

To the personal attention of

H.E. Mr Miloško Spajić, Prime Minister of Montenegro

Brussels / The Hague, 6 October 2026

Subject: Europa Nostra appeal for the swift and adequate protection of the endangered Miločer Park

Dear Mr Prime Minister,

We are writing to you on behalf of Europa Nostra, a prominent civil society organisation in Europe who acts as the voice of Europe's cultural and natural heritage. During the last sixty years, we have provided our advice and support to governments, local authorities, heritage institutions, professionals and communities across Europe in safeguarding and enhancing the richness and diversity of cultural and natural heritage that previous generations have left to us, so that the present generation and many generations to come can enjoy it. It is in this spirit that we take the liberty of addressing you, as the Prime Minister of Montenegro, a country with impressive cultural and natural heritage which forms part of an integral part of Europe's shared heritage, testifying to its diversity, multilayeredness and interconnectedness.

One of Montenegro's most valuable heritage sites is Sveti Stefan, together with Miločer Park, a former royal residence and historic park. As you are likely aware, the Cultural Landscape of Sveti Stefan, which includes Miločer Park, [was selected in 2023 as one of Europe's most endangered heritage sites](#), within the "7 Most Endangered" programme run by Europa Nostra with the support of the European Investment Bank Institute. Following this decision and subsequent mission to Montenegro, our European experts [published a Technical Report](#) on the Cultural Landscape of Sveti Stefan in 2024, which you will find [enclosed](#).

We fully understand the complexity of Sveti Stefan and Miločer Park which requires taking into consideration numerous concerns and actors, to ensure that these unique heritage sites can be safeguarded for future generations and enjoyed by the present generations in a responsible and sustainable manner. In this context, we applaud your Government's decision to invalidate the urban plan 'Tourist Resort Miločer', as well as to protect Miločer Park as an immovable cultural property. The need for formal legal protection of the Miločer Park has been one of the key recommendations of our Technical Report within the 7 Most Endangered Programme and remains a precondition for any long term safeguard and sustainable management of this significant heritage landmark.

However, we remain deeply concerned by the ongoing uncertainties concerning the future of the 'Janu Montenegro' Condo Hotel development project in the Miločer Park, the construction of which started some years ago. As highlighted in our Technical Report, the condo hotel development project, even in the scale that has been already



The European Voice of
Civil Society committed
to Cultural Heritage

www.europanostra.org

International Secretariat
Secrétariat international
Lange Voorhout 15
NL - 2514 EA Den Haag
T +31 70 302 40 50
E info@europanostra.org

Brussels Office
Bureau de Bruxelles
2 Avenue Palmerston
B - 1000 Bruxelles
E bxl@europanostra.org

ING Bank (NL) N° 63 18 630
IBAN: NL63INGB0006318630
BIC: INGBNL2A

KvK (NL) N° 27281560

partially built, is oversized and therefore inappropriate and incompatible with the historic, aesthetic and landscape values of the Miločer Park in which it is located. It is important to recall that though the Miločer Park has not yet been legally protected as a heritage site, it has been protected by related spatial plans. These spatial plans have regrettably been overridden by a related *Lex specialis*, allowing the investor to start building the condo hotel. Moreover, even with the *Lex specialis* in place, there have been provisions and measures for the safeguard of the Miločer Park which have been ignored, leading, among other aspects, to the destruction of the old royal garage built in 1930s, an architectural masterpiece of architect Dragomir Tadić, which formed part of the Miločer royal complex. Furthermore, we wish to draw your personal attention to the fact that the project which the investor started to build is larger in scale and volume than the winning architectural project which was approved by the jury, as confirmed by architect Branislav Mitrović who was a member of this jury. This regrettable development was made possible [through a series of breaches of the rule of law](#).

For the above reasons, we urge your Government to adopt the necessary measures to prevent the construction of an additional, third apartment block within the “Janu Montenegro” condo hotel development project to avoid any further degradation of the value and integrity of the Miločer Park. The spatial zone designated for the planned additional apartment block is located directly next to the historic and current main entrance to Miločer Park with its important original aesthetic and functional role. It is evident that this additional construction would completely obscure and visually overwhelm this original main entrance zone, as well as old royal villas that form a substantial part of this area of the park, which have already been significantly and deplorably affected by recent constructions.

As indicated above, we strongly believe that the construction of a third apartment block would further undermine the rule of law principle because the decisions that led to the issuing of the building permit for the construction of such a large facility at this location are questionable in many respects, as well as because the Milocer Park protection process, as decided by your Government, is currently under way.

Bearing in mind the great significance of the Miločer Park for Montenegro and for Europe as a whole, as well as the fact that the European Parliament in its recent [Report on the 2025 Commission report on Montenegro](#) (May 2026) called for the finalization of the protection procedure for this site, **we expect the protection procedure for the Miločer Park to be conducted swiftly, adequately and transparently, with due participation of heritage experts, local community, and relevant civil society organisations.**

We applaud Montenegro’s impressive progress towards EU accession, and we sincerely hope that your country will soon become a full member of the European Union. We are aware that certain decisions from the previous governments have significantly damaged the historical and landscape values of the Miločer Park, but remain confident that your government has the power and determination to stop further degradation of cultural and natural heritage in Montenegro and ensure its long term safeguarding for generations to come.



We stay at your disposal for any further advice, consultations or support that you and your government might need in protecting the outstanding heritage of Sveti Stefan and the Miločer Park, or any other heritage site in Montenegro.

Please note that this letter will be shared, for information, with the President of Montenegro, with relevant members of your government (Ministry of Spatial Planning, Urbanism and State Property and Ministry of Culture and Media), with the Office for the protection of cultural goods of Montenegro, and with relevant representatives of the EU Institutions (EU Commissioner Marta Kos, EU Ambassador Johann Sattler, and EP Rapporteur Marijan Šarec).

Thanking you in advance for your personal attention for our important appeal,

Respectfully and cordially yours,



Hermann Parzinger
Executive President



Sneška Quaedvlieg-Mihailović
Secretary General

