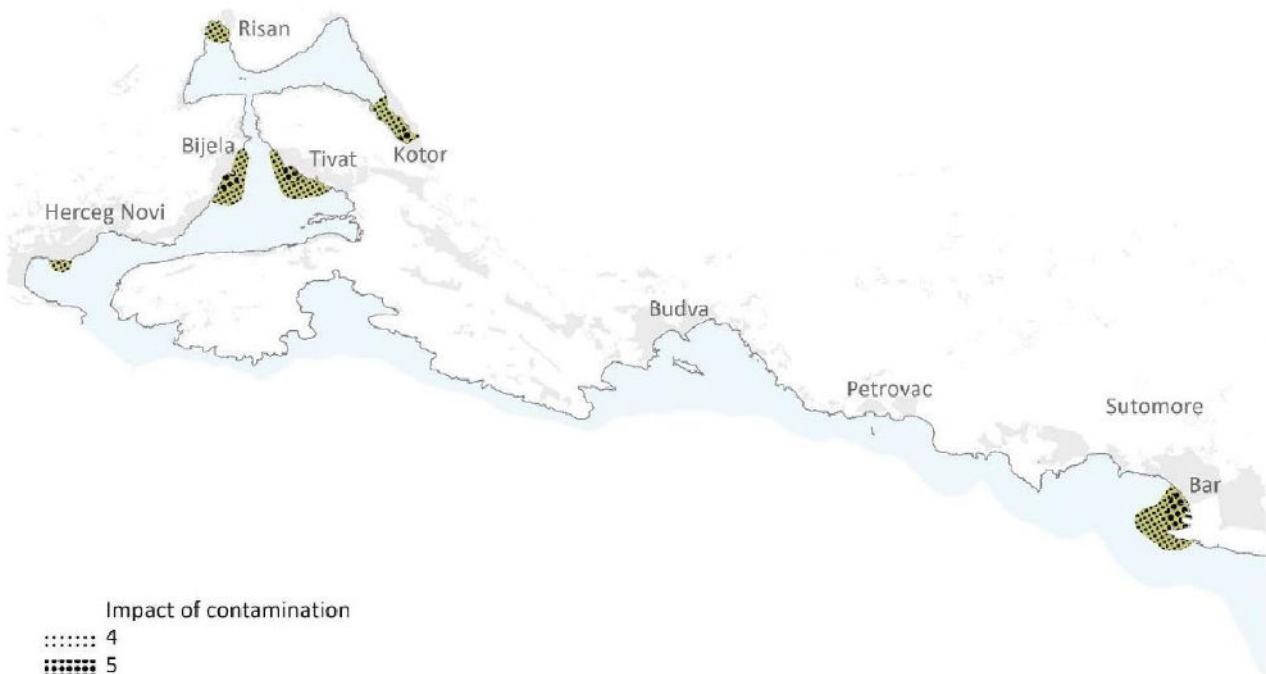
A4. Enterprise Engagement and Sustainability Standards

Introduction to Criterion A4 : Enterprise Engagement and Sustainability Standards

Criterion A4 of the GSTC Destination Criteria v2.0 focuses on the need for destinations to engage with tourism-related enterprises regarding sustainability issues. This engagement involves regularly informing businesses about sustainability practices, supporting them in adopting more sustainable operations, and encouraging the adoption of recognized sustainability standards. The ultimate goal is to foster a tourism industry that operates in a way that is environmentally responsible, socially equitable, and economically viable, thereby contributing to the overall sustainability of the destination.

Criterion & Indicators Score

Table 11 : A4 – Enterprise Engagement and Sustainability Standards

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
A4	A4 Enterprise engagement and sustainability standards	a	Evidence of regular communication of sustainability issues to tourism-related businesses (Media, meetings, direct contact etc.).	1		0,40	
		b	Sustainability support and advice to tourism- related business – available and promoted.	1			
		c	Number and percentage of businesses certified against tourism sustainability standards (and whether GSTC recognised/accredited), with targets for wider outreach.	0			
		d	Evidence of promotion of certification schemes.	0			
		e	List of tourism-related certified enterprises, kept up to date.	0			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Regular Communication on Sustainability:** The City of Kotor has established regular communication channels with tourism-related enterprises to inform them about sustainability

issues. These communications include newsletters, workshops, and meetings that focus on the importance of sustainable tourism practices. The city has been successful in raising awareness among local businesses about the need to operate in a way that minimizes environmental impact and maximizes social and economic benefits for the community.

- **Support for Sustainable Practices:** Kotor has provided some forms of support to local tourism enterprises to help them adopt more sustainable practices. This support includes offering training programs on waste management, energy efficiency, and the use of local products. Additionally, the city has facilitated access to resources and tools that enable businesses to implement these practices effectively, contributing to a gradual shift towards more sustainable operations across the tourism sector.

Challenges

- **Adoption of Certification by Small Enterprises:** One of the significant challenges Kotor faces is encouraging small and medium-sized enterprises (SMEs) to adopt sustainability certification. Many smaller businesses may lack the resources or knowledge to pursue certification, leading to slower adoption rates compared to larger enterprises. Overcoming this challenge requires targeted support and incentives that are specifically designed to address the needs and constraints of smaller businesses.

- **Consistency in Sustainability Practices:** While there has been progress in promoting sustainable practices, there is still inconsistency in how these practices are adopted across the tourism sector. Some businesses have fully embraced sustainability, while others may only implement basic measures. Ensuring a more consistent application of sustainable practices across all tourism enterprises remains a challenge that Kotor needs to address.

- **Promotion of Certification Schemes:** The city has not actively promoted the adoption of recognized sustainability certification schemes among local tourism businesses. Is also not encouraging enterprises to seek certification in an efficient way.

- **Engagement Beyond Awareness:** Although Kotor has been successful in raising awareness about sustainability, there is a need for deeper engagement with businesses to ensure that awareness translates into concrete action. Moving from awareness to implementation requires ongoing support, monitoring, and possibly the introduction of incentives or regulations to encourage businesses to take meaningful steps towards sustainability.

Conclusion

The City of Kotor has made minor strides in engaging with tourism-related enterprises on sustainability issues, not clearly providing support for sustainable practices, and promoting certification schemes. However, challenges related to the adoption of certification by SMEs, consistency in sustainability practices, and deeper business engagement need to be addressed to achieve broader and more effective implementation of sustainability across the tourism sector.

Recommendations for Improvement

1. **Targeted Support for SMEs:** Kotor should develop targeted programs specifically designed to help SMEs adopt sustainability certification. This could include financial incentives, simplified certification processes, and dedicated support services that provide hands-on assistance with meeting certification requirements.

2. **Standardize Sustainability Practices:** The city could work towards standardizing sustainability practices across all tourism enterprises by introducing baseline sustainability requirements that all businesses must meet. These standards could be reinforced through regular audits and the provision of resources to help businesses achieve compliance.

3. **Deepen Business Engagement:** To ensure that sustainability awareness translates into action, Kotor should deepen its engagement with businesses by offering continuous support and follow-up after initial training sessions. This could include mentoring programs, peer networks, and recognition schemes that reward businesses for achieving specific sustainability milestones.

4. **Incentivize Sustainability Certification:** The city could introduce incentives for businesses that achieve sustainability certification, such as tax breaks, marketing support, or preferential treatment in public procurement processes. These incentives could motivate more businesses to pursue certification and implement sustainable practices.

Relevant References

- Implementing a Pilot SME Voucher Scheme in Montenegro, OECD, 2013.
- The role of tour operators in sustainable tourism development; The case of Kotor, Dragicevic M., Prorocic S., Letunic S., 2013.

Figure 38 : Statistical data of accommodation capacity, where private sites are the majority and not evaluated
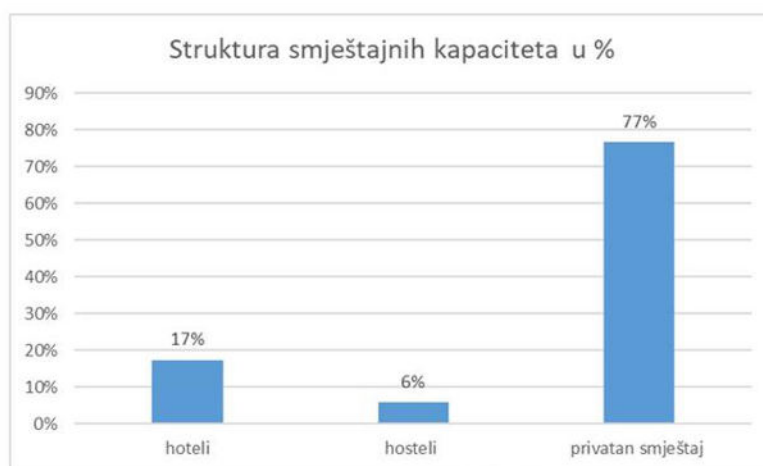
Dijagram 2: Struktura smještajnih kapaciteta, izvor: Strateški plan razvoja opštine Kotor za period 2020-2024.godina, Kotor, januar 2020. godine

A5. Resident Engagement and Feedback

Introduction to Criterion A5 : Resident Engagement and Feedback

Criterion A5 of the GSTC Destination Criteria v2.0 emphasizes the importance of engaging local residents in the planning and management of tourism within the destination. It focuses on promoting public participation, regularly monitoring community feedback regarding tourism's impact, and ensuring that local communities are well-informed about sustainable tourism opportunities and challenges. The criterion also highlights the need for destinations to act on residents' feedback and provide educational and training programs to enhance community understanding and involvement in tourism.

Criterion & Indicators Score

Table 12 : A5 – Resident Engagement and Feedback

				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
Criteria			**Indicators**	Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A5	A5 Resident engagement and feedback	a	Evidence of the promotion and facilitation of public participation in destination planning/management.	3		1,80
		b	Information on the type and level of such participation.	2		
		c	Surveys of residents and other systematic feedback mechanisms, covering tourism issues.	2		
		d	Evidence of action taken in response to residents' feedback.	1		
		e	Programme of information, education and training on tourism provided for residents.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Active Public Participation:** The City of Kotor has made significant strides in promoting public participation in tourism planning and management. The city regularly holds community meetings and consultations where residents can voice their opinions and concerns regarding tourism development. This engagement has helped ensure that local voices are heard and considered in decision-making processes.

- **Monitoring and Reporting of Resident Feedback:** Kotor has implemented some mechanisms to regularly monitor and report on resident satisfaction and concerns related to tourism. Surveys and feedback forms are distributed to residents to gather their opinions on how tourism is impacting the community. The results are then made publicly available, demonstrating a commitment to transparency and accountability.
- **Educational Programs:** The city has developed educational programs aimed at increasing local residents' understanding of sustainable tourism. These programs include workshops and informational sessions that focus on the economic, social, and environmental aspects of tourism, helping to build the capacity of the community to engage with and benefit from tourism activities.

Challenges

- **Inconsistent Feedback Collection:** While mechanisms for collecting resident feedback are in place, there are inconsistencies in how frequently and comprehensively this feedback is gathered and acted upon. Some residents may feel that their concerns are not always addressed, leading to potential dissatisfaction with the tourism management process.
- **Engagement of Diverse Community Groups:** Ensuring that all segments of the community, including minority groups and those less directly involved in tourism, are engaged in the feedback process remains a challenge. There is a need for more targeted outreach efforts to include these groups in consultations and decision-making.
- **Resource Limitations for Educational Programs:** Although educational programs are available, there are limitations in terms of resources and reach. Expanding these programs to ensure that all residents have access to information and training opportunities is necessary for broader community involvement.
- **Level of quality in accommodation facilities:** Low level of quality of accommodation capacities → unfavorable structure of accommodation capacities- 30%, 70% ratio of collective and individual accommodation.

Conclusion

The City of Kotor has made commendable progress in engaging residents in tourism planning and management, with active public participation, regular feedback monitoring, and the provision of educational programs. However, challenges related to consistent feedback collection, engagement of diverse community groups, and resource limitations need to be addressed, especially from the citizens in the old city.

Recommendations for Improvement

1. **Enhance Feedback Collection and Response Systems:** Kotor should work on making its feedback collection more consistent and comprehensive. This could involve setting up a regular schedule for feedback collection, ensuring that all segments of the community are reached, and providing clear communication on how resident feedback is being used to inform decisions.

2. **Targeted Outreach to Diverse Groups:** The city should implement targeted outreach programs to engage minority and underrepresented groups in the tourism planning process. This could include tailored consultations, focus groups, or partnerships with community organizations that work with these groups.

3. **Expand Educational Programs:** Kotor should seek additional resources to expand its educational programs, ensuring that they are accessible to all residents. This could involve offering more workshops, creating online learning opportunities, or providing materials in multiple languages to reach a broader audience.

4. **Act on Feedback with Transparency:** The city should ensure that actions taken in response to resident feedback are clearly communicated back to the community. This transparency will help build trust and ensure that residents feel their input is valued and impactful.

Relevant References

- **Водич за партиципацију у планирању урбаног развоја**, AMBERO consulting, **Београд**, 2013.
- Mehanizmi građanskog učešća u donošenju odluka na nacionalnom i lokalnom nivou, Centar za razvoj nevladinih organizacija (CRNVO), Podgorica, 2020.

A6. Visitor Engagement and Feedback

Introduction to Criterion A6 : Visitor Engagement and Feedback

Criterion A6 of the GSTC Destination Criteria v2.0 emphasizes the importance of engaging visitors and collecting their feedback regarding their experiences at the destination. It focuses on monitoring visitor satisfaction with both the quality and sustainability of their experiences, taking action in response to feedback, and ensuring that visitors are informed about sustainability issues and their role in addressing them. This criterion is essential for maintaining high levels of visitor satisfaction while promoting sustainable tourism practices.

Criterion & Indicators Score

Table 13 : A6 – Visitor Engagement and Feedback

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A6	A6 Visitor engagement and feedback	a	Visitor surveys (and other feedback mechanisms) – carried out and reported.	3		1,75
		b	Surveys and feedback includes visitor reaction to sustainability issues.	1		
		c	Evidence of actions taken in response to visitor survey/feedback findings.	2		
		d	Examples of visitor information that covers sustainability issues and how to respond to them.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Regular Visitor Surveys:** The City of Kotor has implemented regular visitor surveys to assess satisfaction levels and gather feedback on various aspects of their experience. These surveys include questions related to the quality of services, the state of natural and cultural sites, and awareness of sustainability practices. The data collected from these surveys is used to improve tourism offerings and address any concerns raised by visitors.

- **Sustainability Information for Visitors:** Kotor has made efforts to inform visitors about local sustainability issues and how they can contribute to protecting the environment and cultural heritage. Information on sustainable practices, such as responsible waste disposal, water

conservation, and respecting local customs, is made available through various channels, including brochures, signage, and digital platforms.

- **Responsive Action to Feedback:** The city has shown a commitment to responding to visitor feedback by implementing changes based on survey results. For example, improvements in waste management at tourist sites and enhancements to public transport options have been made in response to visitor concerns about environmental impacts and ease of access.

Challenges

- **Comprehensive Feedback Collection:** While visitor surveys are conducted regularly, the collection of feedback may not fully capture the diversity of visitor experiences. Ensuring that feedback represents the views of all visitor segments, including those who may not participate in traditional surveys, is a challenge. This could lead to gaps in understanding visitors' needs and preferences.

- **Visitor Awareness and Engagement:** Although efforts have been made to inform visitors about sustainability, engaging them in actively participating in sustainable practices remains challenging. Many visitors may not fully understand the impact of their actions or may prioritize convenience over sustainability, leading to lower engagement in responsible tourism behaviors.

- **Data Utilization for Continuous Improvement:** There is room for improvement in how visitor feedback data is utilized for continuous improvement. While some actions are taken in response to feedback, a more systematic approach to analyzing data and implementing broader changes across the destination could enhance overall visitor satisfaction and sustainability outcomes.

Conclusion

The City of Kotor has made progress in engaging visitors and collecting feedback on their experiences, with a focus on promoting sustainability. However, there is limited systematic collection of visitor feedback, and visitor engagement in sustainability practices remains low. The report notes that data utilization from feedback could be improved for more comprehensive destination management. Challenges related to comprehensive feedback collection, visitor engagement in sustainability, and the systematic use of feedback data need to be addressed.

Recommendations for Improvement

1. **Expand Feedback Mechanisms:** Kotor should explore additional feedback mechanisms to ensure a more comprehensive understanding of visitor experiences. This could include digital feedback platforms, real-time surveys at key sites, and targeted outreach to underrepresented visitor groups.

2. **Enhance Visitor Education Campaigns:** The city should strengthen its visitor education campaigns by using more interactive and engaging methods to increase awareness of sustainability issues. This could involve the use of apps, gamification, and guided tours that emphasize the importance of sustainable practices.

3. **Systematize Data Analysis and Response:** Kotor should develop a more systematic approach to analyzing visitor feedback data and implementing changes. This could involve setting up a dedicated team to review feedback regularly, identify trends, and coordinate responses across different sectors of the tourism industry.

4. **Promote Active Visitor Participation:** To encourage more active participation in sustainable practices, Kotor could introduce initiatives that reward responsible behavior, such as discounts for visitors who use public transport or bring reusable items. These incentives can help shift visitor behavior towards more sustainable choices.

Relevant References

- The search of satisfaction of tourists in order to improve the quality of Montenegro tourism, Stojanovic J., UTMS Journal of Economics, 2012.
- Visit Kotor, Tourism Organization of Kotor, 2024.

A7. Promotion and Information

Introduction to Criterion A7 : Promotion and Information

GSTC-D Criterion A7 emphasizes that promotion and visitor information material about the destination should be accurate and reflect the destination's sustainability values. This includes ensuring that marketing messages align with the destination's commitment to sustainable tourism and treat local communities and natural and cultural assets with respect.

Criterion & Indicators Score

Table 14 : A7 – Promotion and Information

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
A7	A7 Promotion and information	a	Current information and promotional material with appropriate content.	3			2,33
		b	A process exists for checking the accuracy and appropriateness of destination promotion and information.	3			
		c	Evidence of consultation with local communities and environmental and cultural bodies on communications content and delivery.	1			

Outstanding Achievements

- **Accurate and Responsible Promotion:** The City of Kotor has made significant strides in ensuring that its promotional materials accurately represent the cultural and natural heritage of the area. The city's marketing strategies are aligned with its UNESCO World Heritage status, focusing on promoting the historical significance and natural beauty of the destination in a way that respects and preserves its unique characteristics.

- **Community-Inclusive Marketing:** Kotor actively involves local communities and cultural bodies in the development of promotional content. This inclusive approach ensures that marketing materials accurately reflect local traditions, values, and environmental considerations, contributing to a more authentic and respectful tourism experience.

Challenges

- **Consistency Across Channels and local heritage:** One of the challenges Kotor faces is maintaining consistency in its sustainability messaging across all promotional channels. While the city's official materials emphasize sustainability, there are instances where third-party operators or unofficial channels might use outdated or less accurate information, leading to potential misunderstandings among visitors.

- **Balancing Tourism Growth with Sustainability:** As tourism demand increases, there is a challenge in balancing the promotion of Kotor as a must-visit destination with the need to manage visitor numbers and protect local resources. Overpromotion could lead to overcrowding, putting pressure on Kotor's cultural and environmental assets.

Conclusion

Kotor has demonstrated a strong commitment to responsible tourism promotion, aligning its marketing efforts with sustainability principles and involving local stakeholders in the process. However, challenges remain in ensuring consistent messaging across all platforms and balancing the growth of tourism with the preservation of the destination's cultural and natural assets. That includes the need for clearing the message of the promotion, supporting the local heritage via the souvenir shops and minimizing cultural models that create misleading messages.

Recommendations for Improvement

1. **Enhance Coordination with Third-Party Promoters:** Kotor should establish guidelines and best practices for third-party promoters to ensure that all promotional content accurately reflects the city's sustainability values. This could involve partnerships with tour operators and online platforms to promote consistent messaging.

2. **Focus on Sustainable Tourism Growth:** The city should continue to emphasize the importance of sustainable tourism in its promotional efforts, perhaps by setting visitor limits for certain attractions and encouraging off-season travel. This will help manage visitor numbers and reduce the environmental impact of tourism on the city.

Relevant References

- Events and festivals in Montenegro, Visit Montenegro, 2024.
- Visit Kotor, Tourism Organization of Kotor, 2024.

A8. Managing Visitor Volumes and Activities

Introduction to Criterion A8 : Managing Visitor Volumes and Activities

Criterion A8 under the GSTC Destination Criteria v2.0 focuses on managing visitor volumes and activities to ensure sustainable tourism. The goal is to establish a system for monitoring and managing visitor flows, particularly during peak seasons and at popular sites, to balance economic, cultural, environmental, and community needs. This criterion is vital for maintaining the quality of life for residents, preserving cultural and natural heritage, and providing a satisfying experience for visitors.

Criterion & Indicators Score

Table 15 : A8 – Managing Visitor Volumes and Activities

	Criteria		Indicators			
				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A8	A8 Managing visitor volumes and activities	a	The destination management strategy and action plan addresses seasonality and spread of visitation.	1		1,00
		b	Variation in visitor volumes throughout the year is monitored, including in the most visited locations.	2		
		c	Impacts of visitor volumes and activities are identified through observation and community and stakeholder feedback.	1		
		d	Actions taken to manage visitor flows and impacts.	0		
		e	Marketing strategy and selection of target markets takes account of visit patterns, the impact of activities and destination needs.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

The City of Kotor has made significant strides in implementing visitor management strategies, particularly in response to the pressures of being a UNESCO World Heritage site and a popular cruise destination. Some key achievements include:

- **Seasonality Management:** Kotor has developed strategies to address the seasonality of tourism, which is a significant issue given the high volume of cruise ship arrivals during the summer months. The city has implemented policies to spread visitor arrivals more evenly throughout the year, reducing pressure during peak times.

- **Monitoring Visitor Volumes:** The city actively monitors visitor numbers, especially in the old town, to ensure that the cultural and historical sites are not overwhelmed. This monitoring has been instrumental in making informed decisions about managing visitor flows.

- **Stakeholder Engagement:** Kotor has involved various stakeholders, including local businesses, residents, and cultural heritage organizations, in the development and implementation of its visitor management strategies. This collaborative approach has enhanced the effectiveness of the measures taken.

Challenges

Despite these successes, Kotor faces several challenges in managing visitor volumes:

- **Overtourism During Peak Season:** The influx of cruise ships, particularly during the summer, still presents a significant challenge. The old town often becomes overcrowded, which not only detracts from the visitor's experience but also poses risks to the preservation of the site's cultural heritage.

- **Impact on Local Community:** The high volume of tourists during peak seasons can disrupt the daily lives of residents, leading to issues such as congestion, noise, and environmental degradation. Balancing the needs of the local community with those of the tourism industry remains a challenge.

- **Infrastructure Strain:** The city's infrastructure, particularly in the historic old town, is under constant strain from the large number of visitors. This includes wear and tear on historical structures and the need for waste management and other public services to cope with the increased demand.

Conclusion

The City of Kotor has demonstrated a commitment to managing visitor volumes and activities, with effective strategies already in place. However, the challenges of overtourism, particularly related with cruise ships, and the resulting strain on the local community and infrastructure require ongoing attention, especially via the creation of a comprehensive carrying capacity study that is still missing.

Recommendations for Improvement

1. **Enhanced Visitor Distribution Strategies:** Further diversification of tourism offerings across the wider region could help alleviate pressure on Kotor's old town. Promoting alternative sites and attractions outside the city center could distribute visitor flows more evenly.

2. **Cruise Ship Regulation:** Implementing stricter controls on the number of cruise ships allowed to dock each day, especially during peak season, could significantly reduce overcrowding and its associated impacts.

3. **Sustainable Infrastructure Investment:** Continued investment in infrastructure that supports sustainable tourism, such as improved waste management systems and transportation networks, is essential to accommodate the high volume of visitors without compromising the integrity of the historic sites.

4. **Community Engagement and Education:** Ongoing engagement with local residents and the provision of education on the benefits and challenges of tourism can foster a more cooperative relationship between the tourism industry and the community, ensuring that tourism growth does not come at the expense of local quality of life.

Relevant References

- The Impact of Mass / Cruising Tourism on The Urban Area of Kotor, Županović I., Zečević D., 2020.
- Tourism gentrification in Mediterranean heritage cities. The necessity for multidisciplinary planning, Snezana B., Mina A., Cities / Volume 124, 2022.
- What is the Risk of Increased Traffic in Boka Bay?, Petrović, I. et al, Journal of Maritime Sciences (JMS), Vol. 23, No. 2, 2022.

Figure 39 : Managing visitors' volumes especially in Old city could support tourism product

A9. Planning Regulations and Development Control

Introduction to Criterion A9 : Planning Regulations and Development Control

Criterion A9 of the GSTC Destination Criteria v2.0 focuses on the importance of having robust planning regulations and development controls to ensure sustainable tourism. This criterion mandates that destinations implement guidelines, regulations, and policies that control the location, nature, and scale of tourism-related development. These regulations should include environmental, economic, and socio-cultural impact assessments to ensure that development aligns with sustainable practices, respects community needs, and protects cultural and natural assets.

Criterion & Indicators Score

Table 16 : A9 – Planning Regulations and Development Control

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
A9	A9 Planning regulations and development control	a	Specific policies/regulations/ guidelines which control development – documented and identified by title and date.	3		2,00	
		b	Impact assessment requirements are set out, covering environmental, economic, and socio- cultural impacts, at sufficient scale to address long term issues for the destination.	2			
		c	Specific regulations on property rental and operation for tourism, with evidence of their application and enforcement.	2			
		d	Evidence of public participation in the development of policies/regulations/guidelines .	2			
		e	Evidence of consultation with, and consent from indigenous people or minority ethnic groups when tourism development has been proposed or has occurred in their territories.	1			
		f	Evidence of communication and enforcement of the policies/regulations/guidance, at planning, development and implementation stages.	2			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Heritage Protection through Regulation:** Kotor has implemented strict planning regulations to protect its status as a UNESCO World Heritage site. These regulations are designed to preserve the city's historical and cultural heritage, ensuring that new developments within the old town and surrounding areas do not detract from its cultural value. For example, the city has enforced height restrictions on new buildings to maintain the visual integrity of the old town's skyline.

- **Environmental Impact Assessments:** The city requires thorough environmental impact assessments (EIAs) for new developments, particularly those near sensitive areas such as the Bay of Kotor. These assessments help mitigate potential negative impacts on the natural environment, ensuring that tourism development does not compromise the bay's ecological health.

- **Public Participation in Planning:** Kotor has encouraged public participation in the planning process, allowing residents and stakeholders to voice their concerns and contribute to development decisions. This engagement has fostered a sense of ownership among the local community and ensured that development aligns with public interests.

Challenges

- **Pressure from Tourism-Driven Development:** Despite stringent regulations, Kotor faces significant pressure from investors and developers seeking to capitalize on the city's tourism appeal. This pressure sometimes leads to challenges in enforcing regulations, especially in cases where economic incentives may conflict with sustainable development goals.

- **Illegal Construction:** The city has struggled with illegal construction activities, particularly in areas where regulations are less strictly enforced. These unauthorized developments can undermine the city's efforts to control growth and preserve its cultural and natural heritage.

- **Balancing Development and Preservation:** Finding the right balance between necessary tourism infrastructure development and the preservation of Kotor's cultural and environmental assets remains a challenge. The need for modern amenities and accommodations must be weighed against the potential risks to the city's heritage and environmental integrity.

Conclusion

The City of Kotor has made commendable progress in implementing planning regulations and development controls to safeguard its cultural and environmental heritage. However, ongoing challenges, particularly from tourism-driven development pressures and illegal construction, need to be addressed to ensure long-term sustainability.

Recommendations for Improvement:

1. **Strengthen Enforcement Mechanisms:** Kotor should enhance its enforcement of planning regulations, particularly in combating illegal construction. This could involve increasing the capacity of local authorities to monitor and respond to unauthorized developments more effectively.

2. **Develop Sustainable Tourism Infrastructure Guidelines:** The city could benefit from developing specific guidelines for sustainable tourism infrastructure that align with its cultural and environmental preservation goals. These guidelines should be integrated into the planning process to ensure that all new developments contribute positively to the city's sustainability objectives.

3. **Enhance Stakeholder Collaboration:** Continued collaboration between local authorities, residents, and the tourism industry is crucial. Creating a formal platform for ongoing dialogue can help address concerns early in the planning process and ensure that development projects have broad support and alignment with sustainability goals.

4. **Promote Adaptive Reuse of Buildings:** Encouraging the adaptive reuse of existing buildings for tourism purposes, rather than new construction, can help preserve the city's cultural heritage while meeting the needs of the growing tourism sector. This approach can also reduce environmental impacts and maintain the historic character of Kotor.

Relevant References

- National strategy for integrated coastal zone management, Ministry of Sustainable Development and Tourism, 2015.

A10. Climate Change Adaptation

Introduction to Criterion A10 : Climate Change Adaptation

Criterion A10 of the GSTC Destination Criteria v2.0 emphasizes the need for destinations to identify and address the risks and opportunities associated with climate change. This criterion calls for the integration of climate change adaptation strategies into the planning, design, development, and management of tourism facilities. It also involves providing information on climate change risks and future conditions to residents, businesses, and visitors. Effective adaptation strategies are essential to safeguard the destination's environmental, economic, and social assets against the adverse impacts of climate change.

Criterion & Indicators Score

Table 17 : A10 – Climate Change Adaptation

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A10	A10 Climate change adaptation	a	The destination management strategy and action plan identifies and addresses climate issues.	1		1,20
		b	Regulations, guidelines and zoning for tourism development and activities accommodate the consequences of climate change.	1		
		c	A climate risk assessment, covering current and future risks – undertaken and made publicly available.	2		
		d	Evidence of consideration of impact on, and contribution of, local ecosystems to climate change adaptation.	0		
		e	Information on climate change that has been made publicly available.	2		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Risk Assessment and Adaptation Planning:** Kotor has initiated comprehensive climate risk assessments to understand the potential impacts of climate change on its coastal and cultural

heritage. These assessments have informed the development of adaptation strategies, particularly in vulnerable areas such as the Bay of Kotor, which is prone to rising sea levels and increased frequency of extreme weather events.

- **Integration of Climate Considerations in Development Plans:** The city has started integrating climate change considerations into its urban planning and tourism development strategies. For instance, new tourism infrastructure projects are required to include climate resilience measures, such as elevated structures in flood-prone areas and the use of materials resistant to extreme weather conditions.

- **Community and Stakeholder Engagement:** Kotor has actively involved local communities and stakeholders in discussions about climate change adaptation. This has included educational programs to raise awareness of the risks posed by climate change and the importance of adopting sustainable practices. By doing so, the city has fostered a more climate-aware community that supports and participates in adaptation efforts.

Challenges

- **Limited Resources for Implementation:** While Kotor has made significant progress in planning for climate change adaptation, the city faces challenges in securing the necessary resources for full implementation. Limited financial and technical resources can hinder the city's ability to execute large-scale adaptation projects, such as the reinforcement of coastal defenses or the retrofitting of existing infrastructure.

- **Balancing Short-Term Economic Gains with Long-Term Resilience:** The tourism sector, which is a major contributor to Kotor's economy, sometimes prioritizes short-term economic benefits over long-term climate resilience. This can lead to resistance against stringent adaptation measures that may be perceived as costly or restrictive.

- **Monitoring and Updating Adaptation Strategies:** As climate conditions continue to change, there is a need for continuous monitoring and updating of adaptation strategies. Kotor faces challenges in maintaining an adaptive management approach, particularly in ensuring that all stakeholders remain engaged, and that the latest scientific data is incorporated into planning processes.

Conclusion

The City of Kotor has taken important steps toward climate change adaptation, particularly through risk assessments and the integration of climate considerations into development plans. However, challenges related to resource availability, the balance between economic interests and resilience, and the ongoing need for strategy updates highlight areas where further work is needed. Enforcement of collaboration between universities, private sector and the Municipality of Kotor should be searched on that field.

Recommendations for Improvement:

1. **Seek External Funding and Partnerships:** Kotor should explore opportunities to secure external funding from international organizations, climate funds, or partnerships with other cities facing

similar challenges. These resources could support the implementation of large-scale adaptation projects that the city's budget cannot cover on its own.

2. **Develop a Climate Resilience Action Plan:** While the city has made progress in integrating climate considerations into planning, a dedicated Climate Resilience Action Plan could provide a more focused framework for all stakeholders. This plan should outline specific, actionable steps to enhance resilience, prioritize projects based on risk assessments, and establish clear timelines for implementation.

3. **Strengthen Public-Private Collaboration:** Enhancing collaboration between the public sector and private tourism enterprises can help align economic goals with climate resilience. The city could introduce incentives for businesses that invest in climate-resilient infrastructure or adopt sustainable practices, ensuring that adaptation measures are seen as beneficial rather than burdensome.

4. **Continuous Monitoring and Adaptive Management:** Establish a system for regular monitoring and evaluation of climate adaptation measures, ensuring that strategies are updated as new data becomes available. This could involve setting up a dedicated task force or working group focused on climate resilience, composed of representatives from government, academia, and the private sector.

Relevant References

- Environmental Responsibility and Climate Change, Tenerife Global Summit, 2024.
- Gender-sensitive Climate Risk Assessment of Kotor Bay, Montenegro, GEF MedProgramme – Enhancing Environmental Security, SCCF Project, 2022.
- Kotor Climate (Montenegro), Climate Data, 2024.

Figure 40 : Simulation results on the risk of floods due to climate crisis effect in the coming years

in the areas threatened by sea rise, we have individual parts of settlements, tourist zones and nautical infrastructure, such as Kotor (Figure 2).

A11. Risk and Crisis Management

Introduction to Criterion A11 : Risk and Crisis Management

Criterion A11 of the GSTC Destination Criteria v2.0 focuses on the importance of destinations having a comprehensive risk reduction, crisis management, and emergency response plan. These plans should address a wide range of risks, including natural disasters, terrorism, health emergencies, and resource depletion, among others. The criterion emphasizes that these plans should be regularly updated and communicated effectively to residents, visitors, and enterprises. Proper risk and crisis management are crucial for maintaining the safety and security of a destination, ensuring its resilience, and protecting its reputation as a safe place for tourism.

Criterion & Indicators Score

Table 18 : A11 – Risk and Crisis Management

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
A11	A11 Risk and crisis management	a	A documented risk reduction, crisis management and emergency response plan for tourism in the destination.	1		1,00
		b	The plan recognises a wide range of risks, including natural disasters, terrorism, health, resource depletion, and others appropriate to the location.	1		
		c	Communication procedures identified for use during and after an emergency.	1		
		d	Programme for local delivery of information and training on risk and crisis management.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Comprehensive Risk Assessment:** The City of Kotor has conducted extensive risk assessments that cover various potential threats, including natural disasters such as earthquakes and floods, which are particularly relevant given Kotor's geographical location. This risk assessment forms the foundation of the city's crisis management plan.

- **Emergency Response Plan Development:** Kotor has developed an emergency response plan that is well-documented and includes specific procedures for a range of scenarios, from health emergencies to environmental disasters. The plan is designed to ensure a coordinated response across various agencies and stakeholders, reducing the potential impact of crises on both residents and visitors.

- **Public Awareness and Training Programs:** The city has made significant efforts to raise public awareness about potential risks and the corresponding emergency procedures. This includes regular training sessions for local residents and tourism-related businesses, which ensure that everyone is prepared and knows how to act in case of an emergency. These programs have contributed to a higher level of community resilience and preparedness.

Challenges

- **Communication of Plans for Tourists:** While Kotor has made strides in developing and communicating its risk management plans to residents and businesses, there is still a challenge in effectively communicating these plans to tourists. Visitors, who may not be familiar with local risks or emergency procedures, need clear and accessible information in multiple languages to ensure they are informed and prepared.

- **Regular Updates and Plan Adaptation:** The dynamic nature of risks, especially with the evolving climate conditions and geopolitical landscape, necessitates frequent updates to the crisis management plan. However, Kotor faces challenges in maintaining a regular review and update cycle for its plans due to resource constraints, potentially leaving some areas underprepared for emerging risks.

- **Resource Allocation and Coordination:** Ensuring that all sectors, including tourism, are adequately resourced and coordinated during a crisis remains a challenge. There is a need for continuous investment in emergency infrastructure and resources to ensure that the plans can be effectively implemented when necessary.

Conclusion

The City of Kotor has made significant progress in developing and implementing a comprehensive risk and crisis management framework. The city's proactive approach to risk assessment and the development of a detailed emergency response plan is commendable. However, challenges remain in terms of continuing and expanding the subject of these plans, communicating them to tourists, regularly updating the plans, and ensuring adequate resource allocation.

Recommendations for Improvement

1. **Enhanced Visitor Communication:** Kotor should implement more robust systems to communicate emergency procedures to tourists. This could include multilingual information available at key tourist sites, hotels, and online platforms. Additionally, including emergency information in visitor materials such as brochures or apps could help ensure that tourists are well-informed.

2. **Establish a Regular Review Process:** To address the challenge of keeping crisis management plans up-to-date, Kotor should establish a formalized review and update process, ideally on an annual basis. This process should involve all relevant stakeholders, including local authorities, businesses, and community representatives, to ensure that the plans remain relevant and effective.

3. **Invest in Emergency Infrastructure:** Continued investment in emergency response infrastructure, such as early warning systems and emergency shelters, is crucial. Kotor should seek external funding opportunities or partnerships with international organizations to bolster its resources for managing crises.

4. **Strengthen Public-Private Collaboration:** Enhancing coordination between public authorities and the private sector, particularly in tourism, can improve the overall effectiveness of crisis management. Regular joint exercises and simulations can help identify gaps in the plan and ensure a more cohesive response during actual emergencies.

Relevant References

- Corruption, public trust and medical autonomy in the public health sector of Montenegro: Taking stock of the COVID-19 influence, I. Radević, 2022.
- Performance audit of efficient response management in case of sudden pollution in Adriatic Sea, Montenegro State audit institution, 2021.
- Responses to disasters and crises through subnational social protection systems: Case of Montenegro, UNICEF, 2023.

Figure 41 : An example of oil spill simulation in the Port of Kotor area
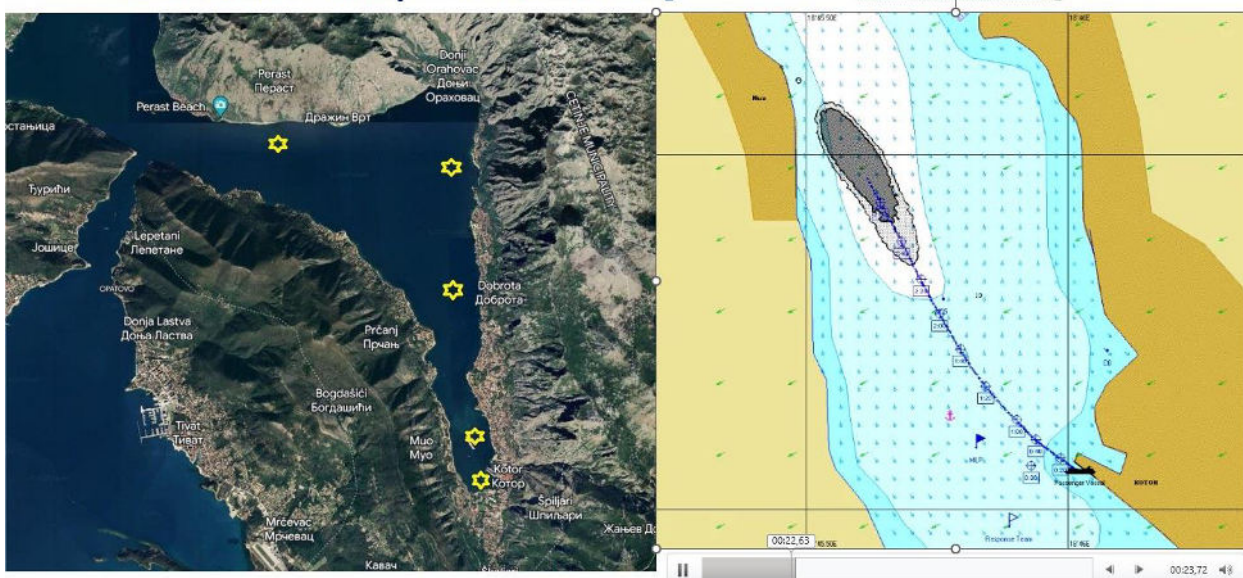
B. SOCIO-ECONOMIC SUSTAINABILITY

B1. Measuring the Economic Contribution of Tourism

Introduction to Criterion B1 : Measuring the Economic Contribution of Tourism

Criterion B1 of the GSTC Destination Criteria v2.0 focuses on the importance of measuring the direct and indirect economic contributions of tourism to a destination's economy. This includes monitoring various indicators such as visitor volume, visitor expenditure, employment, and investment, as well as understanding how the economic benefits are distributed within the community. Accurate measurement and reporting are essential for making informed decisions about tourism management, ensuring that tourism contributes positively to the local economy while minimizing any potential negative impacts.

Criterion & Indicators Score

Table 19 : B1 – Measuring the Economic Contribution of Tourism

Criteria			Indicators		No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B1	B1 Measuring the economic contribution of tourism	a	Programme of economic data gathering.	2			1,33
		b	Annual reports on the direct and indirect economic contribution of tourism in the destination.	1			
		c	Data covering a range of measures of economic impact (e.g. volume, expenditure, employment, investment and spread of economic benefit in the destination).	1			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Tourism Data Collection and Reporting:** The City of Kotor has implemented a robust system for collecting data related to tourism, including visitor numbers, spending patterns, and the economic impact on local businesses. This data is crucial for understanding the role of tourism in the city's economy and for making informed decisions about tourism management. The city regularly publishes reports that detail these economic contributions, which helps to maintain transparency and inform stakeholders.

- **Positive Impact on Local Employment:** Tourism in Kotor has created significant employment opportunities for local residents, particularly in sectors such as hospitality, retail, and cultural services. The city's emphasis on promoting local hiring in tourism-related businesses has helped to ensure that the economic benefits of tourism are widely distributed within the community.

- **Support for Small and Medium Enterprises (SMEs):** Kotor has actively supported the development of local SMEs that cater to tourists, such as local crafts, food producers, and service providers. By promoting local products and services, the city has enhanced the retention of tourism spending within the local economy, which has strengthened the economic resilience of the community.

Challenges

- **Seasonal Economic Fluctuations:** One of the major challenges Kotor faces is the seasonal nature of its tourism, which leads to significant economic fluctuations. During peak tourist season, there is a surge in economic activity, but during the off-season, many businesses struggle to remain viable, leading to seasonal unemployment and underemployment.

- **Uneven Distribution of Economic Benefits:** While tourism has generated considerable economic benefits for Kotor, these benefits are not always evenly distributed across the community. Certain areas and businesses, particularly those located in the historic center, receive the majority of tourism revenue, while outlying areas and smaller enterprises may not experience the same level of economic impact.

- **Dependence on Cruise Tourism:** Kotor's economy has become highly dependent on cruise tourism, which brings a large number of visitors but often with lower per capita spending compared to other types of tourists. This reliance on cruise tourism can make the local economy vulnerable to fluctuations in the cruise industry and may limit opportunities for more sustainable and higher-value tourism development.

Conclusion

The City of Kotor has made substantial progress in measuring and understanding the economic contributions of tourism, which has helped to optimize the benefits of tourism for the local economy. The role and the activities of the Tourism Organization of Kotor is doing a great job, offering a comprehensive measurement of tourism's indirect and induced economic impacts in their reports

and outcomes. However, challenges related to seasonality, uneven distribution of benefits, and dependence on cruise tourism need to be addressed to ensure long-term economic sustainability. Also, more effort should be made on visitor volume and expenditures tracking, broader economic indicators such as employment and local investment monitoring analysis.

Recommendations for Improvement

1. **Diversify Tourism Offerings:** Kotor should work on diversifying its tourism offerings to attract visitors year-round, reducing the impact of seasonality on the local economy. This could include developing and promoting cultural events, conferences, and nature-based tourism during the off-season.

2. **Enhance Economic Benefit Distribution:** The city should implement strategies to ensure a more even distribution of economic benefits from tourism. This could include providing incentives for tourists to visit and spend in less frequented areas of Kotor and supporting smaller businesses outside the historic center with marketing and capacity-building initiatives.

3. **Reduce Dependency on Cruise Tourism:** To reduce dependency on cruise tourism, Kotor could focus on attracting higher-spending overnight visitors, such as those interested in cultural tourism or ecotourism. This could involve developing new tourism products that appeal to these markets and investing in infrastructure that supports longer stays.

4. **Strengthen Data Collection and Analysis:** While Kotor's current data collection efforts are commendable, there is always room for improvement. The city could further refine its data collection processes to include more detailed information on visitor demographics, spending patterns, and the economic impact on specific sectors. This would enable more targeted and effective tourism management strategies.

Relevant References

- Economic Impact of Tourism, Montenegro Tourism Board, 2024.
- Montenegro Datasets, IMF, 2024.
- Montenegro Economy briefing: Tourism and its implications on the economy of Montenegro, Weekly Briefing / Vol. 6, No. 2, China CEE, 2018.

B2. Decent work and career opportunities

Introduction to Criterion B2 : Decent Work and Career Opportunities

Criterion B2 of the GSTC Destination Criteria v2.0 focuses on the promotion of decent work and career opportunities within the tourism sector. It emphasizes the need for destinations to support and encourage the creation of safe and secure jobs that provide a living wage, equal opportunities for all, and avenues for training and career advancement. This criterion aligns with the broader goals of promoting social inclusion, reducing inequality, and ensuring that tourism contributes positively to the socio-economic development of local communities.

Criterion & Indicators Score

Table 20 : B2 – Decent work and career opportunities

Criteria			Indicators			
			No document exists	0	Areas of Risk <1	
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
			Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
B2	B2 Decent work and career opportunities	a	Provision of relevant skills training programmes/courses, available locally.	3		
		b	Statements of commitment by tourism enterprises to the provision of decent work/ career opportunities.	0		1,75
		c	Training and employment opportunities promoted to and taken up by local people, including women, young people, minorities and people with disabilities.	3		
		d	Channels for checking working conditions and receiving/handling grievances (e.g. involvement of labour unions).	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Promotion of Local Employment:** The City of Kotor has been effective in promoting local employment within the tourism sector. The city has implemented policies that encourage tourism enterprises to hire locally, providing employment opportunities for residents and

helping to reduce unemployment rates in the area. This approach has also contributed to the development of a skilled workforce that is well-versed in the needs of the tourism industry.

- **Training and Capacity Building:** Kotor has established various training programs aimed at enhancing the skills of its workforce, particularly in the areas of hospitality, cultural heritage management, and language skills. These programs are often conducted in collaboration with local educational institutions and industry experts, ensuring that the training is relevant and up to date. This has helped to create a more capable and competitive workforce, ready to meet the demands of the tourism sector.
- **Commitment to Equal Opportunities:** The city has made significant efforts to ensure that employment opportunities within the tourism sector are accessible to all members of the community, including women, youth, and minority groups. This commitment to inclusivity has been reflected in the increasing diversity of the workforce in Kotor's tourism industry.

Challenges

- **Seasonal Employment and lack of adequate labor force:** A significant challenge in Kotor is the seasonality of tourism, which leads to seasonal employment. Many jobs in the tourism sector are temporary, and only available during the peak tourist season. This creates job insecurity for workers and can lead to financial instability for those who rely on tourism for their livelihoods.
- **Limited Career Advancement Opportunities:** Despite the availability of jobs, there are limited opportunities for career advancement within the tourism sector in Kotor. Many jobs are entry-level positions with few clear pathways for promotion or professional development, which can lead to high turnover rates and difficulties in retaining skilled workers.
- **Wage Disparities:** There are ongoing concerns about wage disparities within the tourism sector, with some workers earning less than a living wage, particularly in lower-skilled positions. Addressing these disparities is crucial for ensuring that tourism provides fair and equitable economic benefits to all workers.
- **Blending of local labor force with immigrants:** High pressure of the immigrant population, especially in urban and coastal settlements and the immediate hinterland, which led to the creation of agglomerations and caused overcrowding, which is very evident in the coastal area.

Conclusion

The City of Kotor has made notable progress in promoting local employment, providing training opportunities, and ensuring equal access to jobs in the tourism sector. However, challenges related to seasonal employment, limited career advancement opportunities, and wage disparities need to be addressed to fully realize the potential of tourism as a driver of socio-economic development.

Recommendations for Improvement

1. **Promote Year-Round Tourism:** To address the challenge of seasonal employment, Kotor should focus on promoting year-round tourism. This could involve developing and marketing attractions and activities that appeal to tourists outside the peak season, such as cultural events,

eco-tourism, and wellness tourism. By extending the tourism season, the city can create more stable and continuous employment opportunities.

2. **Develop Career Pathways:** The city should work with tourism enterprises to develop clear career pathways that provide opportunities for advancement. This could include the creation of mentorship programs, professional development courses, and recognition of skills and experience. Providing these opportunities will help retain talent and reduce turnover in the sector.

3. **Ensure Fair Wages:** Kotor should implement policies or initiatives that encourage or require tourism enterprises to pay fair wages that reflect the cost of living. This could involve setting minimum wage standards for the tourism sector or offering incentives to businesses that commit to paying living wages.

4. **Expand Training Programs:** The city could expand its training programs to cover a broader range of skills, including management and entrepreneurship, to help workers move up the career ladder. Partnering with industry leaders to provide advanced training and certification programs can help workers gain the skills needed for higher-level positions.

Relevant References

- Montenegro: Small Business Act profile, ETF, 2019.
- Strategija zaposljavanja opstine kotor, Municipality of Kotor, 2021-2024.

B3. Supporting Local Entrepreneurs and Fair Trade

Introduction to Criterion B3 : Supporting Local Entrepreneurs and Fair Trade

Criterion B3 of the GSTC Destination Criteria v2.0 emphasizes the importance of supporting local entrepreneurs and promoting fair trade within the tourism sector. The criterion encourages destinations to retain tourism spending within the local economy by supporting small and medium enterprises (SMEs), promoting local products, and ensuring that tourism benefits are distributed equitably across the community. This approach helps strengthen the local economy, supports cultural preservation, and fosters sustainable tourism practices that benefit the entire community.

Criterion & Indicators Score

Table 21 : B3 – Supporting Local Entrepreneurs and Fair Trade

Criteria			Indicators		No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B3	B3 Supporting local entrepreneurs and fair trade	a	Advice, finance or other support – available in the destination for tourism-related SMEs.	3			2,20
		b	Assistance with market access for local tourism- related SMEs.	3			
		c	Action to encourage and assist local tourism enterprises to purchase goods and services locally.	1			
		d	Initiatives to help local farmers, artisans and food producers to engage in the tourism value chain.	3			
		e	Local produce and crafts identified, promoted and available for sale to visitors in the destination.	1			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Promotion of Local Products:** The City of Kotor has actively promoted the sale and use of local products within the tourism sector. This includes encouraging restaurants, hotels, and shops to source food, crafts, and other goods from local producers. This initiative not only supports local

entreprenurs but also enhances the authenticity of the tourist experience by offering visitors products that reflect the unique cultural heritage of Kotor.

- **Support for SMEs:** Kotor has implemented various programs to support local SMEs, particularly those involved in tourism-related activities. These programs include providing access to financing, offering business development training, and facilitating market access through promotional activities. By supporting SMEs, Kotor has helped create a more resilient and diversified local economy that is less dependent on large tourism operators.

- **Fair Trade Practices:** The city has encouraged fair trade practices by promoting local businesses that adhere to ethical standards in sourcing and production. This includes supporting cooperatives and businesses that prioritize sustainable practices and fair wages for workers. These efforts contribute to a more equitable distribution of tourism benefits and promote social sustainability within the community.

Challenges

- **Market Access for Small Producers:** Despite efforts to support local entrepreneurs, small producers in Kotor still face challenges in accessing broader markets. Many local businesses struggle to compete with larger, more established companies, particularly in attracting the attention of tourists who may be more familiar with international brands. Enhancing the visibility and appeal of local products remains a challenge.

- **Balancing Tradition with Modernity:** While promoting local products and traditions is a key focus, there is a challenge in balancing the preservation of cultural heritage with the need for innovation and modernization. Some traditional businesses may struggle to adapt to changing market demands or to incorporate new technologies that could enhance their competitiveness.

- **Distribution of Tourism Benefits:** While there are initiatives to support local entrepreneurs, there is still a need to ensure that the economic benefits of tourism are distributed more evenly across the community. In some cases, certain areas or groups may benefit more from tourism than others, leading to disparities in economic development within the city.

- **Lack of connection between traditional development and innovation / outcomes from the research community:**
  https://www.montenegro.travel/uploads/2_BUSINESS/Analiti%C4%8Dke%20kartice%20i%20putni%20nalozi/Strateska%20dokumenta/montenegro-tourism-development-strategy-2022-2025-with-the-action-plan.pdf

Conclusion

The City of Kotor has made significant strides in supporting local entrepreneurs and promoting fair trade within its tourism sector. These efforts have helped to strengthen the local economy, preserve cultural heritage, and promote sustainable tourism practices. However, challenges related to market access, balancing tradition with modernity, and ensuring equitable distribution of tourism benefits remain.

Recommendations for Improvement

1. **Enhance Market Access:** Kotor should focus on enhancing market access for local producers by developing stronger branding and marketing strategies that highlight the uniqueness and quality of local products. This could include the creation of a "Made in Kotor" label, marketing campaigns targeting tourists, and partnerships with online platforms to reach a broader audience.

2. **Support Innovation in Traditional Sectors:** The city could offer additional support to traditional businesses by providing training and resources to help them innovate while preserving their cultural heritage. This could involve the introduction of new technologies, improving product design, or finding new ways to market traditional products to modern consumers.

3. **Promote Inclusive Economic Development:** Kotor should implement strategies to ensure that the economic benefits of tourism are more evenly distributed. This could include targeted support for underrepresented groups in the tourism sector, such as women, youth, and minority entrepreneurs, as well as initiatives to promote tourism in less-visited areas of the city.

4. **Strengthen Collaboration Among Stakeholders:** The city should foster stronger collaboration among local businesses, government agencies, and tourism operators to create a more coordinated approach to supporting local entrepreneurs. This could involve the establishment of a local tourism network or cooperative that helps small businesses pool resources, share best practices, and collaborate on joint marketing initiatives.

Relevant References

- Implementing a Pilot SME Voucher Scheme in Montenegro, OECD, 2013.
- Montenegro's Road to Sustainable Tourism Growth and Innovation, S. Janketic, J. C. Smolović, Bucar M., Jacimovic D., 2018.
- Podržani projekti, IPA, 2022.

B4. Support for Community

Introduction to Criterion B4 : Support for Community

Criterion B4 of the GSTC Destination Criteria v2.0 emphasizes the importance of destinations fostering support for local communities through tourism. This criterion encourages the development of systems that enable and encourage tourism enterprises, visitors, and the general public to contribute to community well-being and sustainability initiatives. The goal is to ensure that tourism benefits the local population not only economically but also in terms of social and environmental sustainability, thereby creating a more resilient and cohesive community.

Criterion & Indicators Score

Table 22 : B4 – Support for Community

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B4	B4 Support for community	a	Support for local community and sustainability initiatives by local tourism enterprises is encouraged and facilitated.	2		1,33
		b	Schemes exist, and are promoted, for visitors to support local community and sustainability initiatives.	0		
		c	Volunteering and engagement with the community does not involve intrusion or exploitation.	2		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Community Engagement Programs:** The City of Kotor has implemented several community engagement programs that encourage both locals and visitors to participate in sustainability initiatives. These programs include volunteer opportunities in local conservation efforts, such as beach cleanups and cultural heritage preservation projects. These initiatives not only benefit the environment and cultural sites but also foster a sense of community among residents and visitors.

- **Support for Local Initiatives:** Kotor has been successful in promoting and supporting local community initiatives that align with sustainable tourism practices. The city has facilitated funding and logistical support for community-driven projects, such as the restoration of historic buildings and the development of local parks. These projects have helped to enhance the quality of life for residents and have provided additional attractions for visitors.
- **Encouragement of Responsible Tourism:** The city actively promotes responsible tourism practices among visitors, encouraging them to respect local customs, support local businesses, and participate in community activities. This is done through informational campaigns, signage, and partnerships with local tour operators who emphasize the importance of sustainability in their offerings. These efforts have contributed to a more respectful and engaged visitor population.

Challenges

- **Ensuring Broad Community Participation:** While Kotor has made progress in supporting community initiatives, there is still a challenge in ensuring broad and inclusive participation across all segments of the local population. Some community members, particularly those in more marginalized groups, may feel disconnected from or less likely to benefit from tourism-related initiatives.
- **Balancing Tourism and Local Needs:** There is an ongoing challenge in balancing the needs of the tourism sector with those of the local community. As tourism grows, it can sometimes lead to pressures on local infrastructure, housing, and public services, potentially causing friction between residents and the tourism industry.
- **Sustainability of Community Initiatives:** Many community initiatives in Kotor rely on external funding or volunteer participation, which can make them vulnerable to fluctuations in resources and engagement levels. Ensuring the long-term sustainability of these initiatives is a key challenge that needs to be addressed.

Conclusion

The City of Kotor has demonstrated a strong commitment to supporting its local community through various initiatives that engage both residents and visitors in sustainable practices. However, challenges related to inclusivity, balancing tourism with local needs, and ensuring the sustainability of community initiatives remain. In practice, the mechanisms for involving enterprises and the public in contributing to sustainability initiatives lack concrete examples and systematic promotion. Kotor faces challenges in encouraging both visitors and locals to engage in sustainable practices.

Recommendations for Improvement

1. **Enhance Inclusivity in Community Initiatives:** Kotor should develop strategies to ensure that all community members, including marginalized groups, are actively involved in and benefit from tourism-related initiatives. This could involve targeted outreach efforts, providing support for grassroots projects in underserved areas, and ensuring that community consultations are inclusive and representative.

2. **Develop a Comprehensive Community Impact Plan:** To better balance the needs of tourism and the local community, Kotor could develop a comprehensive community impact plan that outlines strategies for managing the social and economic impacts of tourism. This plan should include mechanisms for monitoring and addressing potential conflicts, such as those related to housing or public services, and should involve close collaboration with local stakeholders.

3. **Secure Sustainable Funding for Community Initiatives:** To ensure the long-term success of community initiatives, Kotor should explore options for securing more sustainable funding sources. This could include partnerships with private sector entities, establishing community foundations, or applying for grants from international organizations focused on sustainable development.

4. **Strengthen Visitor Education Programs:** Kotor can further enhance its responsible tourism efforts by expanding its visitor education programs. This could involve the development of more comprehensive educational materials, offering workshops or tours that focus on sustainability, and partnering with local schools or community groups to involve young people in these efforts.

Relevant References

- Cultural Tourism and Community Engagement: Insight from Montenegro, Business Systems Research / Vol. 12, Moric I. et al., 2021.
- Culture heritage – Treasure of Cross Border Region, IPA, 2022.
- National Action Plan for the implementation of the initiative Open Government Partnership Montenegro 2023- 2024, Open Government Partnership, 2022.

B5. Preventing Exploitation and Discrimination

Introduction to Criterion B5 : Preventing Exploitation and Discrimination

Criterion B5 of the GSTC Destination Criteria v2.0 focuses on the responsibility of tourism destinations to uphold international standards on human rights and to prevent exploitation, discrimination, and harassment. This criterion mandates that destinations establish and enforce laws and practices to protect vulnerable populations, including children, women, minorities, and marginalized groups. It also involves promoting awareness and ensuring that tourism activities do not contribute to human trafficking, modern slavery, or any form of exploitation.

Criterion & Indicators Score

Table 23 : B5 – Preventing Exploitation and Discrimination

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B5	B5 Preventing exploitation and discrimination	a	Reference (title, date) to specific laws that pertain in the destination regarding human rights, exploitation, discrimination and harassment.	3		1,25
		b	Evidence of communication and enforcement of above laws and related good practice (including to tourism enterprises and visitors).	1		
		c	Risk and impact analysis regarding human rights, including human trafficking, modern slavery and child labour – conducted regularly.	1		
		d	Destination and key tourism players are signatories to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.	0		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Implementation of Anti-Exploitation Laws:** The City of Kotor has enacted and enforced laws that align with international human rights standards to prevent exploitation and discrimination. These laws are designed to protect vulnerable groups, including women, children, and minorities, from human trafficking, forced labor, and other forms of exploitation. The city has also implemented strict regulations for businesses in the tourism sector, ensuring that they comply with these standards.

- **Awareness Campaigns:** Kotor has launched public awareness campaigns aimed at educating both residents and tourists about the dangers of exploitation and the importance of upholding human rights. These campaigns include information on recognizing and reporting signs of human trafficking and other forms of exploitation. By raising awareness, Kotor has helped create a more vigilant and informed community.

- **Support Systems for Victims:** The city has established support systems for victims of exploitation, including hotlines, counseling services, and shelters. These services are designed to provide immediate assistance to those in need and to facilitate their reintegration into society. Kotor's commitment to supporting victims highlights its dedication to human rights and social justice.

Challenges

- **Enforcement of Regulations:** While Kotor has made significant progress in establishing laws to prevent exploitation and discrimination, the enforcement of these regulations can be challenging. Ensuring that all businesses, particularly those in the informal sector, comply with these laws requires ongoing monitoring and resources, which can be difficult to maintain.

- **Tourism-Related Exploitation Risks:** As a popular tourist destination, Kotor is vulnerable to risks associated with tourism-related exploitation, such as human trafficking and illegal labor practices. The transient nature of tourism can make it challenging to identify and address these issues promptly.

- **Cultural Sensitivities and Discrimination:** Despite efforts to promote equality, there can still be underlying cultural sensitivities and biases that lead to discrimination against certain groups, including ethnic minorities, women, and LGBTQ+ individuals. Addressing these deep-seated issues requires continuous education and cultural change.

Conclusion

The City of Kotor has made commendable efforts to prevent exploitation and discrimination within its tourism sector by implementing laws, raising awareness, and providing support to victims. However, challenges related to the enforcement of regulations, tourism-related risks, and cultural sensitivities persist.

Recommendations for Improvement

1. **Strengthen Enforcement Mechanisms:** Kotor should enhance its enforcement mechanisms by increasing the capacity of local authorities to monitor and regulate businesses, particularly those in the informal sector. This could involve regular inspections, training for law enforcement, and the use of technology to track compliance.

2. **Expand Collaboration with International Organizations:** The city could benefit from expanding its collaboration with international organizations that specialize in human rights and anti-trafficking efforts. These partnerships can provide additional resources, expertise, and best practices to help Kotor address complex issues related to exploitation and discrimination.

3. **Enhance Training and Education Programs:** Kotor should continue to invest in training and education programs for both residents and businesses. These programs should focus on recognizing and preventing exploitation, promoting cultural sensitivity, and understanding the rights of all individuals. Involving community leaders and influencers in these efforts can help facilitate broader cultural change.

4. **Implement a Visitor Code of Conduct:** To mitigate the risks associated with tourism-related exploitation, Kotor could implement a visitor code of conduct that outlines expected behaviors and provides information on how to report suspicious activities. This code of conduct could be distributed through hotels, tour operators, and online platforms to ensure wide reach.

Relevant References

- Crna gora zastitnik ljudskih prava i sloboda izvjestaj o radu za, Godinu, Podgorica, 2020.
- Montenegro 2022 Human Rights, U.S. Department of State, 2022.

B6. Property and User Rights

Introduction to Criterion B6 : Property and User Rights

Criterion B6 of the GSTC Destination Criteria v2.0 emphasizes the importance of respecting and protecting property rights and user rights within tourism destinations. This criterion requires that destinations enforce laws and regulations that ensure public consultation and consent, particularly when it comes to property acquisitions and developments that may affect communal or indigenous rights. The criterion also covers the protection of user rights to key resources, such as access to natural sites or cultural heritage areas, ensuring that local communities are not unfairly displaced or deprived of their rights due to tourism development.

Criterion & Indicators Score

Table 24 : B6 – Property and User Rights

Criteria			Indicators			
				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B6	B6 Property and user rights	a	Reference (title, date) to specific laws that pertain in the destination regarding property rights and acquisitions and user and access rights to resources.	3		2,25
		b	Reference in the above laws to communal and indigenous rights, public consultation and resettlement.	2		
		c	Evidence of enforcement of the above laws in the context of tourism development and activity.	2		
		d	Evidence of community consultation, consent and compensation.	2		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Strong Legal Framework for Property Rights:** The City of Kotor has established a robust legal framework that protects property rights and ensures that any acquisition or development involving land or property is conducted transparently and with the consent of affected parties. This framework aligns with international standards and provides a solid foundation for managing property-related issues in the context of tourism development.

- **Public Consultation Processes:** Kotor has implemented effective public consultation processes that involve local communities in decision-making, particularly regarding developments that might impact communal lands or access to cultural and natural resources. These consultations have helped to ensure that local voices are heard and that developments proceed with the support of the community.

- **Protection of Access Rights:** The city has made significant efforts to protect access rights to key natural and cultural sites, ensuring that tourism does not infringe on the ability of local communities to access these resources. This includes maintaining public pathways, preserving traditional access routes, and ensuring that tourism infrastructure does not block or limit access to important sites.

Challenges

- **Balancing Development and Property Rights:** As Kotor continues to grow as a tourism destination, there are ongoing challenges in balancing the needs of development with the protection of property and user rights. There is pressure to develop more tourist infrastructure, which can sometimes lead to conflicts with local communities over land use and property rights.

- **Ensuring Equitable Consultation:** While public consultation processes are in place, ensuring that these processes are truly inclusive, and representative of all community members can be challenging. Marginalized groups, including ethnic minorities and economically disadvantaged residents, may not always have the opportunity to fully participate in these consultations, leading to concerns about the equity of decision-making processes.

- **Managing Conflicts Over Resource Use:** Conflicts can arise when the interests of the tourism industry clash with those of local communities, particularly regarding the use of natural resources such as water, land, and access to cultural sites. These conflicts can be difficult to manage, especially when economic interests are at stake.

Conclusion and Recommendations

The City of Kotor has made commendable progress in protecting property and user rights through a strong legal framework, public consultation processes, and efforts to maintain access to key resources. However, challenges remain in balancing development with the protection of rights, ensuring equitable consultation, and managing resource use conflicts.

Recommendations for Improvement

1. **Strengthen Inclusivity in Public Consultations:** Kotor should take additional steps to ensure that all segments of the community, including marginalized groups, are included in public consultations related to property and user rights. This could involve outreach programs, targeted consultations, and providing platforms for voices that are less likely to be heard in traditional consultation settings. **Develop Conflict Resolution Mechanisms:** The city could benefit from establishing formal mechanisms for resolving conflicts between tourism development and community rights. These mechanisms should be designed to facilitate dialogue, mediate disputes, and find mutually

acceptable solutions that balance development needs with the protection of property and user rights. **Monitor and Enforce Access Rights:** Kotor should continue to monitor access to key natural and cultural sites to ensure that tourism development does not infringe on the rights of local communities. This could involve regular audits, public reporting, and corrective actions where necessary to maintain access rights.

2. **Educate Stakeholders on Property and User Rights:** The city should invest in education programs for both developers and the community about the importance of property and user rights. These programs can help build awareness, reduce conflicts, and ensure that all parties understand their rights and responsibilities in the context of tourism development.

Relevant References
- Law on Patents, Official Gazette of Montenegro No. 42, 2015.

B7. Safety and Security

Introduction to Criterion B7 : Safety and Security

Criterion B7 of the GSTC Destination Criteria v2.0 focuses on ensuring the safety and security of both residents and visitors in a tourism destination. This criterion emphasizes the need for destinations to establish systems that monitor, prevent, report, and respond to crime, safety, and health hazards. The goal is to create a secure environment that addresses the needs of all stakeholders and ensures that the destination remains a safe place to live and visit.

Criterion & Indicators Score

Table 25 : B7 – Safety and Security

Criteria			Indicators		
			No document exists	0	Areas of Risk <1
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
			Not applicable in the destination	not appl.	Excellent Performance ≥2.50
B7	B7 Safety and security	a	Security and health services are well established and active in the destination.	2	2,33
		b	The needs of visitors are identified and addressed in the delivery of security and health services.	3	
		c	Tourism facilities are inspected for compliance with safety and hygiene standards.	2	

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Effective Health and Safety Services:** The City of Kotor has established robust health and safety services that are well-equipped to handle emergencies. This includes a network of health facilities and emergency response teams that are trained to deal with both routine health issues and crises that may arise due to the influx of tourists, especially during peak seasons. The city's proactive approach to health and safety has been a cornerstone of its ability to maintain a safe environment for both residents and visitors.

- **Crime Monitoring and Prevention:** Kotor has implemented a comprehensive system for monitoring and preventing crime within the city, particularly in areas frequented by tourists. The local police force is visible and active, which helps to deter criminal activities. Additionally, the city has invested in surveillance technologies and community policing initiatives that involve local residents in maintaining safety and security.

- **Tourism Facility Inspections:** The city regularly inspects tourism facilities to ensure they comply with safety and hygiene standards. This includes accommodations, restaurants, and recreational facilities. These inspections are crucial for maintaining high standards of safety and for preventing health hazards that could negatively impact visitors' experiences.

Challenges

- **Handling Peak Season Crowds:** One of the significant challenges for Kotor is managing the large influx of tourists during the peak season. The increased number of visitors can strain the city's health and safety services, making it more challenging to maintain the same level of safety and security. This can lead to overcrowding, which not only impacts the visitor experience but also increases the risk of accidents and health issues.

- **Visitor Awareness of Safety Protocols:** While Kotor has strong safety systems in place, ensuring that all visitors are aware of and adhere to safety protocols is an ongoing challenge. Language barriers and varying levels of understanding among tourists from different countries can make it difficult to communicate important safety information effectively.

- **Resource Allocation for Emergency Response:** As tourism grows, so does the need for more resources to be allocated towards emergency response services. Ensuring that the city's emergency response teams are adequately funded and equipped to handle potential crises, particularly during peak times, remains a challenge.

Conclusion

The City of Kotor has made significant strides in establishing a safe and secure environment for both residents and tourists. Its proactive approach to health and safety services, crime prevention, and facility inspections has contributed to a positive safety record. However, challenges related to peak season crowd management, visitor awareness, and resource allocation for emergency response need to be addressed to maintain and improve these standards.

Recommendations for Improvement

1. **Enhance Visitor Communication on Safety Protocols:** Kotor should develop multilingual communication strategies to ensure that all visitors are well-informed about safety protocols. This could include clear signage, mobile apps, and brochures in multiple languages, as well as training for tourism operators on how to communicate safety information effectively.

2. **Implement Crowd Management Strategies:** To better manage the peak season crowds, Kotor could implement crowd control measures such as timed entry to popular sites, increased staffing during peak times, and the use of technology to monitor and manage visitor flows in real-time.

3. **Increase Investment in Emergency Response:** The city should consider increasing its investment in emergency response services to ensure they are adequately equipped to handle the growing number of tourists. This could include additional training for emergency personnel, investment in new equipment, and the establishment of quick-response teams during peak seasons.

4. **Promote Community Involvement in Safety Initiatives:** Encouraging greater involvement of local residents in safety and security initiatives can help enhance the overall safety of the environment. Community watch programs, safety workshops, and partnerships between residents and law enforcement can contribute to a safer destination for everyone.

Relevant References

- List of public medical facilities in Montenegro, Foreign, Commonwealth & Development Office, 2023.

B8. Access for All

Introduction to Criterion B8 : Access for All

Criterion B8 of the GSTC Destination Criteria v2.0 emphasizes the importance of ensuring that tourism sites, facilities, and services are accessible to everyone, including persons with disabilities and those with specific access requirements. This criterion advocates for the design and implementation of solutions that make sites and services inclusive while preserving the integrity of natural and cultural heritage. It also emphasizes the importance of providing information about accessibility to help visitors make informed decisions.

Criterion & Indicators Score

Table 26 : B8 – Access for All

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
B8	B8 Access for all	a	The existence of any regulations and standards regarding the accessibility of visitor sites, facilities and services.	3		1,17	
		b	Consistent application of accessibility standards in public facilities.	1			
		c	Data on the extent/proportion of visitor sites and facilities that are accessible.	0			
		d	Evidence of programmes to improve access for people with a range of access needs.	1			
		e	Information on accessibility included in communications about the destination as a whole.	0			
		f	Details of accessibility included in visitor information about key sites.	2			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Development of Accessible Facilities:** The City of Kotor has made significant progress in developing accessible facilities for tourists with disabilities. Key cultural sites and public spaces have been upgraded with ramps, handrails, and other modifications that enhance accessibility.

These efforts have been part of a broader initiative to make the city's historic and natural sites more inclusive for all visitors.

- **Public Information on Accessibility:** Kotor has taken steps to ensure that information on the accessibility of its sites and services is available to visitors. This includes publishing accessibility details on tourism websites, brochures, and key entry points to cultural and natural sites. This transparency helps visitors with specific needs to plan their trips effectively and enjoy their experience in Kotor.

- **Collaboration with Disability Advocacy Groups:** The city has actively collaborated with local and national disability advocacy groups to ensure that the needs of persons with disabilities are considered in the planning and development of tourism infrastructure. This collaboration has led to the inclusion of specific features in public transportation and tourist information centers that cater to the needs of visitors with disabilities.

Challenges

- **Accessibility of Historic Sites:** Despite progress in making some areas of Kotor more accessible, the city's historic old town, with its narrow streets and ancient architecture, presents significant challenges for full accessibility. The preservation of cultural heritage often limits the extent to which modifications can be made, resulting in some areas remaining difficult to access for individuals with mobility impairments.

- **Inconsistent Application of Accessibility Standards:** While certain parts of Kotor have been made more accessible, the application of accessibility standards is inconsistent across the city. Some public facilities and tourist attractions have yet to be upgraded to meet modern accessibility standards, creating disparities in the visitor experience.

- **Limited Awareness Among Businesses:** There is still a lack of awareness among some local businesses about the importance of providing accessible services. This can result in gaps in service provision, such as restaurants without accessible restrooms or hotels that lack facilities for guests with disabilities.

Conclusion

The City of Kotor has made commendable efforts to improve accessibility across its tourism infrastructure, particularly in providing accessible facilities and information to visitors. However, challenges remain, particularly in addressing the accessibility of historic sites and ensuring consistent application of accessibility standards across all sectors, including the implementation of the national relevant legislation. These efforts should be connected with activities for visitor volume control, infrastructure support, financial means and risk management, especially for sensitive services like health support.

Recommendations for Improvement

1. **Expand Accessibility Upgrades in Historic Areas:** Kotor should explore innovative solutions to enhance accessibility in its historic old town. This could include portable ramps, virtual tours for inaccessible areas, and other creative adaptations that respect the cultural heritage while improving accessibility.

2. **Standardize Accessibility Practices:** The city should work towards standardizing accessibility practices across all public facilities and tourist attractions. This could involve creating a comprehensive accessibility audit and certification program that ensures all sites meet a consistent standard of accessibility.

3. **Increase Awareness and Training for Businesses:** Kotor should implement training programs for local businesses to raise awareness about the importance of accessibility and to provide guidance on how to make their services more inclusive. Incentives could be offered to businesses that meet high accessibility standards.

4. **Enhance Public Transport Accessibility:** Further improvements in public transportation, including the introduction of more accessible vehicles and better connectivity to key tourist sites, could greatly enhance the overall accessibility of the city.

Relevant References

- Montenegro 2022 Human Rights, U.S. Department of State, 2022.
- The Strategy for Protection of Persons with Disabilities from Discrimination and Promotion of equality 2017-2021, The Ministry of Human and Minority Rights, 2016.

Figure 42 : An example of limited access to old city visits due to flooding conditions
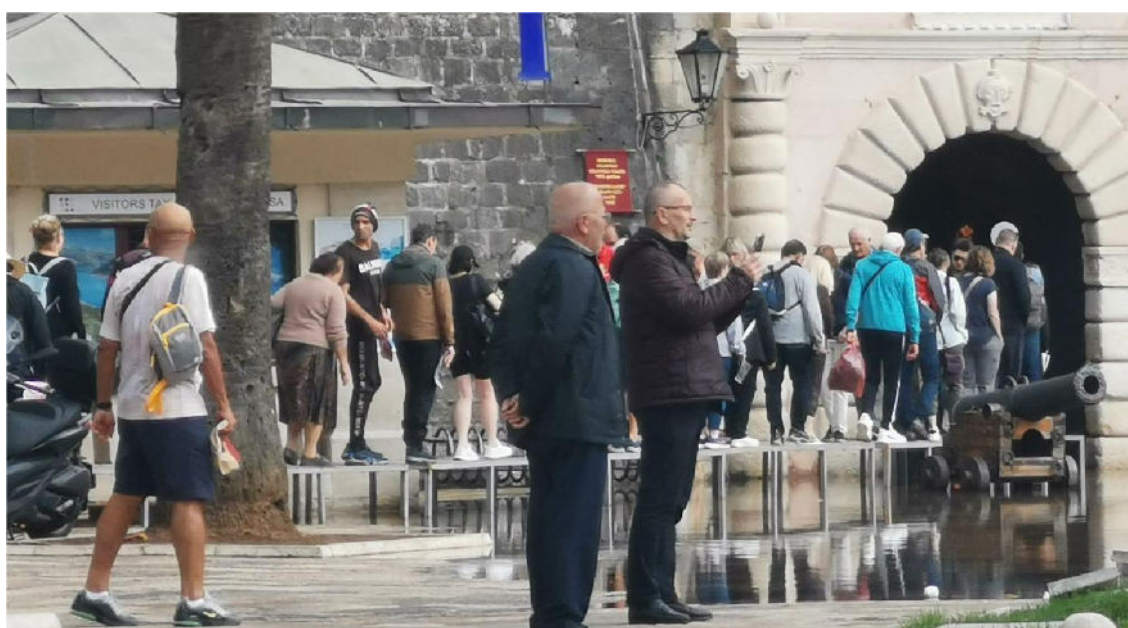
C. CULTURAL SUSTAINABILITY

C1. Protection of Cultural Assets

Introduction to Criterion C1 : Protection of Cultural Assets

Criterion C1 of the GSTC Destination Criteria v2.0 emphasizes the importance of protecting and conserving cultural assets, including built heritage, cultural landscapes, and other significant cultural elements. This criterion calls for the establishment of policies and systems that evaluate, rehabilitate, and conserve cultural assets to ensure they are preserved for future generations. It also highlights the need for using tourism income to support conservation efforts and maintain the integrity and authenticity of cultural sites.

Criterion & Indicators Score

Table 27 : C1 – Protection of Cultural Assets

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
C1	C1 Protection of cultural assets	a	Lists of cultural assets, including evaluation and indication of vulnerability.	3		2,67	
		b	Programme of rehabilitation and conservation of assets.	3			
		c	Mechanisms for using income from tourism to support conservation of cultural assets.	2			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Robust Cultural Heritage Protection Policies:** The City of Kotor has established strong policies aimed at protecting its rich cultural heritage, particularly as a UNESCO World Heritage site. These policies include strict regulations on development and modifications within the historic old town to ensure that the architectural integrity and cultural value of the site are preserved. The city's commitment to these policies has helped maintain Kotor's cultural landscape, making it a prominent and well-preserved example of medieval architecture in the Adriatic.

- **Rehabilitation and Conservation Programs:** Kotor has implemented several successful rehabilitation and conservation programs that have focused on restoring and preserving key cultural assets. These programs are often supported by international partnerships and funding, which have enabled the city to undertake significant restoration projects, such as the repair of historic buildings and the conservation of ancient fortifications. These efforts have not only preserved the physical structures but also enhanced the overall visitor experience by maintaining the authenticity of the site.
- **Use of Tourism Revenue for Conservation:** The city has effectively utilized tourism revenue to fund conservation efforts. Entry fees to certain cultural sites and contributions from the tourism sector are directed towards maintaining and restoring cultural assets. This approach has provided a sustainable funding source for ongoing conservation activities, ensuring that Kotor's cultural heritage is preserved despite the pressures of increasing tourism.

Challenges

- **Managing Tourist Impact on Cultural Sites:** One of the significant challenges Kotor faces is managing the impact of large numbers of tourists on its cultural sites, particularly during the peak season. The influx of visitors can lead to wear and tear on historic structures, overcrowding, and a strain on the resources needed for site maintenance. Balancing the needs of conservation with the economic benefits of tourism remains a critical issue.
- **Balancing Development with Preservation:** As tourism grows, there is ongoing pressure to develop new infrastructure to accommodate visitors. However, this development must be carefully balanced with the need to preserve Kotor's cultural heritage. The challenge lies in allowing modern development that meets the needs of the tourism industry while ensuring that it does not compromise the historical and cultural integrity of the area.
- **Limited Local Engagement in Conservation Efforts:** While Kotor has made strides in protecting its cultural assets, there is room for improvement in involving the local community more actively in conservation efforts. Greater engagement with residents could help foster a deeper appreciation for cultural heritage and ensure that conservation efforts are more inclusive and reflective of the community's values.
- **Balance on development and protection in cultural sites:** Excessive real estate development (is jeopardizing Montenegro's landmark historical site of Kotor).

Conclusion

The City of Kotor has shown a strong commitment to the protection and conservation of its cultural assets, supported by robust policies, effective rehabilitation programs, and the strategic use of tourism revenue. However, challenges remain in managing tourist impacts, balancing development with preservation, and enhancing local engagement, including the fulfillment of UNESCO requirements, like the new Heritage Management Plan that was in Draft version at the time of the Assessment.

Recommendations for Improvement

1. **Implement Visitor Management Strategies:** Kotor should develop and implement more robust visitor management strategies to reduce the impact of tourism on cultural sites. This could include limiting the number of visitors to certain sites during peak times, offering alternative routes, and improving the distribution of tourists across the city to alleviate pressure on the most sensitive areas.

2. **Strengthen Regulatory Frameworks for Development:** The city should continue to strengthen its regulatory frameworks to ensure that any new development is in line with conservation goals. This could involve more stringent guidelines for building design and construction within heritage zones and ensuring that all new projects undergo thorough cultural impact assessments.

3. **Enhance Community Involvement in Conservation:** Kotor should work to enhance community involvement in cultural conservation efforts. This could include educational programs, volunteer opportunities, and public consultations that give residents a more active role in preserving their cultural heritage. Engaging the community can also help build stronger support for conservation initiatives and ensure that they are sustainable in the long term.

Relevant References

- Cultural and Heritage Tourism Management, UNESCO World Heritage Centre, 2024.
- Natural and Culturo-Historical Region of Kotor, UNESCO, 2023.
- Slow Tourism Concept and Cultural Sites: Is The Town of Kotor (Montenegro) Ready for The Cittaslow Movement?, Bulatovic I., Micera R., 2018.

Figure 43 : An example of possible improper building facelifts in Kotor Old City

C2. Cultural Artefacts

Introduction to Criterion C2 : Cultural Artefacts

Criterion C2 of the GSTC Destination Criteria v2.0 focuses on the protection and management of cultural artefacts within a destination. This criterion emphasizes the importance of having laws and regulations that govern the proper sale, trade, display, and gifting of historical and archaeological artefacts. It also stresses the need for enforcement of these laws and public communication to ensure that tourism activities do not lead to the exploitation or illegal trade of cultural heritage items.

Criterion & Indicators Score

Table 28 : C2 – Cultural Artifacts

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
C2	C2 Cultural artifacts	a	Reference to relevant laws relating to historical artefacts pertaining in the destination (title, date)	3		1,67
		b	Evidence of communication of relevant laws to tourism enterprises and visitors.	1		
		c	Evidence of enforcement of relevant laws.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Strict Enforcement of Cultural Artefact Laws:** The City of Kotor has established and strictly enforces laws that govern the sale, trade, and display of cultural artefacts. These laws align with international standards, ensuring that the city's rich cultural heritage is protected from illegal trade and exploitation. Regular inspections and monitoring by local authorities help to enforce these regulations effectively, particularly in markets and shops where artefacts might be sold.

- **Public Awareness Campaigns:** Kotor has successfully launched public awareness campaigns aimed at both residents and visitors to educate them about the importance of preserving cultural artefacts. These campaigns include information on the legal aspects of buying and selling artefacts, as well as the ethical considerations involved in maintaining the integrity of

cultural heritage. By raising awareness, the city has helped to reduce the demand for illicitly obtained artefacts and fostered a culture of respect for heritage.

- **Collaboration with Cultural Institutions:** Kotor has collaborated with local museums and cultural institutions to ensure that artefacts are properly conserved and displayed. These partnerships have allowed for the proper cataloging and preservation of artefacts, making them accessible to the public in a manner that respects their historical and cultural significance. Exhibits and educational programs in museums have further enhanced public understanding and appreciation of Kotor's cultural heritage.

Challenges

- **Preventing Illegal Trade:** Despite the city's efforts, there remains a challenge in completely eradicating the illegal trade of cultural artefacts, particularly given Kotor's popularity as a tourist destination. The demand for unique souvenirs can sometimes lead to the illicit sale of artefacts, especially in less regulated environments. This issue requires continuous vigilance and enforcement by local authorities.

- **Balancing Tourism and Artefact Protection:** The growing tourism industry in Kotor poses challenges in balancing the accessibility of cultural artefacts with their protection. While it is important to make artefacts available for educational and tourism purposes, there is a risk of overexposure or damage, particularly in high-traffic areas. Ensuring that artefacts are displayed in a manner that protects them while still allowing public access is an ongoing challenge.

- **Resource Constraints:** Like many destinations with rich cultural heritage, Kotor faces resource constraints in its efforts to protect and manage cultural artefacts. This includes the financial and human resources needed for continuous monitoring, enforcement, and the maintenance of conservation programs. These limitations can impact the city's ability to fully implement its artefact protection strategies.

Conclusion

The City of Kotor has made significant progress in protecting cultural artefacts through strict enforcement of laws, public awareness campaigns, and collaborations with cultural institutions. However, challenges such as preventing illegal trade, balancing tourism with artefact protection, and managing resource constraints need to be addressed to enhance the effectiveness of these efforts.

Recommendations for Improvement

1. **Strengthen Cross-Border Cooperation:** Kotor should strengthen its cooperation with regional and international bodies to combat the illegal trade of cultural artefacts. This could include sharing information, conducting joint operations, and participating in international initiatives focused on the protection of cultural heritage.

2. **Enhance Artefact Display Standards:** The city could develop and implement enhanced standards for the display of cultural artefacts, particularly in areas frequented by tourists. These standards should focus on minimizing damage and overexposure while maximizing educational value.

Introducing more secure and climate-controlled environments for sensitive artefacts could be part of this effort.

3. **Increase Resource Allocation:** To address resource constraints, Kotor should explore additional funding opportunities, such as grants from international cultural preservation organizations or partnerships with private entities. Increasing investment in the training of local personnel involved in artefact conservation and enforcement could also help enhance the city's capacity to protect its cultural heritage.

4. **Ongoing Public Education Efforts:** Kotor should continue and expand its public education efforts, targeting both tourists and local residents. This could include more interactive and engaging formats, such as virtual tours, workshops, and storytelling sessions that highlight the significance of cultural artefacts and the importance of their preservation.

Relevant References

- City Card of Kotor (https://aquariumboka.ucg.ac.me/en/kotor-card/).

C3. Intangible Heritage

Introduction to Criterion C3 : Intangible Heritage

Criterion C3 of the GSTC Destination Criteria v2.0 emphasizes the importance of supporting and protecting intangible cultural heritage. This includes local traditions, arts, music, language, gastronomy, and other aspects of local identity and distinctiveness. The criterion calls for destinations to ensure that the presentation and interpretation of intangible heritage are sensitive and respectful, involving local communities and providing visitors with authentic and genuine experiences.

Criterion & Indicators Score

Table 29 : C3 – Intangible Heritage

Criteria			Indicators		No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
C3	C3 Intangible heritage	a	Identification and listing of intangible cultural heritage.	3			2,50
		b	Examples of celebration and visitor experiences of intangible cultural heritage (events, distinctive products etc.).	2			
		c	Evidence of involvement of local and indigenous communities in developing and delivering visitor experiences based on intangible cultural heritage.	3			
		d	Feedback from visitors and local communities on delivery of intangible heritage experiences.	2			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Active Promotion of Intangible Heritage:** The City of Kotor has made significant efforts to actively promote its intangible cultural heritage, particularly through local festivals, traditional music performances, and culinary events. These activities not only highlight the city's rich cultural traditions but also provide visitors with an immersive and authentic experience of Kotor's heritage.

- **Community Involvement:** Kotor has successfully involved local communities in the development and delivery of intangible heritage experiences. Local artisans, musicians, and chefs are regularly engaged in cultural events, ensuring that tourism supports the preservation of traditional skills and knowledge. This community involvement helps to maintain the authenticity of the experiences offered to tourists and ensures that the benefits of tourism are distributed within the community.
- **Support for Local Arts and Crafts:** The city has implemented programs to support local artisans, providing them with platforms to showcase and sell their crafts. These initiatives have helped preserve traditional crafts and provided an additional source of income for local communities, further integrating intangible heritage into the tourism value chain.

Challenges

- **Over-commercialization Risks:** One of the significant challenges Kotor faces is the risk of over-commercializing its intangible heritage. As tourism grows, there is a tendency for some cultural expressions to be modified or simplified to appeal to tourists, potentially leading to the erosion of their authenticity and cultural significance.
- **Balancing Tourism and Cultural Integrity:** Maintaining a balance between providing tourists with access to intangible heritage and preserving the cultural integrity of these traditions is a constant challenge. The influx of tourists can sometimes lead to cultural performances being tailored to tourist expectations rather than reflecting their original form and meaning.
- **Limited Resources for Heritage Preservation:** While there is strong community involvement in preserving intangible heritage, there are still limited resources available for comprehensive documentation and preservation efforts. Ensuring that these cultural elements are properly recorded and passed on to future generations requires ongoing investment in education and preservation programs.

Conclusion

The City of Kotor has made commendable strides in promoting and preserving its intangible cultural heritage, with strong community involvement and support for local arts and crafts. However, challenges related to over-commercialization, maintaining cultural integrity, and resource constraints must be addressed to ensure the long-term sustainability of these efforts, otherwise Intangible cultural heritage Kotor will be in serious risk due to commercialization of local traditions.

Recommendations for Improvement

1. **Develop Guidelines for Cultural Tourism:** Kotor should develop and implement guidelines for cultural tourism that emphasize the importance of preserving the authenticity of intangible heritage. These guidelines can help prevent the over-commercialization of cultural expressions and ensure that tourism activities are respectful of local traditions.
2. **Invest in Heritage Documentation:** The city should invest in comprehensive documentation of its intangible heritage, including recording traditional practices, languages, and arts. This

documentation can serve as an educational resource and help safeguard these traditions for future generations.

3. **Strengthen Cultural Education Programs:** Kotor could enhance its cultural education programs for both residents and visitors. These programs should focus on the significance of intangible heritage, its role in the community, and the importance of preserving it in its original form. Collaborating with local schools and cultural institutions could help integrate these programs into the broader educational system.

4. **Promote Sustainable Cultural Experiences:** The city should encourage the development of sustainable cultural tourism experiences that allow visitors to engage with intangible heritage in a way that is both educational and respectful. This could include small-group workshops, interactive performances, and guided tours that emphasize the cultural context of the traditions being showcased.

Relevant References

-   Cultural and Heritage Tourism Management, UNESCO World Heritage Centre, 2024.
-   Culture heritage – Treasure of Cross Border Region, IPA, 2022.
-   Slow Tourism Concept and Cultural Sites: Is The Town of Kotor (Montenegro) Ready for The Cittaslow Movement?, Bulatovic I., Micera R., 2018.

Figure 44 : An example of misleading message of local heritage identity in old city

C4. Traditional Access

Introduction to Criterion C4 : Traditional Access

Criterion C4 of the GSTC Destination Criteria v2.0 focuses on ensuring that local communities maintain access to natural and cultural sites that are important to their traditions and daily lives. This criterion emphasizes the importance of monitoring, protecting, and when necessary, rehabilitating or restoring traditional access rights to these sites, even as they are developed or promoted for tourism purposes. It is crucial for maintaining the cultural identity and heritage of local communities while balancing the needs of tourism.

Criterion & Indicators Score

Table 30 : C4 – Traditional Access

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
C4	C4 Traditional access	a	Monitoring of accessibility to natural and cultural sites for the local community.	3		2,67
		b	Evidence of engagement with the local community regarding traditional access.	2		
		c	Specific action to protect and/or rehabilitate local community access.	3		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Protection of Traditional Access:** The City of Kotor has made commendable efforts to protect traditional access to key cultural and natural sites for local communities. Regulations are in place to ensure that developments related to tourism do not impede the ability of residents to access important religious, cultural, or natural sites that are integral to their heritage and daily practices. For example, access routes to local churches and natural landmarks have been preserved despite the increase in tourist infrastructure.
- **Community Engagement:** Kotor has involved local communities in discussions and decision-making processes related to the management of access to cultural and natural sites. This inclusive approach has helped ensure that community needs and traditions are respected. The

city has hosted public consultations and workshops where community members can voice their concerns and preferences regarding access to significant sites.

- **Monitoring and Documentation:** The city has established systems to monitor and document access to key sites, ensuring that any changes in accessibility are recorded and addressed. This ongoing monitoring helps to identify potential issues early and allows for timely interventions to maintain access for local residents.

Challenges

- **Pressure from Tourism Development:** One of the significant challenges Kotor faces is balancing the demand for tourism development with the need to preserve traditional access. The growth of tourism infrastructure, such as hotels, restaurants, and transportation facilities, sometimes encroaches on areas traditionally used by local communities, leading to conflicts over land use and access rights.

- **Ensuring Long-Term Access:** As tourism continues to grow, ensuring the long-term access of local communities to cultural and natural sites becomes more challenging. The increasing number of tourists can lead to overcrowding at popular sites, which may restrict or complicate access for local residents, especially during peak tourist seasons.

- **Resource Allocation for Access Maintenance:** Maintaining traditional access routes and sites requires continuous investment, particularly in infrastructure and conservation. However, Kotor faces resource constraints that can limit its ability to keep these routes and sites in optimal condition, potentially affecting accessibility over time.

Conclusion

The City of Kotor has made significant efforts to protect traditional access to cultural and natural sites for local communities, with strong regulations, community engagement, and monitoring systems in place. However, challenges related to tourism development pressures, long-term access maintenance, and resource allocation remain.

Recommendations for Improvement

1. **Strengthen Zoning Regulations:** Kotor should consider strengthening zoning regulations to create clear boundaries that protect traditional access routes and sites from encroachment by tourism development. These regulations should be enforced consistently to prevent conflicts between tourism infrastructure and community access rights.

2. **Develop a Long-Term Access Strategy:** The city should develop a long-term strategy for maintaining and enhancing access to cultural and natural sites. This strategy could include measures such as limiting visitor numbers during peak times, creating alternative access routes for tourists, and prioritizing local access during important cultural events.

3. **Increase Investment in Access Infrastructure:** Kotor should seek additional funding or partnerships to invest in the maintenance and improvement of access infrastructure. This could

involve upgrading paths, signage, and transportation links to ensure that local communities can continue to access important sites easily and safely.

4. **Foster Sustainable Tourism Practices:** The city should promote sustainable tourism practices that respect and prioritize traditional access. This could include educating tourists about the cultural significance of certain sites and encouraging behaviors that do not interfere with local access rights. Tour operators and guides could be trained to understand and respect these access issues.

Relevant References

- Zakon o zaštiti prirodnog i kulturno-istorijskog područja Kotora, Government of Montenegro, 2013.

C5. Intellectual Property

Introduction to Criterion C5 : Intellectual Property

Criterion C5 of the GSTC Destination Criteria v2.0 emphasizes the importance of protecting and preserving the intellectual property rights of communities and individuals within a tourism destination. This includes safeguarding traditional knowledge, cultural expressions, and other forms of intellectual property from unauthorized use or exploitation by the tourism industry. The criterion calls for the implementation of laws, guidelines, and practices that ensure that the intellectual property of local communities is respected and that any use of such property is appropriately authorized and compensated.

Criterion & Indicators Score

Table 31 : C5 – Intellectual Property

Criteria			Indicators		
			No document exists	0	Areas of Risk <1
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
			Not applicable in the destination	not appl.	Excellent Performance ≥2.50
C5	C5 Intellectual property	a	Reference to laws on intellectual property pertaining in the destination (title, date).	2	1,00
		b	Communication of intellectual property rights to tourism stakeholders.	1	
		c	Evidence that intellectual property rights are protected in the development of cultural experiences for visitors.	0	

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Legal Framework for Intellectual Property:** The City of Kotor has established a legal framework that recognizes and protects the intellectual property rights of local communities. This framework includes regulations that prevent the unauthorized use of traditional knowledge, cultural expressions, and other intangible assets in the tourism sector. These laws are aligned with national and international standards, ensuring a robust level of protection for local cultural heritage.

- **Community Involvement in Cultural Activities:** Kotor has made significant efforts to involve local communities in cultural tourism activities, ensuring that their intellectual property is used with consent and that they benefit economically from its use. For example, local artisans, musicians,

and performers are often involved in tourism events and are compensated for their contributions, ensuring that their rights are respected and that they benefit from the commercialization of their cultural expressions.

- **Awareness and Education Programs:** The city has implemented awareness and education programs aimed at both residents and tourism enterprises to promote understanding and respect for intellectual property rights. These programs include workshops and informational campaigns that highlight the importance of protecting traditional knowledge and cultural expressions from exploitation.

Challenges

- **Enforcement of Intellectual Property Rights:** Despite the existence of legal protections, enforcing intellectual property rights in the tourism sector remains a challenge. There are instances where traditional designs, music, or other cultural expressions are used without proper authorization or compensation. This issue is compounded by the difficulty of monitoring and regulating all tourism-related activities, particularly in informal settings.

- **Balancing Commercialization and Preservation:** Kotor faces the challenge of balancing the commercialization of cultural heritage with the need to preserve its authenticity and integrity. While tourism can provide economic benefits, there is a risk that over-commercialization could lead to the misrepresentation or dilution of cultural expressions, undermining their value and significance to the local community.

- **Limited Resources for Legal Support:** Providing adequate legal support and resources for communities to protect their intellectual property rights is a challenge. Many local artisans and cultural practitioners may lack the knowledge or resources to navigate the legal system and protect their rights effectively, making them vulnerable to exploitation.

Conclusion

The City of Kotor has made significant progress in establishing a legal framework for the protection of intellectual property rights and involving local communities in cultural tourism activities. However, challenges related to enforcement, balancing commercialization with preservation, and providing legal support need to be addressed to fully safeguard the intellectual property of local communities.

Recommendations for Improvement

1. **Strengthen Enforcement Mechanisms:** Kotor should enhance its enforcement mechanisms to better protect intellectual property rights. This could involve increasing the capacity of local authorities to monitor and regulate the use of cultural expressions in tourism, as well as providing channels for reporting unauthorized use.

2. **Develop Guidelines for Sustainable Commercialization:** The city should develop guidelines that help balance the commercialization of cultural heritage with its preservation. These guidelines

could provide tourism enterprises with best practices for using cultural expressions in a way that respects their authenticity and ensures fair compensation for the creators.

3. **Enhance Legal Support for Communities:** Kotor should provide greater legal support and resources to local communities to help them protect their intellectual property rights. This could include offering legal advice, facilitating access to legal representation, and conducting educational programs that empower communities to assert their rights.

4. **Promote Ethical Tourism Practices:** The city should promote ethical tourism practices that prioritize the respect and protection of intellectual property. This could involve collaborating with tourism operators to ensure that cultural experiences offered to tourists are based on consent and fair agreements with local communities.

Relevant References

- Law on Patents, Official Gazette of Montenegro No. 42, 2015.

Figure 45 : An example of 'local' called jewelry in old city souvenir shop

C6. Visitor Management at Cultural Sites

Introduction to Criterion C6 : Visitor Management at Cultural Sites

Criterion C6 of the GSTC Destination Criteria v2.0 focuses on the management of visitors within and around cultural sites to optimize visitor flow, minimize adverse impacts, and ensure that the characteristics, capacity, and sensitivity of the sites are respected. The criterion emphasizes the importance of having systems in place to monitor visitor impacts, implement management strategies, and provide guidelines for visitor behavior to protect the integrity of cultural sites.

Criterion & Indicators Score

Table 32 : C6 – Visitor Management at Cultural Sites

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
C6	C6 Visitor management at cultural sites	a	Monitoring of visitor flows and impact on cultural sites, with results shared across the destination.	3		2,00	
		b	Evidence of action to manage tourism-related impacts in or around cultural sites.	2			
		c	Existence and distribution of published guidelines on visitor behaviour at sensitive sites and cultural events and periodic monitoring of compliance.	3			
		d	A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at cultural sites.	1			
		e	Provision of training for guides.	1			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Implementation of Visitor Management Systems:** The City of Kotor has developed and implemented visitor management systems at key cultural sites, particularly in the historic old

town, which is a UNESCO World Heritage site. These systems include monitoring visitor numbers, especially during peak seasons, to prevent overcrowding and reduce the wear and tear on historical structures. For example, the city has installed visitor counters and employs staff to manage and guide visitor flows in the most popular areas.

- **Guidelines for Visitor Behavior:** Kotor has established and widely distributed guidelines for visitor behavior at cultural sites. These guidelines are communicated through signage, brochures, and online platforms, ensuring that tourists are aware of the need to respect the cultural and historical significance of the sites they visit. The guidelines cover issues such as appropriate behavior, photography restrictions, and the importance of not touching or defacing cultural artefacts.

- **Training for Tour Guides:** The city has invested in the training of local tour guides to ensure that they are well-informed about the cultural and historical significance of the sites they are presenting. This training includes best practices for managing groups, minimizing impact on the sites, and educating visitors about the importance of preservation. Well-trained guides play a crucial role in controlling visitor behavior and reducing the potential negative impacts on cultural sites.

Challenges

- **Overcrowding During Peak Seasons:** Despite the implementation of visitor management systems, Kotor faces significant challenges with overcrowding during peak tourist seasons, particularly with the influx of cruise ship passengers. The large number of visitors in a short period can strain the capacity of cultural sites, leading to potential damage and a diminished visitor experience.

- **Balancing Visitor Access with Preservation:** One of the ongoing challenges is balancing the desire to provide access to Kotor's cultural heritage with the need to preserve these sites for future generations. The increasing popularity of the city as a tourist destination puts pressure on cultural sites, necessitating constant evaluation and adaptation of management strategies.

- **Resource Constraints:** The management of cultural sites requires significant resources, including staff, technology, and maintenance. Kotor faces challenges in ensuring that sufficient resources are allocated to maintain and improve visitor management systems, particularly in the context of fluctuating tourist numbers and economic conditions.

Conclusion

The City of Kotor has made commendable efforts in managing visitors at its cultural sites through the implementation of effective management systems, guidelines for behavior, and training programs for guides. However, challenges related to overcrowding, the balance between access and preservation, and resource constraints must be addressed to ensure the long-term sustainability of these efforts. Thus, overcrowding at key cultural sites in Kotor threatens its UNESCO status, while insufficient visitor management practice methos were not implemented always in order to protect sensitive areas.

Recommendations for Improvement

1. **Expand Visitor Management Measures:** Kotor should consider expanding its visitor management measures, such as introducing timed entry systems for the most popular sites during peak seasons. This would help control the flow of visitors and reduce the strain on cultural sites, while still allowing access.

2. **Enhance Monitoring and Adaptation Strategies:** The city should enhance its monitoring systems to include real-time data collection and analysis, allowing for more dynamic and responsive visitor management. This could involve the use of mobile apps that provide live updates on visitor numbers and suggest alternative sites or times to visit less crowded areas.

3. **Increase Investment in Maintenance and Staff:** Kotor should seek additional funding or partnerships to increase investment in the maintenance of cultural sites and the staffing needed to manage visitors effectively. This could include collaborations with international organizations dedicated to cultural heritage preservation.

4. **Promote Off-Peak Tourism:** To reduce pressure on cultural sites during peak seasons, Kotor could promote off-peak tourism by developing and marketing alternative attractions and events during quieter times of the year. This strategy could help spread visitor numbers more evenly throughout the year, benefiting both the sites and the local economy.

Relevant References

- HeritageREVIVED: Preservation, Valorisation and Promotion of Cultural Heritage on the Outskirts of Urban Areas, Interreg IPA, 2014.
- Natural and Culturo-Historical Region of Kotor, UNESCO, 2023.
- Slow Tourism Concept and Cultural Sites: Is The Town of Kotor (Montenegro) Ready for The Cittaslow Movement?, Bulatovic I., Micera R., 2018.

C7. Site Interpretation

Introduction to Criterion C7 : Site Interpretation

Criterion C7 of the GSTC Destination Criteria v2.0 focuses on the importance of providing accurate, informative, and culturally appropriate interpretative materials at cultural and natural sites. The goal is to ensure that visitors understand the significance of the sites they are visiting, thereby enriching their experience while fostering respect for the cultural and natural heritage. This criterion also emphasizes the need for interpretation to be developed in collaboration with local communities and to be available in languages pertinent to both visitors and residents.

Criterion & Indicators Score

Table 33 : C7 – Site Interpretation

Criteria			Indicators			
				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
C7	C7 Site interpretation	a	Provision of informative interpretative material on site and in formats that are accessible pre-arrival.	3		2,40
		b	Evidence that interpretative material has been well researched and is accurate.	3		
		c	Interpretation material that identifies the significance and sensitivity/fragility of sites.	2		
		d	Evidence of host community collaboration in preparation of relevant interpretative material.	1		
		e	Interpretative material available in relevant languages.	3		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Comprehensive Interpretative Materials:** The City of Kotor has made significant efforts to provide comprehensive interpretative materials at key cultural and historical sites, particularly within its UNESCO World Heritage-designated old town. These materials include informative plaques, brochures, and digital resources that explain the historical, cultural, and architectural significance of the sites. The content is designed to be engaging and accessible to a wide audience, enhancing the overall visitor experience.

- **Multilingual Information:** Recognizing the diversity of its visitors, Kotor has ensured that interpretative materials are available in multiple languages, including English, Montenegrin, and several other major European languages. This accessibility allows a broader range of visitors to fully appreciate the cultural and historical context of the sites they are exploring.

- **Community Involvement in Interpretation:** Kotor has actively involved local communities and experts in the development of interpretative materials. This collaboration ensures that the information presented is not only accurate but also reflects the perspectives and values of the local population. This approach helps to preserve the authenticity of the cultural heritage being presented to visitors.

Challenges

- **Ensuring Cultural Sensitivity:** While Kotor has made strides in developing interpretative materials, there is an ongoing challenge in ensuring that all materials are culturally sensitive and do not inadvertently misrepresent or oversimplify complex cultural narratives. This is particularly important in a diverse cultural landscape where historical interpretations can vary.

- **Keeping Information Up to Date:** Another challenge is the need to keep interpretative materials up to date with the latest research and findings. Cultural and historical research is continually evolving, and it can be challenging to ensure that all site information reflects the most current understanding without frequent updates and revisions.

- **Balancing Depth of Information with Visitor Engagement:** Kotor faces the challenge of balancing the depth and complexity of the information provided with the need to keep visitors engaged. Too much detail can overwhelm some visitors, while too little can fail to convey the significance of the site, making it difficult to strike the right balance.

Conclusion

The City of Kotor has made significant progress in providing high-quality, multilingual interpretative materials at its cultural sites, with strong community involvement ensuring that these materials are both accurate and culturally appropriate. However, challenges remain in maintaining cultural sensitivity, keeping information current, and balancing the depth of content with visitor engagement.

Recommendations for Improvement:

1. **Regular Review and Update of Materials:** Kotor should establish a regular review process for all interpretative materials to ensure they reflect the latest research and are culturally sensitive. This could involve forming a committee of historians, cultural experts, and community representatives who meet periodically to review and update content as needed.

2. **Develop Interactive and Digital Interpretation Tools:** To enhance visitor engagement, Kotor could invest in developing more interactive and digital interpretation tools, such as mobile apps, augmented reality experiences, and interactive displays. These tools can offer visitors varying levels of detail based on their interests, allowing them to engage with the content at their own pace.

3. **Training for Guides and Staff:** Kotor should continue to invest in training for guides and site staff to ensure they are well-equipped to provide accurate and engaging interpretations of the sites. This training should include cultural sensitivity training and updates on the latest historical research.

4. **Expand Community Collaboration:** While Kotor has involved local communities in the development of interpretative materials, there is always room to expand this collaboration. Engaging with a wider range of community members, including minority groups and younger generations, can help to ensure that a broad spectrum of perspectives is included in site interpretations.

Relevant References

- Centennial Hall in Wrocław, The World Heritage Committee :17 July 2006.
- The Relationship between Cultural Tourist Experience and Recommendation Intention: Empirical Evidence from Montenegro, Manojlovic M., Perović D., Stanovčić T., 2021.

D. ENVIRONMENTAL SUSTAINABILITY

D1. Protection of sensitive environments

Introduction to Criterion D1 : Protection of Sensitive Environments

Criterion D1 of the GSTC Destination Criteria v2.0 emphasizes the importance of protecting sensitive environments within a destination. This includes monitoring, measuring, and responding to the impacts of tourism on natural ecosystems, conserving habitats and species, and preventing the introduction and spread of invasive species. The criterion calls for the implementation of systems and programs that ensure the protection and conservation of natural heritage, leveraging tourism income to support these efforts where possible.

Criterion & Indicators Score

Table 34 : D1 – Protection of sensitive environments

Criteria			Indicators			
				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D1	D1 Protection of sensitive environments	a	List of natural heritage sites and assets, indicating type, conservation status and vulnerability.	3		2,00
		b	Programmes to conserve biodiversity and natural heritage.	3		
		c	Programmes to eradicate and control invasive species.	2		
		d	Action to identify, monitor and mitigate tourism impacts on biodiversity and natural heritage.	2		
		e	Mechanisms for using income from tourism to support conservation of natural assets.	1		
		f	Communications with visitors and enterprises on reducing spread of alien species.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Monitoring and Conservation Programs:** The City of Kotor has established several monitoring and conservation programs aimed at protecting its natural heritage, particularly in areas of high ecological value such as the Bay of Kotor. These programs include regular assessments of the health of local ecosystems, monitoring the impact of tourism activities, and implementing conservation measures to protect sensitive habitats and species. The city has also worked closely with environmental organizations to manage and mitigate the impacts of tourism on its natural environment.

- **Tourism Revenue for Conservation:** Kotor has effectively used revenue generated from tourism to fund conservation initiatives. For example, entrance fees to protected areas and specific tourism taxes are allocated to conservation projects, helping to ensure that the natural environments that attract visitors are preserved and maintained. This approach not only supports conservation efforts but also helps to raise awareness among visitors about the importance of protecting these environments.

- **Efforts to Control Invasive Species:** The city has initiated programs to control and prevent the spread of invasive species, particularly in marine environments. These efforts are crucial for maintaining the ecological balance and protecting native species that are integral to the local ecosystem. The city's proactive approach in this area has been recognized as a positive step towards sustainable environmental management.

Challenges

- **Pressure from High Tourist Volumes:** One of the major challenges facing Kotor is managing the pressure that high volumes of tourists place on sensitive environments. Popular natural sites can become overcrowded, leading to habitat degradation, pollution, and disturbances to wildlife. The city's natural areas, such as coastal zones and mountainous regions, are particularly vulnerable to these impacts, which can undermine conservation efforts if not properly managed.

- **Balancing Development and Conservation:** As tourism continues to grow, Kotor faces the challenge of balancing the development of tourism infrastructure with the need to conserve its natural heritage. There is a constant tension between expanding facilities to accommodate more visitors and preserving the natural landscapes that are a key attraction for the destination. Ensuring that development is sustainable and does not compromise sensitive environments remains a significant challenge.

- **Resource Allocation for Long-Term Conservation:** While Kotor has made strides in funding conservation through tourism revenue, there are concerns about the long-term sustainability of these efforts. Ensuring that sufficient resources are consistently available for monitoring, conservation, and management activities is critical, especially as the scale of tourism and its associated impacts continue to increase.

Conclusion

The City of Kotor has made commendable efforts in protecting its sensitive environments through monitoring programs, leveraging tourism revenue for conservation, and controlling invasive species. However, challenges related to managing tourist volumes, balancing development with conservation, and ensuring long-term resource allocation need to be addressed to enhance the effectiveness of these initiatives.

Recommendations for Improvement

1. **Implement Stronger Visitor Management Strategies:** Kotor should develop and implement stronger visitor management strategies in sensitive natural areas. This could include limiting the number of visitors to particularly vulnerable sites, implementing seasonal restrictions, and creating alternative routes or attractions to disperse visitor pressure.

2. **Strengthen Regulations on Sustainable Development:** The city should strengthen regulations that govern the development of tourism infrastructure to ensure that new projects do not adversely affect sensitive environments. This could involve stricter environmental impact assessments, enhanced zoning laws, and incentives for sustainable construction practices.

3. **Enhance Funding Mechanisms for Conservation:** To ensure the long-term sustainability of conservation efforts, Kotor should explore additional funding mechanisms. This could include creating endowments or trust funds dedicated to environmental conservation, increasing the portion of tourism revenue allocated to these efforts, or seeking partnerships with international conservation organizations.

4. **Increase Public Awareness and Education:** Kotor could expand its efforts to educate both visitors and residents about the importance of protecting sensitive environments. This could involve creating more educational materials, offering guided eco-tours, and developing campaigns that highlight the value of conservation to both the local community and the tourism industry.

Relevant References

- Bird Life Data Zone, CZIP, 2023.
- Kotor, Montenegro, Is at Risk of Losing UNESCO World Heritage Status, LaGrave K., CN Traveler, 2017.
- Waste Management in Montenegro, European Environment Agency, 2021.

D2. Visitor management at natural sites

Introduction to Criterion D2 : Visitor Management at Natural Sites

Criterion D2 of the GSTC Destination Criteria v2.0 focuses on the management of visitors within and around natural sites to optimize visitor flow, minimize adverse impacts, and ensure the protection of the natural environment. This criterion emphasizes the need for destinations to establish systems that account for the characteristics, capacity, and sensitivity of natural sites, and to provide guidelines for visitor behavior that are accessible to visitors, tour operators, and guides.

Criterion & Indicators Score

Table 35 : D2 – Visitor management at natural sites

Criteria				**Indicators**	No document exists	0	Areas of Risk <1
					Document exists	1	Areas of Moderate Risk 1.00 - 1.49
					Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
					Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
					Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D2	D2 Visitor management at natural sites	a	Monitoring of visitor flows and impact on natural sites, with results shared across the destination.		1		1,00
		b	Evidence of action to manage and mitigate tourism-related impacts in or around natural sites.		1		
		c	Existence and distribution of published guidelines on visitor behaviour at sensitive sites, and periodic monitoring of compliance.		2		
		d	A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at natural sites.		0		
		e	Cooperation with local conservation bodies to identify environmental risks associated with tourism and measures to reduce them.		1		
		f	Provision of training for guides.		1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Visitor Flow Management:** The City of Kotor has implemented visitor management systems in key natural areas, such as the Bay of Kotor and the surrounding mountainous regions. These systems include monitoring visitor numbers and distributing visitors across different sites to prevent overcrowding. By spreading tourist activity more evenly, Kotor has been able to reduce pressure on its most sensitive natural areas.

- **Guidelines for Visitor Behavior:** Kotor has developed and disseminated clear guidelines for visitor behavior in natural areas. These guidelines are available in multiple languages and are distributed at key entry points to natural sites, as well as through tour operators and local guides. The guidelines cover issues such as staying on designated paths, not disturbing wildlife, and minimizing waste, all of which are crucial for protecting the environment.

- **Collaboration with Conservation Bodies:** The city collaborates closely with local conservation organizations to identify environmental risks associated with tourism and to develop measures to mitigate these risks. This collaboration has led to the implementation of practices that protect local flora and fauna and ensure that tourism activities do not harm the natural environment.

Challenges

- **Managing High Tourist Volumes:** Despite these efforts, Kotor faces significant challenges in managing the high volumes of tourists that visit during peak seasons. The influx of visitors can lead to overcrowding, especially in popular natural sites, which threatens the integrity of these environments. Managing this volume effectively remains a critical issue.

- **Resource Constraints for Enforcement:** Kotor also faces challenges related to the enforcement of visitor behavior guidelines. While guidelines are in place, ensuring compliance can be difficult due to limited resources for monitoring and enforcement. This can lead to non-compliance by visitors, which can negatively impact natural sites.

- **Balancing Accessibility with Preservation:** Ensuring that natural sites remain accessible to visitors while also preserving their ecological integrity is an ongoing challenge. The city needs to find a balance between welcoming tourists and protecting the fragile ecosystems that make these areas attractive in the first place.

Conclusion

The City of Kotor has made progress in managing visitors at its natural sites, with effective systems in place for managing visitor flow and clear guidelines for behavior. However, challenges remain in managing high tourist volumes, creating and enforcing guidelines in a formal and efficient way, and balancing accessibility with preservation.

Recommendations for Improvement

1. **Implement Stricter Visitor Caps:** Kotor should consider implementing stricter visitor caps during peak seasons, especially for its most sensitive natural sites. This could involve the use of timed entry systems or advance booking requirements to limit the number of visitors at any given time.

2. **Increase Enforcement Resources:** The city should allocate additional resources to the enforcement of visitor behavior guidelines. This could include hiring more rangers or utilizing technology such as surveillance cameras or drones to monitor compliance in remote areas.

3. **Enhance Visitor Education:** Kotor should expand its efforts to educate visitors about the importance of preserving natural sites. This could involve more interactive and engaging educational materials, such as virtual tours or augmented reality experiences that highlight the impacts of human activity on these environments.

4. **Develop Sustainable Tourism Alternatives:** To reduce pressure on the most popular natural sites, Kotor could develop and promote alternative tourism activities that are less environmentally demanding, such as eco-tours or educational programs focused on conservation.

Relevant References

- Official Travel Guide Kotor, Tourism Organization of Kotor, 2024.
- The Impact of Mass / Cruising Tourism on The Urban Area of Kotor, Županović I., Zečević D., 2020.

Figure 46 : Montenegro Guide for National Parks, including the case of Lovcen National park

D3. Wildlife interaction

Introduction to Criterion D3 : Wildlife Interaction

Criterion D3 of the GSTC Destination Criteria v2.0 focuses on the management of interactions between tourism activities and wildlife to ensure these interactions are non-invasive and responsibly managed. The criterion emphasizes compliance with local, national, and international laws and standards for wildlife interactions, ensuring that tourism does not adversely impact the behavior, well-being, or populations of wildlife. The goal is to protect both the animals and their habitats while providing sustainable wildlife experiences for visitors.

Criterion & Indicators Score

Table 36 : D3 – Wildlife interaction

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D3	D3 Wildlife interaction	a	Reference (title, date) to international, national and local laws that apply in the destination regarding interaction with wildlife.	3		2,00
		b	Endorsement of international standards for wildlife viewing for both marine and terrestrial species.	3		
		c	Distribution of a code of practice for wildlife interaction, including viewing, which reflects international standards.	1		
		d	System for checking compliance with regulations, and code of practice amongst tourism operations.	1		
		e	Actions to monitor wildlife wellbeing and minimize disturbance, in locations where interactions occur.	1		
		f	Provision of information to visitors on harmful wildlife interaction, such as touching and feeding.	3		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Adherence to International Standards:** The City of Kotor has made notable progress in aligning its wildlife interaction practices with international standards. The city has endorsed guidelines for both marine and terrestrial wildlife viewing, ensuring that these activities are conducted in a way that minimizes stress and disturbance to the animals. This adherence helps protect local wildlife, such as the marine species found in the Bay of Kotor, from the negative impacts of tourism.

- **Development and Distribution of Codes of Practice:** Kotor has developed and widely distributed a code of practice for wildlife interactions, which is based on international standards. This code is provided to tour operators, guides, and visitors, ensuring that all stakeholders are aware of the appropriate ways to interact with wildlife. The code covers important aspects such as keeping a safe distance, not feeding wildlife, and respecting natural habitats.

- **Monitoring and Compliance Systems:** The city has implemented systems to monitor wildlife interactions and ensure compliance with established guidelines. Regular checks and assessments are conducted to ensure that tourism operators adhere to the code of practice. This proactive approach has helped reduce the likelihood of harmful interactions between tourists and wildlife.

Challenges

- **Managing Cumulative Impacts:** Despite these efforts, Kotor faces challenges in managing the cumulative impacts of tourism on local wildlife. The increasing number of visitors, especially during peak seasons, can lead to repeated disturbances, which may affect the long-term health and behavior of wildlife populations. Addressing these cumulative impacts requires ongoing monitoring and potential adjustments to tourism practices.

- **Resource Limitations for Enforcement:** While Kotor has established a strong framework for managing wildlife interactions, enforcing these guidelines consistently across all tourism operators can be challenging due to resource limitations. Ensuring that all operators are compliant, particularly those operating in more remote areas, requires additional resources and more robust monitoring systems.

- **Visitor Education and Awareness:** There is a need to continuously educate visitors about the importance of responsible wildlife interactions. Although codes of practice are distributed, ensuring that all visitors understand and adhere to these guidelines remains a challenge, especially when dealing with diverse tourist groups with varying levels of awareness.

Conclusion

The City of Kotor has demonstrated a strong commitment to managing wildlife interactions responsibly by adhering to international standards, developing comprehensive codes of practice, and implementing monitoring systems. However, challenges related to managing cumulative impacts, resource limitations for enforcement, and visitor education need to be addressed to enhance the effectiveness of these efforts. Also, non-invasive practices are inconsistently enforced, and there is no clear system for checking compliance with international standards.

Recommendations for Improvement

1. **Enhance Monitoring and Data Collection:** Kotor should invest in more advanced monitoring systems to better assess the cumulative impacts of tourism on wildlife. This could include the use of technology such as drones or GPS tracking to monitor wildlife movements and behavior, allowing for more informed management decisions.

2. **Increase Resources for Enforcement:** The city should allocate additional resources to strengthen the enforcement of wildlife interaction guidelines. This could involve hiring more personnel dedicated to monitoring and compliance, as well as increasing the frequency of checks on tourism operators.

3. **Expand Visitor Education Initiatives:** Kotor should expand its visitor education initiatives to ensure that all tourists understand the importance of responsible wildlife interactions. This could include more engaging educational materials, interactive workshops, and the use of digital platforms to reach a wider audience.

4. **Develop Sustainable Tourism Alternatives:** To reduce the pressure on wildlife from tourism, Kotor could develop and promote alternative tourism activities that have less impact on local wildlife. This could include eco-tours focused on education and conservation, which offer a meaningful experience without disturbing wildlife.

Relevant References

- Animal Welfare Challenges and Opportunities in Montenegro, Association Korina-Friends of Dogs Montenegro-Network for Animals, 2019.
- Bird Life Data Zone, CZIP, 2023.

D4. Species exploitation and animal welfare

Introduction to Criterion D4 : Species Exploitation and Animal Welfare

Criterion D4 of the GSTC Destination Criteria v2.0 focuses on ensuring that tourism destinations have systems in place to comply with laws and standards related to animal welfare and species conservation. This includes the management of the harvesting, trade, display, and sale of wildlife species and their products. The criterion also addresses the welfare of both wild and domestic animals involved in tourism activities, ensuring they are treated humanely, and their habitats are conserved.

Criterion & Indicators Score

Table 37 : D4 – Species exploitation and animal welfare

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D4	D4 Species exploitation and animal welfare	a	Reference (title, date) to specific international, national and local laws, standards and guidelines that apply in the destination regarding animal welfare and conservation of species.	3		2,00
		b	Notification of laws, standards and guidelines to tourism enterprises and guides.	1		
		c	A system for inspection of the conditions of captive wildlife and domestic animals, including their housing and handling.	2		
		d	Licensing and checking of qualifications of personnel responsible for captive wildlife.	2		
		e	Action to promote the Convention on International Trade in Endangered Species (CITES) in the tourism sector and to ensure compliance with it.	2		
		f	Provision of information to visitors on avoiding trade in endangered species, e.g. in purchase of souvenirs derived from threatened species of wildlife notified by IUCN or CITES.	1		
		g	Enforcement of legislation to ensure that any hunting activity is part of a scientifically based, properly managed and strictly enforced approach to conservation.	3		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Compliance with International Standards:** The City of Kotor has made significant strides in aligning its tourism practices with international standards on species exploitation and animal welfare. The city adheres to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), ensuring that the trade of wildlife products within its jurisdiction complies with global conservation standards.
- **Inspection and Licensing Systems:** Kotor has implemented an inspection and licensing system for tourism enterprises that involve wildlife, ensuring that they meet the highest standards of animal welfare. These inspections cover various aspects, including the housing, care, and handling of animals, and are conducted regularly to ensure ongoing compliance.
- **Public Awareness Campaigns:** The city has launched public awareness campaigns to inform both locals and tourists about the importance of species conservation and the ethical treatment of animals. These campaigns are particularly focused on discouraging the purchase of souvenirs made from endangered species and educating visitors about responsible wildlife tourism practices.

Challenges

- **Enforcement of Animal Welfare Laws:** Despite the systems in place, enforcing animal welfare laws consistently across all tourism enterprises can be challenging. There are instances where smaller or less-regulated operations might not fully comply with the standards, leading to potential animal welfare issues. This is particularly challenging in remote areas where monitoring is less frequent.
- **Tourism Demand and Wildlife Exploitation:** The increasing demand for wildlife-related tourism experiences can sometimes lead to the exploitation of certain species. The pressure to provide such experiences can result in practices that are not aligned with the best animal welfare standards, such as the improper captivity of wild animals or unethical treatment in performances.
- **Resource Constraints:** Like many destinations, Kotor faces resource constraints that limit its ability to fully enforce regulations and conduct comprehensive inspections regularly. Ensuring that all wildlife-related tourism activities meet the required standards requires ongoing investment in training, monitoring, and enforcement mechanisms.
- **Threats on species due to tourism:** Animal and plant species in the wetlands and karstic habitats are threatened due to the loss of habitat from tourism construction and activities and rising sea levels.

Conclusion

The City of Kotor has made commendable efforts to ensure that its tourism industry complies with international standards on species exploitation and animal welfare. However, challenges remain in the consistent enforcement of these standards, managing the demand for wildlife tourism, and addressing resource constraints, including infrastructure updates according to national legislation.

Recommendations for Improvement

1. **Strengthen Enforcement Mechanisms:** Kotor should consider enhancing its enforcement mechanisms by increasing the frequency of inspections, particularly in remote areas, and ensuring that all tourism enterprises are held accountable to the same high standards. This could involve training more inspectors or leveraging technology for remote monitoring.

2. **Promote Ethical Wildlife Tourism:** The city should promote ethical wildlife tourism alternatives that do not involve the exploitation of animals. This could include developing eco-tourism experiences that focus on observing animals in their natural habitats without disturbing them, thereby reducing the demand for unethical practices.

3. **Increase Support for Smaller Enterprises:** Providing additional support and resources to smaller tourism enterprises can help them comply with animal welfare standards. This could include offering training programs, financial incentives, or partnerships with animal welfare organizations to improve their practices.

4. **Enhance Public Education:** Kotor should continue to expand its public education efforts, focusing on the long-term impacts of species exploitation and the importance of ethical wildlife interactions. These campaigns could be more targeted, reaching specific tourist demographics and using various platforms to ensure widespread awareness.

Relevant References

- Animal Welfare Challenges and Opportunities in Montenegro, Association Korina-Friends of Dogs Montenegro-Network for Animals, 2019.
- European Commission: Impact of Light and Noise Pollution on Biodiversity, fundsforNGOs, 2023.

Figure 47 : An evaluation of essential facilities capacity in animal welfare sites in Montenegro
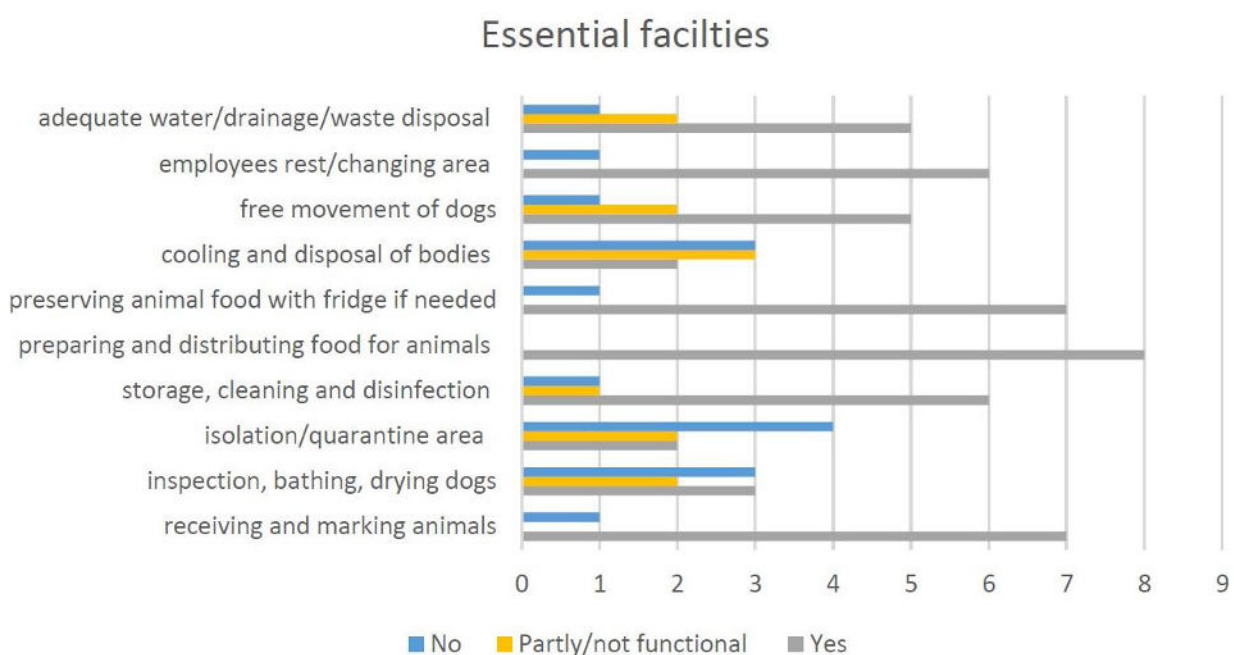
D5. Energy Conservation

Introduction to Criterion D5 : Energy Conservation

Criterion D5 of the GSTC Destination Criteria v2.0 focuses on the importance of energy conservation in tourism destinations. This criterion emphasizes the need for destinations to establish targets to reduce energy consumption, improve energy efficiency, and increase the use of renewable energy. It encourages destinations to support tourism enterprises in measuring, monitoring, reducing, and publicly reporting their energy usage, ultimately contributing to broader sustainability goals.

Criterion & Indicators Score

Table 38 : D5 – Energy Conservation

Criteria			**Indicators**			
				No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D5	D5 Energy conservation	a	Energy consumption targets are publicised and promoted.	0		0,75
		b	Programme to increase energy efficiency – e.g. promoting and supporting insulation.	1		
		c	Investment in renewable energy and percent of total provision/consumption.	2		
		d	Support and incentives for energy monitoring and reduction by enterprises.	0		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Public Awareness Campaigns:** Kotor has implemented some public awareness campaigns aimed at both residents and visitors to encourage energy conservation. These campaigns include tips on reducing energy usage, the benefits of using renewable energy sources, and the importance of reducing the overall carbon footprint of tourism-related activities. The city's efforts in this area have helped raise awareness about the importance of energy conservation.

- **Initial Steps Towards Renewable Energy:** Kotor has begun exploring the use of renewable energy sources, particularly in public buildings and tourist facilities. While still in the early stages, there are ongoing projects aimed at increasing the share of renewable energy in the city's energy mix. This includes pilot projects for solar energy installations on public buildings and the promotion of small-scale renewable energy solutions for private enterprises.

Challenges

- **Limited Adoption of Renewable Energy:** Despite the initial steps, the adoption of renewable energy sources in Kotor remains limited. The city's tourism sector is still heavily reliant on traditional energy sources, and the transition to renewable energy is slow due to the high initial costs and the lack of widespread infrastructure to support these technologies.

- **Limited Promotion of Energy Efficiency:** The City of Kotor has made small progress in promoting energy efficiency among its tourism enterprises. Not a large number of hotels and businesses have adopted energy-saving measures, such as installing energy-efficient lighting, appliances, and heating systems. These initiatives have been supported many times by local government incentives, which encourage businesses to invest in energy-efficient technologies.

- **Inconsistent Implementation Across Enterprises:** While some tourism enterprises have embraced energy efficiency measures, there is inconsistency in their adoption across the sector. Smaller businesses, in particular, may lack the resources or knowledge to implement these measures effectively, leading to uneven progress in energy conservation.

- **Monitoring and Reporting:** Kotor faces challenges in establishing a comprehensive system for monitoring and reporting energy consumption among tourism enterprises. Without accurate data, it is difficult to assess the effectiveness of energy conservation initiatives and identify areas for improvement.

Conclusion

The City of Kotor has made minor progress in promoting energy efficiency and raising awareness about energy conservation. Challenges related to the adoption of renewable energy, inconsistent implementation of energy-saving measures, and the need for better monitoring and reporting systems need to be addressed, especially via the creation of a Municipal Strategy on Energy Efficiency in Public and Private sector, offering special benefits to the adopters. More widespread adoption of energy-efficient technologies across the tourism sector is needed.

Recommendations for Improvement

1. **Expand Renewable Energy Initiatives:** Kotor should prioritize the expansion of renewable energy projects, particularly in the tourism sector. This could involve providing greater financial incentives for businesses to invest in renewable energy, as well as supporting the development of the necessary infrastructure to make renewable energy more accessible.

2. **Support Smaller Enterprises:** The city should offer targeted support to smaller tourism enterprises to help them implement energy efficiency measures. This could include providing training, offering subsidies or grants, and creating partnerships with energy service companies that can assist with the installation and maintenance of energy-efficient technologies.

3. **Enhance Monitoring and Reporting Systems:** Kotor should develop a more robust system for monitoring and reporting energy consumption across the tourism sector. This system should include clear guidelines for businesses on how to measure and report their energy usage, as

well as regular audits to ensure compliance and track progress toward energy conservation targets.

4. **Promote Best Practices:** The city should promote best practices in energy conservation by showcasing successful case studies from local businesses that have effectively reduced their energy consumption. This could inspire other enterprises to follow suit and contribute to a broader culture of sustainability within the destination.

Relevant References

- Energy Development strategy of Montenegro by 2025, Ministry for Economic Development in Montenegro, 2007.

Figure 48 : Limited documentation in place for energy development strategies in Montenegro
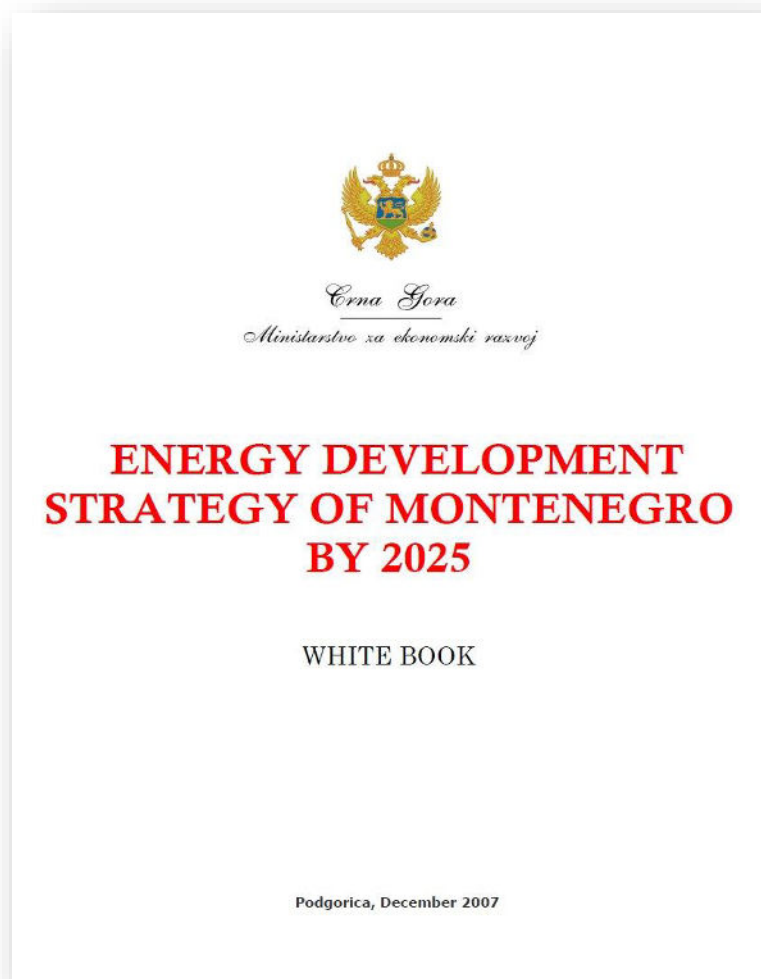
D6. Water Stewardship

Introduction to Criterion D6 : Water Stewardship

Criterion D6 of the GSTC Destination Criteria v2.0 emphasizes the importance of responsible water management in tourism destinations. This criterion focuses on encouraging tourism enterprises to measure, monitor, and publicly report their water usage. It also calls for assessing water risk in the destination, particularly in areas with high water stress, and setting stewardship goals to ensure that tourism does not conflict with the needs of local communities and ecosystems.

Criterion & Indicators Score

Table 39 : D6 – Water Stewardship

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
D6	D6 Water stewardship	a	Provision of guidance and support for monitoring and reduction of water usage by enterprises.	0		0,80	
		b	Program to regularly assess water risk.	2			
		c	Setting, publication and enforcement of water stewardship goals, where water risk has been assessed as high.	0			
		d	Monitoring and control of sources and volume of water used for tourism purposes and its effect on local communities and ecosystems. Promotion and checking of adherence to goals by tourism enterprises.	1			
		e	Visitor information on water risk and minimising water use.	1			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Water Usage Monitoring:** The City of Kotor has taken steps to monitor water usage across the tourism sector. Some hotels and tourism enterprises have implemented water-saving technologies and practices, such as installing low-flow fixtures and promoting linen reuse programs, which help reduce overall water consumption.

- **Public Awareness Campaigns:** Kotor has launched public awareness campaigns aimed at both tourists and locals to promote water conservation. These campaigns highlight the importance of saving water, particularly during the peak tourist season when the demand is highest. The city has also provided guidelines on water-saving practices to tourism enterprises, which are encouraged to follow and promote these practices.
- **Initial Steps in Water Risk Assessment:** Kotor has begun assessing water risk in the region, particularly concerning the impact of tourism on local water resources. These assessments are crucial for understanding the long-term sustainability of water usage in the destination, especially in light of increasing tourist numbers.

Challenges

- **Limited Comprehensive Water Stewardship Programs:** While there are initial steps in water monitoring and risk assessment, Kotor still faces challenges in developing comprehensive water stewardship programs. These programs are needed to systematically address water usage, particularly in high-risk areas, and ensure that water conservation efforts are coordinated and effective across the tourism sector.
- **Inconsistent Implementation Across Enterprises:** The adoption of water conservation measures varies widely among tourism enterprises. While larger hotels may have the resources to implement water-saving technologies, smaller businesses often struggle to adopt similar measures due to a lack of resources or awareness. This inconsistency can lead to uneven water usage reductions across the destination.
- **Resource Allocation for Water Management:** Ensuring adequate resources for continuous water management, including monitoring, assessment, and the implementation of water-saving initiatives, remains a challenge. Kotor needs to ensure that sufficient funding and technical support are available to sustain these efforts over the long term.

Conclusion

The City of Kotor has made commendable progress in raising awareness about water conservation and taking initial steps toward monitoring water usage in the tourism sector. However, challenges remain in developing comprehensive water stewardship programs, ensuring consistent implementation across enterprises, and securing the necessary resources for effective water management, including the water management at the old city which creates serious issues for water resources.

Recommendations for Improvement

1. **Develop Comprehensive Water Stewardship Programs:** Kotor should establish a more comprehensive water stewardship program that includes clear targets for water usage reduction, regular assessments of water risk, and coordinated actions across all tourism enterprises. This program should also include contingency plans for managing water shortages during peak seasons.

2. **Support Small Enterprises:** The city should provide additional support to smaller tourism enterprises to help them implement water-saving technologies and practices. This could involve offering subsidies, providing technical assistance, or facilitating partnerships with organizations that specialize in water conservation.

3. **Enhance Monitoring and Reporting Systems:** Kotor should strengthen its systems for monitoring and reporting water usage across the tourism sector. Regular reporting and transparency in water usage data can help identify areas for improvement and ensure that all stakeholders are held accountable for their water conservation efforts.

4. **Increase Public Engagement:** Kotor should continue to expand its public engagement efforts, particularly by involving tourists more actively in water conservation initiatives. This could include more visible and engaging campaigns that educate visitors about the importance of water stewardship and encourage them to participate in conservation efforts.

Relevant References

- Illegal landfills, Water Pollution, Poor Waste Management in Boka Bay, Total Montenegro News, 2020.
- Water and Wastewater Services in the Danube Region, Danube Water Program, 2015.
- Water Management, MONSTAT, 2021.

Figure 49 : An example of an EU-Funded project on Blue economy to enhance Water Stewardship

D7. Water Quality

Introduction to Criterion D7 : Water Quality

Criterion D7 of the GSTC Destination Criteria v2.0 focuses on ensuring that water quality is maintained for drinking, recreational, and ecological purposes. It emphasizes the importance of regular water quality monitoring, public availability of the results, and timely responses to any water quality issues. This criterion also involves ensuring that tourism activities do not negatively impact water quality, and that visitors are informed about the quality of local water sources, encouraging sustainable practices such as the use of local drinking water instead of bottled water.

Criterion & Indicators Score

Table 40 : D7 – Water Quality

Criteria			Indicators		
			No document exists	0	Areas of Risk <1
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
			Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D7	D7 Water quality	a	Programme of water quality monitoring.	3	
		b	Existence of data and reports on water quality.	3	
		c	Monitoring bathing water, with certification and identification of sites reaching set standards.	3	2,40
		d	Evidence of actions to improve water quality.	2	
		e	Information for visitors on quality of local drinking water, to encourage use as alternative to bottled water.	1	

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Regular Water Quality Monitoring:** The City of Kotor has established a regular program for monitoring water quality in both drinking water sources and recreational areas such as the Bay of Kotor. These monitoring efforts ensure that water quality standards are maintained, protecting both the health of residents and the experience of visitors.

- **Public Availability of Water Quality Data:** Kotor has made efforts to ensure that water quality data is publicly available. This transparency allows both residents and visitors to be informed about the safety and quality of water for drinking and recreational purposes. The city's commitment to transparency in this area has helped build trust and promote sustainable water usage.
- **Actions to Improve Water Quality:** The city has undertaken several initiatives to improve water quality, particularly in areas that are heavily impacted by tourism. These efforts include upgrading sewage treatment facilities, implementing stricter controls on waste disposal, and working with local businesses to reduce pollutants entering the water system. These actions have contributed to maintaining high water quality standards in key areas.

Challenges

- **Impact of High Tourist Volumes:** During peak tourist seasons, the high volume of visitors can strain water resources and impact water quality, particularly in popular recreational areas. The increased demand for water and the potential for pollution from tourist activities require continuous monitoring and responsive management.
- **Limited Resources for Comprehensive Monitoring:** While Kotor has established water quality monitoring programs, there are challenges in maintaining comprehensive and continuous monitoring due to limited resources. Ensuring that all relevant water bodies are regularly tested, and that the data is up to date can be resource-intensive, and gaps in monitoring can lead to unaddressed issues.
- **Visitor Behavior and Water Usage:** Educating visitors about sustainable water usage and ensuring compliance with guidelines to protect water quality remains a challenge. Despite efforts to promote the use of local drinking water, many visitors continue to rely on bottled water, contributing to plastic waste and the potential for water quality degradation.
- **Impact to water aquifer:** Impact of the rising sea levels on water aquifer causing the aquifers to be undrinkable during the summer season.

Conclusion

The City of Kotor has made significant progress in monitoring and maintaining water quality, with regular testing and public reporting systems in place. However, challenges related to the impact of high tourist volumes, resource limitations, and visitor behavior need to be addressed to enhance water quality management.

Recommendations for Improvement

1. **Enhance Visitor Education Programs:** Kotor should expand its visitor education programs to include more targeted information on the importance of sustainable water usage. This could involve creating campaigns that specifically address the benefits of using local drinking water

and reducing reliance on bottled water, thereby decreasing plastic waste and protecting water quality.

2. **Increase Resources for Monitoring:** The city should seek additional resources to support more comprehensive water quality monitoring. This could involve partnerships with environmental organizations or seeking grants to fund advanced monitoring technologies and additional testing sites.

3. **Implement Seasonal Water Management Strategies:** To address the impact of high tourist volumes, Kotor could develop seasonal water management strategies that include stricter regulations during peak seasons, increased monitoring, and the implementation of temporary measures to protect water quality in vulnerable areas.

4. **Strengthen Waste Management Practices:** Improving waste management practices, particularly in relation to preventing pollution of water bodies, is crucial. Kotor could enforce stricter controls on waste disposal, particularly for businesses located near water sources, and promote best practices for waste management to all tourism enterprises.

Relevant References

- Monitoring of bathing water quality on public beaches in Montenegro, JPOMD, 2019
- Water Management, MONSTAT, 2021.

D8. Wastewater

Introduction to Criterion D8 : Wastewater

Criterion D8 of the GSTC Destination Criteria v2.0 addresses the management of wastewater in tourism destinations. This criterion focuses on ensuring that wastewater is properly treated and reused or safely discharged without causing adverse impacts on the local population or the environment. It involves having clear and enforced guidelines for the sitting, maintenance, and testing of septic tanks and wastewater treatment systems. Effective wastewater management is crucial for protecting water quality, public health, and the overall sustainability of the destination.

Criterion & Indicators Score

Table 41 : D8 – Wastewater

Criteria			Indicators		
			No document exists	0	Areas of Risk <1
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
			Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D8	D8 Wastewater	a	Written guidelines and regulations on wastewater treatment.	2	1,75
		b	System of enforcing guidelines amongst enterprises.	1	
		c	Monitoring/testing of released wastewater.	3	
		d	Provisional of sustainable municipal water treatment systems, for use by the tourism sector, where practical and appropriate.	1	

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Implementation of Wastewater Treatment Systems:** The City of Kotor has made progress in implementing wastewater treatment systems, particularly in key tourist areas. These systems are designed to handle the increased load during peak tourist seasons, ensuring that wastewater is treated before being discharged into the environment. This has helped to protect the Bay of Kotor, a critical natural asset, from pollution and degradation. A particular issue is

faced around the old city and across the costal are in the Port of Kotor that should be handled in a more serious way.

- **Enforced Guidelines and Regulations:** Kotor has established clear guidelines and regulations for wastewater management, which are enforced through regular inspections and compliance checks. These regulations cover the siting and maintenance of septic tanks, as well as the operation of municipal wastewater treatment facilities. The enforcement of these guidelines has been essential in maintaining high water quality standards in the region.

- **Public Awareness and Education:** The city has also undertaken public awareness campaigns to educate both residents and tourists about the importance of proper wastewater management. These campaigns include information on how individuals can contribute to wastewater management efforts, such as by reducing water usage and properly disposing of waste. The engagement of the community in these efforts has been a key factor in the success of Kotor's wastewater management strategy.

Challenges

- **Capacity Issues During Peak Tourist Season:** Despite the advancements in wastewater management, Kotor faces challenges during the peak tourist season when the volume of wastewater increases significantly. The existing infrastructure can become strained, leading to potential risks of overflows or insufficient treatment, which could negatively impact the environment and public health.

- **Resource Constraints for Monitoring and Maintenance:** Ensuring continuous monitoring and maintenance of wastewater treatment systems is resource intensive. Kotor faces challenges in securing the necessary funding and technical resources to consistently monitor and maintain all wastewater facilities, particularly in more remote areas.

- **Integration of Small-Scale Enterprises:** While larger hotels and facilities are generally compliant with wastewater regulations, smaller enterprises and individual households may struggle to meet the standards due to a lack of resources or knowledge. Integrating these smaller entities into the broader wastewater management system remains a challenge.

Conclusion

The City of Kotor has demonstrated a strong commitment to effective wastewater management, with well-established systems and regulations in place. However, challenges related to capacity during peak tourist seasons, resource constraints for monitoring, and the inclusion of smaller enterprises need to be addressed to ensure the long-term sustainability of these efforts. The situation in front of the old city's main gate should be solved as soon as possible via the right infrastructure for accessibility and visitor volume management.

Recommendations for Improvement

1. **Expand Capacity for Peak Seasons:** Kotor should consider expanding the capacity of its wastewater treatment systems to handle the increased load during peak tourist seasons. This

could involve upgrading existing facilities or constructing additional treatment plants to ensure that wastewater is adequately treated even during periods of high demand.

2. **Secure Additional Resources for Monitoring and Maintenance:** The city should explore opportunities to secure additional funding and technical resources for the continuous monitoring and maintenance of wastewater systems. This could include applying for grants, forming public-private partnerships, or introducing a wastewater management fee for tourists.

3. **Support Small Enterprises in Compliance:** Kotor should provide targeted support to small enterprises and households to help them comply with wastewater management regulations. This could involve offering training programs, financial incentives for upgrading septic systems, or technical assistance to ensure that all entities contribute to the city's wastewater management goals.

4. **Enhance Public Awareness Efforts:** The city should continue to enhance its public awareness campaigns, particularly focusing on the role of individuals and smaller enterprises in wastewater management. By increasing education and engagement, Kotor can foster a culture of responsibility and sustainability that supports its overall environmental objectives.

Relevant References

- Illegal landfills, Water Pollution, Poor Waste Management in Boka Bay, Total Montenegro News, 2020.
- Water and Wastewater Services in the Danube Region, Danube Water Program, 2015.
- Water Management, MONSTAT, 2021.

Figure 50 : An often example of sewage management issues in the old city gates

D9. Solid Waste

Introduction to Criterion D9 : Solid Waste Management

Criterion D9 of the GSTC Destination Criteria v2.0 emphasizes the importance of managing solid waste in tourism destinations. This criterion focuses on the measurement and reduction of waste generation, proper treatment and disposal of solid waste, and the implementation of recycling systems. It also encourages the reduction of single-use items, especially plastics, and promotes waste diversion from landfills through reuse, recycling, and safe disposal practices.

Criterion & Indicators Score

Table 42 : D9 – Solid Waste

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D9	D9 Solid waste	a	Waste monitoring programme, with results and targets published.	2		
		b	Coordinated campaign/advice/support with tourism enterprises on waste management, including food waste.	0		
		c	Campaign to reduce/eliminate single use items, especially plastics.	1		
		d	Waste management programme for public offices and facilities.	1		0,88
		e	Provision of a collection and recycling system, with at least four streams (i.e. organic, paper, metal, glass and plastic).	2		
		f	Provision of sustainable system for disposal of residual waste.	0		
		g	Campaign to eliminate dropping of litter, including by visitors, and to keep public spaces clean.	0		
		h	Adequate bins for separated waste disposal.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Implementation of Waste Management Systems:** The City of Kotor has made notable progress in implementing waste management systems that cater to both residents and tourists. The city has established a multiple-stream collection and recycling system that separates waste by type, including organic waste, paper, metal, glass, and plastic. This system has improved the efficiency of waste processing and increased the overall recycling rates within the city.

- **Public Awareness Campaigns:** Kotor has started efficient promotion via public awareness campaigns to encourage both residents and visitors to participate in waste reduction efforts. These campaigns have focused on reducing the use of single-use plastics, promoting the use of reusable items, and educating the public on proper waste disposal practices.

- **Collaboration with Tourism Enterprises:** Kotor has successfully engaged tourism enterprises in its waste management initiatives. Hotels, restaurants, and other tourism-related businesses are encouraged to minimize waste, participate in recycling programs, and reduce their use of single-use items. This collaboration has helped to align the city's waste management goals with the practices of the tourism sector.

Challenges

- **Handling Increased Waste During Peak Tourist Seasons:** One of the main challenges Kotor faces is managing the significant increase in waste generation during peak tourist seasons. The influx of visitors leads to a sharp rise in waste, which can overwhelm the existing waste management infrastructure and lead to issues such as littering and inadequate waste disposal.

- **Resource Constraints for Waste Management:** The city faces resource constraints that affect its ability to consistently manage and monitor waste disposal, particularly in more remote or heavily visited areas. Ensuring that all areas are serviced regularly, and that waste is properly managed throughout the year requires additional resources and infrastructure.

- **Eliminating Single-Use Plastics:** Despite efforts to reduce the use of single-use plastics, the city continues to face challenges in eliminating these items from the tourism sector. Many businesses and visitors still rely on plastic products, leading to ongoing waste management challenges and environmental impacts.

Conclusion

The City of Kotor has made some strides in managing solid waste, with effective recycling systems, public awareness campaigns, and collaboration with tourism enterprises. However, this is not enough, facing serious infrastructure limitations and limited national recycling policies and achievements. Challenges remain in handling increased waste during peak tourist seasons, addressing resource constraints, and eliminating single-use plastics. Overall, Kotor's waste management system is failing to prevent illegal dumping and landfills, contributing to environmental degradation. Waste reduction strategies, particularly in the tourism sector, are not adequately enforced or monitored.

Recommendations for Improvement

1. **Expand Waste Management Capacity During Peak Seasons:** Kotor should consider expanding its waste management capacity during peak tourist seasons by increasing the frequency of waste collection, deploying additional resources, and setting up temporary waste management facilities in high-traffic areas.

2. **Invest in Waste Management Infrastructure:** The city should seek additional funding to invest in waste management infrastructure, particularly in areas that are difficult to service. This could include the development of waste processing facilities, the purchase of additional waste collection vehicles, and the installation of more public recycling bins.

3. **Strengthen Regulations on Single-Use Plastics:** Kotor should introduce stronger regulations to further reduce or eliminate the use of single-use plastics within the tourism sector. This could include banning certain plastic items, providing incentives for businesses that adopt sustainable alternatives, and increasing penalties for non-compliance.

4. **Enhance Monitoring and Reporting:** The city should enhance its systems for monitoring and reporting on waste management outcomes. Regularly published reports on waste reduction, recycling rates, and the success of public campaigns can help to track progress and identify areas for improvement.

Relevant References

- Illegal landfills, Water Pollution, Poor Waste Management in Boka Bay, Total Montenegro News, 2020.
- Waste Management in Montenegro, European Environment Agency, 2021.

Figure 51 : An example of SINGLE USE Plastics in solid waste management municipal facilities

D10. GHG Emissions and Climate Change Mitigation

Introduction to Criterion D10 : Greenhouse Gas (GHG) Emissions and Climate Change Mitigation

Criterion D10 of the GSTC Destination Criteria v2.0 emphasizes the importance of reducing greenhouse gas emissions and implementing climate change mitigation strategies within tourism destinations. This criterion involves setting clear targets for GHG reduction, implementing and reporting on mitigation policies, and encouraging tourism enterprises to measure, monitor, and reduce their emissions. The criterion also supports the use of offsetting schemes to manage any remaining emissions.

Criterion & Indicators Score

Table 43 : D10 – GHG Emissions and Climate Change Mitigation

Criteria			Indicators				
				No document exists	0	Areas of Risk <1	
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49	
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99	
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49	
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50	
D10	D10 GHG emissions and climate change mitigation	a	Published target for percentage of emissions reduction by specified date.	0			
		b	Annual climate report, including monitoring and mitigation actions.	1		0,60	
		c	Supported campaign or other engagement with tourism enterprises on reduction and mitigation of emissions.	0			
		d	Action to reduce emissions from public sector operations.	2			
		e	Information for enterprises and visitors on offsetting schemes that meet recognised standards.	0			

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Setting Emissions Reduction Targets:** The City of Kotor has taken the first steps to set targets for reducing greenhouse gas emissions. These targets will be aligned with international climate commitments.

- **Climate Action Reporting:** Kotor has begun to develop and implement annual climate reports that detail the progress made towards emissions reduction. These reports include information on the effectiveness of mitigation actions, such as the promotion of energy efficiency and the use of renewable energy within the tourism sector. The transparency provided by these reports helps to build trust with stakeholders and demonstrates the city's commitment to addressing climate change.
- **Engagement with Tourism Enterprises:** The city has started engaging tourism enterprises in efforts to reduce and mitigate their greenhouse gas emissions. This includes providing information on best practices for reducing energy use, promoting the adoption of renewable energy sources, and encouraging participation in offsetting schemes. The engagement of the tourism sector is crucial in achieving the city's overall emissions reduction goals.

Challenges

- **Implementation Across All Sectors:** One of the main challenges Kotor faces is ensuring the consistent implementation of emissions reduction strategies across all sectors, including Cruise industry and Port activities, and particularly smaller tourism enterprises that may lack the resources or knowledge to fully engage in these efforts. This inconsistency can hinder the city's ability to meet its overall emissions reduction targets. No campaign and no public availability of the commitments and targets have been found in place during the assessment.
- **Monitoring and Data Collection:** Another challenge is the systematic monitoring and collection of data related to GHG emissions. While there are efforts to track emissions from larger entities, the collection of comprehensive data from all tourism-related activities remains difficult. Accurate and complete data is essential for evaluating progress and making informed decisions about future mitigation strategies.
- **Public and Visitor Awareness:** Raising awareness among residents and visitors about the importance of reducing greenhouse gas emissions remains a challenge. While there are some initiatives in place, more needs to be done to educate the public on how their actions, such as travel choices and energy use, impact overall emissions.

Conclusion

The City of Kotor has made significant progress in setting emissions reduction targets and engaging tourism enterprises in climate change mitigation efforts. However, challenges related to consistent implementation, data collection, and public awareness need to be addressed to further enhance the effectiveness of these initiatives. Potential air pollution from cruise ships should be investigated more, while there is no clear strategy to reduce GHG emissions associated with tourism. Also, there are limited public sector efforts or initiatives encouraging tourism enterprises to mitigate their emissions.

Recommendations for Improvement

1. **Strengthen Support for Small Enterprises:** Kotor should provide targeted support for smaller tourism enterprises to help them implement emissions reduction strategies. This could include offering financial incentives, technical assistance, and training programs to ensure that all sectors of the tourism industry are contributing to the city's climate goals.

2. **Enhance Data Collection and Monitoring Systems:** The city should invest in more robust data collection and monitoring systems to track greenhouse gas emissions across all sectors. This could involve developing a centralized database that allows for more accurate and comprehensive reporting, which would improve the city's ability to measure progress and adjust strategies as needed.

3. **Increase Public and Visitor Engagement:** Kotor should expand its public awareness campaigns to better engage residents and visitors in climate action. This could include promoting low-carbon travel options, encouraging energy conservation, and educating tourists about the benefits of participating in offsetting schemes.

4. **Promote Offsetting Schemes:** To manage any remaining emissions, Kotor should promote and facilitate access to recognized offsetting schemes, ensuring that these options are readily available and easy to understand for both businesses and visitors. This can help to further reduce the city's overall carbon footprint.

Relevant References

- Environmental Responsibility and Climate Change, Tenerife Global Summit, 2024.
- Estimation of Air Pollution from Ships in the B. K. Bay, D. Nikolić, R. Gagić & Š. Ivošević, The Boka Kotorska Bay Environment, 2016.
- Montenegro Sustainable Maritime Competence Development Initiative, University of Montenegro, Faculty of Maritime Studies Kotor, 2015.

Figure 52 : All the sectors should support the implementation of City Climate Targets, including Cruise

D11. Low-Impact Transportation

Introduction to Criterion D11 : Low-Impact Transportation

Criterion D11 of the GSTC Destination Criteria v2.0 focuses on the reduction of transportation-related emissions within a tourism destination. This criterion encourages the use of sustainable, low-emissions vehicles, public transport, and active travel options like walking and cycling. The goal is to minimize the contribution of tourism to air pollution, congestion, and climate change by promoting more sustainable transportation methods both to and within the destination.

Criterion & Indicators Score

Table 44 : D11 – Low Impact Transportation

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D11	D11 Low-impact transportation	a	Investment in more sustainable transport infrastructure, including public transport and low emissions vehicles.	2		
		b	Information promoted to visitors on alternative transport options to and within the destination.	1		
		c	Data on visitor use of alternative transport modes.	1		0,83
		d	Improvement and promotion of cycling and walking opportunities.	1		
		e	Prioritization of visitor markets accessible by short and more sustainable transport options.	0		
		f	Public sector and tourism enterprises prioritise low-impact transportation in their own operations.	0		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Investment in Sustainable Transport Infrastructure:** The City of Kotor has made investments in developing infrastructure that supports low-impact transportation. This includes improvements in public transport options, such as bus services that connect key tourist areas, and the introduction of bicycle lanes to encourage cycling within the city. These efforts have been aimed at reducing the reliance on private cars, which are a major source of emissions.

- **Promotion of Walking and Cycling:** Kotor has promoted walking and cycling as preferred modes of transportation for both residents and tourists. The city's historical layout, with its narrow streets and pedestrian-friendly zones, naturally supports walking. Additionally, the city has implemented cycling routes and bike-sharing programs to make cycling a more accessible option for both tourists and locals.

- **Public Awareness Campaigns:** Kotor has conducted public awareness campaigns to inform visitors about the benefits of using public transportation and low-emission vehicles. These campaigns have included providing information at key entry points, such as bus stations and tourist information centers, and online resources that highlight sustainable transport options.

Challenges

- **High Dependency on Private Vehicles:** Despite the efforts to promote low-impact transportation, there remains a high dependency on private vehicles, particularly during peak tourist seasons. Many visitors arrive by car, and the local infrastructure can become congested, leading to increased emissions and reduced air quality.

- **Limited Use of Public Transportation:** While public transportation options exist, their use is still limited compared to private vehicles. Challenges such as the frequency, convenience, and coverage of bus services can deter both residents and tourists from choosing public transport over private cars.

- **Integration of Sustainable Transport Options:** Integrating various sustainable transport options into a cohesive system that is easy for visitors to use remains a challenge. Ensuring that public transport, cycling, and walking routes are well-connected and convenient requires ongoing planning and investment, creating the proper awareness to the city (not only old city) residences not to block any 'green' transportation activities.

Conclusion

The City of Kotor has made significant strides in promoting low-impact transportation through infrastructure investment, promotion of walking and cycling, and public awareness campaigns. However, challenges related to the dependency on private vehicles, limited use of public transport, and the integration of sustainable transport options need to be addressed.

Recommendations for Improvement

1. **Expand and Enhance Public Transport Services:** Kotor should work on expanding the frequency, coverage, and convenience of its public transport services. This could include increasing the number of buses during peak tourist seasons, improving the connectivity between key tourist sites, and ensuring that public transport options are easily accessible to all visitors.

2. **Incentivize the Use of Low-Emission Vehicles:** The city could introduce incentives for the use of low-emission vehicles, such as electric cars, including the installation of more charging stations and offering parking benefits. Additionally, promoting electric bike rentals could further reduce the reliance on fossil fuel-powered vehicles.

3. **Improve Integration of Transport Modes:** Kotor should focus on better integrating different modes of sustainable transport to create a seamless experience for users. This could involve creating transport hubs that connect public transportation with bike-sharing programs and pedestrian routes, making it easier for tourists to switch between different modes of transport.

4. **Target Short-Haul Visitor Markets:** To reduce emissions from long-haul travel, Kotor could target marketing efforts towards attracting visitors from nearby regions who can travel by more sustainable means, such as train or bus, rather than relying on air travel.

Relevant References

- Montenegro Sustainable Maritime Competence Development Initiative, University of Montenegro, Faculty of Maritime Studies Kotor, 2015.
- Transport Development Strategy – Montenegro 2019-2035, Ministry of Transport and Maritime Affairs, 2019.
- What is a Risk of Increased Traffic in Boka Bay?, Petrović, I. et al, Journal of Maritime Sciences (JMS), Vol. 23, No. 2, 2022.

Figure 53 : Parking Areas and Cycling paths as city infrastructure examples for low emissions transportation

D12. Light and Noise Pollution

Introduction to Criterion D12 : Light and Noise Pollution

Criterion D12 of the GSTC Destination Criteria v2.0 emphasizes the importance of minimizing light and noise pollution in tourism destinations. This criterion focuses on the development and enforcement of guidelines and regulations aimed at reducing the impact of light and noise on local communities, wildlife, and visitors. Effective management of light and noise pollution is crucial for maintaining the environmental quality, health, and well-being of both residents and tourists.

Criterion & Indicators Score

Table 45 : D12 – Light and Noise Pollution

Criteria			Indicators	No document exists	0	Areas of Risk <1
				Document exists	1	Areas of Moderate Risk 1.00 - 1.49
				Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
				Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
				Not applicable in the destination	not appl.	Excellent Performance ≥2.50
D12	D12 Light and noise pollution	a	Guidelines on light and noise pollution – produced and promoted to tourism enterprises.	2		1,67
		b	Identification and monitoring of potential sources of noise and light pollution related to tourism.	2		
		c	Mechanisms to enable residents to report noise and light pollution, with follow-up action.	1		

City of Kotor Performance: Outstanding Achievements and Challenges

Outstanding Achievements

- **Development of Guidelines:** The City of Kotor has developed guidelines to address light and noise pollution within the city, particularly in areas that are heavily frequented by tourists. These guidelines are designed to minimize the impact of artificial lighting and excessive noise on both the local population and the natural environment. The city has also promoted these guidelines among tourism enterprises, encouraging them to adopt practices that reduce pollution.

- **Monitoring and Reporting Systems:** Kotor has established systems for monitoring light and noise pollution, allowing for the identification of problematic areas and the implementation of corrective measures. These systems also include mechanisms for residents to report instances of excessive noise or light pollution, ensuring that local concerns are addressed promptly.

- **Awareness Campaigns:** The city has conducted awareness campaigns to educate both tourists and residents about the importance of minimizing light and noise pollution. These campaigns include information on how individual actions, such as the use of outdoor lighting and noise levels during evening hours, can contribute to a more sustainable and enjoyable environment for everyone.

Challenges

- **Enforcement of Guidelines:** While guidelines for reducing light and noise pollution exist, consistent enforcement across all sectors, particularly in the tourism industry, remains a challenge. Some businesses may not fully comply with the guidelines, leading to ongoing issues in certain areas, especially during peak tourist seasons.

- **Impact on Wildlife:** Despite efforts to reduce light pollution, the impact on local wildlife, particularly nocturnal species, continues to be a concern. Artificial lighting in coastal and natural areas can disrupt the natural behaviors of wildlife, which may have long-term consequences for local biodiversity.

- **Resource Limitations:** The city faces limitations in terms of resources for continuous monitoring and enforcement of light and noise pollution regulations. Ensuring that all areas, particularly remote or less frequently monitored locations, adhere to the guidelines requires additional investment in monitoring equipment and personnel.

Conclusion

The City of Kotor has made notable progress in developing guidelines and systems to manage light and noise pollution, with efforts to monitor, report, and raise awareness about these issues. However, challenges related to enforcement, the impact on wildlife, and resource limitations need to be addressed to enhance the effectiveness of these initiatives.

Recommendations for Improvement

1. **Strengthen Enforcement Mechanisms:** Kotor should strengthen its enforcement mechanisms to ensure that all tourism enterprises comply with light and noise pollution guidelines. This could involve increasing the frequency of inspections, imposing penalties for non-compliance, and providing support to businesses to help them meet the standards.

2. **Enhance Wildlife Protection Measures:** The city should focus on protecting local wildlife from the impacts of light pollution by implementing stricter controls on artificial lighting in sensitive areas. This could include measures such as requiring the use of wildlife-friendly lighting in coastal zones and natural habitats.

3. **Increase Resources for Monitoring:** To ensure comprehensive coverage, Kotor should seek additional resources for monitoring light and noise pollution. This could involve investing in more advanced monitoring technologies and increasing the number of personnel dedicated to enforcement and reporting.

4. **Promote Sustainable Tourism Practices:** Kotor could further promote sustainable tourism practices that minimize light and noise pollution. This could include encouraging the use of quiet, low-impact entertainment options, promoting the benefits of natural lighting, and supporting events that adhere to noise pollution guidelines.

Relevant References

- Estimation of Air Pollution from Ships in the B. K. Bay, D. Nikolić, R. Gagić & Š. Ivošević, The Boka Kotorska Bay Environment, 2016.
- European Commission: Impact of Light and Noise Pollution on Biodiversity, fundsforNGOs, 2023.

GSTC Assessment - Important Areas & Pilot Action Planning

The GSTC Destination Criteria emphasizes the importance of meaningful and inclusive community involvement in destination decision-making. Accordingly, the GSTC Destination Assessment process relies heavily on community stakeholder consultation to evaluate the destination's performance and prioritize risks that need to be addressed. Based on the findings, GSTC identified and recommended 20 main issues for Kotor to address, which were flagged as risks or gaps during the evaluation. This list is a comprehensive outcome of the Assessment process, highlighting the indicators, criteria, and thematic areas with the lowest scores. It identifies the key priorities for Destination officials to focus on in the coming period to achieve more sustainable performance. In the case of Kotor, these are illustrated below, with the related GSTC-D Criteria that could be identified.

Table 46 : Main Challenges on Sustainability Identified in GSTC Destination Assessment

#	Main 20 Issues Identified in GSTC Destination Assessment of Kotor	Related GSTC-D Criteria
1	Destination Plan Incorporating All GSTC Criteria and Indicators (including UNESCO Planning)	A1, A2, B1, C6, D2
2	Infrastructure & Legislation Implementation | Transportation, Parking, Traffic Control, Sewage, Access to all	A3, A4, A9, B5, B8, D11
3	Communication of Sustainable Tourism Activities, Targets and Achievements	A2, A3, A4, A7, B1
4	Comprehensive Monitoring and Data-Driven Decision-making	A2, A3, A4, A5, A6, B4, C6, D2
5	Connecting Research Outcomes and Local Needs, including Private Sector priorities	A3, A10, B1, B3, D1, D10
6	Sustainability Standards & SMEs	A2, A3, A4, D1, D5
7	Differentiation of Tourism offer, including TO, Cruises and Alternative Activities Priority, for minimizing seasonality	A2, A3, A8, B1, C6, D2
8	Tracking of Visitor Satisfaction and feedback	A3, A6, A8, B1, C6, D2
9	Resident Satisfaction and Public Participation in Destination Decision Making	A2, A3, A5, B1

10	Managing visitor volumes and activities	A2, A3, A6, A8, C6, B1, D2
11	Risk Analysis & Crisis Management	A2, A3, A10, A11, D10
12	New Financial Tools and Connection with Tourism Impact (from local to national to local)	A1, A2, A3, B1, B2, B3
13	Traveler Engagement in Community and Local Benefits	A1, A2, A3, A6, A8, B1, B3, B4
14	Cultural Intellectual Property	Protection of Local Culture against others	A2, A3, A4, A6, A9, B1, B3, B4, B6, C2, C3, C5,
15	Climate Change Mitigation and Adaptation Activities	Plans & Implementation against Risks and Management	A2, A5, A9, A10, A11, C6, D1, D10, D11
16	Transport means / alternatives and Green Solutions	low impact transportation	A2, A5, A8, A10, B1, B8, D5, D10, D11
17	Visitor Management System to Protect Sites and Attractions	A2, A6, B6, C6, D2
18	Creation & Communication of Robust Programs on Energy Efficiency, Water Efficiency and Solid Waste management	A2, A3, A4, A10, D1, D5, D6, D7, D8, D9
19	Code of Practice for Tour Guides and Tour Operators	A4, A7, B1, B3, B4, B7, B8, C6, C7, D2
20	Management Measures in Sensitive Natural and Cultural Environments	A2, A3, A7, A8, B8, C6, C7, D2

Based on the list of important areas for future improvement, a workshop was organized to evaluate and prioritize the most critical ones. During this workshop, GSTC presented the 20 identified risk areas as key findings from the GSTC Destination Assessment. Moderated by the GSTC Assessor, this event brought together the Destination stakeholders who participated in the on-site phase to assess and determine the most urgent issues requiring immediate action. This workshop, known as the 'Action Planning Workshop,' took place online on November 24, 2023, with a total of 27 Destination stakeholders participating.

Figure 54 : On-line meeting with Kotor reps for Pilot Action Planning of the most important outcomes
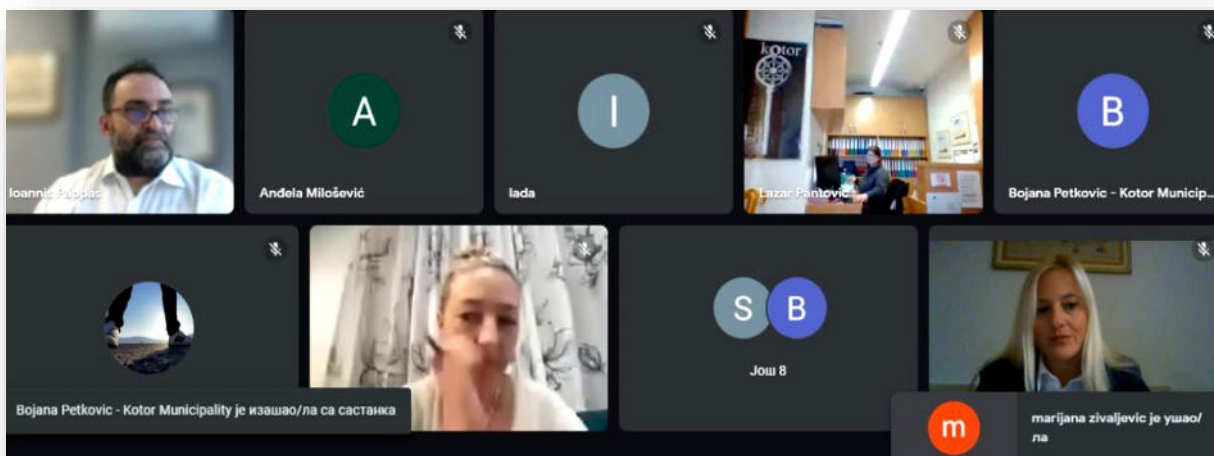
In this event, the draft results of the on-site activities were presented by the Assessor to the Destination stakeholders, together with the list of the **Prioritized Areas of Focus.** Based on a **Voting Process** that was used, the target was to estimate a number for example of the six most important, in order for an Action Plan for these 5 to be created by the Destination Officials. This process was a successful one, concluding to an order of the Prioritized Areas of Focus according to the outcomes of this voting process, which was with no interaction between the participants. This list after the voting is presented in the next figure, putting as the most important areas of future intervention issues, such as:

- transportation, traffic control, sewage problems and access for all, which are included in the greater area of Infrastructure and Legislation implementation
- transport mean, green solutions and low impact solutions

Figure 55 : Importance Order of Prioritized Areas of Focus after Kotor Stakeholders' Voting

2. Infrastructure & Legislation Implementation | Transportation, Parking, Traffic Control, Sewage, Access to all

68%

16. Transport means / alternatives and Green Solutions / low impact transportation

68%

5. Connecting Research Outcomes and Local Needs, including Private Sector priorities

36%

14. Cultural Intellectual Property / Protection of Local Culture against others

36%

7. Differentiation of Tourism offer, including TO, Cruises and Alternative Activities Priority, for minimizing seasonality

32%

6. Sustainability Standards & SMEs

27%

18. Creation & Communication of Robust Programs on Energy Efficiency, Water Efficiency and Solid Waste management

27%

1. Destination Plan Incorporating All GSTC Criteria and Indicators (including UNESCO Planning)

23%

3. Communication of Sustainable Tourism Activities, Targets and Achievements

23%

11. Risk Analysis & Crisis Management

18%

15. Climate Change Mitigation and Adaptation Activities / Plans & Implementation against Risks and Management

18%

19. Code of Practice for Tour Guides and Tour Operators

18%

20. Management Measures in Sensitive Natural and Cultural Environments

18%

4. Comprehensive Monitoring and Data-Driven Decision-making

14%

9. Resident Satisfaction and Public Participation in Destination Decision Making

14%

12. New Financial Tools and Connection with Tourism Impact (from local to national to local)

14%

10. Managing visitor volumes and activities

9%

13. Traveler Engagement in Community and Local Benefits

9%

8. Tracking of Visitor Satisfaction and feedback /

5%

17. Visitor Management System to Protect Sites and Attractions

5%

Before concluding this online meeting with Destination Stakeholders, the results of the voting were primarily used to create a Pilot Action Planning activity, particularly focusing on the top-priority areas. This activity was designed and moderated by the GSTC Assessor as a demonstration, utilizing the Miro platform with active participation from the Destination stakeholders. The goal of this pilot activity was to help Destination Officials become familiar with the necessary characteristics and processes for developing an Action Plan that leverages the outcomes of the GSTC Destination Assessment. This includes addressing high-risk (red) criteria and prioritizing the identified focus areas. The outcomes of the Pilot Action Planning are detailed below.

Figure 56 : Pilot Action Planning Outcomes for Transportation means and Green Solution in Mirro Platform

Concluding on the outcomes of the Pilot Action Planning, the City of Kotor could focus on identifying objectives, activities, partners, results and indicators of the outcome for every single prioritized area based on the GSTC Destination Assessment outcomes. Some examples are given below:

- **Improve Data Collection and Analysis**: To better manage tourism impacts, Kotor should invest in digital tools to gather real-time data on visitor numbers, environmental degradation, and resident satisfaction. This could be achieved by creating mobile apps for tourists and sensors at high-traffic areas to track visitor movements. Example: The city of Amsterdam utilizes real-time visitor monitoring systems at major attractions to manage crowding and disperse visitor traffic. Kotor could adopt a similar approach to manage congestion in the Old Town and coastal areas.

- **Improve Feedback Utilization**: Visitor and resident feedback should be systematically analyzed and acted upon to improve service delivery and address concerns. Kotor should consider developing a digital feedback platform that allows visitors to provide real-time input, which could then be reviewed regularly by the tourism management body. Example: The city of Edinburgh, Scotland, uses a real-time feedback app that provides immediate insights into visitor satisfaction and allows the city to respond swiftly to issues such as overcrowding or infrastructure problems.

- **Strengthen Cultural Preservation:** Kotor should expand efforts to protect both tangible and intangible cultural heritage. Partnering with UNESCO or local cultural preservation organizations could ensure long-term protection of the city's unique customs and traditions. Example: Creating annual cultural festivals that focus on local traditions, language, and cuisine could promote cultural sustainability and attract off-season tourism. The city of Kyoto, Japan, has successfully done this by organizing events centered around traditional crafts and practices.

- **Enhance Waste Reduction Strategies**: The city should focus on reducing the use of single-use plastics by introducing stricter regulations for tourism-related businesses. Waste sorting systems at key sites and more public recycling bins can help encourage better waste management. Example: Barcelona implemented a city-wide ban on single-use plastics in the tourism sector, coupled with public education campaigns. Kotor could introduce similar measures, encouraging businesses to adopt eco-friendly alternatives.

- **Expand Public Transport and Active Travel Options**: Kotor should develop better public transport links and improve cycling and pedestrian infrastructure to reduce traffic congestion and lower emissions. This can include introducing electric buses or shuttle services during peak tourist seasons and adding more bike-sharing stations across the city. Example: Copenhagen's extensive bike-sharing program and cycling infrastructure are models for encouraging low-impact transportation. Kotor could introduce a similar bike-sharing system to encourage both tourists and locals to reduce car usage.

CONCLUSION AND RECOMMENDATIONS

GSTC conducted the Destination Assessment for Kotor between September to December 2023, in collaboration with the Municipality of Kotor and the Port of Kotor. Using GSTC's assessment methodology, the team reviewed legal and policy documents related to city management and consulted with approximately 64 key stakeholders, including representatives from national and local government, the private sector, NGOs, academia, and local residents. These extensive consultations helped evaluate the city's performance against the GSTC Destination Criteria.

The assessment revealed that, out of the 38 GSTC-D criteria, Kotor excelled in 3 (7.9%) areas, was rated good in 11 (28.9%) areas, received a rating of "good with some improvements needed" in 7 (18.4%) areas, was identified as a moderate risk in 10 (26.3%) areas, and flagged as high-risk in 7 (18.4%) areas. Kotor achieved a total score of 60.18, equivalent to 65.82% of the Excellence Limit.

The Municipality of Kotor's performance on the GSTC Criteria underscores its strong commitment to sustainable tourism, especially in the areas of cultural heritage preservation, local economic support, and visitor safety. These impressive scores highlight Kotor's strengths and position it as a model for other destinations, particularly in the following areas:

- **Promotion and Information (A7) :** Kotor excels in providing comprehensive, responsible information to visitors, promoting the destination while educating tourists on the importance of preserving cultural and natural assets. This approach helps guide visitor behavior and ensures they are informed about local customs, environmental concerns, and the significance of Kotor's heritage, mainly via the activities of the Tourism Organization of Kotor.

- **Supporting Local Entrepreneurs and Fair Trade (B3) :** Kotor has made significant strides in supporting local businesses via a successful program of training and financial support of local entrepreneurs, ensuring that tourism benefits are equitably distributed within the local community. This strengthens the region's economic resilience and enhances the visitor experience with authentic local products and services.

- **Protection of Cultural Assets (C1) :** Kotor's effort to preserve its cultural heritage is evident in its comprehensive listing and systematic evaluation of cultural assets, ensuring their protection against potential threats, including climate risks. This is supported by technological means and EU co-funded projects that the local Research institutes are utilizing.

- **Traditional Access (C4) :** Kotor ensures that local communities retain access to natural and cultural sites, balancing the needs of tourists with those of residents. This inclusivity fosters community support for tourism and ensures that the benefits of tourism development are widely shared.

- **Site Interpretation (C7) :** Kotor excels in site interpretation, providing visitors with meaningful and educational experiences that deepen their understanding and appreciation of the destination. High-quality interpretation enhances the visitor experience and promotes responsible behavior, contributing to the conservation of cultural and natural assets, supported by tech means.

Given the value of this Destination Assessment in guiding future priorities, policies, and local actions, a Pilot Action Plan was developed by local stakeholders based on the assessment outcomes. This plan outlines consensus priorities and several key projects for the coming years as a pilot case, with a focus on infrastructure and legislation implementation, including transportation, parking, traffic control, sewage management, and accessibility for all. Other critical issues flagged include sustainable transport solutions, connecting research outcomes with local needs and private sector priorities, protecting cultural intellectual property, differentiating tourism offerings to reduce seasonality, implementing sustainability standards for SMEs and promote energy, water and waste management efficiency.

Stakeholders also prioritized climate change mitigation and adaptation activities, supported by real-time measurements and simulations of greenhouse gas emissions. Given the significant contribution of cruise tourism to the local economy, it is crucial to connect these studies with extensive measurements of the environmental impact of tourism activities. Enhanced public participation in destination decision-making and management, along with resident satisfaction, is essential.

We commend the Municipality of Kotor for taking this significant step toward sustainable destination management by engaging in the GSTC Destination Assessment. We encourage city officials and local stakeholders to promote the necessary actions to ensure the sustainable development of the destination for the benefit of the local community and the protection of its sensitive natural environment, concluding on an urgent finalization of the necessary carrying capacity study for Kotor Destination. This includes a detailed analysis of the assessment findings, the creation of a new Sustainable Tourism Strategy, and an updated Heritage Management Plan, given Kotor's status as a UNESCO-protected area of global interest.

Research by local universities and institutes, supported by innovation, is a natural strength of Kotor, as shown by numerous studies and projects focusing on the Boka Bay area. However, more public-private partnerships (PPPs) are needed to effectively support agile planning and technology. Further studies and projects are recommended to integrate visitor and economic flows between the Old City and the broader municipality, taking research outcomes into account. An integrated plan for sustainable development will be crucial in addressing climate crisis risks that threaten both the environment and the tourism product.

Finally, given Kotor's UNESCO heritage status, future activities should focus on monitoring and evaluating visitor flows, linking them with resident satisfaction through technological and other means. Protecting the cultural heritage from the influence of non-local culture—ranging from souvenirs to food and primary products—should be a key target in the coming years. This effort should be connected with new financial tools and the real economic, environmental, and social impacts on the city. Promoting sustainability across private and public domains, encouraging good practices, raising awareness, and implementing standards and certifications in short- and long-term planning will increase traveler satisfaction and ensure the protection of local culture, the natural environment, and resident prosperity.

ANNEX

A. Finding of Good Practice

The captioned photos below and descriptions show Assessors' findings of Kotor's good practice areas per pillar - indicating that a documented policy exists, and implementation in the following areas is exemplary. These identified areas of good practice are based on information collected both during desktop and on-site assessment, including stakeholder meetings and site visits.

Pillar A : Sustainable Management

Figure 57 : Good Practice A – A smart system to identify car plates, evaluating visitors' origin and flows (A9)

Figure 58 : Good Practice B – Report on Climate Risk Assessment of Kotor (A11 & A12)
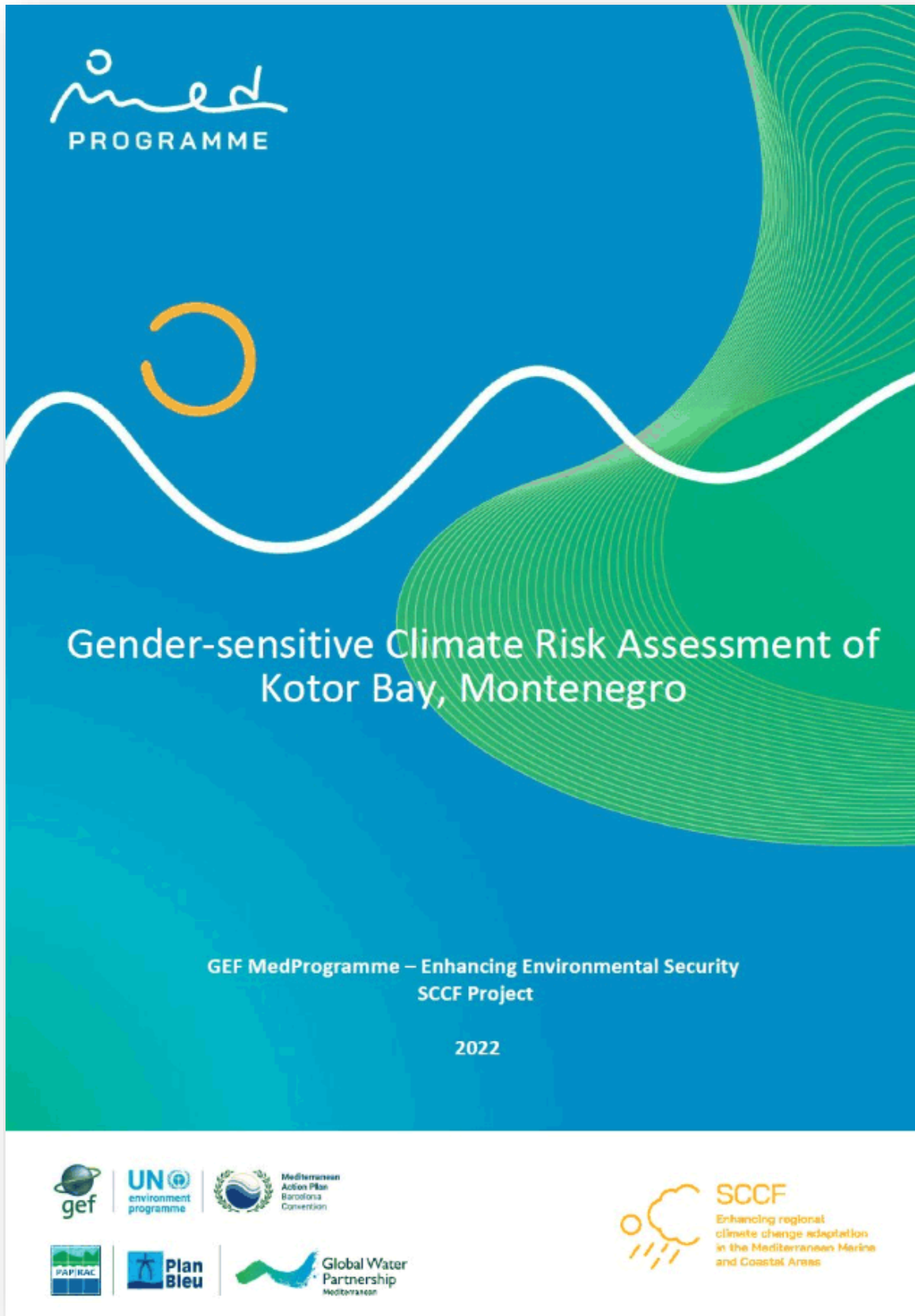
Figure 59 : Good Practice C – A system of Labeling Local Activities and Sites (A7)

Figure 60 : Good Practice D – Official Website of Tourism Organization of Kotor (A7)

Web stranica destinacije Kotor. Izvor: kotor.travel

Pillar B : Socioeconomic Sustainability

Figure 61 : Good Practice E – Support Program for Local Entrepreneurs in Kotor (B2)

Figure 62 : Good Practice F – Campaign to support local products (B3)

Figure 63 : Good Practice G – Access to High Level Education for Local Communities (B4)

Figure 64 : Good Practice H – Access for all Facilities in Public Buildings (B8)
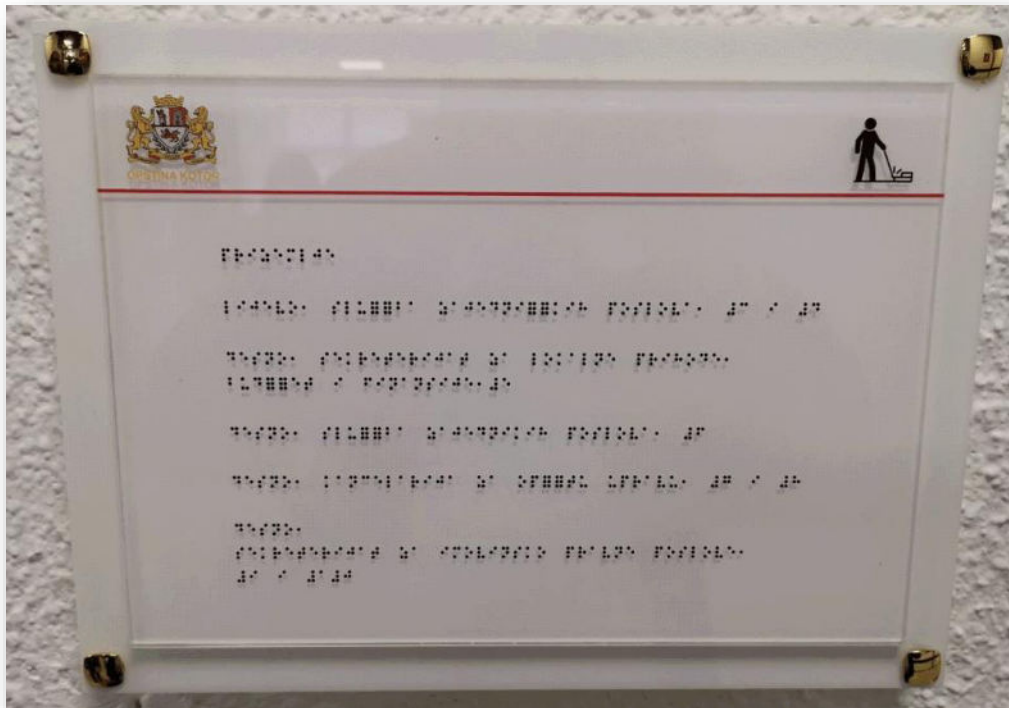
Pillar C : Cultural Sustainability

Figure 65 : Good Practice J – Proper Interpretation of Local Culture (Sant Tryphonas Church) (C1)

Figure 66 : Good Practice I – City Card System to support the local tourism product (C4)

Figure 67 : Good Practice L – Creative HUB as Transformation of old prison to an Entrepreneurship HUB (C3)
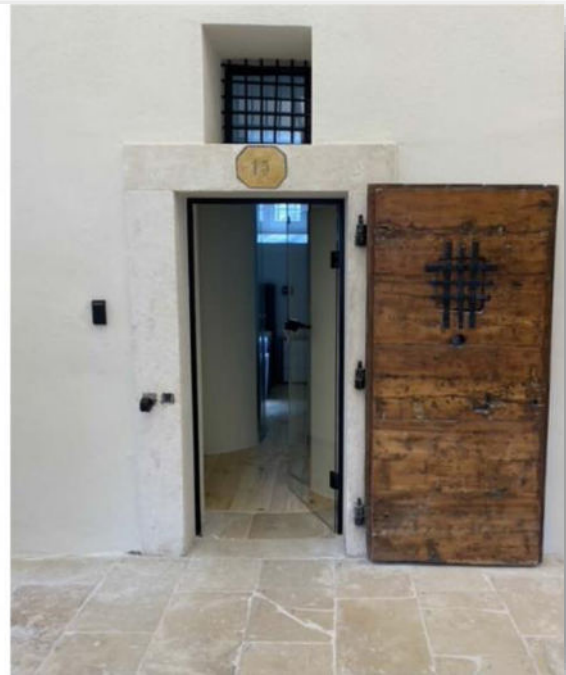
Figure 68 : Good Practice K – Technological solutions for Culture Sites Interpretation (C7)

Pillar D : Environmental Sustainability

Figure 69 : Good Practice M – On-Site Stations (x4) for GHGs monitoring from Cruise in Boka Bay (D1)

Figure 70 : Good Practice P – Marine Institute in Kotor biodiversity protection program example (D3)

Figure 71 : Good Practice N – Use of Renewable Energy Sources for Electricity Production (D5)

Figure 72 : Good Practice O – Implementation of Smart Bus Stop including Recycling Solutions (D9)

B. Completed Assessment Matrix

In the specific part of the Annex, the completed assessment matrix of the GSTC Destination Assessment of Kotor is presented.

Table 47 : Complete Assessment Matrix of Kotor GSTC Destination Assessment

KOTOR MONTENEGRO			INDICATOR SCORING		CRITERIA SCORING
Criteria		**Indicators**	No document exists	0	Areas of Risk <1
			Document exists	1	Areas of Moderate Risk 1.00 - 1.49
			Document and evidence of implementation	2	Needs Improvement 1.50 - 1.99
			Document, evidence, and improving trends	3	Good Performance 2.00 - 2.49
			Not applicable in the destination	not apply.	Excellent Performance ≥2.50
A) Sustainable management					**Average per Criterion**
A(a) Management structure and framework					
A1	**A1 Destination management responsibility**	a	Documentary evidence showing relevant make-up and responsibilities of the group.	**2**	**1.80**
		b	A financial plan and budget showing current and future funding sources	**3**	

		c	Evidence of links and engagement with other bodies	2	
		d	Records of permanent staff and contracted personnel, indicating relevant experience.	2	
		e	Management guidelines and processes, which demonstrate awareness and adherence to sustainability principles and transparency in operations and letting of contracts.	0	
A2	A2 Destination management strategy and action plan	a	A published document setting out the current destination strategy and action.	2	1.20
		b	The strategy/plan clearly visible and available on- line.	2	
		c	Evidence of stakeholder consultation, meetings etc. in developing the plan.	1	
		d	Reference to sustainability principles and an assessment of assets, issues and risks, contained in the strategy and action plan.	1	
		e	Specific references in the strategy/action plan to wider sustainable development policy (including pursuit of the SDGs), and vice versa	0	
A3	A3 Monitoring and reporting	a	Specific quantifiable socio-economic, cultural and environmental indicators and targets were identified.	1	0.50
		b	Measurement against these indicators, with results recorded and publicised at least annually.	0	
		c	Written evidence of monitoring and reporting of actions and outcomes.	0	
		d	Previous reviews of monitoring system and schedule for future reviews.	1	

	A(b) Stakeholder engagement				
A4	A4 Enterprise engagement and sustainability standards	a	Evidence of regular communication of sustainability issues to tourism-related businesses (Media, meetings, direct contact etc.).	1	0.40
		b	Sustainability support and advice to tourism- related business – available and promoted.	1	
		c	Number and percentage of businesses certified against tourism sustainability standards (and whether GSTC recognised/accredited), with targets for wider outreach.	0	
		d	Evidence of promotion of certification schemes.	0	
		e	List of tourism-related certified enterprises, kept up to date.	0	
A5	A5 Resident engagement and feedback	a	Evidence of the promotion and facilitation of public participation in destination planning/management.	3	1.80
		b	Information on the type and level of such participation.	2	
		c	Surveys of residents and other systematic feedback mechanisms, covering tourism issues.	2	
		d	Evidence of action taken in response to residents' feedback.	1	
		e	Programme of information, education and training on tourism provided for residents.	1	
A6	A6 Visitor engagement and feedback	a	Visitor surveys (and other feedback mechanisms) – carried out and reported.	3	1.75
		b	Surveys and feedback include visitor reaction to sustainability issues.	1	

		c	Evidence of actions taken in response to visitor survey/feedback findings.	**2**	
		d	Examples of visitor information that covers sustainability issues and how to respond to them.	**1**	
A7	**A7 Promotion and information**	a	Current information and promotional material with appropriate content.	**3**	**2.33**
		b	A process exists for checking the accuracy and appropriateness of destination promotion and information.	**3**	
		c	Evidence of consultation with local communities and environmental and cultural bodies on communications content and delivery.	**1**	

A(c) Managing pressure and change

A8	**A8 Managing visitor volumes and activities**	a	The destination management strategy and action plan addresses seasonality and spread of visitation.	**1**	**1.00**
		b	Variation in visitor volumes throughout the year is monitored, including in the most visited locations.	**2**	
		c	Impacts of visitor volumes and activities are identified through observation and community and stakeholder feedback	**1**	
		d	Actions taken to manage visitor flows and impacts.	**0**	
		e	Marketing strategy and selection of target markets takes account of visit patterns, the impact of activities and destination needs.	**1**	

A9	**A9 Planning regulations and development control**	a	Specific policies/regulations/ guidelines which control development – documented and identified by title and date.	3	**2.00**
		b	Impact assessment requirements are set out, covering environmental, economic, and socio- cultural impacts, at sufficient scale to address long term issues for the destination.	2	
		c	Specific regulations on property rental and operation for tourism, with evidence of their application and enforcement.	2	
		d	Evidence of public participation in the development of policies/regulations/guidelines.	2	
		e	Evidence of consultation with, and consent from indigenous people or minority ethnic groups when tourism development has been proposed or has occurred in their territories.	1	
		f	Evidence of communication and enforcement of the policies/regulations/guidance, at planning, development and implementation stages	2	
A10	**A10 Climate change adaptation**	a	The destination management strategy and action plan identifies and addresses climate issues.	1	**1.20**
		b	Regulations, guidelines and zoning for tourism development and activities accommodate the consequences of climate change.	1	

		c	A climate risk assessment, covering current and future risks – undertaken and made publicly available.	2	
		d	Evidence of consideration of impact on, and contribution of, local ecosystems to climate change adaptation.	0	
		e	Information on climate change that has been made publicly available.	2	
A11	A11 Risk and crisis management	a	A documented risk reduction, crisis management and emergency response plan for tourism in the destination.	1	1.00
		b	The plan recognises a wide range of risks, including natural disasters, terrorism, health, resource depletion, and others appropriate to the location.	1	
		c	Communication procedures identified for use during and after an emergency.	1	
		d	Programme for local delivery of information and training on risk and crisis management.	1	

B) Socio-economic sustainability

Average per Criterion

B(a) Delivering local economic benefits

B1	B1 Measuring the economic contribution of tourism	a	Programme of economic data gathering.	2	1.33
		b	Annual reports on the direct and indirect economic contribution of tourism in the destination.	1	

		c	Data covering a range of measures of economic impact (e.g. volume, expenditure, employment, investment and spread of economic benefit in the destination).	1	
B2	B2 Decent work and career opportunities	a	Provision of relevant skills training programmes/courses, available locally.	3	1.75
		b	Statements of commitment by tourism enterprises to the provision of decent work/ career opportunities.	0	
		c	Training and employment opportunities promoted to and taken up by local people, including women, young people, minorities and people with disabilities.	3	
		d	Channels for checking working conditions and receiving/handling grievances (e.g. involvement of labour unions).	1	
B3	B3 Supporting local entrepreneurs and fair trade	a	Advice, finance or other support – available in the destination for tourism-related SMEs.	3	2.20
		b	Assistance with market access for local tourism- related SMEs.	3	
		c	Action to encourage and assist local tourism enterprises to purchase goods and services locally.	1	
		d	Initiatives to help local farmers, artisans and food producers to engage in the tourism value chain.	3	
		e	Local produce and crafts identified, promoted and available for sale to visitors in the destination.	1	

			B(b) Social wellbeing and impacts		
B4	**B4 Support for community**	a	Support for local community and sustainability initiatives by local tourism enterprises is encouraged and facilitated.	2	**1.33**
		b	Schemes exist, and are promoted, for visitors to support local community and sustainability initiatives.	0	
		c	Volunteering and engagement with the community does not involve intrusion or exploitation.	2	
B5	**B5 Preventing exploitation and discrimination**	a	Reference (title, date) to specific laws that pertain in the destination regarding human rights, exploitation, discrimination and harassment.	3	**1.25**
		b	Evidence of communication and enforcement of above laws and related good practice (including to tourism enterprises and visitors).	1	
		c	Risk and impact analysis regarding human rights, including human trafficking, modern slavery and child labour – conducted regularly.	1	
		d	Destination and key tourism players are signatories to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.	0	
B6	**B6 Property and user rights**	a	Reference (title, date) to specific laws that pertain in the destination regarding property rights and acquisitions and user and access rights to resources.	3	**2.25**
		b	Reference in the above laws to communal and indigenous rights, public consultation and resettlement.	2	

		c	Evidence of enforcement of the above laws in the context of tourism development and activity.	2	
		d	Evidence of community consultation, consent and compensation.	2	
B7	B7 Safety and security	a	Security and health services are well established and active in the destination.	2	
		b	The needs of visitors are identified and addressed in the delivery of security and health services.	3	2.33
		c	Tourism facilities are inspected for compliance with safety and hygiene standards.	2	
B8	B8 Access for all	a	The existence of any regulations and standards regarding the accessibility of visitor sites, facilities and services.	3	
		b	Consistent application of accessibility standards in public facilities.	1	
		c	Data on the extent/proportion of visitor sites and facilities that are accessible.	0	1.17
		d	Evidence of programmes to improve access for people with a range of access needs.	1	
		e	Information on accessibility included in communications about the destination as a whole.	0	
		f	Details of accessibility included in visitor information about key sites.	2	

C) Cultural sustainability					Average per Criterion
C(a) Protecting cultural heritage					
C1	C1 Protection of cultural assets	a	Lists of cultural assets, including evaluation and indication of vulnerability.	3	2.67
		b	Programme of rehabilitation and conservation of assets.	3	
		c	Mechanisms for using income from tourism to support conservation of cultural assets.	2	
C2	C2 Cultural artifacts	a	Reference to relevant laws relating to historical artefacts pertaining in the destination (title, date)	3	1.67
		b	Evidence of communication of relevant laws to tourism enterprises and visitors.	1	
		c	Evidence of enforcement of relevant laws.	1	
C3	C3 Intangible heritage	a	Identification and listing of intangible cultural heritage	3	2.50
		b	Examples of celebration and visitor experiences of intangible cultural heritage (events, distinctive products etc.).	2	
		c	Evidence of involvement of local and indigenous communities in developing and delivering visitor experiences based on intangible cultural heritage.	3	
		d	Feedback from visitors and local communities on delivery of intangible heritage experiences.	2	
C4	C4 Traditional access	a	Monitoring of accessibility to natural and cultural sites for the local community.	3	2.67

		b	Evidence of engagement with the local community regarding traditional access.	2	
		c	Specific action to protect and/or rehabilitate local community access.	3	
C5	C5 Intellectual property	a	Reference to laws on intellectual property pertaining in the destination (title, date).	2	1.00
		b	Communication of intellectual property rights to tourism stakeholders.	1	
		c	Evidence that intellectual property rights are protected in the development of cultural experiences for visitors.	0	

C (b) Visiting cultural sites

C6	C6 Visitor management at cultural sites	a	Monitoring of visitor flows and impact on cultural sites, with results shared across the destination.	3	2.00
		b	Evidence of action to manage tourism-related impacts in or around cultural sites.	2	
		c	Existence and distribution of published guidelines on visitor behaviour at sensitive sites and cultural events and periodic monitoring of compliance.	3	
		d	A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at cultural sites.	1	
		e	Provision of training for guides.	1	
C7	C7 Site interpretation	a	Provision of informative interpretative material on-site and in formats that are accessible pre-arrival.	3	2.40
		b	Evidence that interpretative material has been well researched and is accurate.	3	

					Average per Criterion
		c	Interpretation material that identifies the significance and sensitivity/fragility of sites.	2	
		d	Evidence of host community collaboration in preparation of relevant interpretative material.	1	
		e	Interpretative material available in relevant languages.	3	

D) Environmental sustainability

D(a) Conservation of natural heritage

					Average per Criterion
D1	D1 Protection of sensitive environments	a	List of natural heritage sites and assets, indicating type, conservation status and vulnerability.	3	2.00
		b	Programmes to conserve biodiversity and natural heritage.	3	
		c	Programmes to eradicate and control invasive species.	2	
		d	Action to identify, monitor and mitigate tourism impacts on biodiversity and natural heritage.	2	
		e	Mechanisms for using income from tourism to support conservation of natural assets.	1	
		f	Communications with visitors and enterprises on reducing spread of alien species.	1	
D2	D2 Visitor management at natural sites	a	Monitoring of visitor flows and impact on natural sites, with results shared across the destination.	1	1.00

		b	Evidence of action to manage and mitigate tourism-related impacts in or around natural sites.	1	
		c	Existence and distribution of published guidelines on visitor behaviour at sensitive sites, and periodic monitoring of compliance.	2	
		d	A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at natural sites.	0	
		e	Cooperation with local conservation bodies to identify environmental risks associated with tourism and measures to reduce them.	1	
		f	Provision of training for guides.	1	
D3	D3 Wildlife interaction	a	Reference (title, date) to international, national and local laws that apply in the destination regarding interaction with wildlife.	3	2.00
		b	Endorsement of international standards for wildlife viewing for both marine and terrestrial species.	3	
		c	Distribution of a code of practice for wildlife interaction, including viewing, which reflects international standards.	1	
		d	System for checking compliance with regulations, and code of practice amongst tourism operations.	1	
		e	Actions to monitor wildlife wellbeing and minimize disturbance, in locations where interactions occur.	1	
		f	Provision of information to visitors on harmful wildlife interaction, such as touching and feeding.	3	

D4	**D4 Species exploitation and animal welfare**	a	Reference (title, date) to specific international, national and local laws, standards and guidelines that apply in the destination regarding animal welfare and conservation of species.	3	**2.00**
		b	Notification of laws, standards and guidelines to tourism enterprises and guides.	1	
		c	A system for inspection of the conditions of captive wildlife and domestic animals, including their housing and handling.	2	
		d	Licensing and checking of qualifications of personnel responsible for captive wildlife.	2	
		e	Action to promote the Convention on International Trade in Endangered Species (CITES) in the tourism sector and to ensure compliance with it.	2	
		f	Provision of information to visitors on avoiding trade in endangered species, e.g. in purchase of souvenirs derived from threatened species of wildlife notified by IUCN or CITES.	1	
		g	Enforcement of legislation to ensure that any hunting activity is part of a scientifically based, properly managed and strictly enforced approach to conservation.	3	

D(b) Resource management

D5	**D5 Energy conservation**	a	Energy consumption targets are publicised and promoted.	0	**0.75**
		b	Programme to increase energy efficiency – e.g. promoting and supporting insulation.	1	

		c	Investment in renewable energy and percent of total provision/consumption.	2	
		d	Support and incentives for energy monitoring and reduction by enterprises.	0	
D6	D6 Water stewardship	a	Provision of guidance and support for monitoring and reduction of water usage by enterprises.	0	0.80
		b	Program to regularly assess water risk.	2	
		c	Setting, publication and enforcement of water stewardship goals, where water risk has been assessed as high.	0	
		d	Monitoring and control of sources and volume of water used for tourism purposes and its effect on local communities and ecosystems. Promotion and checking of adherence to goals by tourism enterprises.	1	
		e	Visitor information on water risk and minimising water use.	1	
D7	D7 Water quality	a	Programme of water quality monitoring.	3	2.40
		b	Existence of data and reports on water quality.	3	
		c	Monitoring bathing water, with certification and identification of sites reaching set standards.	3	
		d	Evidence of actions to improve water quality.	2	
		e	Information for visitors on quality of local drinking water, to encourage use as alternative to bottled water.	1	

D(c) Management of waste and emissions

D8	D8 Wastewater	a	Written guidelines and regulations on wastewater treatment.	2	1.75
		b	System of enforcing guidelines amongst enterprises.	1	
		c	Monitoring/testing of released wastewater.	3	
		d	Provisional of sustainable municipal water treatment systems, for use by the tourism sector, where practical and appropriate.	1	
D9	D9 Solid waste	a	Waste monitoring programme, with results and targets published.	2	0.88
		b	Coordinated campaign/advice/support with tourism enterprises on waste management, including food waste.	0	
		c	Campaign to reduce/eliminate single use items, especially plastics.	1	
		d	Waste management programme for public offices and facilities.	1	
		e	Provision of a collection and recycling system, with at least four streams (i.e. organic, paper, metal, glass and plastic).	2	
		f	Provision of sustainable system for disposal of residual waste.	0	
		g	Campaign to eliminate dropping of litter, including by visitors, and to keep public spaces clean.	0	
		h	Adequate bins for separated waste disposal.	1	
D10	D10 GHG emissions and climate	a	Published target for percentage of emissions reduction by specified date.	0	0.60

	change mitigation	b	Annual climate report, including monitoring and mitigation actions.	1	
		c	Supported campaign or other engagement with tourism enterprises on reduction and mitigation of emissions.	0	
		d	Action to reduce emissions from public sector operations.	2	
		e	Information for enterprises and visitors on offsetting schemes that meet recognised standards.	0	
D11	**D11 Low-impact transportation**	a	Investment in more sustainable transport infrastructure, including public transport and low emissions vehicles.	2	**0.83**
		b	Information promoted to visitors on alternative transport options to and within the destination	1	
		c	Data on visitor use of alternative transport modes.	1	
		d	Improvement and promotion of cycling and walking opportunities.	1	
		e	Prioritization of visitor markets accessible by short and more sustainable transport options.	0	
		f	Public sector and tourism enterprises prioritise low-impact transportation in their own operations.	0	
D12	**D12 Light and noise pollution**	a	Guidelines on light and noise pollution – produced and promoted to tourism enterprises.	2	**1.67**
		b	Identification and monitoring of potential sources of noise and light pollution related to tourism.	2	
		c	Mechanisms to enable residents to report noise and light pollution, with follow-up action.	1	

A=11	**Total Criteria per category**	A = 51	**Total Indicators per category**	
B=8		B= 32		
C=7		C =26		
D=12		D =65		
38	**Total Criteria**	**174**	**Total Indicators**	

C. Others

C.1 Summary of Stakeholders Consulted or Visited On-site

For the sake of Destination Assessment, a number of meetings and consultations as long as on-site visits have taken place. In this process, a large number of stakeholders have contributed via group meetings, on-line meetings, site visits, action planning meetings. The organizations that have been represented in these meetings are given below:

1. Administration of Cultural Heritage, Municipality of Kotor
2. Azil Kotor Animal Selter
3. Blue line public bus line, Kotor
4. Blue World Institute of Marine
5. Cable Car Company, Kotor
6. Chamber of Commerce in Kotor
7. Culture Center "Nikola Durkovic"
8. Dep of Environment, Municipality of Kotor
9. Dep of Human Resources, Municipality of Kotor
10. Dep of Infrastructure & Technical Works, Municipality of Kotor
11. Dep of Urbanization, Municipality of Kotor
12. DMC Kotor
13. DMC Tivat
14. Elektroprivreda Crne Gore (National Electricity Provider)
15. EXPEDITIO Architects
16. Faculty of Maritime Studies, University of Montenegro
17. Faculty of Tourism and hospitality, University of Montenegro
18. Forza Hotels Group
19. Guides Union (association) of Kotor
20. Health / Medical Center of Kotor
21. Hotel Reps (one from City Center, one from outside City Center)
22. Hotels Union of Kotor
23. Human Resources Administration, Municipality of Kotor
24. Hybrid Boats Project, Kotor
25. Institute of Marine Biology
26. Kotor Art Academy
27. Kotor Association of Paraplegics
28. Luka Kotor
29. Marina Port Novi
30. Ministry of economic development, Montenegro
31. Ministry of Human and minority rights, Montenegro

32. Ministry of Internal Rescue and Protection Directorate, Montenegro

33. Ministry of Sustainable Development and Tourism, Montenegro

34. Municipal Inspection, Municipality of Kotor

35. Municipal Police Kotor

36. Museums of Kotor

37. Music School of Kotor

38. National council for Sustainable Development of Montenegro

39. National Museum of Montenegro

40. National Tourism Organization of Montenegro

41. NGO Center for Youth Education (NVOCOE) Montenegro

42. NGO Direct democracy, Citizen participation, Digital democracy, Environment, Peacebuilding

43. NGO eco center Dolphin

44. NGO Karampana

45. NGO Youth with Disabilities of Boka

46. NVO Our Action

47. Port of Kotor

48. PPOU Kotor

49. Recycling Center Kotor

50. Restaurant Reps of Kotor

51. Secretariat for Property Affairs in Kotor

52. Secretariat for the Protection of Cultural and Natural Heritage in Kotor

53. Secretariat for Urban Planning, Housing and Spatial planning for Kotor

54. Secretariat of Culture, Sport and Social Activities

55. Souvenirs Shops Rep of Kotor

56. Taxis Union of Kotor

57. Tourism Organization of Kotor

58. Tourism Police

59. Trade Union of Media of Montenegro

60. Transferring Boats Rep in Kotor

61. Tivat Airport

62. VATEL Hospitality School Montenegro

63. VODACOM

64. VPSUL, company for distribution of electricity

C.2 Kotor Destination Assessment | On-site Itinerary

The following stakeholders attended the GSTC activities during the on-site assessment and/or participated in the destination assessment zoom meetings. In total, over 120 stakeholders across more than 64 different organizations participated in the group and individual meetings.

Table 48 : Program for Arrival Day (23/10/2023)

TIME	CONTENT	PRESENTER
17:00	Arrival of the GSTC Assessor	Facilitated by Liaison
19:30	Meet with Destination Liaison Person / team for final arrangements	Facilitated by GSTC Assessor

Table 49 : Program for 1ˢᵗ Day (24/10/2023)

TIME	CONTENT	PRESENTER
09:00	Introduction	Destination Liaison or Designee
09:10	Welcome – Meeting between Assessor & Officials	Destination High-Level Public Officials
10:30	Meeting with Stakeholders Groups on Management and Tourism GROUP Management 1 & 2 | GROUP Tourism	Facilitated by GSTC Assessor
13.00	Meeting with the Mayor	Facilitated by Destination Liaison
13:30	Visit Tourism Organization of Kotor	Facilitated by Liaison
	Visit at Pomorski Fakultet Kotor which is part of the University of Montenegro	Facilitated by Liaison
	Visit of Kotor HUB	Facilitated by Liaison
	Unguided Tour in the Old City Fortress	Facilitated by GSTC Assessor
	Unguided Visit at the surrounding areas of the Old City	Facilitated by GSTC Assessor
16:30	Document review with Destination Liaison Discussion on Supporting Material provided by the Destination / Liaison	Facilitated by GSTC Assessor
17:00	Closure – End of 1st Day	Facilitated by GSTC Assessor

Table 50 : Program for 2nd Day (25/10/2023)

TIME	CONTENT	PRESENTER
08:30	Meeting of Working Team	Facilitated by Liaison
09:00	Meeting with Stakeholders Groups on Social / Economy / Culture GROUP SOCIAL | GROUP ECONOMY GROUP CULTURE	Facilitated by GSTC Assessor
12:30	Visit at PI Maritime Museum of Montenegro	Facilitated by Liaison
	Visit at Port of Kotor	Facilitated by Liaison
	Guided tour in the Old City of Kotor	Facilitated by Liaison
	Meeting with the UNESCO Representatives	Facilitated by Liaison
	Visit at St. Tryphon Cathedral in Kotor	Facilitated by Liaison
	Visit a hotel case / Hyatt Regency Kotor Bay	Facilitated by Liaison
16:30	Document Review with Liaison Team	Facilitated by GSTC Assessor
17:00	Closure – End of 2nd Day	Facilitated by GSTC Assessor

Table 51 : Program for 3rd Day (26/10/2023)

TIME	CONTENT	PRESENTER
09:30	Opening Workshop with Destination Official & Stakeholders	Facilitated by GSTC Assessor
09:30	Meeting with Stakeholders Groups on Environment GROUP Energy / Waste / Water GROUP Biodiversity GROUP GHGs & Transportation	Facilitated by GSTC Assessor
12:30	Visit at the Institute of Marine Mammals Research, University of Montenegro, in Kotor	Facilitated by Liaison
	Visit at the Aquarium of Kotor	Facilitated by Liaison
	Visit at Composting Facility in Kotor	Facilitated by Liaison
	Visit at the Animal Shelter of Kotor	Facilitated by Liaison
	Visit at Recycling Center Kotor Reciklažno Dvorište Lovanja	Facilitated by Liaison
	Visit at Wastewater Treatment Plant Tivat-Kotor	Facilitated by Liaison
16:30	Document Review with Liaison Team	Facilitated by GSTC Assessor
17:00	Closure – End of 3rd Day	Facilitated by GSTC Assessor

Table 52 : Program for 4th Day (27/10/2023)

TIME	CONTENT	PRESENTER
09:00	Meeting of Working Team	Facilitated by Liaison
09:30	GROUP Municipality Deps	Facilitated by GSTC Assessor
10:00	Brief meeting with Destination Officials reviewing preliminary findings	Facilitated by GSTC Assessor
10:30	Closing Workshop with Officials	Facilitated by GSTC Assessor
11.30	Review of Next Steps and Timing	Facilitated by Liaison
14.00	Visit at the Kotor Medical Center	Facilitated by Liaison
16.00	Visit at the Villages around Kotor City and Cultural related places (Perast)	Facilitated by Liaison
19.00	Closure – End of 4th Day	Facilitated by GSTC Assessor

Table 53 : Program for 5th Day (28/10/2023)

TIME	CONTENT	PRESENTER
09:00	Departure of the Assessor	Facilitated by Liaison

It should be noted that 3 more events have taken place even after the closure of the on-site phase activities, including two (2) on-line meetings via zoom with the stakeholders that couldn't join the meetings during the on-site phase (total participation of 15 stakeholders separated into 2 groups), and one (1) Action Planning Workshop (participation of 27 stakeholders). The 3 events were:

A. 02 11 2023 | Private Sector / Tourism Group (ZOOM) | 7 Participants
B. 02 11 2023 | Transportation Group (ZOOM) | Duration 1.00 h | 8 Participants
C. 24 11 2023 | Action Planning Workshop (ZOOM) | Duration 2.00 h | 27 Participants

C.3 Document Mapping Process Outcomes

In the following table, the summary of the outcomes of the Documents Mapping Process is illustrated.

Table 54 : Document Mapping Process Outcomes

Criteria #	Example of suggested documents/evidence	Document name/date
A1	- Documentary evidence showing relevant make-up and responsibilities of the group. - A financial plan and budget showing current and future funding sources. - Evidence of links and engagement with other bodies. - Records of permanent staff and contracted personnel, indicating relevant experience. - Management guidelines and processes, which demonstrate awareness and adherence to sustainability principles and transparency in operations and letting of contracts.	1. https://ptfund.org/past_projects/improving-services-and-transparency-in-kotor-montenegro/ 2. Strengthening the role of local government to ensure sustainable development of the cruise sector: The case of Kotor/ 2019
A2	- A published document setting out the current destination strategy and action. - The strategy/plan clearly visible and available on-line. - Evidence of stakeholder consultation, meetings etc. in developing the plan. - Reference to sustainability principles and an assessment of assets, issues and risks, contained in the strategy and action plan. - Specific references in the strategy/action plan to wider sustainable development policy (including pursuit of the SDGs), and vice versa.	1. Montenegro Tourism Development Strategy 2022-2025 /March 2022 2. National Strategy for Sustainable Development/ 2016 3. Tourism Policy in Montenegro - Current Situation and Future Challenges/ 2018
A3	- Specific quantifiable socio-economic, cultural and environmental indicators and targets identified. - Measurement against these indicators, with results recorded and publicised at least annually. - Written evidence of monitoring and reporting of actions and outcomes. - Previous reviews of monitoring system and schedule for future reviews.	1. Strategy and Plans for Monitoring marine ecosystem of Montenegro Document Name: National strategy for integrated coastal zone management 2015

A4			2. Montenegro has been part of the Barcelona Convention and its Protocols in the framework of UN Environment/MAP since 2008 and has published the newest report monitoring coastal marine ecosystem: Document name Integrated Monitoring Programme Montenegro 2021 3. Traffic Modelling and Performance Evaluation in Cruise Port of Kotor/ 2013 4. Montenegro Economic Reform Programme (ERP) 2022-2024
A4	- Evidence of regular communication of sustainability issues to tourism-related businesses (Media, meetings, direct contact etc.). - Sustainability support and advice to tourism-related business – available and promoted. - Number and percentage of businesses certified against tourism sustainability standards (and whether GSTC recognised/accredited), with targets for wider outreach. - Evidence of promotion of certification schemes. - List of tourism-related certified enterprises, kept up to date.		1. Restructuring of the Integrated Tourism Product as the Basis of Tourist Destination Sustainability - Kotor Case/ jul 2015 2. Sustainable Tourism Development in Montenegro - Actual Situation and Perspective/ 2013
A5	- Evidence of the promotion and facilitation of public participation in destination planning/management. - Information on the type and level of such participation. - Surveys of residents and other systematic feedback mechanisms, covering tourism issues. - Evidence of action taken in response to residents' feedback.		1. The role of tour operators in the sustainable tourism development= The case of Kotor.

	● Programme of information, education and training on tourism provided for residents.	
A6	● Visitor surveys (and other feedback mechanisms) – carried out and reported. ● Surveys and feedback include visitor reaction to sustainability issues. ● Evidence of actions taken in response to visitor survey/feedback findings. ● Examples of visitor information that covers sustainability issues and how to respond to them.	1. MONSTAT calculates incoming tourist numbers —> Document title: Arrivals and Overnight Tourist Total 2022
A7	● Current information and promotional material with appropriate content. ● A process exists for checking the accuracy and appropriateness of destination promotion and information. ● Evidence of consultation with local communities and environmental and cultural bodies on communications content and delivery.	1. Montenegro Country Strategy 2021-2026/ Sep. 2021 2. Think globally, act locally: Implementing the sustainable development goals in Montenegro 3. Official Travel Guide Kotor: https://kotor.travel/
A8	● The destination management strategy and action plan addresses seasonality and spread of visitation. ● Variation in visitor volumes throughout the year is monitored, including in the most visited locations. ● Impacts of visitor volumes and activities are identified through observation and community and stakeholder feedback. ● Actions taken to manage visitor flows and impacts. ● Marketing strategy and selection of target markets takes account of visit patterns, the impact of activities and destination needs.	1. Montenegro Tourism Development Strategy 2022-2025 /March 2022 —> some actions and data given 2. https://www.proquest.com/openview/4885634da549d94defed9536116115f7/1?pq-origsite=gscholar&cbl=2033472
A9	● Specific policies/regulations/ guidelines which control. development – documented and identified by title and date. ● Impact assessment requirements are set out, covering environmental, economic, and socio-cultural impacts, at sufficient scale to address long term issues for the destination. ● Specific regulations on property rental and operation for tourism, with evidence of their application and enforcement.	1. Slow tourism concept and cultural sites: Is the town of Kotor ready for the cittas low movement/ Dec 2018 2. Montenegro Economic Reform Programme (ERP) 2022-2024

	• Evidence of public participation in the development of policies/regulations/guidelines. • Evidence of consultation with, and consent from indigenous people or minority ethnic groups when tourism development has been proposed or has occurred in their territories. • Evidence of communication and enforcement of the policies/regulations/guidance, at planning, development and implementation stages.	document addresses economic and social indicators that interest the EU in their accession of the country
A10	• The destination management strategy and action plan identifies and addresses climate issues. • Regulations, guidelines and zoning for tourism development and activities accommodate the consequences of climate change. • A climate risk assessment, covering current and future risks – undertaken and made publicly available. • Evidence of consideration of impact on, and contribution of, local ecosystems to climate change adaptation. • Information on climate change that has been made publicly available.	1. Montenegro Tourism Development Strategy 2022-2025 /March 2022 addresses climate issues 2. The tourism strategy does not include climate risk assessment however there is a national strategy on climate change that has been running from 2015-2030 3. The only climate risk assessment available for Kotor Bay was done through Plan Bleu NGO as part of SCCF project - Kotor Bay Climate Risk Assessment Plan Bleu 4. National Strategy for Sustainable Development
A11	• A documented risk reduction, crisis management and emergency response plan for tourism in the destination. • The plan recognises a wide range of risks, including natural disasters, terrorism, health, resource depletion, and others appropriate to the location. • Communication procedures identified for use during and after an emergency. • Programme for local delivery of information and training on risk and crisis management.	1. There is no on-line presence of the full Strategy for Disaster Risk of Montenegro 2018-2023. However, a case study by Unicef offers some insights on how crisis management is handled in Montenegro Document title: Documentation of how

		governments in Europe and Central Asia have responded to disasters and crises through subnational social protection systems: Case of Montenegro
B1	• Programme of economic data gathering. • Annual reports on the direct and indirect economic contribution of tourism in the destination. • Data covering a range of measures of economic impact (e.g. volume, expenditure, employment, investment and spread of economic benefit in the destination).	1. National Action Plan for the implementation of the initiative Open Government Partnership Montenegro 2023- 2024/ Dec 2022 2. Public Finance Management Reform Program 2022 – 2026 3. Montenegro ERP 2022-2024 4. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions/ 2022
B2	• Provision of relevant skills training programmes / courses, available locally. • Statements of commitment by tourism enterprises to the provision of decent work/ career opportunities. • Training and employment opportunities promoted to and taken up by local people, including women, young people, minorities and people with disabilities. • Channels for checking working conditions and receiving/handling grievances (e.g. involvement of labour unions).	1. Plan for the Interoperability/ 2021 2. Mid-term report of Montenegro on the implementation of recommendations received during the third cycle of the Universal Periodic Review (UPR)/ 2018 3. European study on training skills in Montenegro: Document

		in question ETF Montenegro 2021
B3	- Advice, finance or other support – available in the destination for tourism-related SMEs. - Assistance with market access for local tourism-related SMEs. - Action to encourage and assist local tourism enterprises to purchase goods and services locally. - Initiatives to help local farmers, artisans and food producers to engage in the tourism value chain. - Local produce and crafts identified, promoted and available for sale to visitors in the destination.	1. Montenegro: Small Business Act profile/ 2019 2. Implementing a Pilot SME Voucher Scheme in Montenegro/ 2013 3. General information about SMEs in Montenegro 2021 SME Fact sheet
B4	- Support for local community and sustainability initiatives by local tourism enterprises is encouraged and facilitated. - Schemes exist, and are promoted, for visitors to support local community and sustainability initiatives. - Volunteering and engagement with the community does not involve intrusion or exploitation.	1. Green Development Policy and Action/ 2021
B5	- Reference (title, date) to specific laws that pertain in the destination regarding human rights, exploitation, discrimination and harassment. - Evidence of communication and enforcement of the above laws and related good practice (including to tourism enterprises and visitors). - Risk and impact analysis regarding human rights, including human trafficking, modern slavery and child labour – conducted regularly. - Destination and key tourism players are signatories to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.	1. Report of Montenegro on the implementation of the Beijing declaration for (BPfA) and platform for action and 20230 Agenda (2030 AGENDA)/ 2019 2. US report on Human Rights in Montenegro referencing specific laws→ Document in question: Montenegro 2022 Human Rights
B6	- Reference (title, date) to specific laws that pertain in the destination regarding property rights and acquisitions and user and access rights to resources. - Reference in the above laws to communal and indigenous rights, public consultation and resettlement. - Evidence of enforcement of the above laws in the context of tourism development and activity.	1. The Law on Tourism and Hospitality

	● Evidence of community consultation, consent and compensation.	
B7	● Security and health services are well established and active in the destination. ● The needs of visitors are identified and addressed in the delivery of security and health services. ● Tourism facilities are inspected for compliance with safety and hygiene standards.	1. Republic of Montenegro The Law on Health Care https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9455845/ 2. List of Public Medical Facilities in the whole country (Including 3 in Kotor) https://www.gov.uk/government/publications/list-of-medical-facilities-in-montenegro/list-of-public-medical-facilities-in-montenegro
B8	● The existence of any regulations and standards regarding the accessibility of visitor sites, facilities and services. ● Consistent application of accessibility standards in public facilities. ● Data on the extent/proportion of visitor sites and facilities that are accessible. ● Evidence of programmes to improve access for people with a range of access needs. ● Information on accessibility included in communications about the destination as a whole. ● Details of accessibility included in visitor information about key sites.	1. The Strategy for Protection of Persons with Disabilities from Discrimination and Promotion of equality 2017-2021
C1	● Lists of cultural assets, including evaluation and indication of vulnerability. ● Programme of rehabilitation and conservation of assets. ● Mechanisms for using income from tourism to support the conservation of cultural assets.	1. The authority on the protection and conservation of cultural and historic assets is the Ministry of Culture and all associated organizations can be found in the document titled: National Report on Cultural Protection Montenegro

		2. State of Conservation Report for UNESCO regarding Kotor
C2	• Reference to relevant laws relating to historical artefacts pertaining in the destination (title, date). • Evidence of communication of relevant laws to tourism enterprises and visitors. • Evidence of enforcement of relevant laws.	1. The Law on Archives Activity, 2. The Law on Library Activity, 3. The Law on Amendments of Law on Ratification of the Convention on the Protection of Underwater Cultural Heritage, 4. The Law on Culture, 5. The Law on Museums Activity, 6. The Law on Ratification of the Convention on the Protection of Underwater Cultural Heritage, 7. The Law on ratification of the Convention on the Protection of the World Cultural and Natural Heritage, 8. The Law on Memorials and, 9. The Law on Protection of Cultural Heritage. All of the above are referenced in the link below which is part of the Council of Europe https://www.coe.int/en/web/herein-system/montenegro

C3	• Identification and listing of intangible cultural heritage. • Examples of celebration and visitor experiences of intangible cultural heritage (events, distinctive products etc.). • Evidence of involvement of local and indigenous communities in developing and delivering visitor experiences based on intangible cultural heritage. • Feedback from visitors and local communities on delivery of intangible heritage experiences.	1. According to UNESCO intangible heritage there exists a Periodic reporting on the Convention for the Safeguarding of the Intangible Cultural Heritage for Montenegro. The 2015 and 2021 reports are submitted but only the 2015 report is available. Document in question: Report on the Implementation of the Convention and on the Status of the elements inscribed on the representative list of the Intangible Cultural Heritage of humanity 2017 2. Cultural Tourism and Community Engagement: Insight from Montenegro/ 2021
C4	• Monitoring of accessibility to natural and cultural sites for the local community. • Evidence of engagement with the local community regarding traditional access. • Specific action to protect and/or rehabilitate local community access.	1. Community Monitoring of Natural Resource Systems and the Environment
C5	• Reference to laws on intellectual property pertaining in the destination (title, date). • Communication of intellectual property rights to tourism stakeholders. • Evidence that intellectual property rights are protected in the development of cultural experiences for visitors.	1. In Montenegro, the acquisition and disposition of IPR are protected by the Law on the Enforcement of Intellectual Property Rights, which entered into force in 2006. Document title: Law on

		IPR and Patents Montenegro
C6	● Monitoring of visitor flows and impact on cultural sites, with results shared across the destination. ● Evidence of action to manage tourism-related impacts in or around cultural sites. ● Existence and distribution of published guidelines on visitor behavior at sensitive sites and cultural events and periodic monitoring of compliance. ● A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at cultural sites. ● Provision of training for guides.	1. The role of tour operators in the sustainable development tourism development- The case of the tourist destination of Kotor 2. The Relationship between Cultural Tourist Experience and Recommendation Intention: Empirical Evidence from Montenegro/ 2021
C7	● Provision of informative interpretative material on-site and in formats that are accessible pre-arrival. ● Evidence that interpretative material has been well researched and is accurate. ● Interpretation material that identifies the significance and sensitivity/fragility of sites. ● Evidence of host community collaboration in preparation of relevant interpretative material. ● Interpretative material available in relevant languages.	1. Touristic Information about Kotor and relevant activities accessible to all via https://kotor.travel/
D1	● List of natural heritage sites and assets, indicating type, conservation status and vulnerability. ● Programmes to conserve biodiversity and natural heritage. ● Programmes to eradicate and control invasive species. ● Action to identify, monitor and mitigate tourism impacts on biodiversity and natural heritage. ● Mechanisms for using income from tourism to support the conservation of natural assets. ● Communications with visitors and enterprises on reducing the spread of alien species.	1. Tourism gentrification in Mediterranean heritage cities. The necessity for multidisciplinary planning/ May 2022 2. The Montenegrin Innovation Policy to implement innovation in tourism and promote sustainability Document: Montenegro's Road to Sustainable Tourism Growth and Innovation

D2	- Monitoring of visitor flows and impact on natural sites, with results shared across the destination. - Evidence of action to manage and mitigate tourism-related impacts in or around natural sites. - Existence and distribution of published guidelines on visitor behavior at sensitive sites, and periodic monitoring of compliance. - A code of practice for tour operators and tour guides and/or other engagement with them on visitor management at natural sites. - Cooperation with local conservation bodies to identify environmental risks associated with tourism and measures to reduce them. - Provision of training for guides.	1. National strategy for integrated coastal zone management/ 2015
D3	- Reference (title, date) to international, national and local laws that apply in the destination regarding interaction with wildlife. - Endorsement of international standards for wildlife viewing for both marine and terrestrial species. - Distribution of a code of practice for wildlife interaction, including viewing, which reflects international standards. - System for checking compliance with regulations, and code of practice amongst tourism operations. - Actions to monitor wildlife wellbeing and minimize disturbance, in locations where interactions occur. - Provision of information to visitors on harmful wildlife interaction, such as touching and feeding.	1. Law on how to handle wildlife in Montenegro exists Law on the Protection of Animal Welfare 2008 and on hunting, Law on Wildlife and Hunting 2008 2. Law on marine fisheries and mariculture amended in 2015 3. Wildlife conservation tours available in Kotor https://kotor.travel/wild-life-conservation-tours/
D4	- Reference (title, date) to specific international, national and local laws, standards and guidelines that apply in the destination regarding animal welfare and conservation of species. - Notification of laws, standards and guidelines to tourism enterprises and guides. - A system for inspection of the conditions of captive wildlife and domestic animals, including their housing and handling. - Licensing and checking of qualifications of personnel responsible for captive wildlife.	1. https://www.gov.me/en/article/90334--160022 2. Animal Welfare Challenges and Opportunities in Montenegro/ 2019

	• Action to promote the Convention on International Trade in Endangered Species (CITES) in the tourism sector and to ensure compliance with it. • Provision of information to visitors on avoiding trade in endangered species, e.g. in purchase of souvenirs derived from threatened species of wildlife notified by IUCN or CITES. • Enforcement of legislation to ensure that any hunting activity is part of a scientifically based, properly managed and strictly enforced approach to conservation.	
D5	• Energy consumption targets are publicized and promoted. • Programme to increase energy efficiency – e.g. promoting and supporting insulation. • Investment in renewable energy and percent of total provision/consumption. • Support and incentives for energy monitoring and reduction by enterprises.	1. Energy Development strategy of Montenegro by 2025
D6	• Provision of guidance and support for monitoring and reduction of water usage by enterprises. • Program to regularly assess water risk. • Setting, publication and enforcement of water stewardship goals, where water risk has been assessed as high. • Monitoring and control of sources and volume of water used for tourism purposes and its effect on local communities and ecosystems. Promotion and checking of adherence to goals by tourism enterprises. • Visitor information on water risk and minimizing water use.	1. MONSTAT offers statistics on yearly water management → Document title: Water Management 2021 2. No water risk programs identified.
D7	• Programme of water quality monitoring. • Existence of data and reports on water quality. • Monitoring bathing water, with certification and identification of sites reaching set standards. • Evidence of actions to improve water quality. • Information for visitors on quality of local drinking water, to encourage use as alternative to bottled water.	1. According to the EU Montenegro Report water quality monitoring remains limited Document: Montenegro Report 2022
D8	• Written guidelines and regulations on wastewater treatment. • System of enforcing guidelines amongst enterprises. • Monitoring/testing of released wastewater. • Provisional of sustainable municipal wate0r treatment systems, for use by the tourism sector, where practical and appropriate.	1. Water and Wastewater Services in the Danube Region/ 2015

D9	• Waste monitoring programme, with results and targets published. • Coordinated campaign/advice/support with tourism enterprises on waste management, including food waste. • Campaign to reduce/eliminate single use items, especially plastics. • Waste management programme for public offices and facilities. • Provision of a collection and recycling system, with at least four streams (i.e. organic, paper, metal, glass and plastic). • Provision of sustainable system for disposal of residual waste. • Campaign to eliminate dropping of litter, including by visitors, and to keep public spaces clean. • Adequate bins for separated waste disposal.	1. Household food waste in Montenegro/ 2019 2. According to a 2021 European Environment Agency report, there is a relevant policy on waste management which attempts to be parallel to EU adjacent policies, however it is lacking Document title: Country Profile: Waste Management in Montenegro 2021
D10	• Published target for percentage of emissions reduction by specified date. • Annual climate report, including monitoring and mitigation actions. • Supported campaign or other engagement with tourism enterprises on reduction and mitigation of emissions. • Action to reduce emissions from public sector operations. • Information for enterprises and visitors on offsetting schemes that meet recognized standards.	1. A Contribution to the Sustainable Development of Maritime Transport in the Context of Blue Economy: The Case of Montenegro
D11	• Investment in more sustainable transport infrastructure, including public transport and low emissions vehicles. • Information promoted to visitors on alternative transport options to and within the destination • Data on visitor use of alternative transport modes. • Improvement and promotion of cycling and walking opportunities. • Prioritization of visitor markets accessible by short and more sustainable transport options. • Public sector and tourism enterprises prioritize low-impact transportation in their own operations.	1. Transport Development Strategy – Montenegro 2019-2035 2. A Contribution to the Sustainable Development of Maritime Transport in the Context of Blue Economy: The Case of Montenegro 3. Instrument for pre-accession assistance (IPAII) 2014-2020
D12	• Guidelines on light and noise pollution – produced and promoted to tourism enterprises.	1. National Implementation Plan of the Minamata Convention on Mercury

	- Identification and monitoring of potential sources of noise and light pollution related to tourism. - Mechanisms to enable residents to report noise and light pollution, with follow-up action.	with the Action Plan for the period 2022-2023 and the Minamata Initial Assessment Report/ 2021 2. https://www2.fundsforngos.org/latest-funds-for-ngos/european-commission-impact-of-light-and-noise-pollution-on-biodiversity/

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