



# PROGRESS IN LOCKDOWN

Shadow Report  
on Chapter 27

**ENVIRONMENT AND CLIMATE CHANGE**  
MARCH 2020 – DECEMBER 2020





# Chapter 27 in Serbia: **Progress in lockdown**

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Environment and Climate Change

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# Contents

Introduction	6
<b>Financing in the Field of Environmental Protection and Climate Change</b>	<b>9</b>
Overview	10
References	11
<b>Horizontal Legislation</b>	<b>13</b>
Overview	14
Strategic and Legislative Framework	15
The Implementation of Regulations	18
Financing	24
Recommendations	25
References	27
<b>Air Quality</b>	<b>31</b>
Overview	32
Strategic and Legislative Framework	34
The Implementation of Regulations	36
Financing	42
Recommendations	44
References	46
<b>Waste Management</b>	<b>49</b>
Overview	50
Strategic and Legislative Framework	53
The Implementation of Regulations	56
Financing	63
Recommendations	64
References	68
<b>Water Quality</b>	<b>73</b>
Overview	74
Strategic and Legislative Framework	75
The Implementation of Regulations	76
Financing	80
Recommendations	81
References	84

<b>Nature Protection</b>	<b>87</b>
Overview	88
Strategic and Legislative Framework	89
The Implementation of Regulations	92
Financing	96
Recommendations	97
References	101
<b>Chemicals Management</b>	<b>105</b>
Overview	106
Strategic and Legislative Framework	109
The Implementation of Regulations	113
Financing	124
Recommendations	126
References	129
<b>Noise</b>	<b>131</b>
Overview	132
Strategic and Legislative Framework	133
The Implementation of Regulations	134
Financing	135
Recommendations	136
References	138
<b>Climate Change</b>	<b>141</b>
Overview	142
Strategic and Legislative Framework	143
The Implementation of Regulations	149
Financing	150
Recommendations	152
References	155
<b>Forestry</b>	<b>157</b>
Overview	158
Strategic and Legislative Framework	159
The Implementation of Regulations	161
Financing	164
Recommendations	165
References	167
<b>Appendices</b>	<b>169</b>
Appendix I	170
Appendix II	174
Appendix III	208

# Introduction

This is the eighth annual report by Coalition 27, entitled: “Progress in lockdown”. The previous (seventh) edition of the Report was prepared at a time when a state of emergency had been declared in the country due to the COVID-19 pandemic. This edition of the report has been prepared one year later, with no end to the pandemic in sight, but with public life starting to return to normal. The pandemic has marked all aspects of life for the past year, including in the field we are reporting on. The environment has become an issue of widespread interest. On one hand, media outlets across the world have reported that nature is being restored due to decreased traffic and economic activity, i.e., decreased pollution. On the other hand, in many places, including Serbia, the pandemic has laid bare the fragile state of institutions. Even before the pandemic, many institutions lacked sufficient capacity to function properly, a situation that has only been exacerbated by the pandemic. Over the past year the environment has been pushed even further down the Government’s list of priorities, with public health and the economy their main concerns.

However, public health is fundamentally linked to the environment, and so is economic recovery. The European Union plans to use the post-pandemic economic recovery as a chance to build a new, sustainable economy for the 21st century. Decarbonisation of the economy and environmental protection will be priorities for the European Union in the coming decades. This is one of a multitude of reasons why this and future governments of Serbia should prioritise sustainability. The most important context for any future debate on Chapter 27 is the Green New Deal and the Green Agenda for the Western Balkans, in which the countries of the region, including Serbia, have set ambitious goals for themselves to reform their economies towards sustainability. These reforms encompass areas far wider than Chapter 27, but the concepts of decarbonisation and sustainable development lie at their core. Achieving a green economic recovery is the national goal for the next decade, and we will continue to follow it closely.



Over the past year, we have witnessed ever-increasing public interest in issues related to the environment and climate change. Protests have continued to demand that better care be taken of nature and natural resources. In spite of this, progress on Chapter 27 has, in many ways, remained in quarantine; that is to say, behind closed doors. Legislative processes, as well as the development of projects with environmental impacts, such as the construction of a tire factory in Zrenjanin, are still often not transparent, despite extraordinary public interest. The short deadlines for submitting comments, and the almost clandestine publication of the Draft Law on Amendments to the Law on Nature Protection, are the best recent examples of this practice. A green recovery modelled on the EU's approach will require not only extensive legislative activity, but also putting to use our society's full capacity to develop and implement the changes that are coming. For this reason, it is not only proper, but also necessary, that everyone takes part in creating these changes. Citizens have emerged from quarantine – it is time for institutions to do the same.

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Coalition 27 was founded in 2014 by civil society organizations, predominantly with the goal of following and contributing to negotiations on Chapter 27. Today, Coalition 27 consists of nine organizations: The Safer Chemicals Alternative, the Belgrade Open School, Environment Improvement Centre, the Bird Protection and Study Society of Serbia, the Environment Engineering Group, One Degree Serbia, Young Researchers of Serbia, the Climate Action Network Europe (CAN Europe), and the World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia).

The report encompasses nine thematic areas: horizontal legislation, air quality, waste management, water quality, nature protection, chemicals management, noise, and climate change. Since forestry has large impacts on many areas of the environment (nature protection, climate change, etc.), this year's Report, like previous reports, also includes an overview of forestry issues. The Report does not deal with the issues of civil protection, or industrial pollution and risk management. Each thematic area reviews developments in the adoption of

public policies and legislation, the implementation of regulations and financing, and gives recommendations on how to improve the process.

**The Report also contains the following Appendices:**

1. List of abbreviations.
2. Comparative table of recommendations from the seventh (previous) and eighth (present) editions of the Coalition 27 Report.
3. Explanations of the methodologies employed, and a list of authors (organizations) for each area.



# **Financing in the Field of Environmental Protection and Climate Change**

# Overview

Investments in the environment in Serbia remain insufficient for the effective implementation of the acquis related to Chapter 27. Budget allocations for this area are not only limited, but are also not clear enough. For example, the Green Fund budget line was abolished in the Budget of the Republic of Serbia for 2021 (NARS, 2021) without prior explanation. Up to its abolition, the Fund had remained inoperative, because bylaws needed to operationalize the use of the funds were not adopted.

Through inquiries about the status of the Green Fund, which were sent to the Ministry of Environmental Protection and the Ministry of Finance, Coalition 27 learned that the funds previously presented as the Green Fund budget line are intended for a new programme – the Green Agenda – from 2021.

The competent institutions did not share information with citizens about why these changes were made, nor how the Green Agenda programme will work. However, it seems that the point is to create the illusion of investing in the implementation of the Green Agenda for the Western Balkans, while in practice it is evident that the allocation of funds from this budget line is questionable and insufficiently transparent.

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# **Horizontal Legislation**

# Overview

The previous reporting period was marked by the strong influence of the COVID-19 pandemic on citizens' rights to take part in decision making processes related to the environment. In many cases, citizens' right to attend public debates on various projects and plans was limited or completely denied (in some cases, police prevented the public from attending public debates). Moreover, the competent authorities' work was additionally slowed and made more difficult due to public servants working remotely. As part of the shift to working online that the pandemic has required, some processes were organised online, however regulation on public participation haven't been fully applied in these cases.

Legislative activity, as in the previous period, was at a minimum, and slowed down further due to the pandemic. The necessary Amendments to the Law on Environmental Impact Assessment and the Law on Strategic Environmental Impact Assessment have yet to be adopted. A draft of the IV Aarhus Implementation Report was prepared but was not adopted in 2020.

The Aarhus Convention Compliance Committee reacted to breaches of rights under the Aarhus Convention, concluding that the Aarhus convention should be applied fully during the pandemic, that the rights guaranteed by the Convention may not be diminished, and that signatory countries (including Serbia) can in no way justify limiting the rights guaranteed by the Aarhus convention by citing the pandemic. The period was also marked by somewhat increased activity by the Inspection for Environmental Protection, and a more active role of the Ombudsman in monitoring the safeguarding of the right to a healthy environment.



# Strategic and Legislative Framework

Even though the Republic of Serbia has almost completely harmonized national legislation with the Directive on Environmental Impact Assessment (GRS 2018), its successor, Directive 2014/52/EU, adopted to improve the environmental impact assessment process, has yet to be transposed. In order for this Directive to be fully transposed into domestic legislation it is necessary to adopt amendments to the Law on Environmental Impact Assessment, as well as amendments to the Regulation on Amendments to the Regulation on Establishing the List of Projects Requiring a Mandatory Environmental Impact Assessment (List I), and the List of Projects which May Require an Environmental Impact Assessment (List II).

According to the National Programme for the Adoption of the Acquis, (NPAA) (GRS, 2018), the original deadline for adopting the Law on Amendments to the Law on Environmental Impact Assessment was the fourth quarter of 2018, which was initially pushed back to 2019 by the Government Work Plan (VRS, 2019), and then further to October 2020 (GRS, 2020). Up to the time of writing of this report, no activities have been undertaken to amend the above Law, despite the Government Work Plan for 2021 envisaging that the Law should be adopted in December 2021 (GRS, 2021). Since the process to amend the Law was initiated in 2018, the working group has not met regularly. Working group members were selectively involved in certain processes and communication between working group members was almost non-existent. This trend continued in 2020, as no activity has been undertaken related to adopting amendments to the Law.

Workshops and training sessions for civil servants and judiciary representatives pertaining to amendments to this Law (envisaged in the NPAA for 2020) were not held, as they are contingent on the Law having been adopted.

There has been a similar outcome to the adoption of the Law on Amendments to the Law on Strategic Environmental Impact Assessment, which is required for complete harmonization with the Directive on Strategic Impact Assessment (Directive 2011/42/EU).

The process of amending the Law on Strategic Environmental Impact Assessment, which is taking place alongside the process of amending the Law on Environmental Impact Assessment, was supposed to have been completed with the adoption of the Law in late 2018. However, its adoption has continuously been postponed. Even though the Government Work Plan for 2020 envisages the last quarter of 2020 as the new deadline for adopting the Law on Strategic Environmental Impact Assessment, this has not yet happened. The new Government Work Plan has pushed the deadline to adopt this Law to December 2021 (VRS 2021).

Directive 2003/4/EZ on public access to environmental information has been fully transposed into domestic legislation. To achieve complete harmonization, yearly updates to the Ecoregister and the Pollutant release and transfer register must be ensured, in addition to raising the Environmental Protection Agency's capacities to expand the scope of its reporting (GRS, 2018).

Directive 2003/35/EC which provides for public participation in drawing up certain plans and programmes relating to the environment, has still only partially been transposed into domestic legislation. Amendments to the Law on Environmental Impact Assessment must be adopted to achieve full transposition.

To fully transpose Directive 2004/35/ES on environmental liability with regard to the prevention and remedying of environmental damage, Law on Environmental Liability must be adopted. The drafting of this law began in 2015 and, according to the NPAA, it should have been adopted in the second quarter of 2019; however, the drafting process is still on-going. During the drafting process, the Ministry of Environmental Protection, in cooperation with the Aarhus Network and the OSCE Mission to Serbia, held a series of public consultations in several cities throughout Serbia in October and November of 2019. In addition to representatives from the Ministry and the Aarhus Network, representatives of local self-governments and civil society also attended the

consultations. The Government of the Republic of Serbia plans to adopt the Law on Environmental Liability in December 2021.

With regard to Directive 2008/99/ES on the protection of the environment through criminal law, no progress has been made since last year. The Directive has still only been partially transposed into domestic legislation. The adoption of a Draft Law on Amendments to the Criminal Code is planned for December 2021 (VRS, 2021).

Directive 2007/2/EC on establishing Infrastructure for Spatial Information in the European Community (INSPIRE) has been transposed into domestic legislation through the adoption of the Law on National Spatial Data Infrastructure (Official Gazette of the Republic of Serbia, No. 27/2018).

# The Implementation of Regulations

The trend of shrinking space for public participation continued in 2020. While all social spheres were marked by the COVID-19 pandemic this year, the pandemic has been exploited as an excuse to prevent the participation of the interested public in the decision making process. This especially applies to attendance of public debates on strategic impact assessments, and impact assessments for various projects and plans. In some situations, such as the public debate on the Urbanization Plan for part of Makiško polje, a police presence was noted on the day that the public session of the Planning Commission was held.

A lack of coordination between institutions working on drafting legislation was also evident. For example, during the preparation of amendments to the Law on Nature Protection, public participation was entirely lacking (public participation is especially important for the acceptability assessment, which, in some cases, will be carried out as part of impact assessments or strategic environmental impact assessments).

Civil society representatives requested that the competent institutions halt all public debates and insight activities several times, because the way these processes were being carried out ran contrary not only to the law, but democratic principles and civic rights. During these processes, the basic conditions for public participation in decision-making processes were not provided.

Environmental activists and experts have repeatedly pointed out that a lack of the rule of law is especially evident in the field of environmental protection, where laws are often circumvented, both by investors and local authorities, while such behaviour is often not sanctioned (BOS, 2020a). In addition, public access to environmental information during 2020 was limited due to the pandemic, as officials at relevant institutions worked outside of their offices and communication with them was slow.

During a public debate in Zrenjanin in September 2020, citizens were prevented from participating in the public presentation of the Environmental Impact Assessment Study for the construction of a factory by the Chinese company Linglong International Europe d.o.o.; 60 people were present and, according to the Regulation on public events, only 30 people were allowed to enter. (RERI, 2020a). At that time, an Order banning assembly in indoor and outdoor public places in the Republic of Serbia was in force. It is unclear why this and other public presentations and discussions were scheduled despite the unfavourable epidemiological situation. In doing so, local authorities disregarded the Rulebook on Public Insight, Presentation and Public Discussion about the Environmental Impact Assessment Study and failed to fulfil their duty to enable a transparent environmental impact assessment procedure, which requires the participation of any member of the interested public at all public presentations or discussions.

The public session of the Planning Commission of the public insight process for the Draft Spatial Plan for the special purpose area designated for the construction of the thermal power plant "Kolubara B" was scheduled to take place on July 15th 2020, but was pre-emptively postponed due to the COVID-19 pandemic. The session was rescheduled for September 14th. However, when the session was finally held it was terminated after only half an hour following an argument between representatives of the Ministry of Construction, Transportation and Infrastructure and civil society representatives who were in attendance, about irregularities related to the session. CSO representatives insisted that the public session was not allowed to be scheduled due to the epidemiological situation. The number of people gathered at the Lazarevac Municipal Building, where the session was held, exceeded the number of people that were allowed to congregate in one place by the Order banning assembly in indoor or outdoor places in the Republic of Serbia. Despite the fact that it was noted that the number of people present at the meeting hall exceeded the allowed number, the chairperson opened the session, in direct violation of the Order. Additionally, neither the chairperson nor any of the Commission members took official minutes of the session, which constitutes a breach of the very same Rulebook cited by the competent authority in an attempt to limit

the number of participants (BOS, 2020b). After the session was terminated, no information on a new date was published. The Ministry later held the session without public participation on October 16th 2020. According to information received from the Ministry, based on a request for information of public importance, the Ministry published a notification about the planned session only on the day of the session in one print newspaper.

The same situation was repeated during the public insight session on the Draft Detailed Regulation Plan for part of Makiško polje accompanied by the Strategic Environmental Assessment Report for the Plan. This Plan envisages that the wider water source area of Belgrade should be rezoned into building land for the construction of almost 4.5 million m<sup>2</sup> of residential and commercial space, which would jeopardize the city's drinking water supply. Even though many interested citizens came to attend the public debate, they were prevented from attending by the police, municipal police, and security guards, under the pretence of adhering to the epidemiological measures in force at the time (BOS, 2020v).

A similar example illustrating the practice of exploiting the extraordinary measures imposed due to the COVID-19 pandemic in order to hinder public participation, is the case of a request to increase the flotation capacities of the copper mine in Majdanpek, owned by Serbia Zijin Copper, where the public was not even given the opportunity to submit comments during the Environmental Impact Assessment procedure (RERI, 2020b). The Ministry of Environmental Protection adopted a decision that the company was not obliged to compile an Environmental Impact Assessment Study, even though the Ministry failed to first publish the company's request alongside the appropriate documentation on its website for public insight. For this reason, the interested public was not able to access information about the project, and was consequently unable to submit comments.

The Aarhus Convention Compliance Committee reacted to breaches of rights under the Aarhus Convention, concluding that the Aarhus convention should be applied fully during the pandemic, that the rights guaranteed by the Convention may not be diminished, and that signatory countries (including Serbia) can in no way justify limiting the rights guaranteed by the Aarhus convention by citing

the pandemic. Limiting the right to public participation in decision making processes by citing the pandemic, practiced by administrative institutions in Serbia during 2020, therefore constitutes a breach of the Aarhus Convention.

The period covered by this Report was also marked by the process of compiling the IV Aarhus Implementation Report. The methodology for the Report, as well as the public consultations organized in five cities in Serbia, allowed for participation by various interested parties, including institutional representatives, local self-governments and civil society. The process resulted in a Draft IV Aarhus Implementation Report, which was yet to be adopted by the Government at the end of 2020.

Beyond the aforementioned trend of shrinking space for public participation in environmental impact assessments, the studies themselves still contain serious flaws, as was the case in previous years. Though oversights in the studies are often specific to each individual case, common characteristics are nonetheless evident. The most common flaws are diminishing and underestimating potential negative environmental impacts, insufficient detail in presenting initial states in studies, and failure to use up-to-date and widely available data on the state of the environment. These flaws have been identified, for example, with regard to the contents of the Study on Environmental Impact Assessment for the Legalization of the Thermal Power Plant Complex "Nikola Tesla A"; ranging from procedural oversights, the failure to conduct an analysis of the power plant's impact on climate change, and incomplete data on the state of the environment, to attempts to circumvent the need for a comprehensive overview by "slicing" the project up into several units (BGEN, 2020).

The situation is similar regarding the Report on Strategic Environmental Impact Assessment. For example, in the case of the Strategic Environmental Assessment for the Special Purpose Area Spatial Plan for the Construction of the "Kolubara B" Thermal Power Plant the question of the plant's impact on the quality of the environment, i.e., air quality, as well as public health, was only considered at a local level, even though available data and research shows that the impact is far broader, regional and cross-border. Biodiversity was only superficially addressed and biodiversity data was incomplete. The Study offers

no variant solution analysis, and one of the proposed solutions is to abandon the project. Climate change impact was not identified or considered, which is unacceptable given Serbia's commitments under the Paris Agreement, as well as the current climate policies of the EU, which Serbia is striving to join, and with which Serbia already has significant economic exchange – which will be jeopardized by the impact of "Kolubara B".

Civil society organizations have pointed out that the Strategic Assessment Report for the "Avala Film" Detailed Regulation Plan was incomplete (C27, 2020). Crucial flaws in the report included the fact that the Review was not compiled in accordance with the appropriate strategic and planning documents related to environmental protection, planning and construction, including the Environmental Protection Programme for the City of Belgrade, the Afforestation Strategy for the City of Belgrade, the Climate Change Adaptation Action Plan with Vulnerability Assessment for the City of Belgrade, the General Regulation Plan for Green Spaces in Belgrade, among others. The Review also failed to use current data on the state of the environment, protected species, and their habitats.

Respect for citizens' right to a healthy environment has still not reached a satisfactory level. During 2020, the Ombudsman received 5,056 cases, 72 of which were in the area of environmental protection, accounting for 1.42% of the total number of cases. According to the Ombudsman's annual report, most of the complaints filed by citizens about environmental protection related to air, water and soil pollution, waste management, and reactions to citizens' complaints by competent inspectorates. The number of complaints made by citizens related to environmental protection decreased compared to the previous year (OB, 2021). The Ombudsman's report states that competent institutions often fail to take preventive action due to a lack of financial and human resources, and that a number of local self-governments have failed to perform their legal duties related to compiling strategic documents in the area of environmental protection in a timely manner, if at all. A series of reviews of the application of legal provisions pertaining to environmental protection were conducted, most of which were initiated by the Ombudsman themselves due to poor air quality and air pollution (OB, 2021).



In response to citizens' complaints, the Ombudsman also initiated reviews to determine whether inspections of facilities that may have adverse effects on the environment were carried out in accordance with the law, as well as to investigate the competent authorities' reactions to citizens' complaints on the construction of small hydropower plants and waste management (OB, 2021). The Ombudsman highlighted that a comprehensive inspection of PE EPS and the "Kolubara" Mining Basin must be carried out in order to review the application of environmental protection regulations and the approved Environmental Impact Assessments. This is necessary in order to determine whether appropriate monitoring is being conducted in these communities regarding certain environmental factors, and whether mining and energy activities are causing threshold values to be exceeded in these areas (OB. 2020a).

Citizens also informed the Ombudsman via complaints that two active mines in the Bosilegrad Municipality are releasing waste water into the Brankovska and Ljubatska Rivers. After carrying out inspections of the two companies operating the mines, the Ministry of Environmental Protection adopted a decision ordering them to carry out measures to ensure compliance with the law (OB. 2021). Based on complaints from residents in Bor, and those living in the mining zones of the Veliki Krivelj, Bor, and Cerovo mines, the Ombudsman sent an Opinion to the Ministry of Environmental Protection stating that the City of Bor must adopt a Short-term Action Plan, which is currently being developed, as soon as possible, and must continuously and fully inform citizens about the state of the environment throughout the City (OB. 2020b).

# Financing

According to the National Environmental Approximation Strategy, horizontal legislation is an area where harmonization should not be particularly challenging from an economic and financial standpoint, while the expected costs of implementing regulations in this area are far greater (GRS, 2011). The post-screening document adds that most of the expenditure in this sector, around €15million will be incurred by implementing the INSPIRE Directive (Negotiating Group, 2015).

There is an evident lack of information about costs related to harmonizing Serbia's regulations in the area of horizontal legislation with those of the EU, as well as their implementation. Data on expenditure is mostly unavailable to the public, and even when certain data is available, it is often not sufficiently precise, and does not contain appropriate explanations, as is the case with the Ministry of Environmental Protection's Report on Budget Expenditure.

# Recommendations



## Strategic and Legislative Framework

- 1.** Improve the quality of the Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) by adopting the necessary bylaws and planned amendments to the Law on EIA and the Law on SEA.
- 2.** Harmonize List I (projects for which Environmental Impact Assessment is mandatory) and List II (projects for which an Environmental Impact Assessment may be required) with Annexes I and II of Directive 2011/92/EU.
- 3.** Create a list of plans and programmes for which a Strategic Environmental Assessment is mandatory and a list of plans and programmes for which a strategic environmental assessment may be required.



## The Implementation of Regulations

- 4.** Provide transparent and timely information to the public about public hearings through the improved provision of information online, in accordance with the guidelines for the development of the web presentations of state administration bodies, the bodies of autonomous provinces and local self-governments.
- 5.** Ensure the full implementation of the Regulation on the Methodology of Public Policy Management, Policy and Regulatory Impact Assessment, and Content of Individual Public Policy Documents (8/2019-79) in the environment sector.

- 6.** Fully implement the guidelines set out in the Rulebook on the content of requests on the need for environmental impact assessments and the content of requests for determining the scope and content of the Environmental Impact Assessment Study when drafting environmental impact assessment studies.
- 7.** Ensure the inclusion of a cumulative impact assessment in environmental impact assessment studies.
- 8.** Establish quality control of environmental impact assessment studies, as well as a review of studies every five years.
- 9.** In order to achieve greater compliance with Directive 2003/35/EC on public participation, increase the capacity of national institutions and local self-governments to conduct public participation procedures during the preparation and revision of plans and programmes.
- 10.** Increase penalties for environmental pollution.
- 11.** Increase and consistently implement penalties for non-compliance with regulations on the environmental impact assessment and strategic environmental assessment procedures.
- 12.** Ensure the full implementation of the Aarhus Convention during the COVID-19 pandemic with regard to citizens' rights to take part in the decision making process, right to information on the environment, and right to legal protection. All decision making processes (adopting plans, programmes, public policies, legislation, and approval of projects with possible environmental impacts) that violate citizens' rights must be postponed until epidemiological conditions allow for the implementation of these processes in accordance with Serbian law and the Aarhus Convention.

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# HORIZONTAL LEGISLATION

## March 2020

The **Preliminary Cooperation Agreement on the construction of the Kolubara B thermal power plant** was signed between EPS and the Chinese company PowerChina.

## June 2020

The beginning of the **public insight** procedure for the Draft Spatial Plan for the special purpose area designated for the construction of the thermal power plant "Kolubara B", and the Report on the Strategic Environmental Impact assessment for the Plan.

## July 2020

The **public session of the Planning Commission** was postponed due to the COVID-19 pandemic.

## September 2020

The **public session of the Planning Commission** was held in Lazarevac; a number of irregularities were observed.

## October 2020

The **public session on the Planning Commission** was held on October 16<sup>th</sup> 2020 in Belgrade, in the morning, and without public participation. Irregularities were observed again.

- The permitted number of people present was limited to 30 due to epidemiological measures, but there were more than 30 interested citizens;
- The organizer of the public session suggested that citizens leave the premises;
- No record was kept;
- The public session was ended after an hour, without explanation, and without announcing the date on which it would be reconvened.

- The notification that the session would be held was only published in the Kurir newspaper on October 16<sup>th</sup> 2020 - the day of the debate.
- The Ministry of Construction, Transport, and Infrastructure provided information that a notification had been published on its website a day before the debate, which was not the case.



## EPILOGUE

- The entire process of holding the public session was marked by numerous irregularities.
- During the procedure, the Order prohibiting gatherings in the Republic of Serbia in indoor and outdoor public places was issued, as well as the Rulebook on the Content and Procedure for Drafting Spatial and Urban Planning Documents.
- Citizens were not allowed to take part in the decision making process for the spatial planning of the special purpose area designated for the construction of the thermal power plant "Kolubara B" due to the publication of the notification on reconvening the public session on the day it was held.

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KOALICIJA 27







# Air Quality

# Overview

In 2020, the Government failed to adopt any significant documents related to air quality. The Air Protection Strategy, as a framework document, has still not been adopted, and the implementation of the NERP, as well as obligations to the Energy Community, are delayed or not fully implemented. Additionally, many local self-governments have fallen behind schedule in developing local air protection policies, or have no plans to develop such policies at all.

Reports by the Environmental Protection Agency (SEPA), as well as reports by other institutions responsible for air quality monitoring in local networks, lead to the conclusion that the official air quality assessment for most urban environments in Serbia is "excessively polluted". A more detailed analysis also shows that air is officially clean *precisely* in those environments where air quality monitoring is incomplete (not all pollutants are tracked, most notably PM concentrations). On the other hand, the most recent Environmental Protection Agency report shows that there have been significant improvements to the existing air quality monitoring network, and that the data validity has improved significantly, from 48% to 85%. The network and the data it provides must be improved further, in particular by expanding the network to include stations in environments where there are currently no official measurements.

In addition to taking measurements, realistic and sufficient measures must be introduced to contribute to solving air quality problem. The Working Group for systemic solving of air pollution in Serbia, formed by the Government in early 2020, has stopped working. After adopting the Regulation on Subsidizing the Purchase of Electric and Hybrid Cars, the Working Group has not suggested any additional solutions to the existing problems. The Ministry of Environmental Protection has provided encouraging signs by earmarking RSD 100,000,000 in its 2021 budget for "Reducing air pollution in Serbia originating from individual sources – households and independent communities". RSD 200,000,000 for replacing boiler rooms in public institutions, and RSD 100,000,000 for

afforestation, aiming to reduce air pollution. This is a first step in the right direction; however, the funds needed to solve air pollution problems far exceed those currently allocated. For this reason, it is important that subsidies that do not significantly contribute to air pollution reduction (such as, for example, subsidies for the purchase of electric and hybrid cars), are reallocated to finance solutions that will contribute to the improvement of air quality more efficiently.

# Strategic and Legislative Framework

After adopting the National Emission Reduction Plan (NERP) (GRS, 2020), two years later than planned, the Government of the Republic of Serbia has made no significant strides toward improving the strategic and legislative public policy framework for air quality. The Republic of Serbia, as a signatory to the Treaty on Establishing the Energy Community, has been obliged to ensure compliance with the emission limit values set out by the Large Combustion Plant Directive (EC, 2001) since the 1<sup>st</sup> of January 2018. Serbia chose to adopt the NERP as a method of ensuring compliance with the Directive and fulfil its obligations, but adopted it two years behind schedule.

Before the NERP was adopted, the Energy Community Secretariat initiated proceedings against Serbia (EC, 2020) for the large delay in adopting the Plan. The fact that emissions from thermal energy facilities operated by EPS exceed the limit values specified in the NERP many times over was an additional reason for the Energy Community's reaction.

The Air Protection Strategy, which should form the basis of air quality plans, short-term action plans, and programmes to reduce emissions of pollutants into the air, and with which all of these documents must be aligned (GRS, 2013), has still not been adopted. The initial deadline for adopting the Strategy, two years from the adoption of the Law on Air Protection, has long since expired.

The Draft Law on Amendments to the Law on Air Protection, which is supposed to harmonize national legislation with EU directives, should have been submitted in December 2020. Among other things, the Law should harmonization national legislation with directives on ambient air quality, heavy metal presence in ambient air, and limiting air pollution, as well as regulations that should contribute to reducing damage to the ozone layer and reducing emissions

of harmful gasses into the air (GRS, 2020a). Amendments to the Law on Air Protection were not adopted in 2020.

The Plan on Implementing the Directive on Ambient Air Quality was supposed to have been prepared between 2018 and 2020, but is still not finished.

# The Implementation of Regulations

## The State of Air Quality

The Annual Air Quality Report in Serbia for 2019, compiled by the Environmental Protection Agency based on monitoring from the state network, rates the air as excessively polluted in the following cities and agglomerations: Belgrade, Niš, Smederevo, Kosjerić, Pančevo, Novi Sad, Užice, Valjevo, Kraljevo, Subotica, Požarevac, Zaječar, Beočin, and Bor. This means that approximately 3 million citizens were officially breathing excessively polluted air in 2019.

In most cities and agglomerations, the air was rated as excessively polluted due to the high concentrations of  $PM_{10}$  and  $PM_{2.5}$  suspended particles. The yearly limit value for  $PM_{10}$  suspended particle concentration was exceeded in Novi Sad, Užice, Požarevac and Zaječar. The yearly limit value for  $PM_{2.5}$  suspended particle concentration was exceeded in Beočin. In Belgrade, Niš, Smederevo, Kosjerić, Valjevo, Kraljevo, and Subotica, both the yearly limit values for  $PM_{10}$  and  $PM_{2.5}$  suspended particle concentrations were exceeded. The highest average annual values for particulate matter pollution were registered in Valjevo ( $60 \mu\text{g}/\text{m}^3$  for  $PM_{10}$  and  $42 \mu\text{g}/\text{m}^3$  for  $PM_{2.5}$ ). The highest number of days on which  $PM_{10}$  daily limit values were exceeded was registered at the New Belgrade station, amounting to 169 days. In the Bor agglomeration, the air was rated as excessively polluted due to exceedance of the limit values for  $\text{SO}_2$  concentration. During 2019, concentrations of  $\text{SO}_2$  hazardous to human health were registered 13 times in Bor. Very high heavy metal concentrations were also detected in the city. Among others, concentrations of Arsenic, Nickel, and Cadmium many times greater than the limit values were recorded in the air. At one of the stations in Bor, the Arsenic concentration was often close to 100 times greater than allowed.

Compared to the previous year, some cities, such as Niš, Novi Sad, and Zaječar have moved from the list of cities with clean air, to the list of excessively polluted cities. On the other hand, in Kragujevac and Sremska Mitrovica, the air was rated as clean (Category I), which is an improvement compared to 2018, when it was excessively polluted. However, this is not a realistic assessment. Namely, the air in Sremska Mitrovica was rated as clean or only slightly polluted due to the absence of suspended particle measurements in January and February, which produced an inaccurate impression of air quality in the city. In the case of Kragujevac, the rating is questionable because there were 51 recorded days on which suspended  $PM_{10}$  particles exceeded the daily limit value. Pursuant to current regulations (NARS, 2013a), the daily limit value for these particles must not be exceeded for more than 35 days within a calendar year.

Preliminary, unverified data collected from monthly reports on the state of air quality for 2020, published by SEPA, shows that the air was excessively polluted in 2020 in numerous cities throughout Serbia. A large number of daily  $PM_{10}$  limit value exceedances were recorded at 14 stations that are part of the state network. The most days with excessive pollution were recorded in Kosjerić – 143 (SEPA, 2020a). According to this data, a trend toward increasing air pollution was noticeable as the indoor heating season began. It is for this reason that the number of days with recorded excessive air pollution was significantly higher in October, November and December 2020 compared to the summer months, when air pollution was far lower.

## Air Quality Monitoring

In addition to data from the Environmental Protection Agency, air quality assessments also include data from the following institutions: the City Institute for Public Health Belgrade (from stations that are part of the state network), the Provincial Secretariat for Urban Planning, Construction and Environmental Protection of Vojvodina, the City of Pančevo, and data from local institutes for public health in the cities of Sremska Mitrovica, Kraljevo, Užice, Požarevac, Subotica, and Sombor.(SEPA, 2020b).

The availability of data has been significantly improved compared to the previous year. In the Serbian Environmental Protection Agency's annual report for 2018, only 48% of the data from measuring stations was available, which increased considerably in 2019 to 85%, which means that majority of the monitoring stations meet the air quality data standards (GRS, 2013).

It is evident that there are a considerable number of measuring stations throughout Serbia where suspended particle monitoring has not been functioning continuously, which significantly affects air quality ratings. Of the 53 measuring stations featured in the Agency's annual reports, 19 stations do not monitor  $PM_{10}$  concentrations, and as many as 35 do not monitor  $PM_{2.5}$  concentrations. Most stations where the air is rated as clean (Category I) do not actually monitor  $PM_{10}$  and  $PM_{2.5}$  concentrations: In fact,  $PM_{10}$  concentrations are not monitored at 12 of the 18 stations where the air was rated as clean (Category I), and  $PM_{2.5}$  concentrations are not monitored at 17 of these 18 stations (SEPA, 2020b).

A collated overview of air quality monitoring within the local network produced by the Dr Milan Jovanović Batut Institute of Public Health of Serbia provides additional information on air quality in Serbia.

In its report, entitled Urban Air Pollution in the Republic of Serbia Monitored within the Public Health Institution Network in 2019 (IPHS, 2020), the Dr Milan Jovanović Batut Institute provides an overview of data from healthcare institutions that are part of the public health network, and which have monitored air quality in populated areas, as well as data from the city administrations of local self-governments that ordered the monitoring. According to this report, of the 26 locations where  $PM_{10}$  monitoring was conducted, average yearly values exceeding the prescribed limit were recorded at 11 locations.  $PM_{2.5}$  concentrations exceeded the yearly concentration limit values at all but 2 of the 9 locations at which it is monitored. Sulphur-dioxide concentrations were monitored at 87 monitoring stations. An analysis of changes in sulphur-dioxide air pollution reveals that in most cities and communities, the concentrations of this pollutant in 2019 were approximately the same as those in 2018. Among the most important findings of the Institute's report are the facts that the trend of insufficient monitoring of  $PM_{10}$  and  $PM_{2.5}$  air pollution has continued, that



there is a trend of failing to sign contracts for monitoring air quality at the local self-government level in a timely manner, which inhibits or precludes necessary data analysis, and that many monitoring stations have failed to continuously track specific types of pollution, especially PM pollution.

Monitoring stations operated by cities are assigned to city institutes for public health or other accredited laboratories through a tendering process. In 2020 three entities applied to the air quality monitoring tender for the City of Valjevo; the tendering process resulted in the City Institute for Public Health losing the contract for monitoring air quality in the city, which it had held for 18 years. Instead of the City Institute for Public Health, monitoring will be conducted by the Vatrogas Institute from Novi Sad (VP, 2020).

## Institutional Oversight

In September 2020, the Ombudsman stated that the oversight procedure they had initiated earlier that year with regard to certain local self-governments concluded “the Cities of Niš and Kragujevac, and the Municipality of Kosjerić, have made errors to the detriment of citizens’ rights to a healthy environment by not fulfilling their legal obligation to adopt Air Quality Plans and Short-term Action plans in a timely manner”. Based on the results of the oversight, the Ombudsman provided recommendations for these local self-governments (OB, 2020). After the Ombudsman initiated an oversight procedure with regard to the Ministry of Environmental Protection, the Ministry released a statement stating that it had reminded local self-governments several times of their legal obligation to adopt Short – and Long-Term Air Quality Plans. Additionally, the Ministry requested reports on progress made in fulfilling these obligations from local self-governments, with 29 of the 145 self-governments who received requests replying that they would monitor air quality in 2020, 16 promising to plan measures and activities related to air pollution, and 21 local self-governments saying they are not conducting air quality monitoring and are not planning to adopt the relevant plans.

The development of air quality policies at a local level are lagging behind. The most recent data from the Ministry of Environmental Protection related to Air

Quality Plans and Short-Term Action plans by local self-governments shows that Air Quality Plans were approved for 6 local self-governments: Novi Sad, Bor, Užice, Pančevo, Belgrade, and Smederevo. Only the City of Užice has also received approval for its Short-Term Action plan. The local self-governments of Subotica, Niš, Sremska Mitrovica, Kikinda, Valjevo, Kraljevo and Kragujevac are currently preparing Air Quality Plans. Additionally, Novi Bečej, Beočin, Kladovo, Kruševac, Bor, Kraljevo, Sombor and Kragujevac are currently preparing Short-Term Action Plans. The competent authorities from the Municipality of Ivanjica requested an opinion from the Ministry on whether there is a need to prepare an Air Quality Plan and a Short-Term Action Plan. 29 local self-governments stated to the Ministry that they have no obligation to create and adopt Air Quality Plans or Short-term Action Plans; 36 local self-governments informed the Ministry that they would make decisions on the adoption of these documents based on the results of air quality monitoring; and 61 local self-governments did not reply to the Ministry regarding the adoption of these documents (CINS, 2020b). Pursuant to the Law on Air Protection, all local self-governments with Category III air quality (i.e., where air pollution exceeds the effects of measures already undertaken, where there capacities of the environment are at risk, or where there is constant air pollution in a specific area) are obliged to adopt Air Quality Plans. However, in situations where there is a danger that pollutant levels in the air may exceed one or more concentrations hazardous to human health, Short-Term Action Plans are also adopted (NARS, 2013b).

Many local self-governments have been late in adopting Air Quality Plans. Smederevo is an illustrative example of bad practice. The local authorities prepared and gained approval for an Air Quality Plan from the Ministry, but then waited two years to adopt it (CINS, 2020a). After several warnings from the Ministry, the Plan was officially adopted in March 2020. An additional challenge has been identified in local self-governments where current planning documents for air pollution reduction are in effect but have not produced results. One example of this is the City of Belgrade, which had an Air Quality Plan for the period between 2016 and 2020. However, throughout the entire period during which this document was in effect, air in Belgrade was rated to be excessively polluted..

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*During 2020 the City of Belgrade took steps toward drafting a new Air Quality Plan. The public was not involved in this process. Civil society organizations (BOS and RERI) therefore organized public consultations for the interested public, at which citizens and experts discussed the process and collaborated to prepare comments for the Draft Air Quality Plan. The Draft was submitted for public debate on January 15th 2021, with a 15-day deadline for submitting comments.*

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# Financing

In early 2020, the decision was made to earmark funds for subsidizing the purchase of hybrid and electric cars in the amount of RSD 120,000,000 (GRS, 2020b). The Ministry of Environmental Protection's response to a request for access to information of public importance, made by the Belgrade Open School, states that the Ministry has received 242 requests for subsidies for this type of car between March 12<sup>th</sup> 2020 and November 27<sup>th</sup> 2020. Of these, 108 requests were approved; RSD 21,458,272.47 was spent of the earmarked RSD 120,000,000. This measure is inadequate and will not make a significant impact on reducing air pollution in Serbia, as, on one hand, most citizens of Serbia cannot afford to buy hybrid and electric cars, and on the other hand, the amount of air pollution produced by traffic is not high enough that transitioning to electric cars would significantly improve the situation (even if all cars were replaced by hybrids or electric vehicles, the improvement in air quality would not be significant).

For this reason, several civil society organizations have started an initiative and a petition to reallocate these funds to measures to increase the energy efficiency of homes. Though the Ministry and the Government of Serbia has not responded to the petition, the Law on the Budget of the Republic of Serbia for 2021 (GRS, 2020) shows that the Ministry of Environmental Protection has allocated funds for air pollution reduction through several project activities and budget lines. As part of the budget line entitled "Reducing air pollution in Serbia from individual sources – homes and independent communities", funding in the amount of RSD 100,000,000 was earmarked. Additionally, the Ministry of Environmental Protection's budget also allocates RSD 100,000,000 through the budget line "Afforestation with the Aim of Protecting and Preserving Landscape Diversity", and an additional RSD 200,000,000 for the modernization of boiler rooms in public facilities.

Additionally, the Minister for Mining and Energy, Zorana Mihajlović, has announced that €1.5 billion will be allocated for energy efficiency and pollution

reduction projects over the coming year, particularly focusing on reducing CO<sub>2</sub> emissions (NM, 2020). The Minister also announced that, by adopting the Draft Law on Energy Efficiency and the Rational Use of Energy (GRS, 2021), a legislative framework will be put in place to subsidize action to increase the energy efficiency of Serbian citizens' homes.

In order to continue to improve air quality, it is necessary to continue to strengthen the implementation of air quality monitoring, continue to develop the network of monitoring stations, adopt clear obligations for polluters, and build strong institutions to monitor the fulfilment of these obligations. Expanding and maintaining the network mostly depends on the budget at the disposal of the Agency for Environmental Protection. The Budget of the Republic of Serbia for 2021 allocates RSD 129,901,000 to the Agency for Environmental Protection for monitoring air, water, and sediment quality (NARS, 2021). This is an increase compared to 2020, when RSD 119,573,000 was allocated for the same purpose (NARS, 2020). A trend of increasing investment can be identified, but with no precise indication as to the amount earmarked for monitoring air quality in 2020 and 2021.

According to estimates by the Fiscal Council, Electric Power Facility of Serbia (EPS), as the biggest polluter in Serbia, is obliged to invest approximately €650million in air protection projects by 2027 (FC, 2018). Most of these funds are supposed to be invested in projects to reduce air pollution from thermal power plants, with the current financial damage to the region produced by these thermal power plants estimated to be up to €1.8 billion per year (HEAL, 2016).

# Recommendations



## Strategic and Legislative Framework

1. Enable the participation of the interested public in the process of developing the Air Quality Strategy.
2. Start the process of establishing binding standards for low-power combustion appliances used in households (stoves and solid fuel stoves) in accordance with the Eco-design Directive (2009/125/EC). Given the widespread use of inefficient stoves and solid fuel ovens in households, consider the accelerated transposition of this Directive.



## The Implementation of Regulations

3. Ensure that competent institutions enforce regulations related to legal deadlines for the creation of public policies concerning air quality, regulations related to air quality monitoring, the exchange of air quality information, and obligations under international agreements.
4. Monthly information about detected exceedances of hourly and daily limit values (LV) must include information about which monitoring stations were/were not operating during that month.
5. Stakeholders responsible for air quality monitoring should ensure that the measuring system is well-maintained and that data is made available. Financing for the smooth operation of air quality monitoring networks should also be secured, especially for urban agglomerations such as Belgrade.

6. Local governments/cities should improve the quality and visibility of air quality data, as well as ensure easy public access to air quality data provided by the local monitoring networks.



## Financing

7. Secure financing for the unobstructed work of inspectorates for environmental protection.

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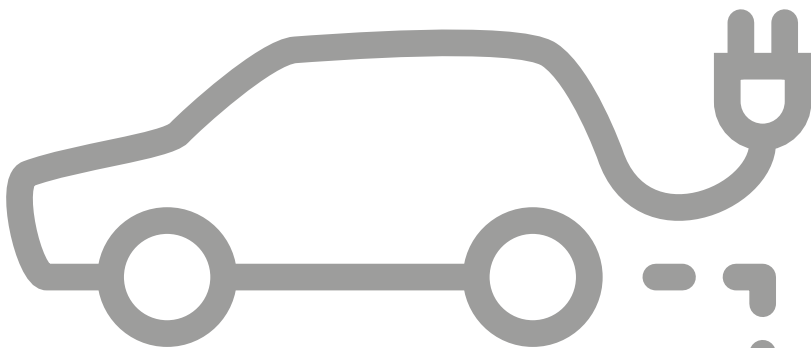


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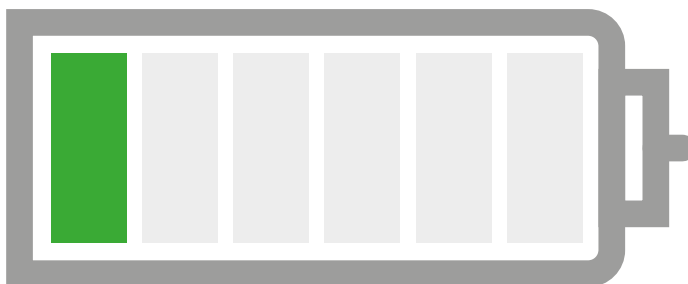
# AIR QUALITY

## FUNDS PARKED IN THE WRONG PLACE



In 2020, the Government set aside  
**RSD 120,000,000**  
for subsidies for the purchase of  
**hybrid and electric cars.**

Only  
**RSD 21,458,272**  
was spent





# **Waste Management**

# Overview

In 2020, in response to the COVID-19 pandemic, Serbia's authorities focused on measures to protect public health and prevent the spread of the novel coronavirus. Large amounts of waste face masks and gloves were generated, as well as packaging for various kinds of disinfectants. The Government has not adopted any legal act to regulate the appropriate disposal of these kinds of waste.

Given the large number of infected and unwell citizens, the authorities should have anticipated the flow of waste that would be created, as well as capacities and options for treating this waste in order to protect the health of citizens, employees of healthcare facilities and temporary accommodation facilities for patients with mild symptoms, as well as the environment (MEP, 2020a).

Medical waste generated by healthcare facilities must be treated in accordance with the Law on Waste Management (Official Gazette of the Republic of Serbia, 36/2009, 88/2010, 14/2016, 95/2018 – other law), and in accordance with the Rulebook on Medical Waste Management (Official Gazette of the Republic of Serbia 48/2019) and the Rulebook on the Procedure for Managing Pharmaceutical Waste (Official Gazette of the Republic of Serbia 48/2019).

All waste created by patients infected with SARS-CoV-2 constitutes infectious medical waste (waste index no. 18 01 01/18 01 03\*), i.e., hazardous waste, and as such must be treated (sterilized and ground up) before being stored. SARS-CoV-2 is a Category B infectious substance (assigned UN 3291); waste contaminated with the virus is treated in the same way as other medical waste, with additional caution. Additional caution means that special measures must be taken when packaging, storing, collecting, transporting, and treating such waste (MEP, 2020a).

During the state of emergency, large amounts of communal waste was also generated as a result of people staying at home, and had time to clean out their attics and basements. In some municipalities, the amount of waste

generated over the two-month period of the State of Emergency increased by 20% (EEG, 2021).

All waste producers, owners and/or other holders of waste, with the exception of households, are obliged to submit yearly reports to the Environmental Protection Agency. Yearly reports must be sent to the Agency by March 31<sup>st</sup> of the year following the reporting year. Reports from the reporting period therefore contain information about 2019 and 2020. The deadline for submitting data to the Agency's information system was extended until the 15<sup>th</sup> of June 2020 (SEPA, 2020a) due to the state of emergency enacted in Serbia on the 15<sup>th</sup> of March 2020 (Official Gazette of the Republic of Serbia, No. 29, of March 15, 2020).

The number of reports submitted to the Environmental Protection Agency by waste producers in the period between 2013 and 2018 increased by 56%, but slightly decreased in 2019 compared to the previous year. The number of reports submitted by waste management operators increased slightly, while the number of reports submitted by waste producers decreased.

The total amount of waste generated in 2019 was slightly less than twelve million tonnes. This is a slight increase compared to 2018 and is due to the slightly increased amount of waste generated by construction and demolition at facilities for waste and communal waste treatment.

Hazardous waste accounted for 0.6% to 1.3% of total waste in the period 2011-2019. In 2019, hazardous waste accounted for 0.7% of total waste.

The amount of stored communal waste grew by about sixty thousand tonnes in 2019 compared to 2018. A large amount of waste is still stored in unsanitary landfills.

Based on data submitted by 342 operators licensed to reuse waste, 2.27 million tons of waste was treated in 2019 by August of that year. The most commonly processed waste was unprocessed slag produced in smelting processes, followed by waste iron and paper and cardboard packaging. When it comes to hazardous waste, a significant proportion is made up of electrical and electronic equipment, lead batteries, waste oil and oil-containing waste (SEPA, 2020a).

Hazardous waste treatment companies have reported that they treated 90,234 tonnes of hazardous waste for reuse in various operations in 2019 (SEPA, 2020a).

In 2019, a little over 2,000,000 tonnes of waste was stored, 14,000 tonnes of which was hazardous waste.

The Republic of Serbia exported 415,790 tonnes of waste in 2019, of which 17,273 tonnes was classified as hazardous and 398,717 as non-hazardous. More than half of the exported waste was made up of metals, most commonly metals that contain iron. Waste paper and cardboard also make up significant quantities of the exported waste, as do paper packaging, slag from iron smelting and pouring, and glass packaging. Exported hazardous waste is mostly made up of lead batteries and car batteries. Serbia imported 227,998 tonnes of waste, with 5,958 classified as hazardous and 222,040 as non-hazardous. Approximately 60% of the imported waste was made up of paper and cardboard packaging (SEPA, 2020a).

At the end of July 2019 2,064 valid permits had been issued as per the Register for waste management permits. This number was reduced compared to the same period in 2016 and 2017. The Register of waste management permits contained 2,360 valid permits at the beginning of August 2020, which is only slightly more than in the same period in the previous year (SEPA, 2020a).

During 2016, a Register of withdrawn waste management permits was also created. By the end of August 2020, a total of 117 withdrawn permits were registered.

# Strategic and Legislative Framework

Article 75 (Reporting) of the Law on Waste Management stipulates that producers, owners, and/or other parties operating with waste are obliged to keep daily records on waste and submit regular reports to the Environmental Protection Agency. In 2020, a new Rulebook was adopted:

- the Rulebook on the Forms for Daily Waste Management Records and Yearly Waste Management Reports with Instructions on Their Completion (Official Gazette of the Republic of Serbia, No. 7 of January 29, 2020).

This Rulebook prescribes the form for daily waste records and provides instructions for its completion.

Based on Article 75, Paragraph 18, Clause 2 of the Law on Waste Management (Official Gazette of the Republic of Serbia, 36/2009, 88/2010, 14/2016, 95/2018 – other law), the Minister for Environmental Protection adopted:

- the Rulebook on the Methodology for Collecting Data on the Composition and Quantities of Communal Waste in Local Self-Governments (Official Gazette of the Republic of Serbia, No. 14, February 21. 2020).

This Rulebook prescribes the methodology for collecting data on the composition and amounts of communal waste in local self-governments.

Based on Article 16, paragraph 4 of the Law on Packaging and Packaging Waste (Official Gazette of the Republic of Serbia, No. 36/09 and 95/18 – other law) and Article 42, paragraph 1 of the Law on the Government (Official Gazette of the Republic of Serbia, No. 55/05, 71/05 – correction, 101/07, 65/08, 16/11, 68/12 – US, 72/12, 7/14 – US, 44/14 and 30/18 – other law), the Government has adopted:

- the Regulation on Determining the Packaging Waste Reduction Plan for the Period from 2020 to 2024 (Official Gazette of the Republic of Serbia, No. 81 of June 5, 2020).

This Regulation determines the Packaging Waste Reduction Plan for the period from 2020 to 2024.

Based on Article 2 of the Decree on the Amount and Conditions for the Allocation of Incentive Funds (Official Gazette of the Republic of Serbia, No. 1/2019), the following was adopted:

- Rulebook on Harmonized Amounts of Incentives for Reuse, Recycling and Use of Certain Types of Waste (Official Gazette of the Republic of Serbia, No. 49/2020), which determines the harmonized amounts of incentives.

This ordinance does not define incentives for operators for reuse / recycling / use of waste portable (household) batteries, despite them being classified as a special waste flow.

As part of the twinning project *EU Support for Developing a Strategic Waste Management Framework*, the following planning documents were created at the level of the Government of Serbia:

- A Waste Management Strategy for the period between 2019 and 2024, and
- A Waste Prevention Programme.

The new Waste Management Strategy has yet to be adopted, having been planned for a five-year period (2019-2024), focusing on transitioning away from the regional sanitary storage concept to the regional waste management centre model, which provides for separate collection, separation and recycling.

The Waste Prevention Programme is based on the principle of waste generation prevention, but is not legally binding. The Programme's purpose is to determine the goals and priorities for the Programme, measures to implement it for the period between 2020 and 2025, as well as to determine the qualitative criteria



or indicators for Programme assessment, based on an analysis of the current state of affairs in the area of waste management in Serbia and the benefits of the measures described in the EU's Waste Framework Directive.

# The Implementation of Regulations

The Law on Waste Management (Official Gazette of the Republic of Serbia, No. 36/2009, 88/2010, 14/2016, 95/2018 – other law), Article 75, regulates the obligation of producers and owners of waste to manage and maintain daily waste records and submit a regular annual report to the Environmental Protection Agency by the 31<sup>st</sup> of March of the year following the year being reported on. The annual waste report is filled out and submitted electronically, through an application available on the Agency's website. Based on the Rulebook on the Forms for Daily Waste Management Records and Yearly Waste Management Reports with Instructions on Their Completion (Official Gazette of the Republic of Serbia, No. 7/2020), all waste producers and all waste management entities, as well as those who put packaging and products on the market that become special waste streams after use, are obliged to submit annual reports.

During 2018 and 2019, the obligation of submitting data in this form was shared by enterprises classified as collectors or other owners of waste who are not: waste producers, landfill operators, waste reuse operators, waste importers or exporters; however, as a new Rulebook on the Forms for Daily Waste Management Records and Yearly Waste Management Reports with Instructions on Their Completion (Official Gazette of the Republic of Serbia, No. 7/2020) was adopted in 2020, all enterprises operating in waste management must submit the DEO6 form.

In accordance with the Rulebook on the Methodology for Collecting Data on the Composition and Quantities of Communal Waste in Local Self-Governments (Official Gazette of the Republic of Serbia, No. 14, February 21. 2020), local self-governments are obliged to analyse the quantities and composition of municipal waste in their respective territories four times per year.

Data on municipal waste is submitted by public utility companies or other companies that have a contract with local self-governments to perform these activities. For 2019, a total of 109 reports on municipal waste were received on the KOM1 form (SEPA, 2020a).

In accordance with Article 4 of the Law on Waste Management, local self-governments are obliged to compile a list of unregulated landfills in their area and to prepare remediation and reclamation projects for existing non-sanitary landfills.

According to data obtained from 144 local self-governments, public utility companies organize waste disposal in 137 unsanitary landfills (dumpsites) located in 111 municipalities. These are mainly landfills for which remediation and closure are envisaged in accordance with the Waste Management Strategy. Of the total number of landfills, 30 have been reported to be permanently closed, while the remaining 107 are still in use. Of the total number of unsanitary landfills, waste is stored without any control at 42, waste sorting is done at 57, waste is stored layer by layer at 28, while waste disposal in cassettes was reported at 9. 21 landfills are not covered with inert material, while the others are covered in whole or in part (SEPA, 2020a).

There are 29 unsanitary landfills in flood risk areas.

No records of waste receipts are kept at 61 landfills; records are kept at the remaining 65. Rehabilitation, closure and reclamation projects have been created for 88 landfills, with 41 projects being carried out completely or partially according to plan. New projects must be created or existing projects updated for 58 landfills (SEPA, 2020a).

Around 20% of generated municipal waste in Serbia is dumped at illegal landfills, outside the control of municipal public utility companies.

Data on illegal landfills was submitted by 131 local self – governments, reporting on the existence of at least 2,305 illegal landfills in Serbia. In 2019, 1,396 of these illegal landfills were not cleared at any time during the year.

Article 5 of the Law on Waste Management (Official Gazette of the Republic of Serbia, No. 36/09, 88/10, 14/16 and 95/2018 – other law) defines special waste streams that delineates waste flows (spent batteries, waste oil, waste tires, waste electrical and electronic products, waste vehicles and other waste) from the place of origin, through collection, transport and treatment, to storage in landfills. In the same Law, in Chapter 7, Management of Special Waste Streams, Articles 47 to 58 prescribe the obligation to manage certain special waste streams, as well as the obligation by owners of these types of waste to report, and submit appropriate data, to the Environmental Protection. Article 75 regulates the reporting procedure.

By the legal deadline for the reporting year (March 31<sup>st</sup>), special waste streams were reported by 5,058 enterprises.

The Environmental Protection Agency's Report includes the following groups of products that become special waste streams after use:

- tires
- batteries
- oils
- electrical or electronic products
- vehicles

At the beginning of July 2020, 3,734 notifications were sent to enterprises that had failed to submit yearly reports, in addition to information on their obligation to submit data on products imported or produced that become special waste streams after use (SEPA, 2020c).

The Republic of Serbia has no system of continuous collection of portable batteries and car batteries, nor are there any facilities to sort and temporarily store used batteries and car batteries. Even though legal regulations prescribe appropriate storage and the obligation to export hazardous waste within a year, most portable (household) batteries are stored without any special treatment. A significant problem for the Republic of Serbia regarding portable batteries

is the fact that there is only one company exporting this waste stream (for recycling), while there is no organized system for collection and storage, nor any incentives provided by the state.

The Law on Waste Management does not regulate or define the legal basis for adopting a Rulebook that would regulate managing biodegradable kitchen waste generated by preparing and serving food, as well as other activities that occasionally or continuously generate food waste, i.e., food that is no longer suited for its intended purpose. Further, there is no primary separation of this type of waste. It is therefore impossible to implement the EU's thematic strategy on the prevention and recycling of waste, which aims to use waste as a resource, primarily for producing secondary raw materials and energy – one of the key goals of the circular economy. Additionally, EC Directive 2008/98/EC on waste envisages the adoption of special measures to prevent the generation of food waste (NALED, 2021).

Seven operators are licensed to manage waste packaging: SEKOPAK, EKOSTAR PAK, DELTA-PAK, CENEKS, TEHNO EKO PAK, EKOPAK SISTEM and UNI EKO PAK. In 2019, these seven operators managed waste packaging on behalf of 1,935 legal entities or entrepreneurs placing packaged products on the market in Serbia (SEPA, 2020b).

According to all available data, the total amount of packaging placed on Serbia's market in 2019 is 371,510.9 tonnes. The amount of reused waste packaging reported by operators is 228,546.4 tonnes. Of this amount, 218,662.6 tonnes of waste packaging were submitted for recycling (SEPA, 2020b).

According to data submitted to the Environmental Protection Agency until July the 14<sup>th</sup> 2020, the total amount of packaging placed on Serbia's market is 371,510.9 tonnes (SEPA, 2020b).

The Law on Fees for the Use of Public Goods removes the obligation to report and pay fees for products containing asbestos.

The Law on Fees for the Use of Public Goods prescribes that oils should only be reported on in kilograms.

## Pharmaceutical Waste

Article 5 of the Law on Waste Management defines pharmaceutical waste as “all drugs, including primary packaging, as well as all accessories for their use in the possession of a legal entity, i.e., an entrepreneur engaged in human and animal health care, and which have become unusable due to lapsed expiration dates, defects in terms of their prescribed quality, contaminated packaging, spills, dissipation, being prepared and then unused, returned by end users, or which cannot be used for other reasons, as well as pharmaceutical waste from drug production and wholesale and retail trade of drugs and production of galenic drugs and other pharmaceutical waste ”( EEG, 2020).

In regard to pharmaceutical waste generated by citizens, in practice this type of waste is generally treated as hazardous pharmaceutical waste, although it is known that not all drugs that can be found in households pose a danger to human health or the environment and are not in fact hazardous waste. Namely, in the system of characterization, defined in the Rulebook on Categories, Testing and Classification of Waste, waste from cytotoxic and cytostatic drugs is classified by index number 180108\*, which belongs to the hazardous waste group, while index number 180109 is used to mark drugs that belong to the non-hazardous waste group (EEG, 2020).

The Law on Fees for the Use of Public Goods (Official Gazette of the Republic of Serbia, No. 95/2018, 49/2019, 86/2019) prescribes that drugs remaining in citizens' possession after their expiration date and are collected from them represent a special waste stream and, as such, require special procedures and possibilities of disposal. Prior to the adoption of this Law, the Regulation on Products that Become Special Waste Streams after Use did not recognize expired drugs remaining in citizens' possession as such. With the adoption of the Law on Fees for the Use of Public Goods in 2018, certain provisions of this Regulation ceased to apply, and the remaining ones oblige drug manufacturers and importers to keep daily records on the quantity and type of products manufactured and imported that become special waste streams after use, compile yearly reports, and report to the Environmental Protection Agency by March 31<sup>st</sup> of the year following the year being reported on (EEG, 2020).

The obligations of actors in the process of managing pharmaceutical waste collected from citizens are defined in Article 56b of the Law on Waste Management, and in particular by the Rulebook on the Procedure for Managing Pharmaceutical Waste. Because it is impossible to determine the origin of this waste, almost all drugs collected from citizens by pharmacies are treated as hazardous waste.

How the costs of pharmaceutical waste management are covered is prescribed by Article 56b of the Law on Waste Management, which states that the costs of managing or exporting pharmaceutical waste collected from citizens are borne by the producer and/or importer placing the pharmaceutical products on Serbia's market. The amount of these fees is determined in proportion to a particular producer's share of the total amount of products placed on the market in Serbia, based on records kept by the Medicines and Medical Devices Agency of Serbia.

The Law on Fees for the Use of Public Goods defines the base fee as the amount of drugs produced or imported in kilograms (kg), while the fee amount for drugs collected from citizens is RSD 242 per kg (EEG, 2020).

The existing regulations have not sufficiently defined the problem of pharmaceutical waste collection from citizens, nor established a clear and applicable system for its appropriate disposal. The adoption of the Rulebook on Pharmaceutical Waste Management did not introduce the expected fundamental changes, even though its adoption heralded the creation of an efficient solution. On the contrary, it introduced unclear solutions that are difficult to implement in practice, and the existing regulations have failed to even establish a basis for implementing the principle of the manufacturer's responsibility, nor allow for a simple and realistic mechanism for covering the costs of collection, storage, transport and disposal of pharmaceutical waste collected from citizens (EEG, 2020).

This state of affairs has led to only a few pharmacies, in Novi Sad, collecting pharmaceutical waste from citizens. Pharmacies that collect pharmaceutical waste from citizens are not interested in promoting this activity, as the costs of disposing of the pharmaceutical waste collected from citizens are paid by the pharmacies themselves, which reduces their profits. The only ones who

benefit from this state of affairs are drug importers and producers, who bear no costs for the disposal of pharmaceutical waste collected from citizens, even though the regulations require them to, and the main damage is to the environment and the health of people exposed to hazardous materials from improperly stored pharmaceutical waste (EEG, 2020).



The Ministry of Environmental Protection put out a public call from April 1<sup>st</sup> 2019 to January 31<sup>st</sup> 2020 for the Reuse and Use of Waste as Secondary Raw Material, for Producing Energy or Producing Multi-Use Carrier Bags. The decision on allocating incentives for this public call was made on May 4<sup>th</sup> 2020. Due to the epidemiological situation, and after the adoption of the Law on Confirming Regulations Made during the State of Emergency and the Regulation on Amendments to the General Revenues, Expenditures and Expenses of the Budget of the Republic of Serbia for 2020 to mitigate the negative consequences of the COVID-19 pandemic, funds originally planned by the Budget for 2020 for the recycling industry were reduced from RSD 3.5 billion to RSD 2.6 billion. This is also the total amount allocated to recycling companies through this public call and the signed agreements (MEP, 2020b).

# Recommendations



## Strategic and Legislative Framework

- 1.** Improve the waste management control system, with special emphasis on the movement and disposal of waste.
- 2.** Continue developing partnerships with civil society.
- 3.** Suspend all activities related to the amendment of the Law on Waste Management aimed at legalizing the import of waste for the purpose of co-processing and its use as an alternative fuel.
- 4.** Improve the legal framework to enable the efficient implementation of extended liability principles as well as the “polluter pays” principle.
- 5.** Review regional plans and the National Waste Management Strategy, with the continued implementation of infrastructure projects for the construction of landfills.
- 6.** Adopt the waste sludge management strategy in Serbia.
- 7.** Improve the legislative framework for finally closing unsanitary landfills.
- 8.** Develop a waste generation prevention plan.
- 9.** Introduce obligatory monitoring for dioxin and furan at all landfills.
- 10.** Include industry in the application of the circular economy concept.
- 11.** Due to the nature and duration of the COVID-19 pandemic, assign healthcare waste to a separate form in the National Register of Pollution Sources.

- 12.** Adopt a Rulebook that will allow citizens to hand over hazardous waste to operators more easily.



## The Implementation of Regulations

- 13.** Create an economic model to motivate local self-governments to dispose of waste at sanitary landfills and accelerate the process of closing and remediating landfills/dumpsites.
- 14.** Provide prerequisites for the application of waste management hierarchy principles, with an emphasis on waste prevention, as well as the reuse and recycling of waste.
- 15.** Introduce systemic water and air monitoring at non-sanitary landfills, and ensure a system of public reporting on landfill gas emissions from landfills managed by public utility companies (PUCs).
- 16.** Carry out inspections of industries obliged to report on waste management to ensure truthful reporting.
- 17.** Raise public awareness on the importance of setting up a system of waste management and the consequences of inadequate waste management on the environment.
- 18.** Fine local self-governments that fail to meet their obligations under the Law on Waste Management (failing to adopt waste management plans, failing to adopt plans to close unsanitary landfills and dumps, failing to submit regular reports to the EPA).
- 19.** Leasing of chemicals, i.e. procuring only chemicals that industry really needs in the context of the circular economy (creating as little waste as possible).
- 20.** Provide for appropriate management of hazardous waste generated in Serbia in anticipation of the expected ban on exporting hazardous waste.

- 21.** Adopt measures to incentivize local recyclable waste treatment instead of exporting it.
- 22.** Revise waste management and export permits.
- 23.** More intensively involve PUCs in the system of packaging and packaging waste management.
- 24.** More intensive inspection supervision over the implementation of the Law on Packaging and Packaging Waste.
- 25.** Introduce a special article to contracts between waste generators and hazardous waste treatment operators requiring hazardous waste treatment operators to inform waste generators in writing about the final treatment of waste, thereby observing the waste producer's extended liability.
- 26.** Adopt a common methodology for sending data to the Statistical Office of the Republic of Serbia and the EPA.
- 27.** Improve the system for textile waste management. Separate collection of textile waste should be organized, and steps taken to prevent the collected textile ending up in landfills or incinerators.



## Financing

- 28.** Introduce economic instruments for reducing waste sent to landfills without treatment.
- 29.** Introduce a deposit system for a portion of packaging waste.
- 30.** Introduce umbrella insurance for hazardous waste operators, so that insurance companies cover the costs of appropriately disposing the hazardous waste as well as any damages.
- 31.** Introduce a set of economic instruments for communal waste (landfill fees, deposit systems).

- 32.** Prescribe deadlines and the types of packaging eligible for the deposit system only after a feasibility study has been produced.
- 33.** Adopt a bylaw to define fees for importing drugs and placing them on the market due to the probability that the drugs may become hazardous waste after their expiration date.

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# WASTE MANAGEMENT

## TOTAL AMOUNT OF WASTE PRODUCED IN 2019

Based on **two different** and conflicting reports  
by official state institutions.

**TOTAL**

**11,976,125 t**

Environmental Protection Agency



**"the total amount of waste generated  
during 2019 was slightly less than 12  
million tons"**

– Waste Management in the Republic of Serbia  
in the period between 2011 and 2019, pg. 9

**TOTAL**

**66,565,200 t**

Statistical Office of the Republic of Serbia



**"During 2019, 66.6 million  
tonnes of waste was  
generated in the Republic of  
Serbia. Of the total amount  
of waste generated,  
businesses generated 97%,  
with households  
contributing 3%."**

– Eko-bilten 2019, pg. 22

**\*Sources:** Environmental Protection Agency: [www.sepa.gov.rs/download/Otpad\\_2011-2019\\_Finale.pdf](http://www.sepa.gov.rs/download/Otpad_2011-2019_Finale.pdf)  
Statistical Office of the Republic of Serbia: [publikacije.stat.gov.rs/G2020/Pdf/G20205663.pdf](http://publikacije.stat.gov.rs/G2020/Pdf/G20205663.pdf)



Thermal process waste	8,264,434	69%
Communal waste (household waste and similar commercial and industrial waste), including separately collected fractions	2,463,422	21%
Waste from waste management facilities, wastewater treatment plants outside the place of generation and preparing water for human consumption and industrial use	509,013	4%
Construction waste and demolition waste (including earth excavated from contaminated locations)	329,757	3%
Packaging waste, absorbents, mops, filter materials and protective fabrics, unless specified otherwise	144,345	1%
Waste not otherwise specified in the catalogue	63,834	1%
Waste from shaping and physical and mechanical surface processing of metal and plastic	58,850	<1 %
Waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing, and preparing and processing food	47,492	<1 %
Waste from wood processing and production of paper, cardboard, pulp, panels and furniture	43,708	<1 %
Waste from the textile, fur, and leather industries	13,684	<1 %
Oil and other liquid fuel waste (except edible oils and those in chapters 05, 12, and 19)	12,279	<1 %
Organic chemical process waste	10,487	<1 %
Waste from producing, formulating, supplying and using coatings (colours, lacquers, and glass glazes), glues, sealants, and printing colours	4,278	<1 %
Waste from human and animal health care and research (except waste from kitchens and restaurants not stemming from immediate health care)	3,263	<1 %
Waste from oil refining, natural gas purification, and pyrolytic treatment of coal	2,643	<1 %
Waste from surface chemical treatment and protection of metals and other materials; hydrometallurgy of non-ferrous metals	2,509	<1 %
Waste from inorganic chemical processes	1,583	<1 %
Waste from the photography industry	295	<1 %
Waste organic solvents, coolants, and propellants (except 07 and 08)	249	<1 %
Waste generated by research, excavation from mines and quarries, and physical and chemical treatment of minerals	-	0%

*Environmental Protection Agency*

**TOTAL: 11,976,125 t**

Mining	53,770,441	81%
Electricity, gas and steam supply	7,500,434	11%
Household waste	1,976,292	3%
Processing industry	1,605,680	2%
Construction	605,889	1%
Water supply and waste water management	590,586	1%
Service industry	421,837	1%
Agriculture, forestry and fisheries	94,041	<1 %

*Statistical Office of the Republic of Serbia*

**TOTAL: 66,565,200 t**





# **Water Quality**

# Overview

The previous year did not bring any significant progress in the strategic and legislative framework of the water sector. The Water Management Plan, as one of the key documents for further progress in this area and harmonization with EU practices, has still not been published. The Plan was developed through an EU twinning project. The publication of the draft was announced for the end of 2020; however, this has still not taken place. One positive step was the drafting of an action plan for the implementation of the Water Management Strategy, but this has also not yet been adopted by the Government of the Republic of Serbia.

It is obvious that in the previous period, the Government has concretized and consolidated activities on reducing surface water pollution, i.e., building capacities for wastewater treatment. Progress is evident in the preparation of investment projects, which should lead to more efficient and faster construction of the wastewater treatment plants themselves.

There has been no significant progress in mitigating and eliminating hydro-morphological pressures, such as the construction of small hydropower plants and intense exploitation of river sediments. The fact that construction projects that significantly endanger water resources and run contrary to the principles of integrated and sustainable management have continued to appear and receive support is discouraging.

There has been no change to the financing and administrative capacity in the water sector compared to the previous period.

# Strategic and Legislative Framework

In the previous period, no new legislation has been drafted, adopted or significantly amended in the water sector.

During 2020, the development of the Water Management Plan for the Republic of Serbia 2021–2027 continued according to the previously prepared Work Program and the plan for the development of the Water Management Plan for the Republic of Serbia 2021–2027. The plan is being developed as part of the EU twinning project Support to Policy Planning in the Water Management Sector. Its development and adoption are essential for the appropriate implementation of European legislation in the field of water in Serbia.

In September 2020, the second conference within the Plan development process was held, followed by the final conference at which the programme of measures for the future Plan were presented. Civil society participation was facilitated during the development of the Plan through participation in the conferences and submission of written comments. The publication of the Draft Plan was announced for the end of 2020, but had not been published at the time of writing. According to the aforementioned Work Program and the plan for the development of the Plan, the Draft Plan should have been published in December 2020.

At the end of 2020, a public debate was held on the Proposed Action Plan for the implementation of the Water Management Strategy for the Republic of Serbia from 2021 to 2023. The public debate was completed and the draft of this plan, together with the report on the Strategic Environmental Impact Assessment, is available to the public (MAFWM, 2020), but has not yet been adopted by the Government of the Republic of Serbia. The plan provides an overview of the activities for the implementation of the Strategy with defined responsible parties, deadlines, financial resources and indicators for monitoring implementation. The adoption of this plan would create the conditions for the effective implementation of the Strategy.

# The Implementation of Regulations

Based on the events of the previous year, it can be said that wastewater treatment is finally starting to be recognized as one of the priorities in the field of environmental protection. In 2020, the Ministry of Environmental Protection announced that technical documentation has been prepared for the construction of 29 wastewater treatment plants (WWTPs). The Review of Projects and Project Activities in Waste and Wastewater Management (MEP, 2020) states that WWTP construction projects have been completed, or are in the final phase of construction, in Leskovac, Raška, and Subotica, as well as the joint project for Kula and Vrbas. In addition, the Review lists another 34 projects that are in the preparatory stages with the participation of the Ministry of Environmental Protection or other competent institutions and bodies.

In 2020, the Framework Loan Agreement LD 2026 (2019) was ratified between the Council of Europe Development Bank and the Republic of Serbia for the programme loan – Water Supply and Wastewater Treatment Plants (NARS, 2020). This loan will provide €200 million, mostly for the construction of wastewater treatment plants in Serbia.

In January 2020, the Ministry of Construction, Transport and Infrastructure of Serbia signed two agreements with the Chinese company CMEC (China Machinery Engineering Corporation) for the collection and treatment of wastewater from the central sewage system of the City of Belgrade. The contract for the first phase of construction is worth €271 million, and the value of the total investment is estimated at up to €771 million. No public procurement procedure was conducted for contracting of this work. The basis for signing the contract is the Agreement on Economic and Technical Cooperation in the Field of Infrastructure between the Government of the Republic of Serbia and the Government of the People's Republic of China, signed in 2009 (CPES,

2021). The details of the contract are not known, nor have they at any point been presented to the public. It is a positive development that the treatment of wastewater in Belgrade has finally started to be resolved, but it is worrying that it is being done in a non-transparent manner and while ignoring the legal order of the Republic of Serbia.

Individual projects that were active in 2020:

- The Ministry of Finance (Sector for Contracting and Financing Programs from European Union Funds) announced that a tender would be issued for the construction of a WWTP in Niš in September 2020, but it had not yet been issued by the end of 2020. The estimated value of the project is €43 million.
- In August 2020, the WWTP in Kruševac was put into operation. The plant was built with a loan from the German Development bank KfW.

Significant progress in practice, i.e., in the percentage of wastewater that is treated, is still not evident. According to data from the Statistical Office of the Republic of Serbia, the percentage of the population connected to urban wastewater treatment with at least secondary treatment in 2019 was 13.1%, which is not significantly different from previous years (SORS, 2020). While progress in the preparation of projects for WWTPs is certainly visible, we hope that the construction and operation of WWTPs will be significantly accelerated in the near future.

The Environmental Protection Agency has continued regular monitoring of surface waters. In 2020, the results of surface and groundwater quality testing in 2019 were published. The monitoring covered 70 profiles in 49 watercourses, seven profiles in the canal network, one reservoir and 53 groundwater stations (SEPA, 2020). The scope of monitoring, i.e., the number of analysed water bodies, has changed slightly in the past few years. Taking into account the number of water bodies, which according to the current Rulebook on the Identification of Surface and Groundwater Bodies amounts to 493 watercourses, five lakes and 153 groundwater bodies (MAFWM, 2010), it is clear that monitoring coverage is far from adequate and that such monitoring does not

meet the requirements of the Water Framework Directive. It should be noted that the new typology of water bodies, which has been announced and is being developed, will significantly increase the number of water bodies, which will further increase the requirements for water quality monitoring. The current capacities of the Environmental Protection Agency are modest and should be significantly strengthened in order to raise water quality monitoring to a level that will meet obligations under European water policies.

The issue of the construction of small hydropower plants, which has attracted a lot of public attention in the past few years, and which has been identified as one of the most significant factors endangering watercourses in Serbia, has not yet begun to be resolved in a systematic way. On the contrary, in December 2020, the Ministry of Mining and Energy increased the incentives for privileged electricity producers, blowing wind into the sails of investors for the further construction of small hydro plants. The adopted Regulation on the Amount of Special Fee for Incentivizing Privileged Electricity Producers in 2021 (VRS, 2020) (Official Gazette of the Republic of Serbia, No. 152/2020), increases the incentives from 0.093 dinars per kWh consumed to 0.437 dinars per kWh. Several local governments have recognized the danger posed by the spontaneous construction of small hydro plants and, within their competencies, have initiated appropriate procedures to better regulate the sector. Last year, the municipalities of Užice, Požega, Bor, Svrlijig, Vlasotince, Arilje and Paraćin suspended the issuance of permits for the construction of small hydro plants until the spatial plans were changed.

Uncontrolled and excessive extraction of river sediments remains a serious threat to the preservation of watercourses in Serbia. No significant progress has been made in controlling river sediment exploitation. The capacities of the competent inspectorate are still insufficient to properly respond to these pressures, which dramatically endanger Serbia's rivers. During the previous year, civil society organizations also registered specific examples of violations of regulations and illegal use of river sediments. The situation on the lower course of the Drina river is especially problematic, as reported by the Center for Investigative Journalism (CINS, 2020), where the situation is further aggravated by the unresolved delineation of the border between Bosnia and Herzegovina and the Republic of Serbia.



The principle of integrated water management, although formally introduced through the Law on Waters, is still difficult to implement in practice. This is perhaps best illustrated by cases of controversial projects that have attracted public attention in the past year, such as the planned construction in the area of the water protection zone at Makiš (Belgrade) and the announced project to build a residential and business complex at an unprotected part of the Danube near Novi Sad. In the first case, construction is planned in the immediate vicinity of Makiško polje, the largest water source for Belgrade, which would expose it to pollution. In the case of Novi Sad Waterfront, it is planned to move the embankment in the direction of the river in order to create a construction area. This solution is extremely problematic in light of modern principles of river conservation and management, as well as international agreements, such as the Convention on Cooperation for the Protection and Sustainable Use of the Danube River (FAFRY, 2003), which Serbia has signed, and which unequivocally obliges Serbia to use water and watercourses sustainably.

In accordance with Article 142 of the Law on Waters (NARS, 2010), at the end of 2020 the Ministry of Agriculture, Forestry and Water Management began the formation and election of members of the National Water Conference, a body that should ensure public participation in water management. The National Conference should have 14 members, including representatives of citizens' associations. The Conference is formally established, and its members appointed, by the Government of the Republic of Serbia, however at the time of writing, this process has not been completed.

In 2020, a study of the situation in the field of wastewater management was prepared through the project Public-Private Dialogue for Development, implemented by NALED, the Association 3E and the Network of Inspectors of Serbia (Krstović et al, 2020). The study, in addition to state bodies, included the business sector in considering and assessing the wastewater situation. In addition to highlighting specific problems in the implementation of obligations and control of businesses that discharge industrial wastewater (inadequate capacities, unclear legal provisions), the study showed that stronger and better structured involvement of business is necessary in order to effectively solve wastewater problems, from policy development to implementation.

# Financing

According to the Regulation on Determining the Water Management Program in 2020 (GRS, 2020a), RSD 3.68 billion was allocated from the Budget Fund for Water for the regulation and use of water, protection of water from pollution, regulation of watercourses and protection against the harmful effects of water, and planning and international cooperation in the field of water. In 2019, RSD 3.73 billion was earmarked for the same purposes. The distribution of funds in relation to the planned work has remained the same as previously, with most of the funds, in the amount of about RSD 2.9 billion (about 80% of the total budget), continuing to be directed to the regulation of watercourses and protection from the harmful effects of water (floods and torrents). In the last few years, the water management budget has stagnated.

Other funds are also directed to water management and protection. In 2020, the Ministry of Environmental Protection provided RSD 270,000,000 for the construction of a WWTP in Leskovac, and the Ministry of Construction, Transport and Infrastructure provided RSD 60,000,000 for the construction of a WWTP in Kikinda. Local governments also invested in the water sector, primarily water protection and the construction of wastewater treatment plants.

The total budget expenditure for water management is difficult to monitor, as it is spread across several budget lines (capital investments, co-financing of international projects, etc.) as well as local government budgets. However, expenditure is nonetheless clearly insufficient, given the scope of necessary investment.

# Recommendations



## Strategic and Legislative Framework

- 1.** Integrate nature directives (Birds Directive and Habitats Directive) into the field of water management. Better coordination is needed between the water management sector and the environmental sector regarding the implementation of EU directives.
- 2.** Develop a concrete plan and set of measures for the improvement of water quality monitoring in accordance with the requirements of the Water Framework Directive.
- 3.** Develop specific strategies to improve investment in wastewater treatment facilities. Initiate the development of models and strategies for knowledge transfer in the field of wastewater treatment in order to reduce costs and mobilize domestic capacities.
- 4.** Adopt strategic and planning documents in accordance with the obligations arising from the Water Framework Directive (Water Management Plan, Flood Risk Management Plan).



## The Implementation of Regulations

- 5.** Develop capacities and improve the organization of public institutions responsible for water management, especially at the local level – the complexity of water management issues requires stronger personnel and technical capacities. The competent institutions must conduct an analysis of the existing capacities as soon as possible and develop a plan for their improvement. To achieve this, professional institutions and CSOs need to advocate for greater political and financial support for the water management sector.

- 6.** Develop structured cooperation with other relevant sectors: environmental protection, energy, agriculture and spatial planning. This requires constant communication and exchange of information between sectors to be established.
- 7.** Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.
- 8.** Integrate nature-based solutions into water management practices and more seriously consider ecosystem services. Specific capacities for these needs should be developed in the competent institutions.
- 9.** Improve control and mitigation of key dangers: poorly planned small hydropower plants, gravel extraction, pollution, uncontrolled use of groundwater, and illegal construction on river banks – river habitats, wetlands, and water resources in general are very endangered in Serbia. Urgent action is needed at the national level.
- 10.** Develop a single database on planning and constructing WWTPs that is available to the interested public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.
- 11.** Adopt key strategic and planning documents for alignment with EU water management legislation and practice.



## Financing

- 12.** Gradually increase water prices and fees for wastewater drainage and treatment services, in order to provide for the construction of the necessary facilities for water drainage and treatment and their normal operation.
- 13.** Permanently increase budget funds for financing water management activities and water protection.

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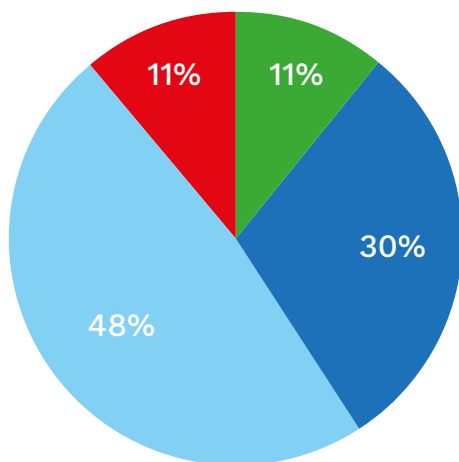
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# WATER QUALITY

## SURFACE WATER QUALITY

**78% OF WATER COURSES** where the quality is measured are rated as being of good or excellent quality



**SURFACE WATER  
QUALITY IN SERBIA**  
(percentage of analysed samples)

- bad
- good
- very good
- excellent

\* Source: Environmental Protection Agency

<http://indicator.sepa.gov.rs/pretraga/indikatori/svefind/6f14b40186514ca6b35fa3a628337e9a>

Most communal and industrial waste water is **NOT TREATED**, but directly dumped into water courses (recipients) – the question therefore arises:

**DOES WATER QUALITY MONITORING PROVIDE A REALISTIC PICTURE OF THE STATE OF OUR WATER COURSES?**

**DO NATURAL ECOSYSTEMS STILL  
HAVE THE CAPACITY TO RESIST OUR  
NEGLIGENCE TOWARDS RIVERS?**









# **Nature Protection**

# Overview

The year marked by the COVID-19 pandemic has not brought progress in the field of nature protection, while problems caused by human activities that put pressure on nature have intensified.

In 2020, the necessary progress in the strategic and legislative framework has failed to materialize. The Draft Law on Amendments to the Law on Nature Protection has not been adopted. There have also been no amendments to domestic regulations in order to harmonize them with those of the European Union, which should provide better species protection. Strategic documents in this area have not been adopted. At the same time, the process of drafting the Spatial Plan of the Republic of Serbia from 2021 to 2035 will begin, and will introduce a new planning approach to resolving the conflict between nature protection and other sectors, especially tourism.

There is a lack of proactive action by decision makers to enforce regulations; procedures for designating protected areas are slow, and there is a lack of an appropriate reaction to the absence of an effective system of supervision and control. Pressure put on protected areas, and nature in general, during the pandemic by irresponsible visitors further indicates inconsistencies in the implementation of area and species protection and the lack of appropriate reactions from institutions.

Although investment in the protection of nature diversity is an investment in societal resilience, insufficient state investment in nature protection leaves no room for progress in this area.

# Strategic and Legislative Framework

The Law on Nature Protection should guarantee the protection and preservation of nature, biological, geological and landscape diversity as part of the environment (MEP, 2009). With this in mind, amendments to the Law require a dedicated approach by decision makers, which is lacking in this case, as the Draft Law on Amendments to the Law on Nature Protection was not passed within the set deadline. Originally planned for March 2019, the Government Work Plan for 2020 (GRS, 2020) moved the deadline for adopting the Law to December of the same year. The working group formed to draft the proposal has not been convened since February 2019. In addition to the postponement of the deadline for the adoption of the Law, the whole process can be assessed as deficient, given that the principles of transparency and timely and quality stakeholder involvement have not been respected.

The lack of harmonization of domestic regulations with European Union legislation is evident in regard to species that should be protected in accordance with the Birds Directive. The current Rulebook on Declaring a Closed Hunting Season for Protected Wild Game Species (MAEP, 2016) is not harmonized with the Birds Directive, as it allows for hunting certain species throughout the year to prevent damage to hunting grounds, which directly conflicts with paragraph 2) of Article 9 of the Directive. The fact that the Rulebook does not recognize the global endangerment of the turtle dove (*Streptopelia turtur*), which is still classified as game, and that hunting and poaching are recognized as the main threats to the survival of this species (IUCN, 2019), demonstrates the need for urgent changes to the Rulebook. This situation is in direct conflict with the Birds Directive with regard to the hunting of species with an unfavourable conservation status, as well as hunting and disturbing permanently protected or hunting-protected species during the breeding season. The status of species in the Rulebook on the Declaration and Protection of Strictly Protected and

Protected Species of Plants, Animals and Fungi has still not been harmonized with their status in the Birds Directive and the Habitats Directive. There was no harmonization of these regulations in the reporting period.

The Government Work Plan for 2020 (GRS, 2020) planned for the adoption of amendments to the Law on Wildlife and Hunting and the Law on Protection and Sustainable Use of Fish Stock, both of which have a significant impact on nature. The adoption of these amendments had not been placed on the Government's agenda by December 2020 – the deadline set by the Work Plan. Civil society representatives (WWF Adria-Serbia) were included in the Working Group for drafting amendments to the Law on Protection and Sustainable Use of Fish Stock, while no information is available on the process of amending the Law on Wildlife and Hunting.

The Government Work Plan also envisaged the harmonization of domestic regulations with the *EU Regulation on the protection of species of wild fauna and flora by regulating trade therein* (EC No. 338/97) by drafting the Law on Transboundary Traffic and Trade in Wild Species of Plants and Animals. By December 2020 the proposal had not been put on the Government's agenda. No information is available as to what stage the drafting process is at.

A planning document for determining development priorities in the field of nature protection has been in development since 2014, but has not yet been adopted (C27, 2019). Given that the previous Biodiversity Conservation Strategy expired in 2018, and that there is no umbrella strategy for environmental protection that addresses nature protection issues, it is clear that, although necessary, a strategic approach to solving nature protection problems is entirely missing. This failure is the consequence of a lack of political will and human resources on the part of the competent authorities to resolve this issue.

Having signed the Declaration on the Green Agenda for the Western Balkans (GRS, 2020), the Government of Serbia has committed itself to implementing all five pillars of the Green Agenda, one of which relates to nature protection and biodiversity conservation. Civil society organizations from Serbia also participated in the creation of guidelines for this pillar, through the Biodiversity

Task Force of South-East Europe of the Regional Cooperation Council and the BioNET Network (RCC, 2020).

The action plan for the implementation of the Open Government Partnership initiative in the Republic of Serbia 2020–2022 was adopted in December 2020 (MPALSG, 2020). One of the obligations under the plan is to define the obligation to establish Stakeholder Councils in all Protected Areas in the Republic of Serbia within the Law on Nature Protection. This commitment arose as a result of the recognized needs and dialogue between civil society and the Ministry of Environmental Protection.

The decision to develop a Spatial Plan for the Republic of Serbia from 2021 to 2035, (previously) adopted by the Government, was published in the Official Gazette of the Republic of Serbia, No. 48/19. In March 2020, the Ministry of Construction, Transport and Infrastructure announced an early public insight procedure. A section of the document entitled *Review of Spatial Planning in the Republic of Serbia* states: "In the coming period, new planning approaches will be necessary to resolve conflicts and harmonize development and protection needs (e.g. between nature protection zones and tourism development in mountain areas)". Additionally, in a document presented during the early public insight procedure, some important principles of nature protection were completely neglected, primarily ecological connection and preservation of green infrastructure. For this reason, in addition to the general importance of the Spatial Plan and its impact on nature protection, civil society organizations have sent numerous comments and recommendations to the body responsible for early public insight procedure.

# The Implementation of Regulations

The territory covered by Protected Areas in Serbia increased in 2020 from 575,310 ha, or 6.51% of the total area of the Republic of Serbia, to 678,196 ha, or 7.66% of the total area of the Republic of Serbia (MEP, 2020). The modest progress lags far behind the strategic goal envisaged by the Spatial Plan of the Republic of Serbia, which set a target of increasing the area under protection to 12% (NARS, 2010). The procedure for establishing Protected Areas lasts on average about five and a half years; these procedures are evidently too slow and inefficient (C27, 2020).

In July 2020, the UNESCO Executive Council confirmed that Đerdap would be included in the Global Geoparks network, thus establishing the first geopark in Serbia, covering an area of about 130,000 ha. The management of the geopark is entrusted to PE National Park Đerdap, which has yet to develop an appropriate model of management and stakeholder involvement. This raises the need for a legal definition and regulation of geoparks and other internationally recognized areas such as Biosphere Reserves, internationally Important Bird and Biodiversity Areas (IBA) and Prime Butterfly Areas (PBA), which are not subject to the Law on Nature Protection.

During 2020, activities on establishing ecological networks continued. In December 2020, the Institute for Nature Conservation of the Republic of Serbia conducted a public procurement in order to obtain data on habitat types and individual groups of flora and fauna, as well as data on birds, in order to establish an ecological network for the Republic of Serbia and the European Union ecological network "Natura 2000" in Serbia, as well as to obtain data to compile red lists of individual groups of organisms. Funds for these activities were allocated from the budget of the Republic of Serbia, in the form of support from the Ministry of Environmental Protection for the work of the Institute

for Nature Conservation of the Republic of Serbia (PPP, 2020). The implementation of the EU project for "Natura 2000" in Serbia, which is financed from the IPA programme of the European Union, was also continued, in order to support the establishment of the EU ecological network "Natura 2000". In the period between March and October 2020, field activities began to collect data to identify and designate potential SPA and SCI areas in accordance with the Birds Directive and the Habitats Directive. Within the project, an analysis of the legislative framework of the Republic of Serbia for nature conservation and environmental protection in relation to the requirements of the ecological network "Natura 2000" was undertaken. Based on this analysis, recommendations will be made for amendments to the Law on Nature Protection and other regulations in order to harmonize them with EU legislation relevant for establishing the ecological network "Natura 2000". The analysis was not presented to the public in the reporting period. Activities were also carried out to strengthen capacities for the future management of the ecological network, as well as promotional activities through an awareness raising campaign about "Natura 2000" (Eptisa, 2020).

In October 2020, BirdLife International announced a new network of Important Bird and Biodiversity Areas (IBA) in Serbia. The new national IBA network consists of 79 areas of the most vulnerable habitats for birds and biodiversity, covering 29.2% of the territory of the Republic of Serbia (2,579,364 ha). The network of IBAs serves as the basis for determining parts of the ecological network of the Republic of Serbia and for defining the international ecological network "Natura 2000" through Special Protection Areas, which are declared according to the European Union Birds Directive (BLI, 2020).

As part of the activities aimed at implementing international agreements, the Ministry of Environmental Protection, in cooperation with the Environmental Protection Agency and stakeholders, is preparing the VI National Report on the Implementation of the Convention on Biological Diversity (MEP, 2020). A three-year report on the implementation of the convention in the Republic of Serbia for the period 2018-2020 was prepared and submitted to the Secretariat of the Ramsar Convention. (MEP, 2020). The public was not consulted in this process, nor was the public aware of the content of the Report, despite the

Convention recommending that stakeholders should be involved in the preparation of the report. In Serbia today, numerous Ramsar sites suffer from negative human influence, including Peštersko polje, where peat is exploited (FI, 2020), Labudovo okno, where legal hunting is not controlled and poaching is not prevented (Jovanović et al, 2020) and Carska bara, where a tire factory is being built in the immediate vicinity (RERI, 2020). Due to their importance for the preservation of wetlands, urgent action from the competent state authorities is necessary in order to prevent the further endangerment of these Ramsar-listed sites.

An appeal procedure is being conducted against the Republic of Serbia within the framework of the Berne Convention based on four reports from civil society organizations. Two complaints pertain to birds, one to the risk of the disappearance of the great bustard in Serbia (*Otis tarda*) and one to the construction of a port at the confluence of the Sava and the Danube. The appeal procedure is currently in a permanent monitoring status (MEP, 2020).

Preserving the habitat of a certain endangered plant or animal species is the basic precondition for its protection. In addition to the presence of endangered species, certain areas are also protected due to their landscape or geological characteristics. Corridors between valuable nature areas are also an important part of nature protection. The usurpation of space due to illegal construction constitutes aggravated endangerment of protected areas with some or all of the previously mentioned values. There are few protected areas in Serbia not under pressure from illegal construction. The passive role of state institutions in solving this problem is evident in the example of the Uvac Special Nature Reserve, where inspectors from the Ministry of Construction, Transport and Infrastructure issued 42 decisions ordering that illegal construction be halted, and buildings already under construction within the reserve be demolished. Among these, only 13 buildings were demolished, exclusively based on one decision from 2015 (CINS, 2021).

Preventive measures to protect endangered plant and animal populations are rare and sporadic. One of the problems is the lack of a strategic approach to species protection, i.e. the lack of population and species management plans.



Such plans are common practice in the EU and build on the Birds Directive and the Habitats Directive. There is no official action plan or species management plan in Serbia. Management plans for species of large beasts (lynx and bear) have been in preparation for a long time, but have not been adopted or used at any point. One of the main reasons for this situation is that plans for species and population protection are not clearly defined in the Law on Nature Protection and are, therefore, not functional (even when they are prepared) because competencies are not prescribed. In addition to the lack of proactive action on the part of competent state institutions, the prevention of direct endangerment of wild species is also lacking. A good example of the inactivity of institutions is the available data on the areas known to be extremely hazardous to birds, such as: Svilojevo – one of the most critical points for poisoning birds of prey, Labudovo okno – one of the most critical points for bird poaching, the Rasina region –extremely hazardous for songbirds, and Potočac – site of the most widespread electrocution of birds in Serbia. Despite numerous appeals from civil society organizations and the public, the problems posed by these hazardous hotspots have not been resolved (Jovanović et al, 2020).

Deficiencies in implementing the Law on Nature Protection, the Regulation on Controlling the Use and Trade of Wild Flora and Fauna (GRS, 2005) and other legislation regulating these issues, as well as deficiencies in inspections, have led to an escalation of conflicts among truffle collectors. In 2020, the first armed conflict between collectors took place, in which two people were killed. According to statements by experts from the Museum of Natural History, most of the truffle trade in Serbia is conducted through illegal routes (RTS, 2020).

In October 2020, the Ministry of Environmental Protection continued the “Don’t Burn the Stubble!” campaign in order to raise awareness among farmers about the harmfulness of burning crop residues. In addition to raising awareness, the campaign aimed to inform the public that burning stubble is prohibited by law and qualifies as a criminal offense, with high fines prescribed for perpetrators (MEP, 2020).

## Financing

According to the Report on the Implementation of the Budget of the Ministry of Environmental Protection for the period January 1<sup>st</sup> 2020–December 31<sup>st</sup> 2020 (MEP, 2021), RSD 457,315,000 was allocated for nature protection, of which 93.051% or RSD 425,537,182 was spent. The spent funds account for 18.48% of the total budget allocated for the work of the Ministry of Environmental Protection for 2020. Funds allocated for nature protection from the Green Fund include RSD 35,230,000 for forestation in order to protect and preserve landscape diversity, which is 1.2% of the total budget of the Fund. Of this amount, 99.99% (RSD 35,227,694) was spent. These symbolic investments in nature protection by the State through the competent Ministry are insufficient to make progress in this sector.

Investment in establishing the ecological network of the Republic of Serbia and the ecological network of the European Union – “Natura 2000” continued through the allocation of budget funds of the Republic of Serbia to support the work of the Institute for Nature Conservation of Serbia.

# Recommendations



## Strategic and Legislative Framework

- 1.** Improve the Law on Nature Protection in line with the EU legislation, ratified international agreements, good practice in the sector and the needs of nature protection in Serbia. Ensure the process of improving the Law is transparent and enables public participation, in accordance with the positive regulations of the Republic of Serbia and good practice.
- 2.** Regulate the ecological network acceptability assessment procedure through appropriate regulations, in order to establish the necessary standards for the approval of plans and projects that may have an impact on the ecological network, in accordance with paragraph 3) of Article 6 of the Habitats Directive.
- 3.** Develop and adopt public policies in the field of nature protection in accordance with the Law on Nature Protection, the Law on the Planning System and ratified international agreements, and fully harmonize the strategic framework with the EU Biodiversity Strategy.
- 4.** Amend the Rulebook on the Declaration and Protection of Strictly Protected and Protected Species of Plants, Animals and Fungi and the Rulebook on Declaring a Closed Hunting Season for Protected Wild Game Species, to fully transpose the provisions of the Habitats Directive and the Birds Directive on hunting.
- 5.** Develop and adopt a document to precisely determine the sequence and procedure for competent authorities detecting cases of poisoning, as well as other cases of illegal actions pertaining to wild species.

6. Improve cooperation in the process of adopting planning documents and regulations between: the nature protection sector, the energy sector, the spatial planning and urban planning sector and the construction sector, especially those regulating and applying Environmental Impact Assessment and Strategic Environmental Impact Assessment procedures.
7. Establish Ministry of Environmental Protection mechanisms to improve the participation of civil society organizations in the processes of preparing, adopting and monitoring the implementation of regulations in the field of nature protection, primarily by involving stakeholders at an early stage, in accordance with the Regulation on Public Policy Management Methodology, Policy and Regulation Analysis, and the Content of Individual Public Policy Documents, as well as the Guidelines for the Inclusion of Civil Society Organizations in the Process of Drafting Regulations of the Government of the Republic of Serbia.



## The Implementation of Regulations

8. Publish the negotiating position in the field of nature protection and involve civil society organizations in the negotiation process.
9. Improve the capacities of the Ministry of Environmental Protection, enhance cooperation and ensure the open flow of information between different sectors within the Ministry and with stakeholders, such as civil society organizations, by appointing a person in charge of cooperation with CSOs.
10. Improve the capacities of the Institute for Nature Conservation (at the provincial and state level) by increasing the number of employees and providing them with further training, as well as improving technical capacities.

- 11.** Continue building the capacities of the police, inspectorate, prosecution and judiciary to implement regulations related to species and habitat protection, in cooperation with professional civil society organizations.
- 12.** Improve annual inspection plans and their implementation in protected areas, i.e. ecological network areas, in order to prevent excessive use of natural resources and illegal activities, and to ensure the preservation of the natural values of these areas.
- 13.** Strengthen cooperation between all actors in order to prevent corruption in the nature protection sector (especially related to the illegal use of forests, water resources and illegal hunting activities).
- 14.** The competent Ministry should work more intensively on solving problems and preventing violations of the provisions of the International Convention on the Conservation of European Wildlife and Natural Habitats in the Republic of Serbia.
- 15.** Ensure regular and appropriate reporting under ratified international agreements in the field of nature protection (especially under the Convention on the Conservation of European Wildlife and Natural Habitats, the Convention on the Conservation of Migratory Species of Wild Animals, the Ramsar Convention and the CITES Convention). Ensure the process of drafting the report is transparent, including the opinions of the interested public.
- 16.** Prescribe measures for the preservation, restoration and improvement of the state of the ecological network area, through a participatory process that includes professional organizations of state bodies and civil society, as well as the users of the area.

- 17.** Ensure continuous institutional support for the efficient establishment of the ecological network of the Republic of Serbia and the "Natura 2000" ecological network, and include the nature protection sector and other relevant sectors, especially agriculture, forestry, spatial planning and energy in a timely manner.



## Financing

- 18.** Continue regular financing of activities for the establishment of the ecological network of the Republic of Serbia and "Natura 2000", with full and regular reporting on implemented activities and spent funds.
- 19.** Ensure that appropriate funds are allocated in the budget for nature protection and regular and detailed reporting on expenditure; allocate more funds for the practical protection of species and habitats.

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# NATURE PROTECTION

## FEW PROTECTED AREAS

Protected areas make up **7.66%** of the territory of the Republic of Serbia. In the EU, protected areas make up **26%** of the territory. The **only country** with less protected area than Serbia in the region is Bosnia and Herzegovina, where 4% of the territory is under protection.



## LACK OF MANAGEMENT CAPACITY

In Serbia, protected areas are most often managed by public companies whose **PRIMARY ACTIVITY IS NOT NATURE PROTECTION**, but rather an additional activity within its operation. **Insufficient investment** by managers in a professional workforce and technical capacities are reflected in the neglect of protected areas.



## LACK OF IMPLEMENTATION OF REGULATIONS

The lack of an effective system for monitoring and control of activities undertaken inside protected areas leaves room for **NUMEROUS ILLEGAL ACTIONS THAT GO UNPUNISHED**. Weak capacities of guard services, the absence of proactive action by inspectorates, insufficient involvement of the judiciary, and an **absence of political will** have turned protected areas into spaces where nature endangerment is thriving.

## LACK OF PUBLIC AWARENESS

The absence of public awareness about appropriate behaviour in nature was evident during 2020, when, due to the COVID-19 pandemic, citizens **visited protected areas in Serbia en masse**. The endangerment of plant and animal species and their habitats due to **UNRESTRAINED AND MASSIVE OFFROAD DRIVING WITHIN PROTECTED AREAS**, using cars, motorbikes, quad bikes, boats, and drones, is only one negative example of this.



# A LOT OF NATURE ENDANGERMENT!







# **Chemicals Management**

# Overview

The legislative framework created by the adoption of the Law on Chemicals, the Law on Biocidal Products, and the relevant bylaws, has established a system of chemicals management in Serbia in accordance with EU principles.

Regarding updating of regulations, **only the Rulebook on the List of Classified Substances was updated during the reporting period. The new Law on Biocidal Products has yet to be adopted two years after it was drafted, while the Candidate List of Substances of Very High Concern, the List of Substances of Concern (Authorization List), the Rulebook on Restrictions/Bans on Production, Placing on the Market and Use of Chemicals, have not been updated.**

The action plans for the National Implementation Plan for the Stockholm Convention have yet to be adopted – and as of this year have become obsolete – as they are projected until 2020. No decision has yet been made on the ratification of the Minamata Convention.

The development of the legislative framework must continue, both through the harmonization of regulations with new EU regulations and amending existing ones, and by strengthening the capacities necessary for the implementation of regulations.

The prescribed administrative procedures are being implemented, but given the scope and content of documentation required by these procedures, as well as the confidentiality of certain data, it is necessary to continue to improve the system, particularly electronic data delivery, as well as strengthening the administrative and professional capacities of the Department of Chemicals and inspection bodies for the control of chemicals and biocidal products.

**It is necessary to improve the efficiency of the implementation of administrative procedures** for entry in the Register of Chemicals and entry in the Temporary List of Biocidal Products by strengthening electronic protection

and data access and improving the digital portals. In addition, Decisions on Entry in the Register of Chemicals under the Accelerated Procedure must be adopted for requests from previous years and the requirements for testing the effectiveness of biocidal products must be harmonized with laboratory capacities in Serbia.

A ban on the use of certain phthalates in consumer products has entered into force in the European Union, but due to delays in updating regulations Serbia has not yet adopted the ban. Given that the prohibition process is time consuming, and that there is a delay between a ban being adopted and its mandatory application, **there is a risk that general use products containing banned phthalates will spill over from the EU market into the Serbian market over the next three years (where they are still allowed due to the absence of a ban).**

It is necessary to establish a mechanism for the implementation of **Article 82 of the Law on Chemicals**, which instructs the Ministry of Environmental Protection to develop and implement projects to monitor the placing on the market and use of chemicals, monitor their metabolites and the pathways of chemicals into the environment and living organisms, in order to track the risks posed by chemicals to human health and the environment, i.e., provide control over the use of substances of concern and the implementation of restrictions and prohibitions on the production, placing on the market and use of chemicals. This is a very important measure that would allow monitoring of progress toward reducing risks posed by the most dangerous chemicals.

Due to changes in the content on the website of the Ministry of Environmental Protection, little information has been published about chemicals management, **further reducing the transparency of regulation enforcement.** It is therefore necessary to: Continue strengthening the capacities of the Helpdesk for Chemicals and Biocidal Products and complete the information it contains, which is described below (in the section on "Implementation of Regulations"); **Make publicly available the number of decisions issued on entry in the Register of Chemicals by year, as well as data on placing chemicals on the market disaggregated by hazard class as statistical data, and information on the implementation of all conventions related to chemicals management.** In

this regard, it would be useful for the Ministry to also publish data on the entry of substances of concern, and whether the risk mitigation measures applied by businesses are sufficient to control the risk posed by these chemicals.

**There have been no significant changes** to the administrative capacity in this sector **compared to the previous period**, despite the evident need for increased capacity in order to enforce regulations and further develop the chemicals management system.

**It is necessary to strengthen inspectorates for chemicals and biocidal products**, particularly chemicals in general use products, by strengthening the capacity of the inspectorates themselves and increasing the number of inspections, as well as entering unsafe products in the NEPRO database to ensure that citizens are provided with adequate information about products withdrawn from the market due to chemical risks.

Given the ever greater consumer interest in sustainable products and increasing promotion of sustainable solutions in everyday life, it should be expected that an increasing number of consumers will exercise their right to information on dangerous substances in products defined by Article 27 of the Law on Chemicals. **The Ministry of Environmental Protection must ensure that consumer rights under this Article are protected.**

**Given the scope and complexity of regulation in this sector, financial resources must be provided to strengthen the administrative and professional capacities of the Department of Chemicals in the Ministry, as well as inspection bodies** supervising the implementation of the Law on Chemicals and the Law on Biocidal Products, in order to continuously update legal regulations and implement administrative procedures without breaking deadlines.

# Strategic and Legislative Framework

The legislative framework created by the adoption of the Law on Chemicals and the Law on Biocidal Products, and the relevant bylaws, has established a system of chemicals management in Serbia in accordance with EU principles.

The Law on Chemicals is aligned with the REACH Regulation (EC 1907/2006) to the extent possible; some centralized procedures prescribed by the REACH Regulation, such as registration, evaluation and authorization procedures require EU membership for implementation (MEP, 2009a, MEP 2009b). Further development of the legislative framework should be continued, both by further harmonizing regulations with new EU regulations and amendments to existing ones, and by strengthening the capacities necessary for the implementation of regulations.

**There has been progress in updating regulations related to classifying and labelling chemicals in accordance with technical and scientific progress since the previous Report.** In March 2020, the Rulebook on the List of Classified Substances (Official Gazette of the Republic of Serbia, 22/20) was updated in accordance with the Adaptation to Technical Progress – ATP 13, which has been in force in the EU since the 1<sup>st</sup> of May 2020, and in the Republic of Serbia from the 1<sup>st</sup> of October 2020 (MEP, 2020a). The EU has also adopted ATP 14 (which will be applied from the 9<sup>th</sup> of September 2021), as well as ATP 15 (which will be applied from the 1<sup>st</sup> of March 2022), which also apply to the List of Classified Substances (Annex VI of the CLP Regulation).

No new updates have been made to the Rulebook on Classification, Packaging, Labelling and Advertising Chemicals and Certain Products in Accordance with the GHS (Official Gazette of the Republic of Serbia, 21/19); the Rulebook is therefore only currently harmonized with ATP 11. The EU published ATP 12 on the 12<sup>th</sup> of March 2019, which has been in force since October 17<sup>th</sup> 2020.

It is important to emphasize that regular harmonization of these regulations is extremely important, **given that delays in updating the List of Classified Substances results in deviations of data on harmonized classified substances in Serbia and the EU.** In some cases, there are deviations in the implementation of the prescribed provisions on the classification and labelling of the same substances and compounds on the EU market and the Serbia market, which is contrary to the basic goal of the GHS system – for chemicals to be classified and labelled according to the same rules, or in the same way. If these rules are not followed, difficulties arise in terms of the free movement of imported chemicals, as well as the protection of human health and the environment.

**During the reporting period, there were no updates to the regulations governing restrictions and prohibition on the production, placing on the market and use of chemicals.** However, the following prohibitions imposed by the previous update of this regulation have entered into force:

1. Absolute ban on placing on the market and use of expanded polystyrene (EPS) products containing HBCDD used in construction (from 26 May 2020),
2. Ban on placing on the market thermometers intended exclusively for performing tests according to standards that require the use of mercury thermometers (from October 1, 2020),
3. Ban on placing thermal paper containing 0.02% (m / m) or more of Bisphenol A on the market (from June 30, 2020),
4. Ban on the production and placing on the market of perfluorooctanoic acid (PFOA) and its salts as an ingredient in other substances and as an ingredient in mixtures (from 4 July 2020);
5. Ban on placing on the market of general use windscreen washer or defrosting fluids that contain methanol in a concentration equal to or greater than 0.6% by weight (from 1 June 2020).

The harmonization of this regulation must be continued; there are 75 entries in the EU list, while the domestic regulation contains only 71 restrictions / bans



on production, placing on the market and use of certain hazardous substances, compounds or products. We especially emphasize the need to adopt a ban on certain phthalates contained in products for general use, as soon as possible, as well as a ban on substances classified as carcinogenic, mutagenic and/or toxic to reproduction (categories 1A or 1B) in textiles, clothing and footwear. Both bans became binding in the EU during 2020 and products containing the banned substances were withdrawn from the EU market. There is a danger that these products will reach the market of the Republic of Serbia because they are not yet banned in the country.

**There have been no changes regarding updating the Candidate List of Substances of Very High Concern compared to the 2020 report** (C27, 2020).

The list has been further updated several times in the EU (last updated in January 2021). Currently the List in the EU contains 211 substances, while in the Republic of Serbia the Candidate List of Substances of Very High Concern contains 181 substances. This discrepancy limits consumer rights to information on the presence of these substances in products in Serbia.

**The situation is similar with regard to the List of Substances of Concern, which has not been updated in Serbia since 2018**, with the domestic list now containing 11 fewer substances than the EU list. Based on data from the Information Booklet on the Work of the Ministry of Environmental Protection for the period November 2020–January 2021, the List of Amendments to the Candidate List of Substances of Very High Concern and the List of Amendments to the List of Substances of Concern (MEP, 2021) are in the process of being adopted.

There is a significant delay in the process of harmonizing regulations related to methods of testing the hazardous properties of chemicals, because these regulations have not been updated since 2012.

The drafting of the new Law on Biocidal Products for the purpose of harmonization with the Biocidal Products Regulation (528/2012 EU) was completed in 2018. The EU regulation could not be fully transposed as it regulates, among other things, procedures carried out centrally by the European Chemicals Agency (ECHA) and the European Commission. Problems with the harmonization of this regulation were described in the previous Shadow Report (C27, 2020).

**Although the adoption of the new law was planned for the second quarter of 2019 on the basis of the NPAA, it had not yet been adopted at the time of writing.** Based on the Information Booklet on the Work of the Ministry of Environmental Protection for the period November 2020-January 2021, the Draft Law on Biocidal Products is still in the process of being adopted (MEP, 2021).

There has been no significant change in **administrative capacities** in the sector compared to the previous period. Indeed, the Republic Inspectorate for Environmental Protection in the Area of Chemicals and Biocidal Products was further weakened by the departure of several experienced inspectors (C27, 2020).

Although the Rulebook on Operational Systematization of the competent Ministry envisages a significant increase in the number of employees working on managing chemicals and biocidal products, the limit on the number of employees in state bodies was extended in 2020; it was therefore unrealistic to expect that administrative and professional capacities within the Ministry of Environmental Protection would be strengthened, despite the evident need to do so in order to implement regulations and further develop the chemicals management system.

# The Implementation of Regulations

The Department for Chemicals at the Ministry of Environmental Protection is in charge of tasks related to the implementation of administrative procedures in this sector. The prescribed administrative procedures are being implemented, but given the scope and content of the documentation required by these procedures, as well as the confidentiality of certain data, **it is necessary to continue to improve the system, particularly with regard to digital data delivery.**

## Register of Chemicals

Digital submission of data via the digital platform for entry of chemicals in the Integrated Register of Chemicals (eIRH) began in 2019, with appropriate protection and strictly defined levels of access to data. There are still administrative obstacles regarding the submission of the Application Form through the Ministry's office, because there is still no digital office. Instead, a signed Form must be physically submitted to the Ministry. In addition, there are occasional technical difficulties with the eIRH portal, because the server is sometimes overloaded and the portal does not function, especially during March, which is the most intense period for reporting chemicals to the Register.

With the introduction of the digital application, it was expected that the verification of submitted data and issuance of decisions by the competent authority would be accelerated, because the administrative procedure, from the moment of submitting data until the final issuance of decisions on entering the chemical in the Register, regularly breaks all legally prescribed deadlines, lasting several years on average, especially for businesses registering a large number of chemicals. During the previous year, the delay in issuing Decisions on the Registration of Chemicals was reduced, but in some cases the legally prescribed deadlines were still broken. As highlighted in the previous Report,

**accelerated decisions need to be made for requests from previous years, for which no decisions have yet been issued, by simplifying the procedure** for requests for amendments to documentation, given that a large number of these chemicals are no longer in circulation or the classification, marking, and very often the composition has changed (C27, 2020).

It is necessary to continue to develop and improve the eIRH portal and to consult with chemical advisors during the process, and ultimately to speed up reviews of submitted requests. The database of substances on the eIRH portal must be updated to match the Rulebook on the List of Classified Substances – Table 1, and the names of substances must be harmonized with domestic regulations.

The amounts of fees for entering chemicals into the Register must be reconsidered; currently the ranges are too large (1–100, 100–500, etc.), so that, for example, the same fee applies when reporting just one chemical and when reporting 99 chemicals.

Strengthening administrative capacities for entering chemicals into the Register is also necessary, in order to improve the functionality of the eIRH portal and align it with the presented proposals.

**The number of issued decisions on entry in the Register of Chemicals by year, as well as data on placing chemicals on the market by hazard class, should be made publicly available again as statistical data on the website of the Ministry of Environmental Protection.** In this regard, it would be useful for the Ministry to also publish data on the registration of substances of concern and whether the risk mitigation measures applied by economic operators are sufficient to control the risks posed by these chemicals.

## Biocidal Products

The eIRH for biocidal products began operating in April 2019. The eIRH allows for the submission of requests for entry into the Temporary List of Biocidal Products; it is also possible to submit hard-copy (paper) requests. Given the scope and content of documentation required by this procedure, as well as the confidentiality of certain data, **it is necessary to improve existing protection**

**and strictly define different levels of data access** (enabling direct digital submission of data for owners of confidential data, i.e., foreign producers, and restrict the level of access of importers, while providing chemical advisers with access to all the data they need to prepare the documentation required by domestic regulations).

**The number of requests for testing the efficiency of products is not aligned with the laboratory capacities of the Republic of Serbia.** Consequently, domestic producers are not always able to test the efficiency of products in laboratories in Serbia, which is necessary for entering products into the Temporary List and placing them on the market. This puts domestic producers at a disadvantage compared to importers of biocidal products, who commonly gain the required test results from a foreign manufacturer. This discrepancy became even more evident at the beginning of the COVID-19 pandemic, when there was an increased demand for disinfectants on the market, followed by a corresponding increase in the number of requests for entry into the Temporary List, which is mandatory for placing these kinds of products on the market. The Department of Chemicals reacted adequately to the emergency situation, addressing requests for registering disinfectants as a matter of priority compared to other types of biocidal products, and thus accelerated the process of placing this type of biocidal product on the market. However, because Serbia does not have the capacity to test disinfectants for effectiveness against viruses, domestic manufacturers were forced to withdraw the claim that they were effective against viruses from their disinfectants, even though the active substance and concentration were the same as those used by foreign manufacturers.

## Bans and Restrictions on the Use of Chemicals

Although previously adopted bans/restrictions on five chemicals became mandatory during the previous year, the regulation itself was not updated during the reporting period.

**In the European Union, a mandatory ban on the use of phthalates in consumer products (bis (2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP) and diisobutyl phthalate (DIBP)) has entered**

**into force, while (due to delays in updating regulations) Serbia has not yet adopted this ban** (EC, 2018).

ALHem tested consumer soft plastic products for the presence of these phthalates as part of product screening on the domestic market in order to speed up the ban on phthalates in Serbia, as well as other substances in products that are already banned in the EU, to better protect consumers (ALHem, 2020). The results indicated that almost a third of the tested products (ten out of 36 products) contain these substances, and that these substances can be found in products with which children and young people come into frequent contact (e.g., school equipment, clothing and footwear) as well as in materials used in large quantities to make furniture and other interior elements. In some products, phthalate concentrations have been found to reach 18% of the total mass of the product. Following the results, ALHem, together with several civil society organizations, including Coalition 27, submitted an initiative to the competent Ministry for the accelerated adoption of a ban/restriction on these phthalates in consumer products.

The Ministry's response states that, in accordance with the normative Government Work Plan, harmonization with the provisions of the regulation in question was planned for 2020 and that market analyses in the Republic of Serbia have begun. Unfortunately, due to the COVID-19 pandemic, the planned activities were postponed until 2021 in accordance with the last revision of the Government Work Plan, because consultations with businesses have not been completed. It is expected that the ban will be introduced into national legislation in the fourth quarter of 2021, but when the provisions will actually enter into force will be known only after consultations with the business sector are completed. The competent authority is expected to propose that the ban should come into effect two years from the date of publication in the Official Gazette of the Republic of Serbia, which will be three years after the ban on the use of phthalates in consumer products in the EU.

Given that the ban process is time consuming and that there is a delay between a ban being adopted and its mandatory application, there is a risk that consumer products containing phthalates from the EU market (where they are banned) will flow into the Serbian market over the next three years.

In accordance with the Rulebook on Determining the Program for Monitoring the Safety of General Use Items, in 2020 the **inspection of 3,394 general use items** that may contain substances defined by regulations on bans and restrictions by the Law on Chemicals and the Law on Consumer Goods and the appropriate by-laws was planned, namely: materials and objects in contact with food (1,860), toys (912), and materials and objects that come into direct contact with the skin or mucous membranes during use (622).

Items withdrawn from the market are published in the NEPRO system (notification system for unsafe products), which is an integral part of the market oversight system, and aims to provide consumers with better protection against unsafe products, while educating all market participants and raising awareness on the importance of product safety (NEPRO; MH, 2009).

Despite the extensive monitoring planned for 2020, **only two products that were withdrawn from the market due to chemical risks were included in the NEPRO database in 2020.**

Year	Number of publicly available entries into the NEPRO database of unsafe products in the chemical risk category	Number of samples assessed as chemically defective with regard to the content of bisphenol A, phthalates and metals by the network of the Institute of Public Health *
2020	2	Not known
2019	35	89
2018	2	26
2017	1	36
2016	2	46
2015	0	69

\* Includes dishes and utensils for foodstuffs, packaging for foodstuffs (objects and materials in contact with food), children's toys, and objects that come into direct contact with the skin or mucous membranes

The Dr Milan Jovanović Batut Institute of Public Health of Serbia publishes an annual Report on the Safety of General Use Items in the Republic of Serbia (BATUT, 2019). The Report also includes products covered by the Rulebook on Restrictions/Bans on the Production, Placing on the Market and Use of Chemicals, such as products that come into contact with food (utensils and packaging), dishes, toys and decorative items (jewellery). Comparing the results published

in the Institute's Report and the number of registrations in the NEPRO system indicates that the NEPRO database is updated irregularly, **which deprives consumers of information about products that contain dangerous substances.**

In 2019, **ALHem published the results of testing for prohibited phthalates in children's toys and items intended for child care** purchased on the Serbia market, which estimated that seven out of 15 tested children's toys on the market are chemically unsafe (ALHem, 2019a). The published results caused a great deal of public attention, and media pressure was exerted to carry out an extraordinary inspection and have the items withdrawn from the market as part of the inspection procedure registered in the NEPRO database – which resulted in a drastically increased number of withdrawn products in 2019 (MH, 2020). Prior to the aforementioned ALHem campaign, based on data from the NEPRO database, the number of withdrawn products per year ranges up to a maximum of two, and that there are often years when no products are withdrawn from the market. Statistical analysis indicates that chemical risk control on the Serbian market is poor, rather than high product safety.

**In this regard, it is necessary to establish a mechanism for the implementation of Article 82 of the Law on Chemicals,** which requires the Ministry of Environmental Protection to develop and implement projects to monitor the placing on the market and use of chemicals, monitor their metabolites and chemicals in the environment and living organisms, in order to monitor the risk posed by chemicals to human health and the environment, i.e., to ensure control of the use of substances of concern and the implementation of restrictions and bans on the production, placing on the market and use of chemicals (MEP, 2009a). This is a very important measure that would allow the assessment of what real progress has been made in reducing risks posed by the most dangerous chemicals.

## Chemicals Helpdesk

The Ministry of Environmental Protection's Chemicals Helpdesk was established in 2010, making information and guidelines publicly available, primarily for businesses placing chemicals and biocidal products on the market in the Republic of Serbia, as well as interested citizens and consumers, via a website. The Helpdesk



is set up based on the example of the European Chemicals Agency Helpdesk, and is part of the HelpNet network of the European Chemicals Agency (ECHA). It has been officially featured on the ECHA website since 2016. As part of the development of a new website for the Ministry of Environmental Protection, it is expected that the Helpdesk webpage will be updated; with this in mind, it is important to emphasize the **need to improve certain information**, including:

**Guidelines and criteria for entering a biocidal product into the Temporary List; specifically, making information about requests/criteria for testing the efficacy of a biocidal product by product type and purpose publicly available.** The lack of transparency about this information results in companies requesting additional tests – often efficiency tests that cannot be conducted in the Republic of Serbia – that they could not have foreseen before making a decision on producing/importing the product and preparing the documentation for entry into the Temporary List.

**Guidelines for the delimitation of biocidal products.** These criteria and guidelines are required in practice, but are not mentioned by the Helpdesk.

**Publish in Serbian all the necessary European Chemicals Agency guides** that are used in practice and which are required in training and examinations for chemical advisers, as well as the administrative procedure itself.

Given the complexity of documentation and criteria for conducting administrative procedures, it is necessary to establish a Frequently Asked Questions section and, given that communication with businesses and chemical advisors is usually only in the form of digital correspondence, **enable more efficient and direct communication with stakeholders.**

## Consumer Rights to Information on the Content of Substances of Concern in Products

Article 27 of the Law on Chemicals of the Republic of Serbia stipulates that, at the request of consumers, every supplier of a product that contains a substance of concern in a concentration greater than 0.1% (m / m) is obliged to provide the consumer with sufficient information, as is available to the supplier at that

time, to provide for the safe use of the product, including, as a minimum, the name of the substance in question. The Article applies to products such as clothes, furniture, toys, electronic devices, etc. In the case of products such as food, medicines, cosmetics, cleaning products or paints, the obligation applies only to the packaging of the product (MEP, 2009a).

In order to make it easier for consumers to request this information in accordance with their legal rights, since December 2019 the mobile application Scan4Chem has been available to Serbian citizens, allowing them to send a request to the manufacturer for information about the content of substances of concern (ALHem, 2019b). Through this application alone, over 2,000 requests have been sent since December 2020, with many consumers on social networks complaining that they did not receive a response.

In addition, as part of a research study conducted by ALHem, entitled *Soft Plastics, Harsh Truth*, requests for information on the content of substances of concern were sent to businesses in accordance with consumer rights under Article 27 of the Chemicals Act of the Republic of Serbia regarding the presence of certain phthalates for all purchased and tested products. The study identified ten products that contained substances of concern, and, even though all of these products fall under the right to information – a fact these companies were reminded of by ALHem – **none of them provided information on the presence of substances of concern** (ALHem, 2020).

Given the ever-greater consumer interest in sustainable products and increasing promotion of sustainable solutions in everyday life, it should be expected that an increasing number of consumers will exercise their right to information on dangerous substances in products defined by Article 27 of the Law on Chemicals. **The Ministry of Environmental Protection must ensure that consumer rights under this Article are protected.** However, this type of supervision has not been included in the annual work plan of the inspectorate for years (MEP 2019a, MEP 2020b). Monitoring the protection of consumer rights with regard to information on substances of concern is extremely important in order to protect the health of citizens; given that regulations on bans/restrictions on chemicals in products are not regularly updated, this is the only way to keep

consumers informed about the presence of hazardous substances in products. This is conditional on companies fulfilling their legal obligations and submitting information in response to received requests.

Establishing a database on substances of concern in products, similar to the SCIP database (Substances of Concern in Articles as Such or in Complex Objects (Products)) of the European Chemicals Agency should be considered, in order to provide recyclers and consumers with better information about the presence of hazardous substances in products.

## The Ministry's Projects

During 2019, the implementation of the project *EU for a better environment – Developing a framework for compliance with EU legislation in the areas of air, chemicals and horizontal legislation* (EAS3 project) began, through which specific implementation plans for REACH and BPR are being developed.

The Republic of Serbia has harmonized national legislation with the EU POPs Regulation, but the National Implementation Plan (NIP) for the implementation of the Stockholm Convention, which was updated in 2015, has not yet been adopted. **Given that the NIP Action Plan was projected until 2020, it is now obsolete and the specific action plans, which are an integral part of the updated NIP, must be updated.** This delay makes it difficult to continue monitoring POPs based on the established activities of the program for measuring the levels of POPs in the environment and food, as well as the inclusion of new POPs into the existing program.

In order to establish a functional system for monitoring POPs, it is necessary to strengthen the capacities of laboratories for measuring, especially new POPs, through accreditation of methods, procurement of laboratory equipment and professional development of laboratory staff.

Following changes to the website of the Ministry of Environmental Protection, information about the National Implementation Plan for the Stockholm Convention is no longer available, which it was on the previous version of the website. It is necessary **to make information regarding the implementation**

**of all conventions under the jurisdiction of the Ministry of Environmental Protection publicly available.**

Within the project *Development of Minamata Convention on Mercury Initial Assessment in the Republic of Serbia*, implemented by the Ministry of Environmental Protection with technical support from UNDP and financial support from the Global Environment Facility, a National Mercury Emission Inventory for the Republic of Serbia was prepared, as well as a Report on Capacity Assessment for the Implementation of the Minamata Convention, which the Republic of Serbia signed in 2014. The report on the state of mercury in Serbia is an important step towards the ratification of the Minamata Convention and the adoption of measures for the successful resolution of mercury-related problems. **However, although the final report was completed in 2018, it is not publicly available. So far, no decision has been made on the ratification of the Minamata Convention, despite the expert team and the expert service of the Ministry of Environmental Protection recommending the need to do so.**

The project *Strengthening Synergies in the Implementation of the Basel, Rotterdam, Stockholm and Minamata Conventions in the Republic of Serbia*, implemented by the Ministry of Environmental Protection in cooperation with UNDP, and funded by the UNEP Special Trust Fund, has been extended until the 15<sup>th</sup> of June 2021 due to the COVID-19 pandemic. The aim of the project is to strengthen institutional capacities for joint reporting in accordance with obligations under the conventions, as well as improve cooperation between various sectors of the competent Ministry, agencies, industry (with special emphasis on the recycling sector), scientific research institutes and civil society. Within the project, the following outputs were developed:

- A Report on the Assessment of Decommissioning Costs for two chlor-alkali electrolysis plants in which elemental mercury-based technology was used (MEP, 2021);
- A Manual on Techniques and Methods for Identifying and Separating Waste Containing Polybrominated Diphenyl Ethers (PBDE) for electronic waste recyclers;

- A Summary of the concept of policies to solve the problem of mercury in Serbia;
- A Brochure on the synergy of conventions;
- A Brochure for raising awareness of the Roma population collecting secondary raw materials.

Several draft public policy documents have been prepared and are currently in the phase of consultation between the competent Ministry and the Republic Secretariat for Public Policy, and are not publicly available.

Additionally, a new BRSM IT portal has been established (<https://brsm.ekologija.gov.rs>), which is primarily intended for internal communication and exchange of official data for reporting in accordance with the requirements of BRSM conventions between the competent state authorities. According to the Ministry, the plan is to upgrade the interface of this portal by the end of 2021, which will be available to all interested parties.

# Financing

The financing of chemicals and biocidal product management has been analyzed in detail in previous Coalition 27 shadow reports; there have been no significant changes during the past year.

The system of chemicals and biocidal product management is financed from the Budget of the Republic of Serbia. The Ministry of Environmental Protection has opened a dedicated sub-account for national administrative fees for chemicals and biocidal products. However, due to the structure and functioning of the budget system, **no data is available on the amount of revenues generated from fees used to cover the costs of providing administrative services for administrative procedures** and whether and how much of the costs for these services were paid from funds generated from other taxpayers, i.e., those who do not generate income from chemicals and/or biocidal products. This is not in line with the basic principles set out in the REACH Regulation and the Biocidal Products Regulation (BPR), as well as the accompanying implemented EU regulations governing fees, under which costs related to regulatory procedures for chemicals and biocidal products must be borne by the businesses generating revenue by placing them on the market. The new Law on Biocidal Products, the adoption of which is still pending, will not create a system of fees according to the EU model. Fees are not collected or spent purposefully to reduce the risk of biocidal products (which is the case in the EU). It is necessary to harmonize the domestic system with the EU model. Given that purposefully collected funds (fees) would, among other things, be used to assess the hazards, exposures and risks of biocidal products (which is not part of the usual administrative procedure), all citizens of Serbia would benefit from the implementation of the EU model, as this would protect human health and the environment.

Although public procurement falls under Chapter 5 of this report, it should be noted that **green public procurement is an important economic instrument that can contribute to economic development while reducing environmental**

**impacts throughout the life cycle of the product.** For certain product groups, one of the EU criteria for green public procurement requires information on the presence of substances of concern (e.g., IT equipment, furniture), while for other products such as cleaning agents, paints and varnishes, the absence of substances of concern are a condition for fulfilling the green procurement criterion. The application of green public procurement in the public sector could contribute to better communication on hazardous substances in products, and thus reduce the risk to human health and the environment. Establishing an effective green public procurement system in the Republic of Serbia would be of great importance for creating a sustainable economy, encouraging a circular economy, innovation and increasing the quality of life of all citizens in Serbia.

# Recommendations



## Strategic and Legal Framework

1. Harmonize national regulations with relevant amendments to EU regulations in this sector.
2. Adopt the Draft Law on Biocidal Products.
3. Ratify the Minamata Convention on Mercury.
4. Adopt a Strategic Document and Action Plan to strengthen synergies in the implementation of the Basel, Rotterdam, Stockholm and Minamata Conventions.



## The Implementation of Regulations

5. Strengthen administrative and professional capacities in this sector, especially in the field of registering chemicals and biocidal products in the Register, as well as managing biocidal products, due to the introduction of a new procedure for recognition of EU legislation resulting from the Draft Law on Biocidal Products.
6. Simplify the procedure for resolving requests for entering chemicals into the Register of Chemicals that are more than one year old.
7. Given the scope and content of the documentation required by the procedure for registering biocidal products in the eIRH, as well as the confidentiality of certain data, improve existing protection and strictly define different levels of access to data.



- 8.** Establish a joint body for integrated chemicals management in order to establish satisfactory cooperation and coordination between all relevant sectors and ensure safe management of chemicals throughout their life cycle, i.e., the adoption and implementation of the Integrated Chemicals Management Program. The joint body should include representatives of the competent state bodies in the field of chemicals management and representatives of industry, science and research, and civil society.
- 9.** Strengthen inspections of chemicals and biocidal products control.
- 10.** Strengthen inspection supervision over the application of the Law on Consumer Goods.
- 11.** Improve the information on the Chemicals Helpdesk, such as: guidelines and criteria for entering a biocidal product in the Temporary List, guides that are applied in practice, and frequently asked questions.
- 12.** Make data from the Register of Chemicals about the number of reported chemicals by hazard class available on the website of the Ministry of Environmental Protection again.
- 13.** Establish supervision over the implementation of Article 27 of the Law on Chemicals and protect the rights of consumers.
- 14.** Update the NEPRO database regularly.
- 15.** Make information on the implementation of concessions for which the Ministry of Environmental Protection is responsible publicly available.
- 16.** Update the latest adopted NIP for the Stockholm Convention on Persistent Organic Pollutants.



## Financing

- 17.** Change the domestic system governing the collection of fees and charges by implementing the EU model of financing the chemicals and biocidal product management system to ensure that fees related to regulatory procedures for chemicals and biocidal products are borne by the businesses generating income by putting these chemicals and products on the market.

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# CHEMICALS MANAGEMENT

The Dr Milan Jovanović Batut Institute for Public Health publishes an annual report on the safety of general use items to human health in the Republic of Serbia. **THE REPORT ALSO CONTAINS THE NUMBER OF ITEMS THAT ARE CHEMICALLY DEFECTIVE** due to bisphenol A, phthalate and metal content.

Items recalled from the market are **PUBLISHED IN THE NEPRO SYSTEM** (system for reporting unsafe products), which is part of the market monitoring system, and serves to provide better protection from unsafe products.

Despite the extensive monitoring planned for 2020, **ONLY TWO PRODUCTS** that were recalled from the market due to chemical risk **WERE ENTERED INTO THE NEPRO DATABASE** in 2020.

The number of publicly available reports of **unsafe products** in the NEPRO chemical risk database

2  
35  
2  
1  
2  
0



The number of samples marked as **chemically defective** due to bisphenol A, phthalate and metal content in the Institutes of Public Health network.

No data

89  
26  
36  
46  
69

## ARE CONSUMERS APPROPRIATELY INFORMED ABOUT CHEMICALLY UNSAFE PRODUCTS ON THE MARKET IN THE REPUBLIC OF SERBIA?

Comparing results from the Institute's Report and the number of reports in the NEPRO system **INDICATES THAT THE NEPRO DATABASE IS NOT REGULARLY UPDATED**, which deprives consumers of information about products containing dangerous substances.



**Noise**

## Overview

There were no significant changes in the period covered by this report. The new Law on Environmental Noise Protection has not yet been adopted. There has been some progress in enforcing regulations. The City of Belgrade has begun the project *Acoustic Zoning of the City*, and Studies on the conditions that must be met by the hospitality sector in order to protect against noise on the territory of Belgrade. The City of Novi Sad has made plans to develop a Strategic Noise Map for the entire territory of the city, but the precise start and end dates have not been defined.

# Strategic and Legislative Framework

Since 2010, regulations in the field of noise protection in the Republic of Serbia (Law on Protection from Noise in the Environment (Official Gazette of the Republic of Serbia, No. 36/09, 88/10), Regulation on Noise Indicators, Limit Values, Methods for Assessing Noise Indicators, Harassment and Harmful Effects of Noise in the Environment (Official Gazette of the Republic of Serbia, No. 75/10), Rulebook on the Methodology for Drafting Action Plans (Official Gazette of the Republic of Serbia, No. 72/10) and Rulebook on the Content and Methods for Developing Strategic Noise Maps and the Manner of their Presentation to the Public (Official Gazette of the Republic of Serbia, No. 80/10)) are partially harmonized with EU regulations in this sector. Full implementation of Directive 2002/49/EC is planned for the end of 2021. This includes the development of strategic noise maps and action plans for five agglomerations (Belgrade, Novi Sad, Niš, Kragujevac and Subotica), roads, railways and Belgrade airport (MEI, 2018). The City of Niš developed a Strategic Noise Map in 2019, and is the only city conducting 24-hour continuous monitoring. No city has an Action Plan. Based on the experience gained during the development of the Strategic Noise Map for the City of Niš, a set of Guidelines were developed, in the form of a manual for the development of strategic noise maps in the Republic of Serbia (MEP, 2019).

Additionally, apart from the five agglomerations that regularly monitor noise, a large number of local self-governments do not monitor noise and do not submit data to the Environmental Protection Agency.

A Draft Law on Amendments to the Law on Protection from Noise in the Environment, which should include changes to competencies, new methods for assessing indicators, reporting mechanisms, introduction of the “polluter pays” principle, as well as deadlines for compliance with obligations set by Directive 2002/49/EC and the obligation to apply a single method of calculating noise levels for the entire EU area – CNOSSOS (Directive 2015/996), was not adopted, although adoption of the Draft Law was planned (GRS, 2020).

# The Implementation of Regulations

Based on available data, partial progress was made in 2020 in this sector. The City of Belgrade began the *Acoustic Zoning of Belgrade* project (CB, 2019) in August 2019. The deadline for completing the project is 28 months. Additionally, in July 2019, the City of Belgrade began drafting a Study on the conditions that must be met by catering facilities in order to protect against noise on the territory of Belgrade (CB, 2019). The deadline for preparing the study is 17 months. At the request of the City of Belgrade, a Study of the state of endangerment of Belgrade by noise from catering facilities was developed (Mijić et al, 2020).

The City of Novi Sad has approved the development of a Strategic Noise Map for the entire territory of the City of Novi Sad, through a Decision on Amending the Environmental Protection Program of the City of Novi Sad for the period 2015-2024 – Action Plan for the implementation of the Environmental Protection Program of the City of Novi Sad (2020-2024) (CNS, 2020), but a precise deadline has not been defined.

Only the cities of Subotica and Kragujevac conduct regular environmental noise monitoring activities.



# Financing

In 2020, the Ministry of Environmental Protection of the Republic of Serbia did not allocate funds for the area of noise. All five agglomerations have allocated funds in the budget for 2020 for programs for monitoring the level of communal noise. Additionally, the City of Belgrade has provided funds for the Acoustic Zoning of Belgrade, Research on Methods of Indicative Measurements of Noise Levels in the Environment in Belgrade, and preparing a Study on the conditions that must be met by catering facilities for noise protection in the City of Belgrade, through the Program for Allocating Budget Funds for Environmental Protection in the City of Belgrade for 2020, and Amendments to the aforementioned Program (GB, 2020).

# Recommendations



## Strategic and Legislative Framework

1. Adopt the new Law on Environmental Noise Protection.
2. Fully harmonize bylaws with Directive 2002/49/EC.
3. Introduce uniform methods for calculating noise levels in accordance with Directive 2015/996 (CNOSSOS).



## The Implementation of Regulations

4. Begin developing strategic noise maps for the other four agglomerations (Belgrade, Novi Sad, Kragujevac and Subotica), as well as for the "Nikola Tesla" Airport, and develop action plans for all agglomerations.
5. Work on noise training (especially at the local level).
6. Introduce 24-hour continuous noise monitoring and make data available through a unified presentation of automatic noise monitoring.
7. Implement acoustic zoning of all local self-governments.
8. Assess the harmful effects of noise on human health and the environment.
9. Introduce local self-government control over the implementation of noise monitoring and submission of noise monitoring results to the Environmental Protection Agency.

- 10.** Expand competencies – authorize the environmental inspectorate and municipal police to independently measure the level of communal noise.
- 11.** Verify that organizers of public gatherings, entertainment and sports events and other outdoor and indoor activities have submitted data on noise protection measures in their applications for holding public gatherings and activities, if the use of sound and other devices may exceed the prescribed limit values.



## Financing

- 12.** Provide funds for the implementation of plans (and obligations) in the field of noise protection.

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# MUNICIPAL NOISE LEVELS IN BELGRADE IN 2019

## PERMITTED NOISE LEVELS

Day: 65 dB(A), Evening: 65 dB(A), Night: 45 dB(A)



Jurija Gagarina 193

55.7

55.7

48.9

Bulevar kralja Aleksandra 69

65.7

65.6

61.9

Kraljice Natalije 66

62.7

61.9

58.5

Vojvode Stepe 64

67.5

66.8

62.7

Bulevar despota Stefana 122

68.2

67.5

64.4

Glavna 28, Zemun

65.6

64.8

61.0

Jug-Bogdanova 2

67.5

67.3

63.4

Blagoja Parovića 35

60.7

58.1

54.3

Dalmatinska 1

60.6

60.3

54.8

Bulevar vojvode Mišića 43

67.0

66.0

62.4

\* Source: Beograd u brojkama (Belgrade in Numbers) 2020



KOALICIJA 27





# Climate Change

## Overview

During the reporting period, legislative activity was at a minimum. The Law on Climate Change was adopted after the reporting period (March 2021). The Law, in the form in which it was adopted, cannot be implemented without the adoption of a large number of bylaws. The Low-carbon Development Strategy has not been adopted, the drafting of the National Energy and Climate Plan has not started, and the Nationally Determined Contributions have not been adopted. Due to the COVID-19 pandemic, work on the UNFCCC report was halted during 2020. The rate of implementation of the Acquis in the field of climate change has been low. The application of regulations is of limited scope, as there is no clear legal and strategic framework. However, the implementation of other sectoral policies (such as energy and spatial and urban planning) indicates that climate change is far from being sufficiently integrated into other sectors. There has been a noticeable increase in funding for projects in the field of climate change, although a stable system of financing environmental protection and climate change is still not in place.



# Strategic and Legislative Framework

## The Law on Climate Change

The NPAA and the Work Plans of the Government of the Republic of Serbia envisage that all key EU regulations in the field of climate change will be transposed through the Law on Climate Change, as well as through five regulations and four rulebooks (C27, 2020). During the reporting period, none of the planned documents have been adopted. The Law on Climate Change was not part of the Work Plan of the Government of the Republic of Serbia for 2020.

*The Ministry of Environmental Protection opened a public debate on the Draft Law on Climate Change on March 15, 2018 (MEP, 2018). During the public debate (which lasted over 30 days), the Ministry of Environmental Protection held public presentations in five cities in Serbia, during which citizens could talk to representatives of the Ministry about their comments and remarks. This was an example of good practice of involving the public in the process of passing such important legislation. A Report on the public hearing was published in June 2018. After that, the Draft Law on Climate Change disappeared from the Government's Work Plans. In March 2021, the Government adopted the Draft Law on Climate Change, which is going through parliamentary procedure at the time of writing. The process of adopting this Law has taken over three years. The Law introduces a system for monitoring, reporting and verifying greenhouse gas emissions, but does not contain effective mechanisms for reducing GHG emissions. The Law cannot be implemented without the adoption of a large number of bylaws, which have still not been adopted.*

## Low-Carbon Development Strategy with Accompanying Action Plan

The Low-Carbon Development Strategy with an accompanying Action Plan should establish the direction of the Republic of Serbia's development towards a low-carbon and resource-efficient economy. In addition, the Strategy is the basic instrument for fulfilling obligations under the Paris Agreement and other international obligations that Serbia has undertaken.

A proposed Low Carbon Development Strategy with an accompanying Action Plan underwent public discussion from December 27<sup>th</sup> 2019 to January 24<sup>th</sup> 2020. The report on the public hearing (MEP, 2020a) was published in June 2020. According to the Government Work Plan for 2020, the adoption of the Strategy was planned for December 2020. However, the Strategy was not adopted in 2020. According to the Government's Work Plan for 2021, the adoption of the Strategy is planned for December 2021.

The content of the proposed Low Carbon Development Strategy was described in detail on page 143 of last year's Coalition 27 Report (C27, 2020). The proposed Strategy describes options for decarbonising the economy of the Republic of Serbia until 2050 through potential development scenarios. All scenarios presupposed that Serbia would become a full member of the European Union in 2025. However, even the most ambitious scenario did not predict complete decarbonisation (net zero greenhouse gas emissions). Given that the adoption of the European Green Plan for 2050 by the EU has set the goal of becoming carbon neutral, it is clear that the proposed Low-Carbon Development Strategy is not in line with the EU public policy framework. In the event that Serbia becomes a full member of the EU by 2025, and the Low-Carbon Development Strategy is adopted in the form in which it was made available to the public, the revision of this document will be necessary. Additionally, it should be noted that the EU's climate ambitions for 2030 have also increased: from 40% to a 55% reduction in greenhouse gas emissions compared to 1990. As all of the scenarios elaborated in the Strategy used the already outdated EU climate goals as a starting point, this document before even having been adopted.

Despite the fact that the Strategy was not adopted, the President of the Republic of Serbia stated in December 2020 at the International Climate Ambition Summit (CAS, 2020) that Serbia had developed a long-term Low-Carbon Development Strategy with an action plan and announced that Serbia would “be a low-carbon society in 2050”, as well as that Serbia would reduce greenhouse gas emissions by 33.3% by 2030 compared to 1990 (DLN, 2020). This is also the ambition of the M2 scenario presented in the proposed Low-Carbon Development Strategy with the Action Plan. The President then referred to the draft of this document, as well as the National Integrated Climate and Energy Plan. Neither of these two documents was adopted in Serbia during 2020.

## Increasing the Climate Ambition of the Republic of Serbia and its Obligations under the United Nations Framework Convention on Climate Change (UNFCCC)

The international obligations of the Republic of Serbia are determined by the Laws on the ratification of the UN Framework Convention on Climate Change and its accompanying acts: the Kyoto Protocol, the Doha Amendment to the Kyoto Protocol, and the Paris Agreement.

Among the most important obligations undertaken by signatories of the United Nations Framework Convention on Climate Change is reporting under the Convention (UNFCCC). Following the commencement of the drafting of the Second Biennial Update Report and the Third National Communications Report to the UNFCCC in 2019, by the Ministry of Environmental Protection in cooperation with the UN Development Program, these processes stopped in 2020. The Work Plan of the Government of the Republic of Serbia for 2020 planned for the adoption of both reports in December. However, neither of the reports have been adopted. Working groups did not meet during 2020.

In February 2020, the Ministry of Environmental Protection formed a Working Group for the implementation of the project *Establishing a Transparency Framework in the Republic of Serbia*, thereby beginning work on the revision of Nationally Determined Contributions (NDCs). Members of Coalition 27 were involved in the Working Group. The meetings of the Working Group were not

held due to the state of emergency. A draft of the document was presented in July 2020, but was not adopted during the reporting period. According to the Government Work Plan, it should have been adopted by the end of 2020. The draft of the improved Nationally Determined Contributions itself relies on the M2 scenario of the proposed Low-Carbon Development Strategy, i.e. it sets the goal of reducing GHG emissions by 33% by 2030 compared to 1990.

## Serbia's Climate Policy, the EU and the Energy Community

Serbia signed the Declaration on the Green Agenda for the Western Balkans in November 2020. By signing this document, Serbia has made a political commitment to achieve decarbonisation of the economy by 2050, in line with the upcoming EU climate law (RCC, 2020). The European Union strives to be an example in the fight against climate change, which means that Serbia must comply with the changed EU goals for 2030, i.e.: "reduction of greenhouse gas emissions by at least 55% compared to 1990." This will have a strong impact on the process of setting targets for 2030 conducted by the Secretariat of the Energy Community, the EU Commission and the contracting parties of the Energy Community (which include Serbia). Namely, the Energy Community is currently preparing a Study on the reduction of greenhouse gas emissions by 2030, renewable energy sources (RES) and energy efficiency. The study should link the EU's objectives in these areas with the ambition of the Energy Community contracting parties (and in particular with the countries of the Western Balkans, which aspire to membership in the European Union). The Study will determine targets for reducing GHG emissions, increasing the share of RES and increasing energy efficiency. The findings of these studies are expected to be adopted at the meeting of the Ministerial Council of the Energy Community at the end of 2021, which will lead to changes in the Acquis in these areas (ENC 2020). After that, the contracting parties (including Serbia) will be obliged to adopt legal instruments through which they will transpose these goals into national legislation and ensure their implementation. Serbia will therefore soon be obliged to update its legal framework for climate change, renewable energy sources and energy efficiency.

## The Implementation of the Energy Community Acquis

The Energy Community Annual Acquis Implementation Report for 2020 (EC, 2020a) reiterates the serious need to improve the implementation of climate change regulations. Of the ten areas covered by the Energy Community acquis, implementation in the field of climate change is at the lowest level.

Serbia has yet to draft a National Energy and Climate Plan (NECP). A draft was expected to be presented in 2020, but preparations for drafting the NECP are still in their infancy. Compared to other Western Balkan countries, Serbia lags behind in the development of these plans, and has not yet adopted the legal basis for them.

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*In January 2021, the Ministry of Mining and Energy submitted four key laws for public discussion at the same time: The Draft Law on Renewable Energy Sources, the Draft Amendments to the Law on Energy, the Draft Amendments to the Law on the Efficient Use of Energy and the Draft Amendments to the Law on Mining and Geological Research. This set of legal changes, among other things, regulates the development of the National Energy and Climate Plan.*

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Five years since the Paris Agreement was signed, Serbia has low ambitions to reduce GHG emissions. In 2021, Serbia is expected to submit revised Nationally Determined Contributions (NDCs) to the United Nations Framework Convention on Climate Change (UNFCCC). Serbia and Albania are the only two countries in the Western Balkans that are yet to include greenhouse gas emissions other than CO<sub>2</sub> in their inventories.

The new updated NDCs should be fully aligned with the National Energy and Climate Plan, and should pave the way for fulfilling the political promises of climate neutrality, as envisaged by the Sofia Declaration.

## Coal Regions in Transition

In September 2019, the Secretariat of the Energy Community hosted the launch of a dialogue on the creation of a platform in the regions that rely on coal for the Community's contracting parties. In December 2020, the Platform for Coal Regions in Transition for the Western Balkans and Ukraine was launched (EC, 2020b).

The aim of this platform is to help countries and regions move from a coal-dependent economy to a carbon-neutral economy, while ensuring that the transition is socially just. The initiative is open to any region engaged in mining activities and perhaps using coal for energy purposes. The regions originally identified in Serbia are: Kostolac, Kolubara, Obrenovac and Pomoravlje. These regions will be supported through technical assistance, as well as access to funding for energy transition projects.

Serbia should use this platform to initiate dialogue with local communities in order to start a timely and fair process of energy transition, in line with the goals of climate and energy policy. It should involve all relevant stakeholders and support the coal regions and their residents in this process.

Proper financing and planning of development priorities should be key factors for decision makers when adopting strategic policy documents. This means that Serbia must stop spending tens of millions of euros annually on subsidies for the coal industry. According to a study published in 2019 (EC, 2019), Serbia directly supported the production of electricity from coal with on average 99.78 million euros per year during the period 2015, 2016 and 2017. An update to that study in December 2020 (EC, 2020c) shows that direct investments in 2018 are much smaller and an average of €44.38 million in 2019; however, these subsidies remain the highest in the Western Balkans.

# The Implementation of Regulations

Very limited progress has been made in implementing climate change mitigation or adaptation measures. Significant progress in the implementation of measures has been hampered, as the legal framework for this area has still not been adopted.

If the implementation of public policies in the field of climate change is viewed more broadly, through the implementation of other sectoral policies, it is clear that climate change is still not integrated into other policy areas. For example, in the area of spatial and urban planning, climate change is noticeably neglected. During the preparation of spatial plans for construction at Makiško polje in Belgrade and at the Old Shipyard in Novi Sad the role played by these areas in adapting to climate change was obviously neglected. In the case of Makiško polje, for example, the area is recognized by the City of Belgrade (CB, 2019) as part of Belgrade's climate infrastructure, which needs to be preserved. Despite this, in December 2020, the City of Belgrade adopted the Plan for Detailed Regulation of Part of Makiško polje, which envisages the construction of 4.5 million square meters of residential and business space, a subway with stations and a subway depot (CB, 2020).

# Financing

The Law on Amendments to the Law on the Budget of the Republic of Serbia for 2020 (NARS, 2020) plans funds in the amount of RSD 35,000,000 for the program *Climate Change Resilient Local Development* within the Ministry of Environmental Protection. Within the RS Green Fund, funds have been allocated for the program *Afforestation to Protect and Preserve Landscape Diversity* in the amount of RSD 35,230,000.

In addition, funds were allocated to the Republic Hydrometeorological Service of Serbia in the amount of RSD 56,547,000 for climate monitoring and analysis, and forecasting of climate variability and climate change, and funds in the amount of RSD 2,111,000 for the project Southeast Europe SEE 2013 – ORIENTGATE – *Structured Network for the Integration of Climate Knowledge into Policy and Territorial Planning* as well as funds in the amount of RSD 1,490,000 for *Climate Observations, Modelling and Services in Europe*.

The Law on Amendments to the Law on the Budget of the Republic of Serbia for 2020 (NARS, 2020) allocates funds in the amount of RSD 290,957,000 (namely RSD 19,001,000 from the budget of the Republic of Serbia, and RSD 271,956,000 from EU funds) to the Ministry of Environmental Protection, and RSD 88,938,000 to the Ministry of Mining and Energy (RSD 8,894,000 from the budget of the Republic of Serbia, and RSD 80,044,000 from EU funds) within the project IPA 2013 – Environment and Climate Change. In the aforementioned Law, funds in the amount of RSD 500,240,000 are planned for the Budget Fund for Improving Energy Efficiency.

The originally planned funds in the Law on the Budget of the Republic of Serbia for 2020 (NARS, 2019) were significantly smaller. For the project Climate Change Resilient Local Development, the amount was increased by about 133% (originally planned at RSD 15,000,000). For the IPA 2013 program – Environment and Climate Change, the amount was increased by



about 208% (originally planned at RSD 94,300,000), and the amounts allocated to the Ministry of Environmental Protection and the Ministry of Mining and Energy were increased by about 25% (originally planned at RSD 71,209,000). Funds allocated to the Republic Hydrometeorological Service of Serbia for the project *Climate Monitoring and Analysis and Forecasting Climate Variability and Climate Change* were also increased by about 0.6% (originally planned at RSD 56,201,000), while the project Southeast Europe SEE 2013 – ORIENTGATE – *A Structured Network for the Integration of Climate Knowledge into Policy and Spatial Planning* was not planned.

The Law on Amendments to the Law on the Budget of the Republic of Serbia for 2020 (NARS, 2020) allocates 14% less funds for afforestation in order to protect and preserve landscape diversity compared to the planned funds in the Law on the Budget of the Republic of Serbia for 2020, with amendments to the Law also reducing the amount for the Budget Fund for Improving Energy Efficiency by about 2%.

The Report on the Implementation of the Budget of the Ministry of Environmental Protection (MEP, 2021) shows that 96.61% of the planned funds, i.e. RSD 33,814,029, for the *Climate Change Resilient Local Development* project were spent. Of the funds from the IPA 2013 program – Environmental Protection and Climate Change, the Ministry spent 40.51% (or RSD 7,697,380) of the amount allocated in the Budget of the Republic of Serbia, and 86.27% or RSD 234,616,992 of the EU funds.

The Report on the Implementation of the Budget of the Ministry of Mining and Energy is not publicly available.

# Recommendations



## Strategic and Legislative Framework

- 1.** Adopt all necessary bylaws in order for the Law on Climate Change to be applied.
- 2.** Review and increase ambitions to reduce GHG emissions and adopt revised NDCs by the next United Nations Framework Convention on Climate Change (UNFCCC) Summit, in line with the Paris Agreement. The ambition of the new/revised NDCs should be in line with the new EU targets for 2030, as well as the Green Deal's goal of decarbonisation by 2050.
- 3.** Integrate climate change issues into the process of drafting development plans by local self-governments and establish a mechanism for monitoring the development and work of local self-governments on the issues of climate change mitigation and adaptation.
- 4.** Fully support the work of the Energy Community Secretariat and define goals for reducing greenhouse gas emissions, improving energy production from renewable energy sources, and energy efficiency, and establish a working group and start developing an integrated National Energy and Climate Plan of Serbia within the given deadline and facilitate adequate public participation.
- 5.** Define and adjust the legal and institutional framework related to adaptation to climate change and integrate it into other sectors, primarily: water management, agriculture, urban planning and construction, infrastructure, forestry, nature protection and energy.

6. Adopt Amendments to the Law on Climate Change that will define permits for GHG emissions and emission monitoring obligations for other relevant sectors such as energy. Adopt the necessary legal instruments to define the obligation of plant operators to monitor GHG emissions and submit information on GHG emissions to the Environmental Protection Agency.
7. Adopt Amendments to the Law on Climate Change to establish a CO<sub>2</sub> tax mechanism, and thus fully comply with the ETS Directive and prepare for the implementation of the carbon border adjustment mechanism, which is expected to enter into force in 2023.



## The Implementation of Regulations

8. Establish a National Council for Climate Change, appoint members of the Council from among the representatives of ministries and other bodies and organizations, representatives of the scientific and professional community, as well as representatives of civil society, whose area of activity is important for identifying and implementing activities in the field of climate change by the end of 2021, and adopt the Rules of Procedure of the Council.
9. In the process of drafting the Third National Report under the UN Framework Convention on Climate Change and the Second Biennial Update, take into account the problems already described regarding the reliability and accuracy of GHG inventory data. Use relevant available data, instead of projections. Ensure adequate participation of civil society.
10. Make information on the GHG inventory public, verifiable and easily accessible, in accordance with the laws of the Republic of Serbia and international obligations, such as the Aarhus Convention and the Paris Agreement.

- 11.** Improve efforts to involve the general public in decision-making processes on public policies related to climate change, and above all the participation of the public in the development of the National Climate and Energy Plan, as well as revising NDCs.
- 12.** Increase the number of civil servants in ministries and local self-governments dealing with climate change in various sectors and focus on capacity building.
- 13.** Strengthen capacities in terms of knowledge and skills of civil servants working on the issue of climate change employed in ministries and local self-governments.
- 14.** Improve education on climate change, by strategically and systematically including it in school and university programmes.



## Financing

- 15.** Develop a financial mechanism that will support strategic priorities (which must be in line with the process of Serbia's accession to the European Union), among other things, by redirecting funds intended for the fossil fuel industry to climate change mitigation and adaptation measures.

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**Forestry**

## Overview

The previous period did not bring significant progress in the field of forestry. In 2020, there were no significant activities on preparing and adopting strategic and legal documents in this area.

The Forestry Development Program, as the basic strategic document provided for under the Law on Forests, has still not been adopted, nor is there available information on when its development and adoption will take place.

Serbia's readiness to implement two EU regulations relevant to forestry, the FLEGT regulation (EC, 2005) regulating the import of wood products into the European Union and the EUTR regulation (EU, 2010) regulating trade in wood and wood products, are still assessed as low, and an adequate legal and administrative framework for implementation is lacking.

Serbia has a relatively low forest area, about 30%, and in this respect lags behind the countries of the region and Europe. Despite ambitious goals for increasing forest coverage, no significant progress in afforestation is evident. On the contrary, in the last few years, there has been a decrease in the area afforested annually.

The unfavourable condition of forests is, among other things, reflected in the high proportion of coppice forests. Other problems in forest management and protection include the widespread occurrence of illegal logging, lack of data about privately owned forests and poor control of their use.

Weak and inefficient participation of the public and stakeholders continues to characterize the decision-making process in the forestry sector. Cooperation between the forestry sector and other related sectors is also still inefficient. Slow and inefficient afforestation is precisely the result of the absence of these processes.

Although modern forest management must be based on an integrated approach, there are still problems with this in Serbia. Numerous forest functions and the contribution of forests to society and the economy remain underestimated.



# Strategic and Legislative Framework

In 2020, there were no activities related to developing strategic or legal documents in the field of forestry.

The Forestry Development Program is defined by the Law on Forests (NARS, 2010) as a basic strategic document in the field of forestry. Support for the development of this program has been provided through international projects in which the Forest Administration has participated. These include the project *Contribution of Sustainable Forest Management to a Low Emission and Resilient Development*, which is financed through the Global Environmental Facility and *Support to the Development of the National Forestry Program of the Republic of Serbia – Improvement of Forest Resources*, which is implemented with the support of the Government of Germany. There is no publicly available information about the activities implemented through these projects, or the activities related to developing the Forestry Development Program. Given that there are no clear indications of progress, it can be assumed that the delay in adopting the Forestry Development Program has continued. In a recently published Audit Report (SAI, 2020), the State Audit Institution identified the lack of a strategic document in forestry and recommended that the Forest Administration of the Ministry of Agriculture, Forestry and Water Management take action to adopt a Forestry Development Program.

There were also no significant changes in the legal framework for forestry, with the exception of adopting routine, periodic acts.

There was also no significant progress in 2020 in preparing for the implementation of the FLEGT regulation<sup>1</sup> and EUTR regulation<sup>2</sup>, the two most important European regulations in the field of forestry. The assessment from the previous screening therefore remains valid, i.e. Serbia still does not have sufficient capacity to implement these regulations. The main problems relate to the vaguely defined competencies of the institutions involved in the production and trade of wood products, as well as the absence of a clear system of control that would enable the implementation of these regulations.

Strategic EU documents in the field of forestry – the EU Forestry Strategy (EUCOM, 2013) and the Green Paper on Forest Protection (EUCOM, 2012) – have never been sufficiently studied by the professional public in Serbia. With these documents about to expire, the EU has announced the development of a new forestry strategy, which should be based on the new Biodiversity Strategy until 2030. This is an opportunity to incorporate the principles and goals of European strategic documents into the national strategic documents that are being developed.

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1 Council Regulation (EC) No 2173/2005 of 20 December 2005 on the establishment of a FLEGT licensing scheme for imports of timber into the European Community

2 Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market

# The Implementation of Regulations

According to the data published in the publication Šumarstvo (SORS, 2020), there are 2,240,000 ha of forests in Serbia, of which about 52% are privately owned. Compared to 2014, the forest area has increased by about 500 ha. The total volume of wood is estimated at 362,000,000 m<sup>3</sup>, of which about 176,000,000 m<sup>3</sup> (about 49%) is in state forests.

The average volume per hectare in Serbia is about 160 m<sup>3</sup> / ha, which is approximately equal to the average volume in Europe (163 m<sup>3</sup> / ha). The average annual growth in the forests of Serbia is estimated at 4 m<sup>3</sup> / ha; annual growth is higher in state forests (4.7 m<sup>3</sup> / ha) than in private forests (3.6 m<sup>3</sup> / ha). The average annual growth in Europe is 3.9 m<sup>3</sup> / ha, and 4.5 m<sup>3</sup> / ha in the EU (*Forest Europe*, 2015).

According to data from the Republic Geodetic Authority (RGA 2020), in 2019, 3,370,000 m<sup>3</sup> of forest was cut in Serbia, most of which were deciduous trees (2,930,000 m<sup>3</sup>), with only 435,354 m<sup>3</sup> of conifers. According to data from the Forest Administration, the degree of forest utilization, i.e. annual felling as a percentage of annual increment, is about 50%. This is below the European average of 66% (*Forest Europe*, 2015).

In late 2020, the State Audit Institution published a Report on Afforestation in Serbia (SAI, 2020), which reviewed key data on forestry and identified the main shortcomings and problems. Afforestation in Serbia is still low and amounts to only 29.1%, which is far below the target for afforestation according to the Spatial Plan of the Republic of Serbia from 2010 to 2020 (NARS, 2010a), which was set at 41.4%. It is also significantly lower than the European average, which is about 40%.

According to the Report, in the period between 2014 and 2019, there was a decrease in the volume of afforestation in Serbia. The afforested area fell from 992 ha in 2014 to 614 ha in 2019. The major challenges for improving afforestation are the numerous administrative problems and the harmonization of different interests in land use. Currently, the process of determining appropriate sites for afforestation is very slow.

The poor state that forests are in is reflected in the fact that the proportion of coppice forests is about 65%. Coppice forests, which are formed by spontaneous regeneration from stumps after felling, are considered to be of poor quality, in both ecological and economic terms (wood quality).

The lack of appropriate planning and control of the use of privately-owned forests continues to stand out as one of the significant problems in Serbian forestry. Most private forest sections are small and often have unresolved ownership relations, which makes management very difficult. Adequate data on private forests still does not exist, and control over the use of these forests is inadequate. The association of private forest owners, and the professionalization of its work in forestry, has long stood out as a possible solution for improving the management and use of private forests. Unfortunately, this process is progressing too slowly for significant change to be observed. According to the Law on forests, local self-governments are obliged to adopt forest management programs for their territory that should include all private forests, which have a large number of owners. According to the State Audit Institution (SAI 2020), only one third of local self-governments have adopted such programs, which means that most private forests are managed without a planning basis.

Development Plans for seven forest areas defined by the Law on Forests have also not been developed yet.

The State Audit Institution report (SAI 2020) also noted the existence of 40,000 ha that is registered as belonging to other state bodies and local self-government bodies, which, according to the Law on Forests, cannot use forests. Adequate forest management is practically impossible in these areas. Also, there are about 86,000 ha of forests listed in the cadastre as agricultural land; it is unclear how this forested land is managed.

The administrative line with Kosovo is a critical area for illegal logging in Serbia, and is notable in both earlier data from the Forest Administration and the State Audit Institution report (SAI 2020). In the past 20 years, about 640,000 m<sup>3</sup> of illegally felled wood has been recorded in this area. According to estimates from the Forest Administration, illegal logging is more present in private forests. According to data from the PE Srbijašume, republished by Istinomer (2020), in the first half of 2020 alone, about 2,600 m<sup>3</sup> of illegally felled wood was recorded in state forests. In the same period, about 7,000 m<sup>3</sup> of illegally felled wood was recorded in the area of the administrative line with Kosovo. According to the State Audit Institution report (SAI 2020), in the period between 2010 and 2020, 87,735 m<sup>3</sup> of wood was illegally cut down in Serbia, which represents material damage of more than RSD 475,000,000.

During 2020, there were no additional public consultations in the process of drafting a temporary national standard for forest certification. At the time of writing, the standard had not been adopted.

Harmonization and cooperation between the forestry sector and the nature protection sector is of particular importance for the implementation of the EU Habitats Directive and the Birds Directive (forming the "Natura 2000" ecological network). In the previous period, through the EU IPA project for "Natura 2000" in Serbia, the Forest Administration and the Ministry of Environmental Protection cooperated in exchanging data on forests in order to establish the European Ecological Network "Natura 2000" in Serbia and for further management of the network.

Last year, the *Forests in Women's Hands* project (Fem4Forest) was launched, involving 14 partners from ten countries and funded through the INTERREG Danube Transnational Program. The aim of the project is to strengthen the forestry sector at local, regional and interregional levels, through increased involvement and training of women, supporting their equal presence and competencies in the market. The project partner for Serbia is the Faculty of Forestry of the University of Belgrade, and the strategic partner is the Forest Administration.

# Financing

In 2020, the Regulation on Determining the Annual Program for the Use of the Budgetary Forest Fund in the Republic of Serbia in 2020 initially allocated RSD 800,000,000 to the Budgetary Forest Fund (GRS, 2020). The later revision of the Regulation (GRS, 2020a) reduced the total amount to around RSD 600,000,000. The reason for the budget reduction is the austerity measures resulting from the situation due to the COVID-19 pandemic. All items in the Budgetary Forest Fund have been reduced, but to different extents. Forest protection funds have been reduced by more than 50%.

As in previous years, the largest part of the budget for 2020 was allocated for the construction and reconstruction of forest roads, at around RSD 250,000,000. RSD 65,000,000 was allocated for afforestation, and only RSD 13,500,000 for forest protection..

# Recommendations



## Strategic and legislative framework

1. Develop a national strategic document (development program) for forestry that will provide a long-term vision for development in this area in Serbia with an action plan with defined sources of funding, competent institutions and implementation dynamics. The document must take into account the relevant documents currently being developed at the EU level (Biodiversity Strategy to 2030 and other documents from the Green Agreement package).
2. Develop an institutional framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.



## The Implementation of Regulations

3. Strengthen the capacities of the competent institutions for the implementation of EU legislation and international agreements in the field of nature protection (Habitats Directive and Birds Directive, CITES Convention, etc.).
4. Strengthen the capacities of the competent institutions in forestry regarding EU integration in the field of climate change and energy.
5. Enable effective public participation in the development of key documents regulating forest use (including basic forest management).
6. Evaluate and promote ecosystem services provided by forests, other than wood, and use them in forest management planning.

7. Improve the quality of data on privately owned forests and strengthen control over their use.
8. Improve cooperation with other sectors (nature protection, energy, climate change, water management) in order to integrate forest ecosystems.
9. Establish an inter-ministerial working group that will coordinate the efficient development of afforestation plans.



## Financing

10. More funding from the Budget Fund for Forests should be directed towards financing the protection and improvement of forest ecosystems that provide services that are beneficial to all.



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# FORESTRY

**THE SPATIAL PLAN FOR THE REPUBLIC OF SERBIA ENVISIONS INCREASING THE FORESTED AREA OF THE COUNTRY FROM THE CURRENT 30% TO 41%.**



At the current rate, it will take

**OVER  
1,400 years**

to achieve the goal

**\* Source:** Report on Auditing the Purposefulness of Operations. Afforestation in the Republic of Serbia. State Audit Institution. 2020. <http://dri.rs/php/document/download/3467/2>



KOALICIJA 27

A person in a white lab coat is holding a transparent globe with a grid pattern. The word "Appendices" is written in bold green text across the center of the globe. The background is a soft, out-of-focus grey.

# **Appendices**

# Appendix I

## List of Abbreviations

**ATP** – Adaptation to technical progress

**BGEN** – Balkan Green Energy News

**BPR** – Biocidal Product Regulation

**CIN** – Center for Investigative Journalism

**CINS** – Center for Investigative Journalism Serbia

**CITES** – The Convention on International Trade in Endangered Species of Wild Fauna and Flora

**CMEC** – China Machinery Engineering Corporation

**CNOSSOS** – Common Noise Assessment Methods

**CPCS** – Center for Applied European Studies

**CSO** – Civil Society Organization

**CO<sub>2</sub>** – Carbon dioxide

**EC** – European Council

**EC** – Energy Community

**ECHA** – European Chemical Agency

**EIA** – Environmental Impact Assessment

**eIRH** – Electronic Platform for Entering Chemicals in the Integrated Registry of Chemicals

**EPS** – Public Enterprise *Elektroprivreda Srbije* (Public Enterprise Electric Power Industry of Serbia)

**EU** – European Union

**EUR** – Euro currency

**EUTR** – EU Timber Regulation

**FAFRY** – Federal Assembly of the Federal Republic of Yugoslavia

**FI** – Forum Info

**FLEGT** – Forest Law Enforcement, Governance and Trade

**FC** – Fiscal Council

**GEF** – Global Environment Facility

**GHG** – Greenhouse Gas

**GRS** – Government of the Republic of Serbia

**HEAL** – Health and Environmental Alliance

**INSPIRE** – Infrastructure for Spatial Information in the European Community

**IBA** – Important Bird and Biodiversity Areas

**IPA** – The Instrument for Pre-Accession Assistance

**IPHS** – Dr Milan Jovanović Batut Institute for Public Health

**KfW** – German Development Bank

**MSALSG** – Ministry of State Administration and Local Self-Government

**MH** – Ministry of Health

**MEP** – Ministry of Environmental Protection

**MAFWM** – Ministry of Agriculture, Forestry and Water Management

**MFRS** – Ministry of Finance of the Republic of Serbia

**N/A** – Not applicable

**NARS** – National Assembly of the Republic of Serbia

**NDCs** – Nationally Determined Contribution

**NECP** – National Energy and Climate Plans

**NEPRO** – Rapid Alert System for Dangerous Non-Food Products in the Republic of Serbia

**NERP** – National Emission Reduction Plan

**NIP** – National Implementation Plan

**NM** – *Novi Magazin*

**NPAA** – National Programme for the Adoption of the Acquis

**OB** – Ombudsman

**OSCE** – Organization for Security and Co-operation in Europe

**PBDE** – Polybrominated diphenyl-ethers

**PPP** – Public Procurement Portal

**PM<sub>10</sub>** – Particulate matter up to 10 micrometers

**PM<sub>2.5</sub>** – Particulate matter up to 2.5 micrometers

**POPs** – Persistent Organic Pollutants

**PRTR** – Pollutant Release and Transfer Register

**PUCs** – Public utility companies

**PC** – Public Company

**REACH** – Registration, Evaluation, Authorization and Restriction of Chemicals

**RERI** – Renewables and Environmental Regulatory Institute

**RES** – Renewable Energy Sources

**RTS** – Radio Television of Serbia

**SAI** – State Audit Institution

**SCI** – Sites of Community Importance

**SEPA** – Serbian Environmental Protection Agency

**SO<sub>2</sub>** – Sulphur-dioxide

**SORS** – Statistical Office of the Republic of Serbia

**SPA** – Special Protected Areas

**SEIA** – Strategic Environmental Impact Assessment

**TENT** – Nikola Tesla thermal power plant

**UN** – United Nations

**UNESCO** – United Nations Educational, Scientific and Cultural Organization

**UNFCCC** – United Nations Framework Convention on Climate Change

**WWTP** – Waste Water Treatment Plant


# Appendix II

## Comparative Table of Recommendations for 2020 and 2021

**Legenda:**  Not adopted  Partially adopted  Adopted



## Horizontal Legislation

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Improve the quality of Strategic Environmental Impact Assessment (SEA) and Environmental Impact assessment (EIA) by adopting the necessary bylaws and planned amendments to the Law on EIA and the Law on SEA.			Improve the quality of the Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) by adopting the necessary bylaws and planned amendments to the Law on EIA and the Law on SEA.
Harmonize List I (projects for which an Environmental Impact Assessment is mandatory) and List II (projects for which an Environmental Impact Assessment may be required) with Annexes I and II of Directive 2011/92/EU.			Harmonize List I (projects for which Environmental Impact Assessment is mandatory) and List II (projects for which an Environmental Impact Assessment may be required) with Annexes I and II of Directive 2011/92/EU.
Create a list of plans and programmes for which a Strategic Environmental Assessment is mandatory and a list of plans and programmes for which a strategic environmental assessment may be required.			Create a list of plans and programmes for which a Strategic Environmental Assessment is mandatory and a list of plans and programmes for which a strategic environmental assessment may be required.



**Recommendation for 2020  
from the previous Report**

**Result    Comment**

**Recommendation for 2021**

Provide transparent and timely information to the public about public hearings through the improved provision of information online, in accordance with the guidelines for the development of the web presentations of state administration bodies, the bodies of autonomous provinces and local self-governments.



Provide transparent and timely information to the public about public hearings through the improved provision of information online, in accordance with the guidelines for the development of the web presentations of state administration bodies, the bodies of autonomous provinces and local self-governments.

Ensure the full implementation of the Regulation on the Methodology of Public Policy Management, Policy and Regulatory Impact Assessment, and Content of Individual Public Policy Documents (8/2019-79) in the environment sector.



Ensure the full implementation of the Regulation on the Methodology of Public Policy Management, Policy and Regulatory Impact Assessment, and Content of Individual Public Policy Documents (8/2019-79) in the environment sector.

Fully implement the guidelines set out in the Rulebook on the content of the requests on the need for environmental impact assessment and the content of the request for determining the scope and content of the Environmental Impact Assessment Study, when drafting environmental impact assessment studies.



Fully implement the guidelines set out in the Rulebook on the content of requests on the need for environmental impact assessments and the content of requests for determining the scope and content of the Environmental Impact Assessment Study when drafting environmental impact assessment studies.

Ensure the inclusion of a cumulative impact assessment in environmental impact assessment studies.



Ensure the inclusion of a cumulative impact assessment in environmental impact assessment studies.

Establish quality control of environmental impact assessment studies, as well as a review of studies every five years.



Establish quality control of environmental impact assessment studies, as well as a review of studies every five years.

## Recommendation for 2020 from the previous Report

Result Comment

## Recommendation for 2021

In order to achieve greater compliance with Directive 2003/35/EC on public participation, increase the capacity of national institutions and local self-governments to conduct public participation procedures during the preparation and revision of plans and programmes.



In order to achieve greater compliance with Directive 2003/35/EC on public participation, increase the capacity of national institutions and local self-governments to conduct public participation procedures during the preparation and revision of plans and programmes.

Increase penalties for environmental pollution.



During 2020, increased activity by the inspectorate for environmental protection in controlling the biggest polluters was evident. However, the penalties imposed (most often economic offences, in addition to a fine) are still inadequate and do not correspond to the degree of the damage caused by polluters to the health of citizens and the environment.

Increase penalties for environmental pollution.

Increase and consistently implement penalties for non-compliance with regulations on the environmental impact assessment and strategic environmental assessment procedures.







Increase and consistently implement penalties for non-compliance with regulations on the environmental impact assessment and strategic environmental assessment procedures.






## New recommendations

- Ensure the full implementation of the Aarhus Convention during the COVID-19 pandemic with regard to citizens' rights to take part in the decision making process, right to information on the environment, and right to legal protection. All decision making processes (adopting plans, programmes, public policies, legislation, and approval of projects with possible environmental impacts) that

violate citizens' rights must be postponed until epidemiological conditions allow for the implementation of these processes in accordance with Serbian law and the Aarhus Convention.

# Air Quality









Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Enable the participation of the interested public in the process of developing the Air Quality Strategy.		The air protection strategy has not yet been adopted; it is unknown at what stage of drafting the document is at, because the process has not been open to the public.	Enable the participation of the interested public in the process of developing the Air Quality Strategy.
Start the process of establishing binding standards for low-power combustion appliances used in households (stoves and solid fuel stoves) in accordance with the Eco-design Directive (2009/125/EC). Given the widespread use of inefficient stoves and solid fuel ovens in households, it is necessary to consider the accelerated transposition of deadlines for this Directive.		Steps have been taken to establish a system to subsidize the procurement of more efficient low-power combustion plants at the national level, but the Directive has not been transposed into the national legislative framework.	Start the process of establishing binding standards for low-power combustion appliances used in households (stoves and solid fuel stoves) in accordance with the Eco-design Directive (2009/125/EC). Given the widespread use of inefficient stoves and solid fuel ovens in households, consider the accelerated transposition of this Directive.
Amend the existing legislative framework to include binding regulations to regulate the efficiency and emissions of solid fuel combustion plants.		This recommendation is already contained in the previous one and has therefore been omitted.	n/a
Ensure that competent institutions enforce regulations related to legal deadlines for the creation of public policies concerning air quality, regulations related to air quality monitoring, the exchange of air quality information, and obligations under international agreements.			Ensure that competent institutions enforce regulations related to legal deadlines for the creation of public policies concerning air quality, regulations related to air quality monitoring, the exchange of air quality information, and obligations under international agreements.

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Monthly information about detected exceedances of hourly and daily limit values (LV) must include information about which monitoring stations were/were not operating during that month.		This information is not yet being included in monthly reports on detected exceedances of hourly and daily limit values (LV).	Monthly information about detected exceedances of hourly and daily limit values (LV) must include information about which monitoring stations were/were not operating during that month.
Stakeholders responsible for air quality monitoring should ensure that the measuring system is well-maintained and that data are made available. Financing for the smooth operation of air quality monitoring networks should also be secured, especially for urban agglomerations such as Belgrade.		The availability and validity of data has increased significantly compared to previous years. During 2019, the validity of data from the state network reached 85%, which is a significant improvement, but there is still much of room for improvement and many areas remain without official pollution measurements.	Stakeholders responsible for air quality monitoring should ensure that the measuring system is well-maintained and that data is made available. Financing for the smooth operation of air quality monitoring networks should also be secured, especially for urban agglomerations such as Belgrade.
Cross-sectoral cooperation needs to be improved to enable full implementation of existing legal regulations in the country.		This recommendation was too general and has therefore be omitted.	n/a
Local governments/cities should improve the quality and visibility of air quality data, as well as ensure easy public access to air quality data provided by the local monitoring networks.		Currently, daily official measurements from the local network of measuring stations are available only to the citizens of Belgrade on <a href="http://www.beoeko.com">www.beoeko.com</a> website. Real-time daily data for other cities and towns in Serbia are still not available to citizens.	Local governments/cities should improve the quality and visibility of air quality data, as well as ensure easy public access to air quality data provided by the local monitoring networks.
Provide funding for the effective operation of the inspectorate for environmental protection.		The inspectorate's work in the previous reporting has indicated that, in addition to financing, it is necessary to provide conditions for environmental inspectors to work unhindered and use all the instruments at their disposal, in accordance with their powers.	Secure financing for the unobstructed work of inspectorates for environmental protection.



# Waste Management







Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Improve the waste management control system, with special emphasis on the movement and disposal of waste.		New regulations have been adopted, which should bring about improvements in the waste management control system.	Improve the waste management control system, with special emphasis on the movement and disposal of waste.
Continue developing partnerships with civil society.		CSOs have continued to be included in working groups.	Continue developing partnerships with civil society.
Suspend all activities related to the amendment of the Law on Waste Management aimed at legalizing the import of waste for the purpose of co-processing and its use as an alternative fuel.		Cement plants continue to advocate for the legalization of importing waste for co-process, because they do not want to deal with problems in the work of PUCs, which are supposed to prepare raw materials for them.	Suspend all activities related to the amendment of the Law on Waste Management aimed at legalizing the import of waste for the purpose of co-processing and its use as an alternative fuel.
Improve the legal framework to enable the efficient implementation of extended liability principles.			Improve the legal framework to enable the efficient implementation of extended liability principles as well as the “polluter pays” principle.
Review regional plans and the National Waste Management Strategy, with the continued implementation of infrastructure projects for the construction of landfills.		No review has been completed, nor has a new Strategy been adopted.	Review regional plans and the National Waste Management Strategy, with the continued implementation of infrastructure projects for the construction of landfills.  Adopt the waste sludge management strategy in Serbia
Adopt a waste management strategy for Serbia.			Adopt the waste sludge management strategy in Serbia.
Apply the “polluter pays” principle from the Law on Waste Management, as it is still an incomplete legal definition that lacks mechanisms for extended producer responsibility.			n/a

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Improve the legislative framework for finally closing unsanitary landfills.			Improve the legislative framework for finally closing unsanitary landfills.
Develop a waste generation prevention plan.		A Draft Waste Generation Prevention Plan has been presented.	Develop a waste generation prevention plan.
Introduce obligatory monitoring for dioxin and furan at all landfills.			Introduce obligatory monitoring for dioxin and furan at all landfills.
Adopt clear rules in waste management regulations that clarify who is responsible for what.		Certain new Rulebooks have been adopted that partially define rules for waste management.	n/a
Include industry in the application of the circular economy concept.		The concept of the circular economy in the Republic of Serbia is still in development, but there are industries moving towards this principle.	Include industry in the application of the circular economy concept.
Create an economic model to motivate local self-governments to dispose of waste at sanitary landfills and accelerate the process of closing and remediating landfills/dumpsites.		Last year, the Ministry of Environmental Protection put out calls for local self-governments to clear illegal landfills.	Create an economic model to motivate local self-governments to dispose of waste at sanitary landfills and accelerate the process of closing and remediating landfills/dumpsites.
Provide prerequisites for the application of waste management hierarchy principles, with an emphasis on waste prevention, as well as the reuse and recycling of waste.			Provide prerequisites for the application of waste management hierarchy principles, with an emphasis on waste prevention, as well as the reuse and recycling of waste.
Ensure a system of public reporting on landfill gas emissions from landfills managed by public utility companies (PUCs).			Introduce systemic water and air monitoring at non-sanitary landfills, and ensure a system of public reporting on landfill gas emissions from landfills managed by public utility companies (PUCs).









**Recommendation for 2020  
from the previous Report**

**Result    Comment**

**Recommendation for 2021**

Ensure further application of the “polluter pays” principle and conduct an inspection of the relevant industry to ensure true reporting.			Carry out inspections of industries obliged to report on waste management to ensure truthful reporting.
Raise public awareness on the importance of setting up a system of waste management and the consequences of inadequate waste management on the environment.		Public awareness has been improved due to the support CSOs have received for their initiatives.	Raise public awareness on the importance of setting up a system of waste management and the consequences of inadequate waste management on the environment.
Further develop the capacity of institutions at all levels to monitor and control the implementation of regulations.			n/a
Develop an efficient court system, capable of monitoring and effectively enforcing regulations in the field of waste management.			n/a
Some local self-governments did not adopt waste management plans or plans for clearing unsanitary landfills and dumps by the deadline, and no penal provisions prescribed by the Law on Waste Management were implemented. It is necessary to penalise local self-governments that do not have a waste management plan and/or do not submit regular reports to the Environmental Protection Agency.			Fine local self-governments that fail to meet their obligations under the Law on Waste Management (failing to adopt waste management plans, failing to adopt plans to close unsanitary landfills and dumps, failing to submit regular reports to the EPA).
Leasing of chemicals, i.e. procuring only chemicals that industry really needs in the context of the circular economy (creating as little waste as possible).			Leasing of chemicals, i.e. procuring only chemicals that industry really needs in the context of the circular economy (creating as little waste as possible).













Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Due to the ban on the export of hazardous waste, work on resolving this issue.			Provide for appropriate management of hazardous waste generated in Serbia in anticipation of the expected ban on exporting hazardous waste.
Implement penalties for municipalities that do not send reports and data to the Environmental Protection Agency.			n/a
Introduce systematic water and air monitoring at unsanitary landfills, i.e., the parameters recognized by all municipalities.			n/a
Provide education and training for establishing a zero-pollution system, through cooperation between the civil sector and the ministry responsible for environmental protection.			n/a
Do not export non-hazardous waste that Serbia has the capacity to recycle.			Adopt measures to incentivize local recyclable waste treatment instead of exporting it.
Revise all permits for the management and export of hazardous waste.			Revise waste management and export permits.
Increase participation of public utility companies (PUCs) in implementing the packaging and packaging waste management system.			More intensively involve public utility companies (PUCs) in the system of packaging and packaging waste management.
More intensive inspection supervision over the implementation of the Law on Packaging and Packaging Waste.			More intensive inspection supervision over the implementation of the Law on Packaging and Packaging Waste.

**Recommendation for 2020  
from the previous Report**

**Result    Comment**

**Recommendation for 2021**

Introduce a special article to contracts between waste generators and hazardous waste treatment operators requiring hazardous waste treatment operators to inform waste generators in writing about the final treatment of waste, thereby observing the waste producer's extended liability.		Introduce a special article to contracts between waste generators and hazardous waste treatment operators requiring hazardous waste treatment operators to inform waste generators in writing about the final treatment of waste, thereby observing the waste producer's extended liability.
Provide funds for financing projects for clearing additional landfills/dumps, introduce selective waste collection, and construction of transfer stations and sanitary landfills.		n/a
Provide funds to inform and educate the public about the importance of establishing a waste management system, and conduct education in partnership with CSOs and the media.		n/a
Introduce economic instruments for reducing waste sent to landfills without treatment.		Introduce economic instruments for reducing waste sent to landfills without treatment.
Introduce a deposit system for a portion of packaging waste.		Introduce a deposit system for a portion of packaging waste.
Introduce umbrella insurance for hazardous waste operators, so that the insurance companies will cover the costs of appropriately disposing of hazardous waste as well as any damages.		Introduce umbrella insurance for hazardous waste operators, so that insurance companies cover the costs of appropriately disposing the hazardous waste as well as any damages.
Introduce a set of economic instruments for communal waste (landfill fees, deposit systems).		Introduce a set of economic instruments for communal waste (landfill fees, deposit systems).
Introduce a <i>pay as much as you throw away</i> system.		n/a

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Waste storage should be the most expensive waste treatment option.			n/a
Prescribe deadlines and the types of packaging eligible for the deposit system only after a feasibility study has been produced.			Prescribe deadlines and the types of packaging eligible for the deposit system only after a feasibility study has been produced.

## New recommendations

- Due to the nature and duration of the COVID-19 pandemic, assign healthcare waste to a separate form in the National Register of Pollution Sources.
- Adopt a Rulebook that will allow citizens to hand over hazardous waste to operators more easily.
- Adopt a common methodology for sending data to the Statistical Office of the Republic of Serbia and the EPA.
- Improve the system for textile waste management. Separate collection of textile waste should be organized, and steps taken to prevent the collected textile ending up in landfills or incinerators.
- Adopt a bylaw to define fees for importing drugs and placing them on the market due to the probability that the drugs may become hazardous waste after their expiration date.



# Water Quality

## Recommendation for 2020 from the previous Report

### Result Comment

### Recommendation for 2021

Integrate nature directives (Birds Directive and Habitats Directive) into the field of water management. Better coordination is needed between the water management sector and the environmental sector regarding the implementation of EU directives.



It is expected that this recommendation will be at least partially adopted through the Water Management Plan, which is currently being prepared.

Integrate nature directives (Birds Directive and Habitats Directive) into the field of water management. Better coordination is needed between the water management sector and the environmental sector regarding the implementation of EU directives.

Develop a concrete plan and set of measures for the improvement of water quality monitoring in accordance with the requirements of the Water Framework Directive.



It is expected that this recommendation will be at least partially adopted through the Water Management Plan, which is currently being prepared.

Develop a concrete plan and set of measures for the improvement of water quality monitoring in accordance with the requirements of the Water Framework Directive.

Develop specific strategies to improve investment in wastewater treatment facilities. Initiate the development of models and strategies for knowledge transfer in the field of wastewater treatment in order to reduce costs and mobilize domestic capacities.



Develop specific strategies to improve investment in wastewater treatment facilities. Initiate the development of models and strategies for knowledge transfer in the field of wastewater treatment in order to reduce costs and mobilize domestic capacities.




Adopt strategic and planning documents in accordance with the obligations arising from the Water Framework Directive (Water Management Plan, Flood Risk Management Plan).





A water management plan is being developed, but its adoption has been delayed.

Adopt strategic and planning documents in accordance with the obligations arising from the Water Framework Directive (Water Management Plan, Flood Risk Management Plan).

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Develop capacities and improve the organization of public institutions responsible for water management, especially at the local level; the complexity of water management issues requires stronger staff and technical capacity. The competent institutions must conduct an analysis of the existing capacities as soon as possible and develop a plan for their improvement. To achieve this, professional institutions and CSOs need to advocate for greater political and financial support for the water management sector.			Develop capacities and improve the organization of public institutions responsible for water management, especially at the local level – the complexity of water management issues requires stronger personnel and technical capacities. The competent institutions must conduct an analysis of the existing capacities as soon as possible and develop a plan for their improvement. To achieve this, professional institutions and CSOs need to advocate for greater political and financial support for the water management sector.
Develop structured cooperation with other relevant sectors: environmental protection, energy, agriculture and spatial planning. This requires constant communication and exchange of information between sectors to be established.		The National Water Conference has been initiated.	Develop structured cooperation with other relevant sectors: environmental protection, energy, agriculture and spatial planning. This requires constant communication and exchange of information between sectors to be established.
Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.		Public participation was enabled during the development of the Water Management Plan. Representatives of civil society organizations have been included in the proposed composition of the National Water Conference.	Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Integrate sustainable solutions into water management practices and more seriously consider eco-system services. Specific capacities for these needs should be developed at the competent institutions.			Integrate nature-based solutions into water management practices and more seriously consider eco-system services. Specific capacities for these needs should be developed in the competent institutions.
Improve control and mitigation of key dangers: Intensive proliferation and poor-planning of small hydropower plants, gravel extraction, pollution, uncontrolled use of groundwater, illegal construction on river banks. River habitats, wetlands, and water resources in general are very endangered in Serbia. Urgent action is needed at the national level.		Public pressure regarding the construction of small hydropower plants has increased significantly, but there is still no systematic response from the competent institutions in the field of water management. River sediment extraction is formally regulated through the River Sediment Extraction Plan, but in practice there are still problems and irregularities. There are still no systemic measures to prevent illegal construction on wetlands.  The Ministry of Environmental Protection has published an overview of wastewater treatment plant (WWTP) construction projects for which implementation has begun, or which are in the phase of preparing documentation.	Improve control and mitigation of key dangers: poorly planned small hydropower plants, gravel extraction, pollution, uncontrolled use of groundwater, and illegal construction on river banks – river habitats, wetlands, and water resources in general are very endangered in Serbia. Urgent action is needed at the national level.
Develop a single database on planning and construction of wastewater treatment plants, which should be available to the interested public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.			Develop a single database on planning and constructing wastewater treatment plants (WWTPs) that is available to the interested public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Gradually increase water prices and fees for wastewater drainage and treatment services, in order to provide for the construction of the necessary facilities for water drainage and treatment and their normal operation.			Gradually increase water prices and fees for wastewater drainage and treatment services, in order to provide for the construction of the necessary facilities for water drainage and treatment and their normal operation.
Permanently increase budget funds for financing water management activities and water protection.		Budget funds allocated for water management have stagnated.	Permanently increase budget funds for financing water management activities and water protection.

## New recommendations

- Adopt key strategic and planning documents for alignment with EU water management legislation and practice.



# Nature Protection

## Recommendation for 2020 from the previous Report

### Result Comment

### Recommendation for 2021

Adopt a new Law on Nature Protection, or amend the current one with regard to declaring and managing protected areas, in particular by precisely setting deadlines for submitting protection studies, for notification of the beginning of protection procedures and passing an act on proclamation; harmonize the categorization of protected areas with the categorization of the International Union for Conservation of Nature; improve the management model in protection model in accordance with the specific needs of different areas; improve the designation and implementation of protection regimes and measures, especially biomonitoring.



Improve the Law on Nature Protection in line with the EU legislation, ratified international agreements, good practice in the sector and the needs of nature protection in Serbia. Ensure the process of improving the Law is transparent and enables public participation, in accordance with the positive regulations of the Republic of Serbia and good practice.

Adopt a Regulation on Acceptability Assessment, as well as appropriate amendments to the Law on Strategic Environmental Assessment and the Law on Environmental Impact Assessment in order to establish the necessary standards for approving plans and projects that may have an impact on the ecological network, in accordance with paragraph 3 of Article 6 of the Habitats Directive.







Regulate the ecological network acceptability assessment procedure through appropriate regulations, in order to establish the necessary standards for the approval of plans and projects that may have an impact on the ecological network, in accordance with paragraph 3 of Article 6 of the Habitats Directive.



**Recommendation for 2020  
from the previous Report**

**Result Comment**

**Recommendation for 2021**

Develop and adopt a Nature Protection Strategy and other strategic documents in accordance with the Law on Nature Protection and the Law on the Planning System, fully in line with the EU Biodiversity Strategy.		* The Nature Protection Program was completed in 2020 and adopted in the first half of 2021.	Develop and adopt public policies in the field of nature protection in accordance with the Law on Nature Protection, the Law on the Planning System and ratified international agreements, and fully harmonize the strategic framework with the EU Biodiversity Strategy.
Amend the Rulebook on the Declaration and Protection of Strictly Protected and Protected Species of Plants, Animals and Fungi and the Rulebook on Declaring a Closed Hunting Season for Protected Wild Game Species, to fully transpose the provisions of the Habitats Directive and the Birds Directive on hunting.			Amend the Rulebook on the Declaration and Protection of Strictly Protected and Protected Species of Plants, Animals and Fungi and the Rulebook on Declaring a Closed Hunting Season for Protected Wild Game Species, to fully transpose the provisions of the Habitats Directive and the Birds Directive on hunting.
Develop and adopt a document to precisely determine the sequence and procedure for competent authorities to detect cases of poisoning, as well as other cases of illegal actions pertaining to wild species.			Develop and adopt a document to precisely determine the sequence and procedure for competent authorities detecting cases of poisoning, as well as other cases of illegal actions pertaining to wild species.
Improve cooperation in the process of adopting planning documents and regulations between the nature protection sector, the energy sector, the spatial planning and urban planning sector and the construction sector, especially those regulating and applying Environmental Impact Assessment and Strategic Environmental Impact Assessment procedures.			Improve cooperation in the process of adopting planning documents and regulations between: the nature protection sector, the energy sector, the spatial planning and urban planning sector and the construction sector, especially those regulating and applying Environmental Impact Assessment and Strategic Environmental Impact Assessment procedures.

**Recommendation for 2020  
from the previous Report**

**Result    Comment**

**Recommendation for 2021**

Improve the participation of civil society organizations in the processes of preparing, adopting and monitoring regulations, primarily by involving them in the early stages of drafting, in accordance with the Regulation on Public Policy Management Methodology, Analysis of the Effects of Public Policies and Regulations and Guidelines for the Involvement of Civil Society Organizations in the process of drafting regulations of the Government of the Republic of Serbia.



Establish Ministry of Environmental Protection mechanisms to improve the participation of civil society organizations in the processes of preparing, adopting and monitoring the implementation of regulations in the field of nature protection, primarily by involving stakeholders at an early stage, in accordance with the Regulation on Public Policy Management Methodology, Policy and Regulation Analysis, and the Content of Individual Public Policy Documents, as well as the Guidelines for the Inclusion of Civil Society Organizations in the Process of Drafting Regulations of the Government of the Republic of Serbia.

Publish the negotiating position in the field of nature protection and involve civil society organizations in the negotiation process.








Publish the negotiating position in the field of nature protection and involve civil society organizations in the negotiation process.

Improve the capacities of the Ministry of Environmental Protection, and improve cooperation and ensure an open flow of information between different sectors within the Ministry.



Improve the capacities of the Ministry of Environmental Protection, enhance cooperation and ensure the open flow of information between different sectors within the Ministry and with stakeholders, such as civil society organizations, by appointing a person in charge of cooperation with CSOs.

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Improve the capacities of the Institute for Nature Conservation (at the provincial and state level) by increasing the number of employees and providing them with further training, as well as improving technical capacities.			Improve the capacities of the Institute for Nature Conservation (at the provincial and state level) by increasing the number of employees and providing them with further training, as well as improving technical capacities.
Continue building the capacities of the police, inspectorate, public prosecution and judiciary to implement regulations related to species and habitat protection, in cooperation with professional civil society organizations.		During 2020, training sessions for inspectors, police personnel, prosecutors and judges were held with the goal of raising capacities and increasing intersectoral cooperation in the area of wild species protection.	Continue building the capacities of the police, inspectorate, prosecution and judiciary to implement regulations related to species and habitat protection, in cooperation with professional civil society organizations.
Improve annual inspection plans and their implementation in protected areas, i.e. ecological network areas, in order to prevent excessive use of natural resources and illegal activities, and to ensure the preservation of the natural values of these areas.			Improve annual inspection plans and their implementation in protected areas, i.e. ecological network areas, in order to prevent excessive use of natural resources and illegal activities, and to ensure the preservation of the natural values of these areas.
Strengthen cooperation between all actors in order to prevent corruption in the nature protection sector (especially related to the illegal use of forests, water resources and hunting).			Strengthen cooperation between all actors in order to prevent corruption in the nature protection sector (especially related to the illegal use of forests, water resources and illegal hunting activities).
The competent Ministry should work more intensively on solving problems and preventing violations of the provisions of the International Convention on the Conservation of European Wildlife and Natural Habitats in the Republic of Serbia.			The competent Ministry should work more intensively on solving problems and preventing violations of the provisions of the International Convention on the Conservation of European Wildlife and Natural Habitats in the Republic of Serbia.

**Recommendation for 2020  
from the previous Report**

**Result Comment**

**Recommendation for 2021**

Ensure regular and appropriate reporting under ratified international agreements in the field of nature protection (especially under the Convention on the Conservation of European Wildlife and Natural Habitats, the Convention on the Conservation of Migratory Species of Wild Animals, the Ramsar Convention and the CITES Convention).



During 2020, reporting was carried out according to ratified international agreements in the field of nature protection (Ramsar Convention), but there was no involvement of stakeholders in preparing reports or informing the public about their content.

Ensure regular and appropriate reporting under ratified international agreements in the field of nature protection (especially under the Convention on the Conservation of European Wildlife and Natural Habitats, the Convention on the Conservation of Migratory Species of Wild Animals, the Ramsar Convention and the CITES Convention). Ensure the process of drafting the report is transparent, including the opinions of the interested public.

Prescribe measures for the preservation, restoration and improvement of the state of the ecological network area, through a participatory process with participation by professional organizations of state bodies and civil society, as well as the users of the areas.



Prescribe measures for the preservation, restoration and improvement of the state of the ecological network area, through a participatory process that includes professional organizations of state bodies and civil society, as well as the users of the area.

Provide adequate and purposeful financing for nature protection from the Green Fund in accordance with the needs of nature protection (determine priorities and criteria for the allocation of funds).




n/a

Continue regular financing of activities for establishing the ecological network of the Republic of Serbia and "Natura 2000", with full and regular reporting on the implemented activities and funds spent.



During 2020, investment of budget funds of the Republic of Serbia in establishing the ecological network of the Republic of Serbia and the ecological network of the European Union – Natura 2000 – continued.

Continue regular financing of activities for the establishment of the ecological network of the Republic of Serbia and "Natura 2000", with full and regular reporting on implemented activities and spent funds.

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Ensure that appropriate funds are allocated in the budget for nature protection and regular and detailed reporting on expenditure; allocate more funds for the practical protection of species and habitats.			Ensure that appropriate funds are allocated in the budget for nature protection and regular and detailed reporting on expenditure; allocate more funds for the practical protection of species and habitats.

## New recommendations

- Ensure continuous institutional support for the efficient establishment of the ecological network of the Republic of Serbia and the "Natura 2000" ecological network, and include the nature protection sector and other relevant sectors, especially agriculture, forestry, spatial planning and energy in a timely manner.



# Chemicals Management

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Harmonize national regulations with relevant amendments to EU regulations in this sector.	⊗		Harmonize national regulations with relevant amendments to EU regulations in this sector
Adopt the Draft Law on Biocidal Products.	⊗		Adopt the Draft Law on Biocidal Products.
Update and adopt a NIP for implementing the Stockholm Convention on POPs.	⊗	The old updated version of the NIP has expired without ever having been adopted.	n/a
Ratify the Minamata Convention on Mercury.	⊗		Ratify the Minamata Convention on Mercury.
Adopt a Strategic Document and Action Plan to strengthen synergies in the implementation of the Basel, Rotterdam, Stockholm and Minamata Conventions.	⊗	Consultations between the Ministry of Foreign Affairs and the Republic Secretariat for Public Policies regarding the draft public policy documents are underway but are not yet publicly available.	Adopt a Strategic Document and Action Plan to strengthen synergies in the implementation of the Basel, Rotterdam, Stockholm and Minamata Conventions.
Strengthen administrative and professional capacities in this area, especially in the field of registering chemicals and biocidal products in the Register, as well as managing biocidal products, due to the introduction of a new procedure for recognition of EU acts resulting from the Draft Law on Biocidal Products.	⊗		Strengthen administrative and professional capacities in this sector, especially in the field of registering chemicals and biocidal products in the Register, as well as managing biocidal products, due to the introduction of a new procedure for recognition of EU legislation resulting from the Draft Law on Biocidal Products.

**Recommendation for 2020  
from the previous Report**

**Result Comment**

**Recommendation for 2021**

Resolve requests for entry of chemicals in the Register of Chemicals from previous years under an accelerated procedure (for which no decisions have yet been issued), through simplification of the procedure in terms of requests for supplementing documentation.

Given the scope and content of the documentation required by the procedure for registering biocidal products in the eIRH, as well as the confidentiality of certain data, it is necessary to improve existing protection and strictly define different levels of access to data.



Last year, delays in issuing Decisions on the Registration of Chemicals were reduced, but in some cases the deadlines stipulated by the Law are still being broken.

Simplify the procedure for resolving requests for entering chemicals into the Register of Chemicals that are more than one year old.

Given the scope and content of the documentation required by the procedure for registering biocidal products in the eIRH, as well as the confidentiality of certain data, it is necessary to improve existing protection and strictly define different levels of access to data

Establish a joint body for integrated chemicals management in order to establish satisfactory cooperation and coordination between all relevant sectors and ensure safe management of chemicals throughout the life cycle, i.e., the adoption and implementation of the Integrated Chemicals Management Program. The joint body should consist of representatives of the competent state bodies in the field of chemicals management and representatives of industry, science and research, and civil society organizations.



The BRSM IT portal (<https://brsm.ekologija.gov.rs>) has been established, which is primarily intended for internal communication and exchange of official data for reporting in accordance with the requirements of the BRSM conventions between the competent state authorities.

Establish a joint body for integrated chemicals management in order to establish satisfactory cooperation and coordination between all relevant sectors and ensure safe management of chemicals throughout their life cycle, i.e., the adoption and implementation of the Integrated Chemicals Management Program. The joint body should include representatives of the competent state bodies in the field of chemicals management and representatives of industry, science and research, and civil society.

Strengthen the inspection bodies managing chemicals and biocidal product control.



Strengthen inspections of chemicals and biocidal products control.

Strengthen inspection of the application of the Law on General Use Products, in particular the safety of toys.



Strengthen inspection supervision over the application of the Law on Consumer Goods.

**Recommendation for 2020  
from the previous Report****Result    Comment****Recommendation for 2021**

Change the domestic system governing the collection of fees and charges by implementing the EU model of financing the chemicals and biocidal product management system to ensure that fees related to regulatory procedures for chemicals and biocidal products are borne by the businesses generating income by putting these chemicals and products on the market.












Change the domestic system governing the collection of fees and charges by implementing the EU model of financing the chemicals and biocidal product management system to ensure that fees related to regulatory procedures for chemicals and biocidal products are borne by the businesses generating income by putting these chemicals and products on the market.

## New recommendations

- Improve the information on the Chemicals Helpdesk, such as: guidelines and criteria for entering a biocidal product in the Temporary List, guides that are applied in practice, and frequently asked questions.
- Make data from the Register of Chemicals about the number of reported chemicals by hazard class available on the website of the Ministry of Environmental Protection again.
- Establish supervision over the implementation of Article 27 of the Law on Chemicals and protect the rights of consumers.
- Update the NEPRO database regularly.
- Make information on the implementation of concessions for which the Ministry of Environmental Protection is responsible publicly available.
- Update the latest adopted NIP for the Stockholm Convention on Persistent Organic Pollutants.



# Noise

Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Adopt the new Law on Environmental Noise Protection.			Adopt the new Law on Environmental Noise Protection.
Fully harmonize bylaws with Directive 2002/49/EC.			Fully harmonize bylaws with Directive 2002/49/EC.
Introduce uniform methods for calculating noise levels in accordance with Directive 2015/996 (CNOSSOS).			Introduce uniform methods for calculating noise levels in accordance with Directive 2015/996 (CNOSSOS).
Start developing strategic noise maps for the remaining four agglomerations (Belgrade, Novi Sad, Kragujevac and Subotica), as well as for the “Nikola Tesla” Airport.			Start developing strategic noise maps for the remaining four agglomerations (Belgrade, Novi Sad, Kragujevac and Subotica), as well as for the “Nikola Tesla” Airport, and develop action plans for all agglomerations.
Work on noise training (especially at the local level).			Work on noise training (especially at the local level).
Introduce 24-hour continuous noise monitoring and make data available through a unified display of automatic noise monitoring.		The City of Niš is the only city with 24-hour continuous noise monitoring.	Introduce 24-hour continuous noise monitoring and make data available through a unified presentation of automatic noise monitoring.
Implement acoustic zoning of all local self-governments.		In addition to Niš, the City of Belgrade has also started to develop the project <i>Acoustic Zoning of Belgrade</i> .	Implement acoustic zoning of all local self-governments.
Assess the harmful effects of noise on human health and the environment.			Assess the harmful effects of noise on human health and the environment.
Provide funds for the implementation of plans (and obligations) in the field of noise protection.			Provide funds for the implementation of plans (and obligations) in the field of noise protection.

## New recommendations

- Introduce local self-government control over the implementation of noise monitoring and submission of noise monitoring results to the Environmental Protection Agency.
- Expand competencies – authorize the environmental inspectorate and municipal police to independently measure the level of communal noise.
- Verify that organizers of public gatherings, entertainment and sports events and other outdoor and indoor activities have submitted data on noise protection measures in their applications for holding public gatherings and activities, if the use of sound and other devices may exceed the prescribed limit values.



# Climate Change

## Recommendation for 2020 from the previous Report

### Result Comment

### Recommendation for 2021

Adopt the Law on Climate Change and harmonize it with the EU legal framework for climate change by the end of 2020.



\* The Law was adopted in March 2021.

Adopt all necessary bylaws in order for the Law on Climate Change to be applied.

Review and increase ambitions to reduce GHG emissions and adopt revised NDCs by the next United Nations Framework Convention on Climate Change (UNFCCC) Summit, in line with the Paris Agreement. The ambition of the new/revised NDCs should be in line with the new EU targets for 2030, as well as the Green Deal as a plan for decarbonisation by 2050.



Review and increase ambitions to reduce GHG emissions and adopt revised NDCs by the next United Nations Framework Convention on Climate Change (UNFCCC) Summit, in line with the Paris Agreement. The ambition of the new/revised NDCs should be in line with the new EU targets for 2030, as well as the Green Deal's goal of decarbonisation by 2050.

It is necessary to establish a mechanism to continuously monitor the development and work of local self-governments on climate change mitigation and adaptation, as well as to provide a mechanism for providing technical and expert support to local self-governments that initiate drafting action plans for climate change adaptation.



The preparation of Development Plans offers local governments an opportunity to integrate climate change into sectoral policies at a local level.

Integrate climate change issues into the process of drafting development plans by local self-governments and establish a mechanism for monitoring the development and work of local self-governments on the issues of climate change mitigation and adaptation.

All elements of legislation (laws, documents, bylaws, etc.) that are directly related to greenhouse gas emitters should be revised so as to include climate change aspect (the so-called climate change mainstreaming).



This recommendation is too general, and has therefore been omitted from this year's report.

n/a

**Recommendation for 2020  
from the previous Report**

**Result    Comment**

**Recommendation for 2021**

Fully support the work of the Energy Community Secretariat and define goals for reducing greenhouse gas emissions, improve energy production from renewable energy sources, and energy efficiency, and establish a working group and begin developing an integrated National Energy and Climate Plan (NECP – National Energy and Climate Plans) of Serbia within the given deadline and facilitate adequate public participation.



Fully support the work of the Energy Community Secretariat and define goals for reducing greenhouse gas emissions, improving energy production from renewable energy sources, and energy efficiency, and establish a working group and start developing an integrated National Energy and Climate Plan of Serbia within the given deadline and facilitate adequate public participation.

Define and adjust the legal and institutional framework related to adaptation to climate change and integrate it into other sectors, primarily water management, agriculture, urban planning and construction, infrastructure, forestry, nature protection and energy.



Define and adjust the legal and institutional framework related to adaptation to climate change and integrate it into other sectors, primarily: water management, agriculture, urban planning and construction, infrastructure, forestry, nature protection and energy.

Establish legal instruments to oblige operators to submit information on GHG emissions.



\* With the adoption of the Law on Climate Change, the obligation to obtain permits for GHG emissions was introduced. However, bylaws to ensure that this obligation can be applied, and that it applies to operators from sectors other than air transport, are missing. Therefore, the recommendation has been adjusted.

Adopt Amendments to the Law on Climate Change that will define permits for GHG emissions and emission monitoring obligations for other relevant sectors such as energy. Adopt the necessary legal instruments to define the obligation of plant operators to monitor GHG emissions and submit information on GHG emissions to the Environmental Protection Agency.

**Recommendation for 2020  
from the previous Report**

**Result Comment**

**Recommendation for 2021**

Adopt a CO<sub>2</sub> tax mechanism that would be a source of revenue for the state budget. This is a requirement that Serbia must not only adopt in the near future but will encourage technology improvements, reduce greenhouse gas emissions and encourage much-needed energy mix diversification. No part of CO<sub>2</sub> emissions from thermal power plants and industry is taxed; if the minimum tax price is set at 20 euros per tonne of CO<sub>2</sub>-eq emissions (which is below the current price in the EU), government revenues from taxes on emissions from thermal power plants alone would exceed 600 million EUR per year. That amount of funds would play a significant role in further stimulating the decarbonisation of the economy of the Republic of Serbia.



\* In light of the newly adopted Law on Climate Change and the European Green Deal, it is necessary for the Serbian economy to prepare for the introduction of the so-called carbon border adjustment mechanism, which will introduce carbon footprint taxation on products and services entering the EU single market. Therefore, the recommendation has been adapted to the new circumstances.

Adopt Amendments to the Law on Climate Change to establish a CO<sub>2</sub> tax mechanism, and thus fully comply with the ETS Directive and prepare for the implementation of the carbon border adjustment mechanism, which is expected to enter into force in 2023.

Improve the role of the National Climate Change Council by establishing cross-sectoral cooperation and integrating climate change mitigation and adaptation measures into other public policies, as well as involving representatives of civil society organizations in the work of the Council.



\* The National Climate Change Council is recognized in the Law on Climate Change (Article 17) as an advisory body that should support the Government of the Republic of Serbia. The recommendation has been revised accordingly.

Establish a National Council for Climate Change, appoint members of the Council from among the representatives of ministries and other bodies and organizations, representatives of the scientific and professional community, as well as representatives of civil society, whose area of activity is important for identifying and implementing activities in the field of climate change by the end of 2021, and adopt the Rules of Procedure of the Council.

**Recommendation for 2020  
from the previous Report**

**Result Comment**

**Recommendation for 2021**

In the process of drafting the Third National Report under the UN Framework Convention on Climate Change and the Second Biennial Update, take into account the problems already described regarding the reliability and accuracy of GHG inventory data. Use relevant available data, instead of projections. Ensure adequate participation of civil society representatives.



Coalition 27 representatives were able to take part in drafting these documents through membership of working groups. However, the working groups did not meet for most of 2020, due to the COVID-19 pandemic.

In the process of drafting the Third National Report under the UN Framework Convention on Climate Change and the Second Biennial Update, take into account the problems already described regarding the reliability and accuracy of GHG inventory data. Use relevant available data, instead of projections. Ensure adequate participation of civil society.

Make information on the GHG inventory public, verifiable and easily accessible, in accordance with the laws of the Republic of Serbia and international obligations, such as the Aarhus Convention and the Paris Agreement.



Make information on the GHG inventory public, verifiable and easily accessible, in accordance with the laws of the Republic of Serbia and international obligations, such as the Aarhus Convention and the Paris Agreement.

Continue and improve involvement of civil society organizations in the processes of developing laws and strategic documents, ensuring the widest possible involvement of the public and a fair procedure of public debate; enable local governments, civil society and citizens to actively participate in developing the National Climate Change Strategy with an action plan and in revising the NDC.








The Ministry has involved a number of civil society organizations in the work on updating NDCs. However, wider public involvement has not been achieved.

Improve efforts to involve the general public in decision-making processes on public policies related to climate change, and above all the participation of the public in the development of the National Climate and Energy Plan, as well as revising NDCs.

Increase the number of civil servants in ministries and local self-governments dealing with climate change in various sectors and focus on capacity building.



Increase the number of civil servants in ministries and local self-governments dealing with climate change in various sectors and focus on capacity building.






Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Improve the practice of involving the public in relevant policy-making processes in the field of climate change.		This recommendation is already contained in other recommendations, so it has been omitted from this year's report.	n/a
Strengthen capacities in terms of knowledge and skills of civil servants working on the issue of climate change employed in ministries and local self-governments.			Strengthen capacities in terms of knowledge and skills of civil servants working on the issue of climate change employed in ministries and local self-governments.
Improve education on climate change, by strategically and systemically including it in school and university programmes.			Improve education on climate change, by strategically and systemically including it in school and university programmes.
Develop a financial mechanism that will support strategic priorities (which must be in line with the process of Serbia's accession to the European Union) by, among other things, redirecting funds intended for the fossil fuel industry to climate change mitigation and adaptation measures.			Develop a financial mechanism that will support strategic priorities (which must be in line with the process of Serbia's accession to the European Union), among other things, by redirecting funds intended for the fossil fuel industry to climate change mitigation and adaptation measures.
Provide long-term financial mechanisms for funding capacity building for civil servants and education in the field of climate change to enable the creation of a society resistant to the impacts of climate change.		This recommendation is already contained in other recommendations and has therefore been omitted from this year's report.	n/a







## Recommendation for 2020 from the previous Report

### Result Comment

### Recommendation for 2021

<p>It is necessary to develop a national strategic document (development programme) that will establish a long-term vision for the development of the forestry sector in Serbia, with specified sources of funding and implementation dynamics. This document must take into account relevant EU documents (EU Forestry Strategy, Green Paper on Forest Protection).</p>	<p></p> <p>There is no information on any progress made in developing the Forestry Development Programme.</p>	<p>Develop a national strategic document (development program) for forestry that will provide a long-term vision for development in this area in Serbia with an action plan with defined sources of funding, competent institutions and implementation dynamics. The document must take into account the relevant documents currently being developed at the EU level (Biodiversity Strategy to 2030 and other documents from the Green Agreement package).</p>
<p>Develop an institutional and legislative framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.</p>	<p></p>	<p>Develop an institutional framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.</p>
<p>Strengthen the capacities of the competent institutions regarding the implementation of EU legislation in the field of nature protection (Habitats Directive and Birds Directive, CITES Convention, etc.).</p>	<p></p> <p>Some cooperation has been achieved between the Forest Administration and the Ministry of Environmental Protection on establishing the Natura 2000 ecological network.</p>	<p>Strengthen the capacities of the competent institutions for the implementation of EU legislation and international agreements in the field of nature protection (Habitats Directive and Birds Directive, CITES Convention, etc.).</p>
<p>Strengthen the capacities of the competent forestry institutions regarding EU integration in the field of climate change and energy.</p>	<p></p>	<p>Strengthen the capacities of the competent institutions in forestry regarding EU integration in the field of climate change and energy.</p>
<p>Enable effective public participation in the development of key documents regulating forest use (including the basics of forest management).</p>	<p></p>	<p>Enable effective public participation in the development of key documents regulating forest use (including basic forest management).</p>



Recommendation for 2020 from the previous Report	Result	Comment	Recommendation for 2021
Evaluate and promote other ecosystem services provided by forests, other than wood, and use them in forest management planning.		A more comprehensive approach to ecosystem services is emerging, but no official documents have yet been developed that would precisely define the direction of integration of ecosystem services and biodiversity into forest planning and management.	Evaluate and promote ecosystem services provided by forests, other than wood, and use them in forest management planning.
Improve the quality of data about privately owned forests and strengthen control over their use.		The Second National Forest Inventory is being prepared, which should improve data on all forests in Serbia.	Improve the quality of data on privately owned forests and strengthen control over their use.
Improve cooperation with other sectors (nature protection, energy, climate change, water management) in order to integrate forest ecosystems.		Some cooperation has been achieved between the Forest Administration and the Ministry of Environmental Protection on establishing the Natura 2000 ecological network.	Improve cooperation with other sectors (nature protection, energy, climate change, water management) in order to integrate forest ecosystems.
More funding from the Budget Fund for Forests should be directed towards financing the protection and improvement of forest ecosystems that provide services that are beneficial to all.			More funding from the Budget Fund for Forests should be directed towards financing the protection and improvement of forest ecosystems that provide services that are beneficial to all.

## New recommendations

- Establish an inter-ministerial working group that will coordinate the efficient development of afforestation plans.

# Appendix III

## Methodology and list of Authors (Organizations) by fields

Field	Methodology	List of authors (organizations)
Financing in the Field of Environmental Protection and Climate Change	<ul style="list-style-type: none"> <li>• Policy analysis: analysis of national legal and strategic documents, information collected from official sources available online and obtained based on requests for access to information of public importance.</li> <li>• Consultations with responsible institutions.</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• Belgrade Open School</li> </ul>
Horizontal legislation	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information are collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> <li>• Data related to the implementation of EIA and SEA procedures were collected through participation in public consultations and consultations with local authorities and CSOs.</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• Belgrade Open School</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Direct communication with experts on air quality (meetings, workshops, interviews).</li> <li>• Consultations with responsible institutions.</li> <li>• Media analysis.</li> </ul>	<ul style="list-style-type: none"> <li>• Belgrade Open School</li> </ul>
Waste Management	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Cooperation with experts in the field of waste management.</li> <li>• Analysis of relevant statistical data available online.</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• Environment Engineering Group</li> </ul>

Field	Methodology	List of authors (organizations)
Water Quality	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> <li>• Direct communication with experts on water quality (meetings, workshops).</li> <li>• Participation in working groups for drafting bylaws and national implementation plans (organized by Ministry of Environmental Protection).</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia)</li> </ul>
Nature Protection	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> <li>• Direct communication with experts in the field of nature protection (meetings, workshops).</li> <li>• Scientific field work: collecting and analysing data on habitats and species.</li> <li>• Participation in working groups for drafting bylaws and national implementation plans (organized by Ministry of Environmental Protection).</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• Belgrade Open School</li> <li>• Bird Protection and Study Society of Serbia</li> <li>• World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia)</li> </ul>
Chemicals Management	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Analysis of institutional and administrative capacity and implementation in practice</li> </ul>	<ul style="list-style-type: none"> <li>• Safer Chemicals Alternative</li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> </ul>	<ul style="list-style-type: none"> <li>• Environment Improvement Center</li> </ul>

Field	Methodology	List of authors (organizations)
Climate Change	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information were collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> <li>• Media analysis.</li> </ul>	<ul style="list-style-type: none"> <li>• Belgrade Open School</li> <li>• Climate Action Network Europe (CAN Europe)</li> <li>• Environment Improvement Center</li> <li>• World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia)</li> </ul>
Forestry	<ul style="list-style-type: none"> <li>• Policy analysis: Comparative analysis of national legal and strategic documents and EU legislation – documents and information are collected from official sources available online.</li> <li>• Analysis of relevant studies and projects.</li> <li>• Direct communication with experts in the field of forestry (meetings, workshops).</li> </ul>	<ul style="list-style-type: none"> <li>• World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia)</li> </ul>

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