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MYSTICAL DANUBE

SWOT Workshop Report

for the Pilot Site Bukumirsko lake

Komovi Nature Park

MYSTICAL DANUBE

GREEN AND MYSTICAL DANUBE STORYTELLING ROUTE – Transnational valorisation of natural and intangible cultural heritage for socio-economic development of rural areas in the Danube region

Specific objective 2:

Capacity building of local community stakeholders in the Danube region for the new thematic route

Activity 2.1:

SWOT analysis and tourism-related tools workshops for the development of sustainable community tourism services and products in Pilot sites.

Report on the Conducted SWOT Analysis for the Pilot Site Bukumirsko lake - Komovi Nature Park

SWOT Workshop Report for the Pilot Site Komovi Nature Park

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2 Introduction

The **MYSTICAL DANUBE** project is an initiative aimed at improving the socio-economic and cultural development of regions along the Danube River. Through the project, answers will be provided to several challenges and needs of the Danube region, related to the valorization of natural and intangible cultural heritage as a tourism asset, as well as contributions to regional economic development and social inclusion. The main goal of the project is to develop a coordinated joint transnational approach in the valorization of natural and intangible cultural heritage as a tourism asset in rural and less visited areas in the Danube region.

In **Montenegro** the pilot project area is **Komovi Nature Park**, and the expected results of the project are:

- Among ten selected project territorial units, the area of the Komovi Nature Park will receive strategies for the valorization of natural and intangible cultural heritage;
- In order to develop new tourism services and products through the project, training will be conducted, and the local community in less visited areas will increase the number of joint activities;
- Development of the application "Mystical Stories of the Danube Green Route" will feature thematic stories and information about available tourism services and products in the NP Komovi area;
- Promotion of the pilot location in Komovi Nature Park, located near Bukumirsko Lake.

In the context of the strategic approach to the development of the protected Komovi area, **SWOT analysis** represents a key element of the project. The analysis provides stakeholders' views related to the current strengths, weaknesses, opportunities, and threats of the region.

The results of the SWOT analysis, together with the territorial analysis for each project area, will serve as a basis for the Strategy for the valorization of natural and intangible cultural heritage in rural and less visited areas of the Danube region, with one part being the Komovi Nature Park.

3 Methodology

In the **MYSTICAL DANUBE** project, this analysis focuses on assessing the natural richness, intangible cultural heritage, socio-economic factors, and tourism-related potentials and challenges in pilot areas, by active involvement of stakeholders and focusing on participative approach. The involvement of local stakeholders, such as community members, cultural associations, tourism boards and municipal representatives, is integral to the methodology. Their participation ensured that the analysis reflected the community's unique perspective, identified gaps in services and activities and fostered a sense of ownership over the outcomes. The aim is to establish a solid foundation for sustainable tourism development and the creation of Action Plans for each pilot site.

For **Komovi Nature Park**, the **SWOT workshop** was crucial for gaining insights from stakeholders about the strengths, weaknesses, opportunities, and threats. It brought together representatives from institutions and organizations in the environmental protection, cultural heritage preservation, and tourism sectors. In the first part of the workshop, participants were invited to provide comments and suggestions on the document of Conclusions and Recommendations from two previous RTAT workshops. After that, the SWOT analysis began.

Participants were divided into 4 mixed groups, each consisting of representatives from all sectors. Each table had a host (work coordinator) who recorded the insights during the group discussions. At four tables, flip chart papers were set up, labelled with: Strengths, Weaknesses, Opportunities, Threats. Each group worked on the assigned segment of the SWOT analysis for 20 minutes. After that, the groups rotated, and the hosts remained at their tables to continue coordinating the work of the new group. In the lively atmosphere of discussion, new insights were added or existing ones commented upon. After completion, the insights gathered served as the basis for the SWOT analysis. The outcomes of the SWOT analysis will be used for development of Action Plans aimed at leveraging strengths, addressing weaknesses, capitalising on opportunities and mitigating threats.

4 Partner information

Project title	GREEN AND MYSTICAL DANUBE STORYTELLING ROUTE – Transnational valorisation of natural and intangible cultural heritage for socioeconomic development of rural areas in the Danube region
Activity number	2.1.
Funded by	INTERREG DANUBE
Partner name	Agency for the Management of Protected Areas of Podgorica
Full address	Radosava Burića bb, 81000 Podgorica
Contact person	Ms. Jasna Gajević
Location and date	Podgorica, 02.04.2025.

5 Main SWOT Analysis

SWOT Workshop Report for the Pilot Site Komovi Nature Park

5.1 SWOT Chart

Strengths	Opportunities
<p>Natural Values, Beauties, and Diversity</p> <ul style="list-style-type: none">• Attractive terrain with over 20 peaks higher than 2000 m above sea level, potential for outdoor sports• Recognizable glacial lakes and rivers• Biodiversity, endemic and rare species• Favourable geographical position	<ul style="list-style-type: none">• Existence of good practice examples in the environment for sustainable tourism• Children's Resort Veruša• Increased demand trends for active tourism and eco-friendly tours• Neighboring countries (ALB and KOS) do not develop authentic, non-mass tourism• The protection process of pastures (Katuni) at national and international levels• Presence of the trend of certification for eco-friendly accommodations and facilities• Existence of old abandoned buildings (pastures, watchtowers) that can be revitalized• Special training programs for the adequate development of tourism• Development of specific tourist products (mindfulness, medicinal herbs, forest spa)• Demand for research camps, nature schools
<p>Cultural/Historical Heritage</p> <ul style="list-style-type: none">• Pastures (Katuni)• Sacred sites• Intangible heritage• Traditional communication routes	
<p>Tourism Development Potential</p> <ul style="list-style-type: none">• Existing accommodation capacities (rural households, etc.)• Existing forest resources• Investment potential	

	<ul style="list-style-type: none"> • Trend of storytelling for preserving and promoting cultural heritage • Hiking routes CT 1 and CT 2 pass through the Komovi zone • Thematic pastoral routes – extension to the Komovi zone • Cycling routes (existing ones, need for expansion) • Infrastructure improvement as a prerequisite for the development of nature-based tourism • Digitization of the entire offer
<p>Weaknesses</p> <ul style="list-style-type: none"> • Insufficient management capacity of the protected area (NA) • Underdeveloped tourist and road infrastructure • Insufficient and undeveloped tourist offer • Lack of coordination between tourist organizations, protected areas, and travel agencies • Lack of inter-institutional cooperation and communication • Inefficient monitoring and control system (tourism and environment) • Lack of financial resources • Depopulation and deagrarization of rural areas in the Komovi NP • Illegal waste dumping sites • Insufficient involvement of the local population in creating the 	<p>Threats</p> <ul style="list-style-type: none"> • Accessibility of the destination (infrastructure – roads, electricity, water) • Coverage of mobile operators • Climate change – floods, fires, droughts • Space devastation / lack of a spatial planning framework • Lack of a strategic marketing plan • Disappearance of intangible heritage • Waste – waste management • Uncontrolled deforestation • Depopulation of the area (disappearance of forms of traditional livelihoods, such as pastoralism, traditional crafts, gastronomy, cultural landscape)

offer (it is necessary to link the tourist offer)

- Inefficient system for monitoring illegal construction in protected areas (building dimensions, lack of planning documents)
- Deforestation – weakness lies in insufficient coordination of staff in processing offenders (Komovi NP and Forest Directorate)
- Forest fruit picking – weakness in controlling this activity
- Inefficient inspection oversight in protected areas (number of inspectors and inaccessibility of territory)
- Branding of the area – insufficient
- Insufficient education of the local population and decision-makers
- Lack of a strategic framework for the development of tourist offerings
- Insufficient systemic approach to educating children about protected areas in Montenegro, need to create an educational program for protected areas
- Neglect of material cultural heritage (Komovi NP) – old houses, roads, wells, and trails

- Poaching
- ATVs and quads destroying the landscape and roads
- Fires as a result of human factors
- Irresponsible behavior of visitors
- Insufficient commitment and continuity in the actions of decision-makers at the local and national levels

5.2 SWOT Narrative Description

STRENGTHS

- **Natural values, beauty, and diversity** – Komovi is known for its spectacular landscapes, including mountain peaks (terrain with over 20 peaks higher than 2000 meters above sea level), rivers, glacial lakes, and forests, which represent significant tourism potential. These natural beauties can attract tourists seeking unspoiled nature and adventure tourism.
- **Biodiversity, endemic and rare species** – Komovi Nature Park has a rich floristic and faunal heritage, including endemic and rare species that may be of interest for ecotourism and the exploration of natural values.
- **Potential for ecotourism development** – Komovi Nature Park offers ideal conditions for ecotourism, with untouched landscapes, clean air, and opportunities for hiking, cycling, birdwatching, camping, and other nature-based activities that align with sustainable tourism development.
- **Existing accommodation capacities (rural households, etc.)** – These can be improved and certified as eco-tourism providers.
- **Old and abandoned structures (pastures, stone houses)** – These can be revitalized and adapted for tourism purposes.
- **Communities living in this area have a deep connection with tradition and nature.** The ethnographic heritage and crafts that are present can be used as a foundation for developing culture- and tradition-based tourism.
- **Intangible culture** (legends, stories, folk songs, and customs related to pastoralism, paths and roads used in the past, traditional gastronomy) – These can be utilized in the development of storytelling tourism trends, as well as offers based on authentic, traditional gastronomy.
- **Cultural/historical heritage** (sacred sites, tribal culture of Kuči and Vasojevići, history, famous personalities such as Marko Miljanov) – These can be used in the development of thematic routes and the storytelling trend.
- **Favorable geographical position** – Komovi is located in a strategic area that allows access for tourists from different regions. The proximity to other popular tourist destinations in Montenegro makes Komovi Nature Park an attractive additional destination or part of larger tourism tours.
- **Support from legislation in the field of nature protection** – As a nature park, Komovi is legally protected, which contributes to the preservation of natural resources and increases the trust of investors and tourists seeking authentic and preserved destinations.

- **Support from international initiatives** – Komovi Nature Park can benefit from EU and other international funds, initiatives for nature protection and cultural heritage, and cooperation with organizations promoting sustainable tourism and environmental protection.

OPPORTUNITIES

- **Brand development and promotion of Komovi Nature Park:** Building the brand of the Park as an ecological destination and cultural gem can increase its recognition in the market.
- **Infrastructure improvement:** connecting with major traffic hubs and building sustainable transport networks can facilitate easier access to the Park.
- **Conservation of natural resources and sustainability.** Using the Park's natural resources for sustainable tourism, with minimal negative impact, can enable long-term protection and preservation of these values. This may include directing tourism toward sustainable activities that do not harm ecosystems, such as eco-tours, hiking, cycling, and camping with minimal impact on nature.
- **Increased demand trends for active tourism and eco-friendly tours** can contribute to the development of ecotourism. Komovi has great potential for the development of ecotourism, which is growing worldwide. Offering tourists nature-based experiences such as hiking, cycling, camping, and birdwatching can become the core of the tourism offer. Hiking trails CT 1 and CT 2 pass through the Komovi zone, and the existing network of national and local cycling routes should be expanded to Komovi.
- **Presence of the trend for certification of eco-friendly accommodations and facilities.** Increasing investment in eco-friendly and sustainable accommodation capacities (eco-hotels, glamping, eco-villages) can meet the needs of modern tourists who prefer responsible tourism.
- **Protection of pastures at the national and international level** – Expand the tourism product of Montenegro's thematic pastoral routes to the Komovi zone.
- **Development of specific, innovative tourism products** (mindfulness, medicinal herbs, forest spa, health and recreation, rural tourism, including stays at farms with livestock).

- **Active promotion through digital platforms, social networks, and partnerships with travel agencies** can attract new groups of tourists, including young, eco-conscious tourists, and nature enthusiasts.
- **Use of modern technologies, such as virtual guides, eco-tourism apps, or interactive exhibitions,** can enrich the tourism experience.
- **Storytelling trend for preserving and promoting cultural heritage** – Integrating intangible cultural heritage, such as local customs, festivals, and traditions, can attract visitors who want to experience authentic culture.
- **Demand for research camps and nature schools** is an opportunity for the revitalization of the Children's Resort Veruša.
- **Special training programs for adequate tourism development:** Educating the local population through programs and training in sustainable tourism, nature conservation, and cultural heritage can strengthen the local workforce and increase capacities for providing quality services.
- **Existence of good practice examples in the environment for sustainable tourism** should lead to cooperation with neighboring destinations (in Montenegro or international partners). Cooperation among business entities will also enable the creation of joint tourism packages, increasing the attractiveness of Komovi as a tourist destination. Connecting with other protected areas, cultural heritage, and protected sites can create a comprehensive tourism product.
- **Inclusion in ecological and cultural networks:** Komovi has the potential to become part of a larger network of protected areas and cultural routes, which would enable further promotion and access to larger markets.
- **Financing from international funds and projects:** There is potential to attract funds from international sources and initiatives for the preservation of natural heritage and sustainable development. Programs of the European Union, UNESCO, and organizations engaged in the protection of nature and cultural heritage often provide financial support for such projects.

WEAKNESSES

- **One of the main prerequisites for the development of the area is infrastructure connectivity, which is currently underdeveloped.** The lack of

adequate transport connections (roads, public transportation) makes it difficult for tourists to access Komovi Nature Park, especially those coming from other regions or international destinations.

- **Insufficient strategic framework for the tourism development.**
- **Lack of accommodation capacities and diversification of the accommodation offer:** The limited number of quality accommodation facilities, such as eco-villages, ambient accommodation, well-equipped eco-camps, or other types of accommodation, hinders the attraction of a larger number of tourists. There is a need for the development of sustainable and eco-friendly accommodation capacities that meet the needs of ecotourism.
- **Undefined brand and insufficient promotion and visibility:** A weak marketing strategy and the promotion of natural and cultural resources hinder tourism development.
- **Stakeholder weaknesses:** Lack of inter-institutional cooperation and communication, leading to the disconnection of institutions responsible for the development and protection of the area. Additionally, there are insufficient management capacities for the protected area. There is a need to systematically improve coordination and enhance communication between stakeholders and strengthen management capacities.
- **Insufficient capacity in the protection system of the area leads to:** The presence of illegal waste dumps, deforestation, and uncontrolled forest fruit picking. Weaknesses result from insufficient personnel coordination in processing offenders. (Authorities of Komovi Nature Park and the Forest Directorate) and an inefficient inspection oversight system in the protected area (insufficient number of inspectors and inaccessibility of the territory).
- **Inefficient monitoring system of illegal construction in the protected area** (construction of oversized buildings in the Park, lack of planning documents or institutional recommendations for construction).
- **Neglect and lack of care for material cultural heritage (Komovi NP) –** deterioration of old houses, traditional roads and trails, captured waters.
- **Due to the lack of initiatives for the development of the Komovi NP area,** negative economic trends appear: depopulation and deagrarization of rural areas in the Komovi NP.
- **Insufficient education and training of the local population:** The lack of adequate training for local communities regarding sustainable tourism,

hospitality, and nature protection leads to negative environmental impacts and insufficient provision of quality services for tourists.

- **Insufficient systemic approach to educating children about protected areas** located in Montenegro; there is a need to create an educational program for protected areas.
- **Lack of long-term sustainable financing:** The development of tourism and the preservation of natural and cultural resources require continuous financing. The lack of funds for long-term maintenance of infrastructure and protection activities can be a barrier to the long-term success of the project.

THREATS

- **Global tourism trends close to nature** have led to the development of various nature-based tourism offers both in competitive destinations and in Montenegro. If Komovi Nature Park is not recognized and competitive in the tourism market, its economic development will be hindered. This highlights the necessity that, in addition to developing the products, they must be accompanied by appropriate branding and marketing strategies.
- **Climate change** may have long-term consequences on the natural resources of Komovi Nature Park, including changes in rainfall, temperature, and the length of seasons. These changes can lead to floods, fires, droughts, threaten biodiversity, increase the risk of fires and floods, and reduce the attractiveness of the destination for tourists.
- **Pollution and poor waste management** – Irresponsible local populations and rapid tourism development without adequate waste management infrastructure can lead to pollution of the natural environment, including plastic waste, water and soil contamination, which would negatively affect the aesthetic impression and the state of the ecosystem.
- **Lack of sustainable financing:** If there are not enough stable and long-term sources of funding to maintain infrastructure, carry out activities related to nature and cultural heritage protection, the realization of long-term strategic goals may fail, which could slow down the development of sustainable tourism and resource preservation.
- **Increase in the number of tourists without adequate control** can lead to the degradation of natural resources, including destruction of plant and animal habitats, pollution, infrastructure overload, and negative impacts: such as the

example of uncontrolled use of the nature park by ATVs and quads, which destroy the landscape and roads.

- **Inadequate coordination between various institutions** involved in nature and cultural heritage protection, tourism, and local development, as well as a lack of dedication and continuity in decision-making at the local and national level, could jeopardize the implementation and efficiency of future strategies for the valorization of natural and intangible heritage and tourism development.
- **Lack of an adequate legal regulator** could lead to negative consequences for the protection of nature, cultural heritage, and the disruption of the area due to unplanned and chaotic construction. Illegal activities, such as illegal logging, poaching, or construction without permits, could threaten natural resources and damage the image of Komovi Nature Park, which could affect its protection and tourism attractiveness.
- There is a **risk that tourism development** in some cases may conflict with the goals of protecting natural resources, such as excessive infrastructure development or improper use of natural resources, which could threaten the long-term sustainability of ecosystems.
- **Full coverage of Komovi Nature Park by mobile operators** is a prerequisite for the development of tourism, which will enable the implementation of the digitalization of the tourism offer.

6 Information on SWOT Workshop

The SWOT workshop has been conducted on 11th March 2025 in Podgorica, Montenegro, by the following **stakeholders**:

1. Ministry of Tourism
2. Ministry of Ecology, Sustainable Development, and the Development of the North
3. National Tourism Organization of Montenegro (NTO Montenegro)
4. Environmental Protection Agency (EPA)
5. Directorate for the Protection of Cultural Heritage
6. Chamber of Commerce
7. Public Institution National Parks of Montenegro

8. Historical Institute / University of Montenegro
9. Tourist Organization of Podgorica
10. Tourist Organization of Kolašin
11. Tourist Organization of Andrijevica
12. City of Podgorica – Secretariat for Culture
13. Marko Miljanov Museum
14. Agency for the Management of Protected Areas of Podgorica
15. Agency Komovi Nature Park (NP Komovi)
16. Regional Development Agency Bjelasica Komovi and Prokletije
17. NGO Green Home
18. NGO Parks Dinarides
19. Rajković Winery
20. Nomad & Outdoor Travel Agency
21. 4x4 Adventures Travel Agency
22. Rural Household Katun Mokra
23. Rajković Winery

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were added or existing ones commented upon. After completion, the insights gathered served as the basis for the SWOT analysis.

Photos of participants during the SWOT workshop

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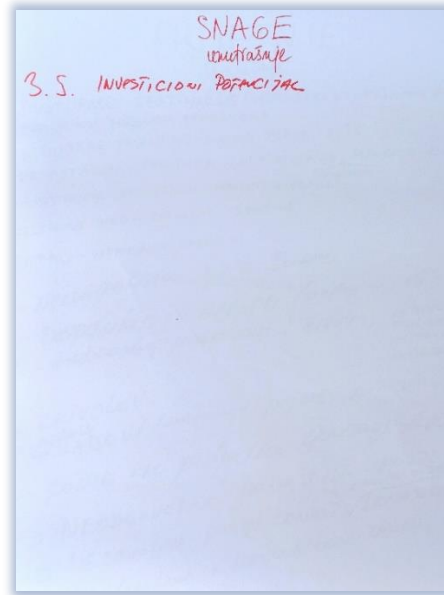
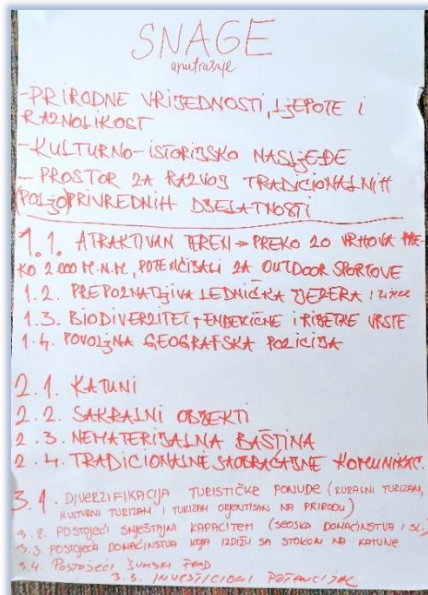


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SWOT analysis worksheets during the workshop:



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PRILIKE

spajanje

- * DUGOČIJE ODMARALIŠTE VERUŠA
- * POSTOJANJE PRIMERA DOBRE PRAKSE U OKRUŽENJU ZA ODRŽIVI TURIZAM
- * POJAČANI TRENDUVI TRAZUJE ZA AKTIVNI TURIZAM I ECO FRIENDLY TURIZAM
- * SUSREĆE KEMGE (ALB, KOS) NE RAZVIJAJU AUTEKTIČNI, NEKASOVNI TURIZAM
- * U PROCEDURI ZAŠTITA IZDIGA NA KATUVE I NA NACIONALNO I MEĐUNARODNOJ NIVOU
- * PRISUSTVO ŠEMA SERTIFIKACIJE ZA ECO FRIENDLY SMJEŠTANJE / SADRŽANJE
- * POSTOJANJE STARIH / NAPUŠTENIH OBJEKATA (KARAVLA, KATUNA) KOJI MOGU DA SE REVITALIZUJU
- * POJEZBU PROGRAMI ZA ADEKVATAN RAZVOJ TURIZMA
- * RAZNOJ SPECIFIČNIH TURISTIČKIH PROIZVODA (MINDFULNESS, GENOVITO BIŠIĆ, TUMSKI SAA)
- * ISTRAŽIVAČKI KAMPUSI, ŠKOLE U PRIRODI
- * STORY TELLING ZA ČUVANJE I PROMOCIJU KULTURNOG NASLEĐA

PRILIKE

spajanje

- * CTA I VIA DINARICA PROLAZE KROZ ZAVU KOMOVA
- * TEMATSKIE, KATUNSKIE RUTE - EKSTENZIVA NA ZAVU KOMOVA
- * BICIKLISTIČKE RUTE (POSTOJE NEKE, POTREBA ŠIRENJE)
- * UNAPREĐENJE INFRASTRUKTURE KAO PREDUSLOV ZA RAZVOJ TURIZMA BAZIRANOG NA PRIRODI
- * DIGITALIZACIJA UKUPNE POUDE

SLABOSTI

umrežavanje

1. Nedovoljni kapaciteti upravljača ZP;
2. nedovoljna razvijena turistička i putna mreža;
3. nedovoljna i nekohezivna turistička mreža;
4. izostanak ~~nekih~~ međuinstitucionalne saradnje i komunikacije;
5. nedovoljno efikasno sistem nadzora i kontrole; (turizma i životna sredina);
6. nedostatak finansijskih sredstava;
7. depopulacija ruralnih područja (PP komovi);
8. Niske Depozicije;
9. Nedovoljno uključeno lokalno stanovništvo u inicijativu razvoja (potrebno uspostaviti mrežu);
10. nedovoljno efikasno sistem nadzora gradnje u ZP; (gabariti) objekata, nedostatak (planova) koordinacije; (putna mreža);
11. Sjeca Sume → slabost za ogled u procesuiranju posetilaca (PP komovi i dijelovi ZP);
12. Ustrajanje čuvanja plodova → slabost je u kontroli i zaštiti okoliša;
13. Nedovoljno efikasno inspekcij nadzora u ZP; (nedostatak mreže);
14. bezobrazne podizanje → slabost je u kontroli i zaštiti okoliša;
15. Nedovoljna edukacija lokalnog stanovništva i donalaca odnosa;
16. Nedovoljna edukacija lokalnog stanovništva i donalaca odnosa;
17. Nedovoljno istraženje prirode u edukaciji djece o ZP i njegovoj važnosti za lokalnu zajednicu i državu;
18. nedostatak materijalnog kulturnog nasleđa (PP komovi) (šare kude, putevi, čuvanje, zaštita).

PRIJETNJE

spajanje

- DOSTUPNOST DESTINACIJE (INFRASTRUKTURA) RUTEVI, STRANA VOZA
- POKREVNOST MOBILNIH OPERATERA
- KLIMATSKIE PROMJENE - POPLAVE, POŽARI, SUŠE
- DEVASTACIJA PROSTORA / NEPOSTOJANJE PLANSKOG OKVIRA (PROSTORNO)
- NEPOSTOJANJE STRATEŠKOG - MARKETING PLANA
- NESTANAK NEKATERIJALNE BASTINE
- OTPAD - UPRAVLJANJE OTPADOM

→ NEDOKONTROLISANA SJECA SUME

→ DEPOPULACIJA OBLASTI (mreža i ZP) - tradicionalnog privrednog i životnog - kulturno nasleđe

→ KRIVOLAZI (umrežavanje prirode, puteva...)

→ POŽARI KAO POSLJEDICA GOSPODARSTVA

→ NEODGOVORNO PONAŠANJE POSJETILACA (komuniteti u prirodi)

→ NEODGOVORNA POSEĆENOST DOLAZI OBLUKA NA lokalnom i nacionalnom nivou.