

SYSTEM.  
**ERROR**



Shadow Report on Chapter 27

**ENVIRONMENT AND CLIMATE CHANGE**

MAY 2024 – MAY 2025



A background image of a mountain range shrouded in mist or fog, with the peaks and ridges fading into the distance. The overall tone is light and atmospheric.

Chapter 27 in Serbia:

# **SYSTEM ERROR**

Shadow Report on Chapter 27:  
Environment and Climate Change

**May 2024 – May 2025**

# Impressum

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# Introduction

**You are holding the twelfth edition of the Shadow Report by Coalition 27 on Serbia's progress in Chapter 27 – Environment and Climate Change.** The Report covers the period from the beginning of May 2024 to the end of May 2025. This year's Report is titled "System Error", as those words most accurately describe the atmosphere in which it was prepared.

In addition to fundamental problems and procedural shortcomings, the very reform process of European integration, which was also the practical reason for the establishment of Coalition 27 eleven years ago, is being implemented less frequently and with decreasing effectiveness. In recent years, it has become increasingly evident that Serbia's direction can be described as a quiet abandonment of the European path. The tragedy following the collapse of the canopy at the Novi Sad Railway Station sparked a strong public reaction, as in the eyes of citizens – and we share this view – this event, along with the circumstances that preceded and followed it, has become an allegory for our everyday reality, one that raises serious concern. It reflects a complete absence of a system of responsible and democratic governance: violations of the law, non-transparent spending of public funds, undermining of judicial independence, lack of accountability among institutions and political officials, disregard for expert opinion, media control and the disempowerment of citizens. Furthermore, the social crisis that unfolded after the collapse and that ultimately led to the fall of the Government of the Republic of Serbia in late January has significantly hindered the work of legislative bodies, leaving many key documents, including the Environmental Protection Strategy, still waiting to be adopted.

For years now, the space for the work and activities of civil society organizations has been gradually shrinking. These organizations face increasing pressure, often accompanied by negative media campaigns, targeting and intimidation of their representatives, as well as being prevented from effectively participating

in decision-making processes. All these pressures culminated in 2025, when a large number of civil society organizations, in protest, froze their membership in policy and legislative working groups.

Coalition 27 is founded on the belief that improving the environmental protection system is only possible through active participation in societal processes aimed at enhancing the legislative framework within Chapter 27, as well as its implementation. The process of European integration still offers the best framework for such reform, but it must be accompanied by democratic foundations for societal development and the building of institutions where there are partners and allies for a system based on democracy and the rule of law. Although year after year violations and failures in the application of regulations are pointed out, the response remains weak, and recommendations for improving the transposition and implementation of EU legislation are largely ignored by decision-makers. In contrast, the academic community values the work of the Coalition – in September 2025, the chapter Chemical Management from the Shadow Report was officially recognized as a scientific contribution by the Scientific Council of the Institute of Economic Sciences.

As a pledge for a better future, yet another annual report is presented to readers, with the core message that the key problems lie in procedural shortcomings – from the adoption of planning documents that are not being implemented, to decision-making processes carried out without public participation or with limited involvement, to the misallocation of funds and the disregard for prescribed procedures – all of which clearly point to the absence of the rule of law and democratic decision-making.

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Coalition 27 consists of 8 organizations: Safer Chemicals Alternative, Belgrade Open School, Bird Protection and Study Society of Serbia, Climate Action Network Europe (CAN Europe), Environment Improvement Center, Environment Engineering Group, Young Researchers of Serbia, and World Wide Fund for Nature Adria – Serbia (WWF Adria – Serbia).

The Report encompasses 11 thematic areas: financing in the field of environmental protection and climate change, horizontal legislation, air quality, waste management, water quality, nature protection, chemicals management, industrial pollution and risk management, noise and climate change, and given that forestry has a major impact on numerous areas in the environment (nature protection, climate change, etc.), this year's Report (as well as the previous ones) provides an overview of that area as well. The Report does not address issues of civil defense. In each thematic area, developments in the adoption of public policies and legislation and regulatory implementation are discussed, and recommendations are made for improving the process.

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

1. List of abbreviations;
2. Comparative table of recommendations from the previous Report by Coalition 27 and this year's Report;
3. Explanation of the methodologies used and a list of authors (organizations) for each chapter;
4. Green cards that provide information on how local self-government units operate in Serbia and how they apply policies and standards in the field of environmental protection.

We would like to express our gratitude to the Association of Young Researchers of Bor, the Association of Private Forest Owners "Bor", the Civic Initiative "TRN" and the members of the Coalition 27 Advisory Board: Damjan Rehm Bogunović and Goran Sekulić (from The Nature Conservancy), for their contribution to the preparation of this Report through useful comments and advice, as well as to the civil society organizations that contributed to data collection in local self-government units through project activities alongside member organizations of Coalition 27.



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

# Introduction

Establishing sustainable financing in the fields of environmental protection and climate change is one of the most important issues and most urgent reform tasks within the entire environmental protection system in the Republic of Serbia. Chapter 27 – Environment and Climate Change is considered one of the most technically complex and financially most demanding chapters in the EU integration process, as it involves not only the transposition of extensive European legislation but also its full implementation. This includes areas such as water and waste management, climate change, industrial pollution and others, all of which require substantial financial resources. All key strategic documents of the Republic of Serbia recognize this need, emphasizing that significantly greater investments from all stakeholders – the state, the economy and citizens – are necessary to resolve the accumulated environmental issues. For illustrative purposes, according to the draft Environmental Protection Strategy – Green Agenda for the Republic of Serbia,<sup>1</sup> which is expected to be adopted, the estimated required funding for the 2024–2033 period exceeds EUR 27 billion.<sup>2</sup> Unless adequate, stable and long-term financing mechanisms are secured, not only will the achievement of strategic goals and fulfillment of international obligations (primarily toward the EU) be jeopardized, but also the protection of citizens' health and the ability to harness the economic potential of the green transition.

Despite the fact that more than ten years have passed since the start of EU accession negotiations, Serbia still does not fundamentally apply the basic financial principle of modern European environmental law – the polluter pays principle. This principle requires the establishment of a system in which the costs of preventing and remedying pollution are borne by those who cause it.

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1 <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/javne-rasprave/javni-poziv-za-ucesce-javnosti-u-procesu-konsultacija-u-vezi-sa-izradom-strategije-zastite-zivotne-sredine-zelena-agenda-republike-srbije-za-period-2024-2033-godine>

2 The approximate costs for achieving the objectives of the Strategy are expressed at 2024 constant prices, which means that the expected inflation over the period until 2033 has not been taken into account.

In practice, this necessitates a robust legal and institutional framework capable of generating, collecting and purposefully directing significant financial resources toward environmental protection. Underdeveloped mechanisms for the collection and expenditure of funds, accompanied by a lack of political will, as evidenced by insufficient allocations from the state budget, have resulted in extremely low investments in environmental protection over the past decade. More precisely, an analysis presented in the previous report by Coalition 27<sup>3</sup> showed that Serbia, during the period from 2014 to 2023, allocated only about one-third of the amount that, according to the National Environmental Approximation Strategy,<sup>4</sup> it was supposed to invest in order to be on track to meet the then-current requirements of Chapter 27 by 2030. Although there are several reasons that contributed to such low investments in environmental protection during the analyzed period, an inadequate financing system was likely one of the main bottlenecks hindering the resolution of all other issues in this sector.

However, in the past few years, an encouraging trend has emerged. The most significant positive change since 2021 has been the noticeable increase in financial resources allocated by the state for environmental protection. This trend continued in 2024 and, according to the Government's plans, is expected to do so in 2025 as well (Figure 1). This development aligns with the repeatedly stated recommendations of the European Commission, civil society and independent bodies such as the Fiscal Council, and offers hope that Serbia may, in the foreseeable future, approach the desirable level of budget expenditures in this area. However, this progress is overshadowed by the fact that the increase is not the result of fiscal and institutional reform, but is largely based on external sources of financing: EU pre-accession funds, bilateral donations, loans from international financial institutions and increasingly, intergovernmental loan arrangements. Such heavy reliance on external funding raises concerns about the long-term sustainability of Serbia's environmental policies and systemic investments in environmental protection and climate change. These concerns are deepened by the simultaneous lack of attention to structural reforms, which

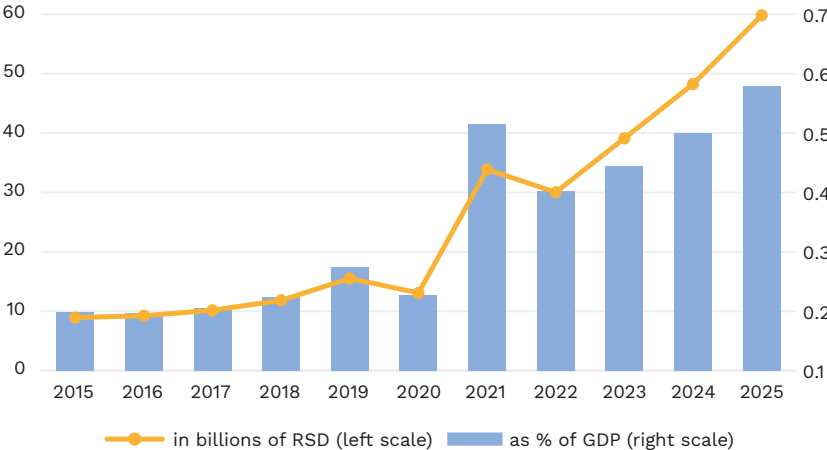
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3 <https://www.koalicija27.org/wp-content/uploads/2024/11/Izvestaj-iz-senke-2024.pdf>

4 <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2011/80/1/reg>

are a prerequisite for developing a domestic financing system – an issue the European Commission has been insisting upon year after year. Specifically, these include the establishment of an operational and adequately resourced Green Fund, consistent earmarked spending of revenues collected through environmental taxes and fees, strengthening institutional capacities and ensuring transparent management of public infrastructure projects.

**Figure 1:** Environmental protection expenditures from the national budget, 2015–2025 (in billions of RSD and as % of GDP)



**Source:** Calculation based on data from the final budget account of the Republic of Serbia and the 2025 Budget Law of the Republic of Serbia

**Note:** The data for 2025 represent the planned environmental protection expenditures as stated in the 2025 Budget Law of the Republic of Serbia, while the data for the previous years reflect their final execution.

# Overview of Financing in the Field of Environmental Protection and Climate Change in 2024 and 2025

According to the data on execution of the budget of the Republic of Serbia, total expenditures for environmental protection and climate change in 2024 amounted to nearly RSD 48.3 billion, which is approximately 0.5% of the Gross Domestic Product (GDP). As shown in Figure 1, last year saw a historical peak in the absolute amount, while in relation to GDP, this was the second-highest level of environmental protection spending since these figures have been tracked (second only to 2021). What is particularly noteworthy is that, for the first time, budget execution actually exceeded the planned values – specifically, the actual expenditures were about RSD 2 billion (4.4%) higher than the amount projected in the revised budget from September 2024.<sup>5</sup> This marks a fundamental shift compared to the poor practices seen during much of the second decade of the 21st century, when the competent institutions often failed to utilize their (already modest) budgets. Compared to 2023, environmental protection expenditures recorded a substantive increase of RSD 9.1 billion, or about 23%. However, despite this encouraging growth, it's important to place these figures in a broader context: environmental protection spending still accounts for a relatively modest 2% of the total national budget expenditures.

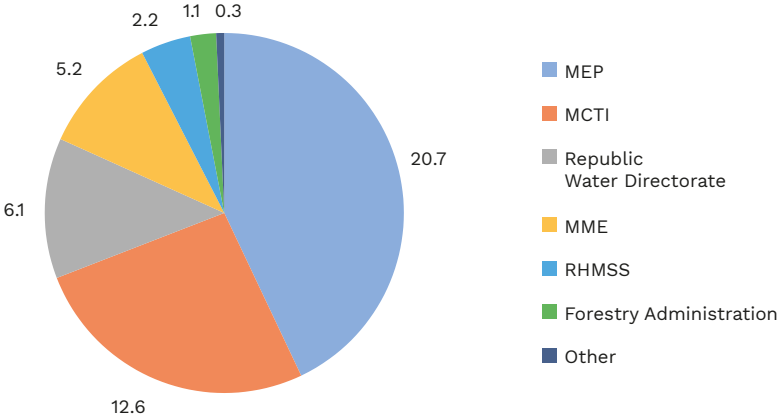
When environmental protection expenditures are analyzed per budget beneficiaries, the spending structure in 2024 shows a clear concentration of responsibilities within a few key institutions (Figure 2). As expected, the largest portion of funds was executed by the Ministry of Environmental Protection (MEP), which, including the budgets of the Environmental Protection Agency and other relevant institutions, accounted for RSD 20.7 billion, or 43% of all

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5 [http://www.parlament.gov.rs/upload/archive/files/cir/pdf/zakoni/14\\_saziv/2183-24%20rebalans%20spojeno%20za%20sajt.pdf](http://www.parlament.gov.rs/upload/archive/files/cir/pdf/zakoni/14_saziv/2183-24%20rebalans%20spojeno%20za%20sajt.pdf)

expenditures in this sector. It is important to note that the Ministry's budget increased by approximately RSD 7,5 billion compared to 2023, which was the main driver of the overall growth in environmental protection expenditure in 2024. Following the Ministry of Environmental Protection in terms of expenditure is the Ministry of Construction, Transport and Infrastructure (MCTI), with RSD 12.6 billion executed (26.2%). The high share of this ministry is due to the fact that it funds the single largest infrastructure project in the field of environmental protection – Clean Serbia. Significant funding was also directed through the Republic Water Directorate (RSD 6.1 billion or 12.6%), primarily for water management, as well as the Ministry of Mining and Energy (RSD 5.2 billion or 10.7%), whose funds were mainly allocated to energy efficiency projects and renewable energy sources. All other budget beneficiaries combined spent the remaining RSD 3,6 billion on various activities related to environmental protection and climate change.

**Figure 2:** Structure of environmental protection and climate change expenditures per budget beneficiaries in 2024 (in billions of RSD)



**Source:** Calculation based on the 2024 national budget execution data

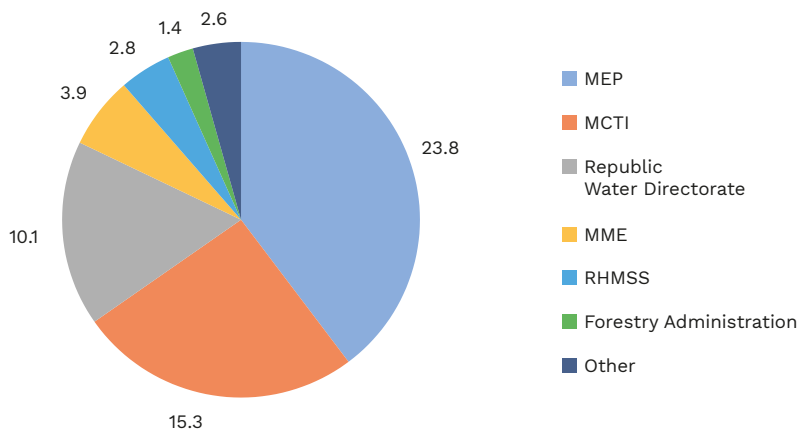
The 2025 Budget Law of the Republic of Serbia<sup>6</sup> announces the continuation of a positive trend, signaling a further increase in investments in environmental protection and climate change. Specifically, total expenditures in this sector are planned at nearly RSD 60 billion, which, according to current projections, should account for almost 0.6% of the estimated GDP for the current year. If the execution follows the plan, this would be a new record level of annual investments in environmental protection from the national budget, making up 2.2% of all national expenditures. Compared to the 2024 execution, the Government has planned an increase of RSD 11.5 billion, or about 24%. This would make 2025 the second consecutive year in which national budget spending on environmental protection has increased by nearly a quarter, confirming the previously mentioned shift in the scale of public funds allocated for this purpose.

The planned increase in environmental protection and climate change expenditures in 2025 is distributed across almost all key budget beneficiaries, and their structure is shown in Figure 3. The Ministry of Environmental Protection (MEP) has been allocated a budget of RSD 23.8 billion, which is approximately RSD 3 billion more than the previous year, accounting for nearly 40% of the total sector budget. It is followed by the Ministry of Construction, Transport and Infrastructure (MCTI), with a planned RSD 15.3 billion (an increase of RSD 2.7 billion), thus maintaining its share of over one-quarter of total allocations. The largest absolute increase is planned for the Republic Water Directorate, whose budget is expected to rise by RSD 4 billion, reaching RSD 10.1 billion and accounting for around 17% of the total environmental protection budget. Among other beneficiaries, the Ministry for Public Investment stands out in particular, with a significant planned increase from RSD 320 million executed in 2024 to almost RSD 2.5 billion in the current year. Given the weak execution of this ministry's budget in the previous year, it remains uncertain whether the barriers to more efficient project implementation have been addressed, which is a prerequisite for fulfilling the much more ambitious 2025 budget plan. On the other hand, the only budget beneficiary for which a decrease in spending is planned is the Ministry of Mining and Energy, with a reduction of RSD 1.3 billion.

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6 <https://mfin.gov.rs/propisi/zakon-o-budzetu-republike-srbije-za-2025-godinu-slubeni-glasnik-rs-br-942024>

**Figure 3:** Structure of environmental protection and climate change expenditures per budget beneficiaries, 2025 (in billions of RSD)



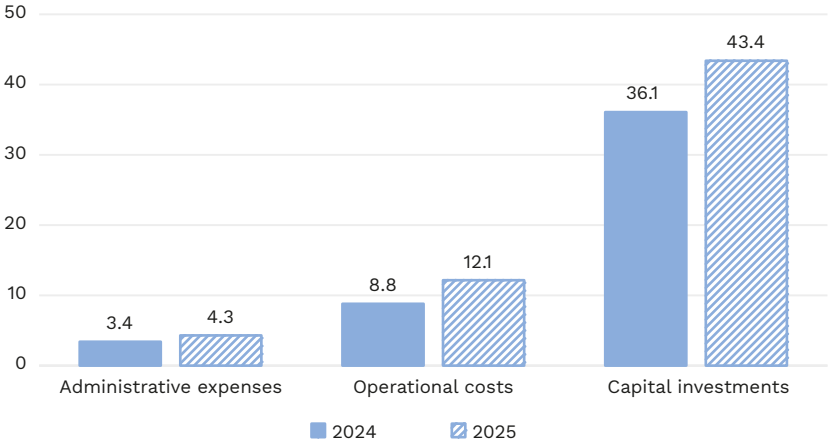
**Source:** Calculation based on the 2025 national budget execution data

In addition to the overall increase in funding, the economic structure of these investments in 2024 is also encouraging, as the spending was predominantly investment-oriented (Figure 4). Specifically, nearly three-quarters of all expenditures (RSD 36.1 billion) were capital expenditures, i.e., investments in the construction of missing municipal infrastructure (wastewater treatment plants, sewer networks, waste management systems), procurement of monitoring equipment, afforestation, ecosystem restoration and more. This represents a significant increase in capital investments of about RSD 10 billion more compared to 2023. On the other hand, operational or current expenses (e.g., equipment maintenance, monitoring, subsidies) amounted to nearly RSD 9 billion (18.2%), while approximately RSD 3.4 billion (7%) were spent on administrative costs, such as salaries and employee benefits, inspection supervision services and international cooperation.

The 2025 budget foresees a similar structure of investments, with a noticeable increase across all three economic categories compared to their realization in 2024. Capital investments are planned to increase by RSD 7.3 billion (about 20%), operational costs by RSD 3.4 billion (a 38% rise), while administrative

expenses are expected to grow by around RSD 900 million (an increase of 27%). Thus, despite the differing growth rates across categories, the favorable budget structure dominated by infrastructure investments has been maintained in 2025, which is an important prerequisite for improving the state of the environment in Serbia.

**Figure 4:** Economic structure of investments in environmental protection, 2024 vs. 2025 (in billions of RSD)

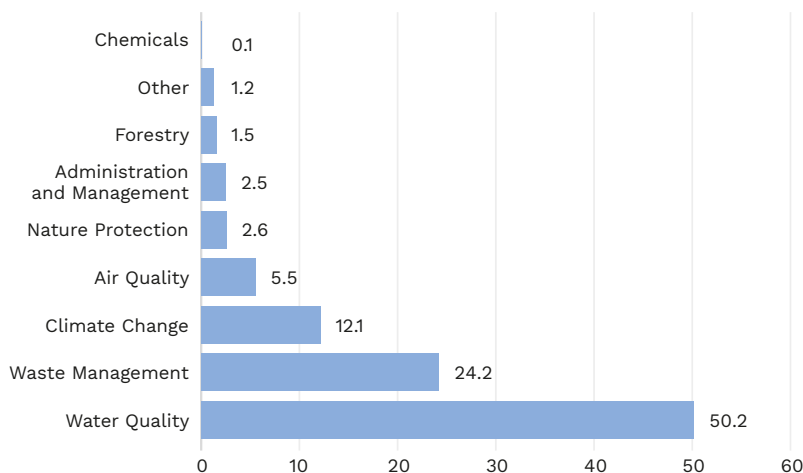


**Source:** Calculation based on the 2024 budget execution data and 2025 Budget Law of the Republic of Serbia

# Sectoral Structure of Environmental Protection Expenditures in 2024 and 2025

An analysis of executed expenditures per sectors in 2024 shows that the majority of funds were directed toward two main areas, which together accounted for nearly three-quarters of the total environmental protection budget (Figure 5). The absolutely dominant sector was water protection and quality, which received RSD 24.2 billion, representing exactly 50% of all funds. In second place, with RSD 11.7 billion (24.2%), was the waste management sector. These two sectors, which generally require the largest infrastructure investments, naturally absorb the bulk of the available budgetary resources. Significantly behind them are investments in the climate change sector, which received RSD 5.9 billion (12.1%), and air pollution reduction, with RSD 2.7 billion (5.5%) allocated. Far smaller amounts were earmarked for nature protection (RSD 1.2 billion), administration and supervision (RSD 1.2 billion) and forestry (RSD 740 million). An almost symbolic amount of RSD 42 million (0.1%) was spent on chemical and biocidal product management, while the remaining approximately RSD 600 million (1.2%) covered related areas such as hunting, nuclear safety and seismic monitoring.

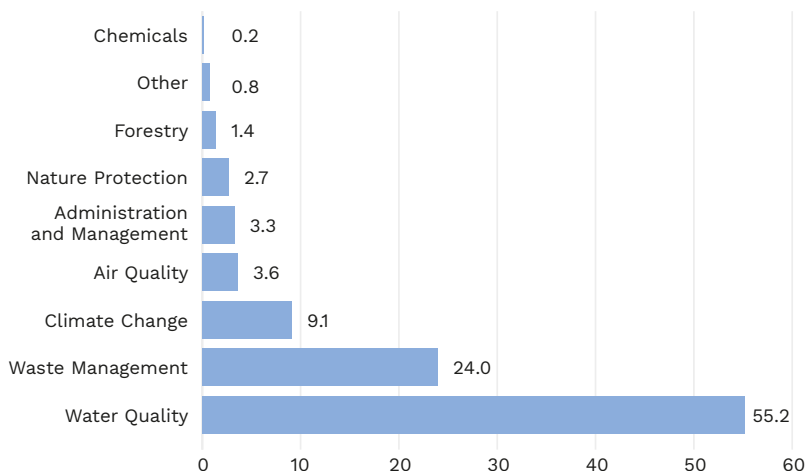
**Figure 5:** Structure of budget expenditures per sectors in 2024 (in %)



**Source:** Calculation based on the 2024 national budget execution data

The planned budget for 2025 indicates the continuation of the same sectoral priorities, resulting in a spending structure very similar to that of 2024 (Figure 6). The two most infrastructure-intensive areas – water and waste management – will continue to absorb nearly 80% of all environmental protection funds. The largest individual increase, of over RSD 9 billion, is planned precisely in the water quality and protection sector, bringing its budget up to RSD 33.4 billion, or as much as 56% of total environmental expenditures. Waste management has been allocated RSD 13.8 billion, accounting for around 23% of planned funds. Changes in other sectors are less pronounced and more varied. On the one hand, slightly lower investments are planned for climate change and air protection, which together with other activities are expected to receive cumulatively about RSD 1.1 billion less than in 2024. On the other hand, an increase of about RSD 1.3 billion in total is planned for the nature protection, administration, forestry and chemical and biocidal product management sectors. In summary, the total amount of funds allocated to the remaining environmental sectors will undergo only minimal changes, with a slight redistribution of funds across individual budget lines.

**Figure 6:** Structure of budget expenditures per sectors in 2025 (in %)



**Source:** Calculation based on data from the 2025 Budget Law of the Republic of Serbia

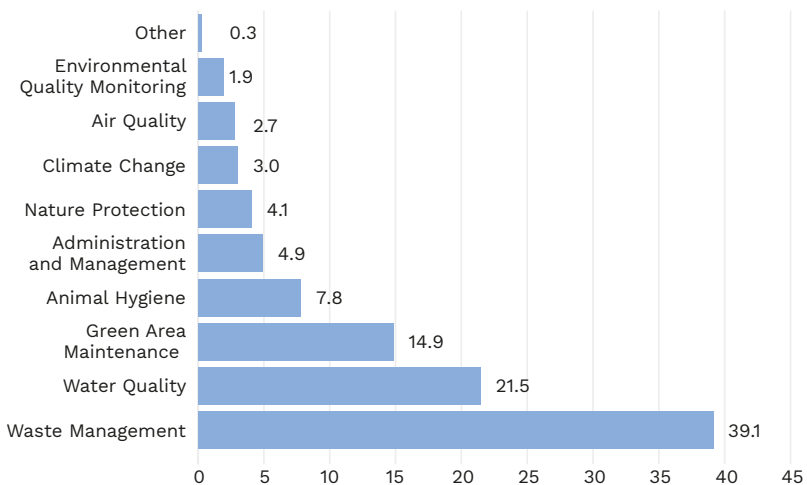
Since a significant portion of responsibilities in the environment and climate change sector is assigned to cities and municipalities, the key activities are also financed from local government budgets. According to budget execution data from 164 local self-government units (LSGs) in 2024, total expenditures classified under environmental protection amounted to RSD 30.6 billion.<sup>7</sup> However, it is important to note that it is methodologically incorrect to directly add this amount to the national government's expenditures in 2024 (RSD 48.3 billion), as a large part of the activities carried out by LSGs is funded through various transfers from the national budget, and such aggregation would result in double counting. Since publicly available data does not allow for a precise separation of expenditures financed from LSGs' own-source revenues, the analysis of local budgets in this report primarily serves to illustrate the structure of local-level investments. It also suggests that total public sector investments in environmental protection are likely somewhat higher than the

<sup>7</sup> The analysis includes only those environmental protection programs and projects that were budgeted in accordance with the legally prescribed functional classification of expenditures, specifically, those with 500–560 codes. It is possible that there are additional local self-government expenditures potentially related to environmental protection, but they were not budgeted or recorded as part of this sector.

national expenditure figure, although the exact amount cannot be determined from the available data.

The structure of environmental protection expenditures at the local government level in 2024 clearly reflects their core municipal responsibilities (Figure 7). The largest portion of funds, RSD 11.9 billion, or 39.1% of total local spending in this area, was allocated to the waste management sector. This is followed by water protection and quality, which received RSD 6.5 billion (21.5%). Together, these two sectors account for over 60% of all expenditures, confirming that waste and wastewater management are the primary environmental responsibilities of cities and municipalities. A significant portion of the budget, RSD 6.9 billion in total, was also spent on two specific programs that fall exclusively under the jurisdiction of local self-governments: maintenance of public green areas and animal hygiene services. The remaining RSD 5.2 billion were distributed across a range of other activities, including administrative functions, nature protection, climate change adaptation measures, air quality protection and environmental quality monitoring.

**Figure 7:** Structure of local government expenditures per sectors in 2024 (in %)



**Source:** Calculation based on the 2024 LSG budget execution data

## Water Quality and Protection

In 2024, a total of 24.2 billion dinars was disbursed from the national budget for the **water quality and protection** sector, which is an increase of around RSD 3 billion compared to the previous year. However, it is important to note that this figure also includes broader activities within the framework of integrated water management – over RSD 6 billion were allocated to projects under the jurisdiction of the Republic Water Directorate, though its direct contribution to water protection is rather symbolic, with less than RSD 15 million spent on such purposes in 2024. The main focus of investments in combating water pollution falls under the jurisdiction of other institutions, primarily the Ministry of Construction, Transport and Infrastructure (MCTI) and the Ministry of Environmental Protection (MEP).

The largest and most ambitious environmental undertaking in Serbia – the Clean Serbia program – is financed through the MCTI budget. This program, funded through a loan agreement with the Bank of China, involves the construction of wastewater treatment plants (WWTPs), sewer networks and pumping stations in 65 cities and municipalities across Serbia. According to budget execution data, approximately RSD 12 billion were disbursed for works under this project in 2024. On the other hand, the implementation of another major MCTI project, the construction of the Central Sewer System of the City of Belgrade, has faced renewed delays. Although there were signs of construction starting in 2023, data shows that in 2024, no funds were executed under this budget line, despite a revised budget allocating RSD 1 billion for the project.

In 2024, the Ministry of Environmental Protection spent approximately RSD 6.6 billion from its budget for this purpose. The most important projects under the Ministry's jurisdiction include those partially financed through EU pre-accession funds (IPA 2017, 2018 and 2020),<sup>8</sup> for which over RSD 2 billion were disbursed, as well as the wastewater management project in Leskovac,

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8 Funds from IPA 2017 are being used to finance the construction of a WWTP in Kraljevo, including the expansion of the sewer network and the construction of a storm-water drainage system to direct wastewater from suburban settlements on the right bank of the Ibar River to the treatment facility. The IPA 2018 project involves the construction of a WWTP in Niš at the Ciganski Ključ site, a small water treatment facility at the Medijana water plant, the construction of six collectors and the development of parts of the sewer network in four villages in the vicinity of Niš.

which received nearly RSD 1.9 billion. Additionally, significant funds (RSD 4.6 billion) were allocated to a project with the generic title Improvement of Environmental Protection Infrastructure. It should be noted, however, that this project includes not only measures for water protection, but also investments in soil protection and waste management.

At the local government level, total expenditures in the water management sector amounted to approximately RSD 6.5 billion in 2024, although, as previously mentioned, this figure also includes funds received from the national budget. An analysis of the economic structure of these expenditures shows that approximately RSD 3.6 billion were allocated to capital investments, while the remaining nearly RSD 3 billion were spent on current expenditures, including subsidies for the regular operations of public utility companies. A more detailed review of capital spending reveals that funds were primarily invested in the construction and rehabilitation of sewer networks for both municipal and storm-water systems, the construction of wastewater treatment plants (WWTPs), as well as the development of necessary project documentation for future infrastructure projects. Looking at individual municipalities and cities, the largest investments in 2024 were recorded in the municipality of Mali Idoš (nearly RSD 800 million for sewer network construction in the villages of Feketić and Lovćenac), the City of Belgrade (approximately RSD 790 million for several smaller projects) and the municipality of Irig (RSD 565 million for the construction of a WWTP in Vrdnik).

In the 2025 budget, the Government plans to continue implementing most of the ongoing water-related projects, with a significant increase in total funds by nearly RSD 9 billion (approximately 35%), bringing the planned expenditures to almost RSD 33 billion. The largest nominal increase is allocated to the budget of the Republic Water Directorate, with around RSD 4 billion more, pushing this agency's budget beyond RSD 10 billion for the current year. The MCTI has been allocated RSD 10 billion to continue the Clean Serbia program, which is about RSD 2 billion dinars less than the amount spent in 2024. At the same time, substantial funds of up to RSD 5 billion are earmarked for the construction of the Central Sewer System of the City of Belgrade. However, this plan should be approached with caution – although RSD 3 billion were initially planned for

this project in 2024, the revised budget reduced the amount to RSD 1 billion, and the actual expenditure was zero. Given this, it is uncertain whether this year's ambitious plan will actually be implemented. Finally, nearly RSD 7 billion are budgeted for the Ministry of Environmental Protection, mainly to continue the same projects as in the previous year, with the notable addition of renewed budget allocation for the construction of a WWTP in Zubin Potok.

## Waste Management

In the **waste management** sector, national-level budget expenditures in 2024 amounted to RSD 11.7 billion, marking a noticeable increase of RSD 2.3 billion compared to 2023. The Ministry of Environmental Protection (MEP) is primarily responsible for execution of these expenditures. The single largest expense in this sector continues to be the incentives for the recycling industry, which totaled nearly RSD 3.9 billion in 2024, slightly less than the previous year. However, a positive trend of growing investment aimed directly at improving the waste management system and conditions on the ground has been observed in recent years. In 2024, RSD 1.6 billion were spent on the construction of regional waste management centers, RSD 1.4 billion on the remediation and closure of non-sanitary landfills, RSD 560 million on equipment for collection and recycling and nearly RSD 200 million on the prevention and removal of illegally dumped waste.

At the local government level, waste management expenditures in 2024 amounted to RSD 11.9 billion, a portion of which was financed through transfers from the national budget. An analysis of the structure of these expenditures reveals that the majority was spent on payments to local utility companies for public area cleaning services and waste management. A significantly smaller share was allocated to capital investments in physical infrastructure, around RSD 2.5 billion, and subsidies to public and private companies in this sector, which totaled about RSD 1 billion. Investment projects financed by cities and municipalities over the past year included the construction of regional waste management and recycling centers, procurement of specialized vehicles, preparation of project and technical documentation and projects for the remediation and reclamation of municipal landfills. Looking at individual local governments,

the highest expenditures on waste management were, as expected, recorded in the largest cities: the City of Belgrade (around RSD 1.5 billion) and the City of Novi Sad (around RSD 1 billion), followed by the City of Niš (around RSD 610 million), Bor (around RSD 590 million), Kruševac (around RSD 560 million), Smederevo (around RSD 370 million) and others.

The 2025 budget continues the trend of increasing investment in waste management, with planned expenditures amounting to around RSD 14.3 billion, which is RSD 2.5 billion more than the amount executed in 2024. As in the previous years, the largest portion of these funds is budgeted under the Ministry of Environmental Protection. An analysis of the plan suggests a continued and gradual policy shift from subsidies toward direct investments. The planned amount for subsidies to the recycling industry has been further reduced by RSD 400 million, now totaling RSD 3.5 billion. In contrast, funding for projects aimed at developing waste management systems has seen a significant increase (from less than RSD 50 million to RSD 700 million), as well as for the construction of regional centers (from RSD 1.6 to nearly RSD 2.2 billion). In addition, the 2025 plan includes new projects financed by EU funds. The most significant is the establishment of an integrated regional waste management system in Novi Sad and six surrounding municipalities (IPA 2021), with a budget of RSD 1.7 billion. A new initiative also includes the procurement of mobile construction waste crushers (IPA 2024). The Government has also planned to continue the implementation of previously launched projects and programs, allocating amounts similar to those in 2024.

## Climate Change

In 2024, national budget expenditures in the field of **climate change** amounted to nearly RSD 5.9 billion, which is almost twice as much as in 2023. Funding for climate-related policies was provided through three budget lines, with the largest contribution coming from the energy sector. The Ministry of Mining and Energy (MME) disbursed over RSD 2.4 billion for various projects in the fields of energy efficiency and renewable energy.<sup>9</sup> In addition, RSD 980 million in incentives for

<sup>9</sup> The majority of funds were spent within two projects: Energy Efficiency in Central Government Buildings (nearly RSD 1.2 billion) and the Clean Energy and Energy Efficiency Project for Citizens (RSD 815 million).

improving energy efficiency were distributed through the Administration for Financing and Promoting Energy Efficiency. The second-largest spender was the Republic Hydrometeorological Service (RHMS), which used nearly RSD 2.2 billion for its regular activities and specific climate-related projects. Several smaller projects were financed under the Ministry of Environmental Protection (MEP), including Reducing the Carbon Footprint of Local Communities through Circular Economy Principles (around RSD 95 million), Green Transformation of Cities – Smart, Sustainable and Low-Carbon Urban Solutions (also around RSD 95 million) and activities related to the preparation of the Report of the Republic of Serbia under the UN Framework Convention on Climate Change, for which RSD 4.5 million were spent.

At the local government level, budget expenditures related to climate change in 2024 were relatively modest, amounting to around RSD 920 million.<sup>10</sup> Most activities carried out by cities and municipalities focused on improving energy management, enhancing energy efficiency in public buildings and co-financing the energy transition of households. In addition, a number of smaller, targeted projects were implemented, such as supporting energy cooperatives in Medveđa, mapping the urban heat island in Belgrade, climate change adaptation through the redesign of schoolyards in Belgrade, and the Solar Schools project in Valjevo. Among individual local governments, the City of Belgrade had by far the highest expenditures in this area (around RSD 645 million), followed by Kragujevac (around RSD 70 million), Novi Pazar (around RSD 58 million), Svilajnac (around RSD 44 million) and Valjevo (around RSD 26 million).

In the 2025 budget, the Government allocated approximately RSD 5.4 billion for climate change, which is approximately 7% less compared to the 2024 level. The plan for the current year mainly involves the continuation of existing policies, including the institutionally significant project Improving Public Financial Management for the Green Transition Operation in Serbia, for which nearly RSD 99 million have been allocated under the Ministry of Finance. The

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10 The estimated amount includes only those program activities and projects at the local government level that are explicitly related to climate change, energy efficiency and renewable energy sources. However, an analysis of national budget expenditures intended to co-finance local projects in these areas in 2024 suggests that the total investments by cities and municipalities may have been somewhat higher, but these costs were likely recorded under other sectors or programs.

Ministry of Environmental Protection has been allocated RSD 177 million for both ongoing and new projects, such as strengthening reporting capacities under the Paris Agreement. The Ministry of Mining and Energy plans expenditures of around RSD 1.6 billion (roughly RSD 800 million less than in the previous year). Among its programs, a new project stands out: the construction of self-balanced solar power plants (1 GW) with battery storage systems, for which RSD 420 million are earmarked. Finally, a notable increase can be seen in the budget of the Republic Hydrometeorological Service (RHMSS), with funding for regular activities rising from RSD 2.2 billion in 2024 to a planned RSD 2.8 billion in the current year.

## Air Quality

Expenditures for reducing pollution and improving **air quality** from the national budget in 2024 amounted to nearly RSD 2.7 billion, which is about RSD 700 million, or nearly one-third more than in 2023. The funding for these projects was provided mainly from the budget section of the Ministry of Environmental Protection (MEP), with significant contributions from the Ministry of Mining and Energy (MME).

In 2024, the MEP continued implementing programs aimed at energy efficiency and reducing air pollution from individual sources. A total of RSD 129.9 million was allocated for co-financing the replacement of individual heating systems (a 30% increase), while nearly twice as much as in 2023 (RSD 684.8 million) was spent on refurbishing boiler rooms in public buildings. However, the implementation of the district heating improvement project in Kragujevac fell significantly short, with only RSD 6 million spent, which is less than 10% of the planned amount. Subsidies for the purchase of environmentally friendly vehicles also continued, but with significantly reduced funding of RSD 205 million, which is more than half less compared to 2023. The main project in the field of air quality and also the single largest expenditure in this sector, is under the jurisdiction of the MME. This is the project Rehabilitation of the District Heating System in Serbia (Phase V), for which just over RSD 1.6 billion was allocated from the budget in 2024. The project is financed through a loan (EUR 30 million) and a grant (EUR 2 million) from the German development

bank KfW, and covers the rehabilitation of seven heating plants in Belgrade, Bor, Jagodina, Leskovac, Negotin, Niš and Senta.

At the local government level, total expenditures for reducing air pollution in 2024 amounted to around RSD 840 million, which, as in other areas, includes funds transferred from the national budget. The main activities of cities and municipalities aligned with the programs implemented at the national level, focusing on reducing pollution from individual heating systems and refurbishing boiler rooms. In terms of individual cities, the largest expenditure by far was recorded in Vranje (almost RSD 580 million invested in the district heating system), followed by Valjevo (around RSD 74 million), Niš (around RSD 26 million), as well as Belgrade and Zaječar (with approximately RSD 14 million each).

Although air protection policy is primarily focused on the local level, where agglomerations with excessively polluted air are required to adopt and implement air quality plans, monitoring the implementation of defined measures through budget data remains difficult. The main reason is the lack of transparency, which prevents precise linking of expenditures to specific activities outlined in the plans. The only examples of good financial reporting practices in the implementation of these measures continue to be the cities of Bor and Belgrade.

Planned expenditures for air protection in the 2025 budget amount to just under RSD 2.2 billion, which is a decrease of about 20% compared to their 2024 level. The Government intends to continue implementing the same policies, but with reduced funding for most of the existing projects. Within the Ministry of Environmental Protection's budget, allocations for boiler room refurbishments have been cut to RSD 350 million, and incentives for eco-friendly vehicles to RSD 170 million, while funding for reducing pollution from individual sources remains at a similar level (RSD 130 million). At the same time, the budget for the district heating project in Kragujevac has been increased to RSD 200 million. The Ministry of Mining and Energy also plans to allocate a smaller amount (RSD 436.6 million) for the continuation of the district heating system rehabilitation project. However, a novelty in the 2025 budget is the new project Energy Efficiency and Air Quality, financed through

EU pre-accession funds (IPA 2025), with an allocation of RSD 860.2 million, making it the largest planned expenditure in this area.

## Nature Protection

Expenditures from the national budget for **nature protection** in 2024 amounted to just over RSD 1.2 billion, which is a significant increase of nearly 50% compared to 2023. Virtually all of these expenditures were financed through the budget of the Ministry of Environmental Protection (MEP). The largest portion, RSD 486 million, was allocated as incentives for the implementation of management programs for protected natural resources, providing direct support to national parks and other managing entities. Additionally, RSD 299 million were allocated for the operations of the key expert institution in this field, the Institute for Nature Conservation of Serbia. A portion of the funds was also invested in direct on-the-ground activities, such as targeted afforestation projects aimed at protecting landscape diversity (RSD 133.5 million) and preserving land as a natural resource (RSD 50 million).

It is particularly important to highlight that, starting in 2023, a new incentive scheme has been financed under the activity Arrangement and Improvement of Nature Protection and Biodiversity Conservation, aimed at local governments whose territories include nationally designated protected areas. After an initial budget of RSD 45 million in 2023, the amount was increased to RSD 100 million in 2024.<sup>11</sup> These are earmarked funds for specific projects that, according to the Ministry, are expected to directly contribute to improved management, greater visibility and better infrastructure within protected areas. Projects eligible for this funding are diverse and include:

- *Improvement of tourism infrastructure* – repair and reconstruction of roads, construction and modernization of facilities (visitor centers, scenic viewpoints, observation towers and rest areas), as well as marking and development of hiking, mountaineering and cycling trails.

11 <https://ekologija.gov.rs/lat/saopstenja/vesti/lokalnim-samoupravama-na-raspolaganju-250-miliona-dinara-za-ocuvanje-i-brigu-o-zasticenim-podrucjima>

- *Education and presentation* – installation of informational and educational signs and the development of speleological sites (caves) for visitors.
- *Biodiversity protection* – measures that directly contribute to the conservation of endangered species and habitats.
- *Promotion and eco-tourism* – organizing events, creating promotional materials and supporting the development of sustainable tourism.

In 2024, local self-governments' expenditures on nature protection amounted to just over RSD 1.2 billion, partially including funds transferred from the national budget. However, a closer look at these expenses reveals a potential methodological issue, as there are indications that this amount sometimes covers general administrative costs for all environmental activities at the local level, which cannot be precisely separated based on publicly available data. In other words, the actual financial resources invested solely in nature protection are likely somewhat lower due to some LSGs recording other ecological expenses under budget items generically categorized as "nature protection". Regarding the allocation of funds, the most significant activities involved implementing projects funded through the Ministry of Environmental Protection competitions (such as afforestation and land protection), as well as budget subsidies for managing protected natural resources under the jurisdiction of cities and municipalities. Analyzing individual units, the highest amounts for this purpose were paid from the budgets of the City of Belgrade (RSD 372 million), the Autonomous Province of Vojvodina (around RSD 192 million) and Novi Sad (RSD 110 million).

In the 2025 budget, the Government allocated RSD 1.6 billion for nature protection, which is a quarter more than in the previous year. The majority of these funds are directed towards continuing and strengthening existing activities: incentives for protected resources management programs increased to RSD 550 million, support for the Institute for Nature Conservation of Serbia rose to RSD 317 million, while RSD 150 million were allocated for afforestation and RSD 66 million for land preservation. A particularly significant decision was

made by the Ministry in July 2025 to increase funds for projects in 24 local self-governments whose territory includes nationally important protected areas from RSD 100 to RSD 250 million.<sup>12</sup> Combined with direct incentives to managers, the total planned funding to support protected areas this year reaches 800 million dinars, marking an important step in the right direction. However, although increased budget allocations are necessary, they should be only part of a broader reform aimed at establishing a long-term sustainable financing model for protected areas in Serbia. Additionally, the 2025 budget includes RSD 20 million for a new support line for local self-governments, intended to fund the project for establishment of Geoparks.<sup>13</sup>

## Forestry

In the **forestry** sector, approximately RSD 740 million were allocated from the national budget in 2024, which is a 43% decrease compared to 2023. The Forestry Administration operating within the Ministry of Agriculture, Forestry and Water Management is responsible for implementing programs in this area. The reduction in funding is mainly due to a cut in the budget for the flagship program Sustainable Development and Improvement of Forestry, which dropped from RSD 850 to RSD 550 million; this program includes several environmentally important projects such as forest protection, tree planting, construction of forest roads and production of planting material. Additionally, the implementation of the planned twinning project aimed at improving forest management, funded by IPA funds and budgeted at RSD 6 million, was completely lacking in 2024.

The 2025 budget foresees a recovery in investments, with a planned increase of about 35% to nearly RSD 1 billion. This rise can be fully explained by the planned growth in spending for the Sustainable Development and Improvement of Forestry program, which is set at RSD 800 million. However, it should be noted that the 2025 Regulation on Determining the Annual Program for the Use of Sustainable Forestry Development and Improvement Funds<sup>14</sup> suggests

12 Ibid.

13 The total project value is estimated at RSD 70 million, with RSD 20 million planned to be spent in 2025.

14 [http://demo.paragraf.rs/demo/combined/Old/t/t2025\\_04/SG\\_031\\_2025\\_004.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2025_04/SG_031_2025_004.htm)

a slightly lower allocation for this purpose, around RSD 713 million, than what is stated in the Budget Law. Moreover, a bigger issue than the amount itself or planning inconsistencies is the unfavorable cost structure, as a significantly larger portion of funds continues to be directed toward the construction and repair of forest roads rather than direct measures for maintaining and improving the quality of forest ecosystems.

## Horizontal Legislation

According to official strategic documents of the Republic of Serbia, starting with the first National Strategy in 2011, aligning with the EU's horizontal legislation does not require significant financial resources. In practice, however, it is not possible to directly track the costs of implementing individual directives, only the overall expenses related to administration, management, policy development and inspection supervision by the competent institutions.

In 2024, financing for the **horizontal sector** defined as such amounted to RSD 1.2 billion – which is almost the same as in 2023 – implying that no significant measures were taken last year to strengthen domestic institutional capacities. The larger portion of this amount (around RSD 750 million) covered the general responsibilities of the Ministry of Environmental Protection, including inspections, while the Serbian Environmental Protection Agency's (SEPA) expenses for monitoring and controlling environmental quality totaled about RSD 398 million. The 2025 budget plans a substantial change, with a projected increase in investment in the horizontal sector by one-third compared to 2024, reaching RSD 1.6 billion. The planned growth will be distributed with the MEP's budget for general responsibilities rising to nearly RSD 1 billion (a 33% increase), while the Agency's available funds will grow to RSD 458 million (a 15% increase).

In the horizontal legislation sector, one of the key links in the chain of responsibility that should ensure effective enforcement of legal regulations is the Environmental Protection Inspectorate. However, it is often considered one of the weakest points in the entire system. The root of the inspection supervision problem lies in the limited capacities for its proper implementation, including an insufficient number of inspectors, poor job systematization and a lack of

technical equipment and specialized knowledge.<sup>15</sup> Consequently, the Coalition 27 reports repeatedly recommend solutions to these issues year after year. Among the most important recommendations are hiring new inspectors and improving the technical equipment of the service, especially by acquiring suitable vehicles for field inspections. Additionally, there has been an emphasis on providing continuous training for employees to prepare them for conducting increasingly complex inspections required by EU standards.

An analysis of budget financing of environmental protection inspections from 2023 to 2025 suggests that despite a nominal increase in costs, there has been no significant progress in addressing the identified problems. Although data show a rise in total expenditures from RSD 164.5 million in 2023 to RSD 181.7 million in 2024, with a planned RSD 204.5 million for 2025, a closer look reveals that this growth is almost entirely due to legally mandated salary increases for existing staff rather than capacity building. Indeed, the vast majority of costs, over 97%, are related to employee expenses, and their increase slightly exceeds the mandatory public sector salary indexation (10% in 2024 and 8% in 2025), implicitly indicating that there was no significant change in the number of inspectors during this period.

A similar conclusion about stagnation can be drawn from the analysis of travel expenses, which are directly related to fieldwork. These costs remained almost the same in 2023 and 2024 (between RSD 2.7 and RSD 2.8 million), and although an increase to RSD 3.65 million is planned for 2025, poor spending in previous years raises doubts about whether this plan will actually be implemented. Particularly concerning is the analysis of expenditures for specialized services, which should fund key activities such as sampling and sending samples for laboratory testing. Budget data shows a double negative trend: first, the planned amounts for this purpose have been decreasing year by year (from RSD 4.4 million in 2023 to only RSD 2 million in 2025), and second, even more alarming, the Ministry has failed to spend these already shrinking funds, with an execution rate of 57% in 2023 and only 22% in 2024. These figures suggest

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15 <https://www.koalicija27.org/wp-content/uploads/2020/10/izvestaj-2020.pdf>

that the Inspectorate's capacity for evidence-based supervision is not only stagnating but also regressing.

## Noise

**Noise and vibration** protection falls entirely under the jurisdiction of local authorities, and therefore, no expenses for this purpose are identified in the national budget. According to data from the Statistical Office of the Republic of Serbia, total costs in this area amounted to around EUR 9 million from 2014 to 2023, with a clear upward trend in recent years (from about EUR 0.5 million to approximately EUR 2 million annually). This increase is a direct result of the adoption of the Law on Environmental Noise Protection at the end of 2021. The Law introduced a range of new obligations for cities and municipalities: all LSGs must now conduct noise monitoring, while agglomerations (urban areas with more than 100,000 inhabitants) have the additional responsibility of creating strategic noise maps and then developing action plans to translate the situation diagnosed in the maps into concrete measures to reduce noise.

The analysis of the 2024 budgets of cities and municipalities confirms that investments in this area are a direct result of these legal obligations and follow the roadmap defined by the Law. Cities that have already fulfilled the requirement to create strategic noise maps have moved on to the next step – developing action plans. Leading this process is the City of Belgrade, which allocated just over RSD 50 million for updating acoustic zones and creating strategic maps and the Action Plan, plus an additional RSD 870,000 for monitoring, totaling RSD 51.5 million.<sup>16</sup> It is followed by Novi Sad, with RSD 10 million for the Action Plan,<sup>17</sup> and Niš, with RSD 1 million for the same purpose,<sup>18</sup> whereby both cities also finance regular noise monitoring (RSD 900,000 and RSD 1.3 million, respectively). Meanwhile, cities in the early stages of implementation, such as Kragujevac<sup>19</sup> and Užice,<sup>20</sup> allocated funds in 2024 to fulfill the basic

16 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_10/BG\\_122\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_10/BG_122_2024_001.htm)

17 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_02/NS\\_006\\_2024\\_005.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_02/NS_006_2024_005.htm)

18 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_03/NIS\\_022\\_2024\\_002.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/NIS_022_2024_002.htm)

19 <https://www.danas.rs/vesti/ekonomija/kragujevac-gradsko-vece-usvojilo-program-raspodele-sredstava-za-zastitu-zivotne-sredine/>

20 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_03/UE\\_004\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_03/UE_004_2024_001.htm)

obligation – noise monitoring (RSD 270,000 and RSD 500,000, respectively). Kragujevac's 2025 plan,<sup>21</sup> which foresees a slight increase to RSD 300,000, indicates continuity of activities in this area, although the allocated funds remain quite modest.

The 2024 budget plans reveal a clear gap between planning and actual implementation of noise protection measures. Current investments in the leading cities (Belgrade, Novi Sad, Niš) are almost exclusively focused on soft measures: monitoring, map creation and strategic planning. Capital investments in physical noise reduction measures – such as building sound barriers, installing “quiet asphalt” on roads, or co-financing soundproofing of facades – are still absent from their budgets. However, the process of developing action plans is expected to change this. By definition, these plans must include concrete, technically feasible measures to reduce noise. Once adopted, they will become legally binding documents that will compel city administrations to plan and finance such, significantly more expensive, capital projects in upcoming budget cycles.

Finally, the budget analysis reveals another systemic flaw – a lack of focus on the problem of environmental vibrations. Although vibrations caused by heavy traffic, tram lines or construction work significantly affect quality of life, they remain financially under-recognized in local policies.

## Chemicals Management

The **chemicals and biocidal products management** system is financed from the national budget. In 2024, RSD 35 million were spent from the budget of the Ministry of Environmental Protection for this purpose, which is nearly the same amount as in 2023 (RSD 34.6 million). The 2025 budget plans a significant increase in funding for chemicals and biocidal products management by over 40%, reaching RSD 49.3 million. In addition to the core budget program, the implementation of the project Further Strengthening of National Capacities for Risk Management of Hazardous Substances Throughout Their Life Cycle continued in both 2024 and 2025, with financial support from UNEP. According

21 <https://kragujevac.ls.gov.rs/vest/sr/94155/program-monitoringa-buke-i-kvaliteta-vazduha-u-kragujevcu-za-2025-godinu.php>

to the original plan, the project is expected to be completed this year. In 2024, RSD 6.9 million were spent on its implementation, while RSD 13.7 million have been allocated for it in this year's budget.

The core principles established by REACH and the Biocidal Products Regulation (BPR), as well as the accompanying EU implementing regulations, stipulate that the costs related to regulatory procedures concerning chemicals and biocidal products must be borne by economic operators who generate income from placing these products on the market. However, even the new Law on Biocidal Products, adopted in 2021, failed to incorporate the EU fee-based model, as it is not aligned with the domestic system governing the collection of taxes and fees. Although there is a sub-account for the payment of national administrative fees for chemicals and biocidal products, due to the structure and functioning of the budgetary system, there is no available data on the amount of revenue generated from fees intended to cover the costs of providing administrative services for implementing regulatory procedures and developing the chemical and biocidal product management system. It is also unclear whether, and to what extent, these costs are being covered by funds collected from other taxpayers, namely, those who do not derive income from chemicals and/or biocidal products. The existing system needs an urgent reform, as earmarked funds (fees) could also be used for hazard, exposure and risk assessment of biocidal products (which does not fall under regular administrative procedures) and this would benefit all citizens of Serbia by protecting human health and the environment.

## Industrial Pollution

The Industrial Emissions Directive (IED) is considered one of the most demanding to implement, as full implementation of the IED and the corresponding Serbian legislation will require significant financial investments from operators. It is expected that the private sector will provide the necessary investments to ensure compliance with directives in this field. The Statistical Office of the Republic of Serbia collects data on current expenditures and investments in environmental protection, and likely also in the area of industrial pollution, made by economic operators. However, based on publicly available information,

it is not possible to determine what portion of the total costs can be attributed specifically to the implementation of the IED. Additionally, the state administration has not allocated any funds for the implementation of this part of the EU acquis, except potentially for strengthening administrative capacities of competent authorities.

The Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution note that one of the reasons for the low number of applications for issuing IPPC permits in the previous period is the high cost of aligning the existing installations with the best available techniques (BAT) and the emission limit values prescribed by BAT conclusions. It is emphasized that these costs need to be thoroughly analyzed through a financial assessment. In the Industrial Policy Strategy of the Republic of Serbia from 2021 to 2030, the Government defined as one of the key measures (Measure 3.2) an incentive program for investments in industrial production encouraging the use of high technologies that produce less impact on the environment, whose application is expected to make a significant contribution to the environmental protection. The effects of this measure will be evaluated by the investment volume and user satisfaction. However, it remains unclear how far the implementation has progressed, as a specific budget line for disbursing these incentive funds is yet to be established.

## Legislative Framework

The cornerstone of the legal framework for environmental protection in the Republic of Serbia is the Law on Environmental Protection,<sup>22</sup> which establishes an integrated protection system and defines the fundamental principles, stakeholders, and instruments, including economic ones that form the basis for

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22 Official Gazette of RS, nos. 135/2004, 36/2009, 95/2018 – as amended, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/135/8/reg>

financing in this field. The Law explicitly sets out principles that directly imply financial obligations, most notably the polluter pays principle and the principle of liability for environmental damage. Article 88 of the Law also defines the main sources of financing, which include funds from the budgets of all levels of government, revenues from pollution and public resource usage fees, donations, as well as earmarked funds from the Green Fund of the Republic of Serbia.

However, situation analysis reveals a significant gap in practice: aside from the evident progress in terms of funds allocated from the national and local government budgets, which is certainly necessary and commendable, there has been a persistent lack of progress in establishing other institutional elements of a sustainable environmental financing system. The most prominent example of this kind of “institutional atrophy” is the Green Fund of the Republic of Serbia. Although the Government formally established the fund back in 2016 with the intention of creating a budgetary mechanism for dedicated environmental investments, and the Law on Environmental Protection from 2018 further specified that these funds should be allocated through public calls, the Green Fund has never truly become operational. Following the abolition of the previous Environmental Protection Fund in 2012, the newly established Green Fund has remained an “empty shell”, as the necessary by-laws that would enable its functioning were never adopted.

The consequences of this situation are both multiple and systemic. The fact that revenues from environmental taxes and fees flow into the general budgets of the Republic and LSGs rather than into a dedicated fund, indicates that – strategically – fiscal centralization continues to be prioritized over sectoral efficiency, while also undermining the principle of earmarked spending. The current system prevents transparent tracking of financial flows, hampers long-term, multi-year investment planning and fails to safeguard funds collected from polluters from being redirected to other purposes during budget execution. The longstanding dysfunction of the Green Fund is, therefore, perhaps the clearest symptom of a lack of political will to establish a transparent domestic financing system for environmental protection, which in the long run, could become a serious risk if the implementation of environmental policies in Serbia becomes overly dependent on external sources of funding.

An attempt to regulate the system of collecting environmental taxes and fees was made at the end of 2018 with the adoption of the Law on Fees for the Use of Public Goods.<sup>23</sup> Although this Law created the appearance of an organized system, a more detailed analysis of how the collected revenues are distributed reveals significant fragmentation, which contradicts the principle that the polluter should pay “at the source.” Specifically, the system is not designed to direct funds to where pollution actually occurs. For example, a municipality hosting a thermal power plant receives only 40% of the revenue from sulfur dioxide and nitrogen oxide emission fees,<sup>24</sup> while revenues from specific waste streams fees (e.g. for tires) generated within its territory are entirely allocated to the national budget. The most widespread environmental fee, the so-called eco-tax, is fully retained by LSGs, but the amount is determined as a lump sum based on the type and size of the company, rather than on actual pollution levels. In practice, this can lead to paradoxical situations where a large IT company pays a significantly higher fee than a small enterprise that is an actual polluter. Such a system makes it difficult for local self-governments to independently finance the resolution of their own environmental “hotspots” and renders them dependent on transfers from the national budget, which are not always transparent or based on clear criteria.

The Law on Fees for the Use of Public Goods underwent amendments at the end of 2023, which came into effect on January 1, 2024, but these amendments mainly involved procedural improvements. For example, a new regulation issued in April 2024 (Official Gazette of RS, no. 30/2024)<sup>25</sup> moved the deadline for submitting eco-tax declarations from July 31 to April 30, requiring urgent adaptation by economic operators, while the actual fee amounts remained unchanged. Additionally, a new Form 1 was introduced, which must now be submitted exclusively electronically through the Local Tax Administration portal. Thus, these amendments can be seen as modernizing the procedure

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23 Official Gazette of RS, nos. 95/2018, 49/2019 and 92/2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/95/17/reg>

24 Moreover, if the polluter is a company of national interest, then 80% of the revenue goes to the national budget, and 20% to the local self-government in whose territory the company is located (Article 133).

25 <https://www.paragraf.rs/propisi/uredba-o-kriterijumima-za-odredjivanje-aktivnosti-koje-uticu-na-zivotnu-sredinu-prema-kolicini-zagadjenja.html>

itself but do not address the fundamental problems related to the inadequate structure and distribution of revenues from environmental taxes and fees.

The annual progress reports of the European Commission for Serbia from 2018 to 2024 highlight these issues as well, showing a clear pattern of recurring recommendations. The 2018 Report laid out fundamental requirements: operationalize the Green Fund, apply the polluter pays principle and strengthen administrative capacities for transposing and implementing European directives in the field of environmental protection and climate change.<sup>26</sup> Nearly identical demands were repeated in the 2019<sup>27</sup> and 2020 Reports.<sup>28</sup> The 2021 Report<sup>29</sup> noted increased budget allocations for the environment, but pointed out that this was largely due to increased foreign borrowing. For the first time, the 2021 Report explicitly required Serbia to earmark all revenues from environmental taxes and fees for ecological purposes. The 2022 Report<sup>30</sup> reiterated these concerns and for the first time directly mentioned the insufficiently transparent arrangement with the Chinese company China Road and Bridge Corporation (CRBC) for the construction of sewage infrastructure. General assessments of limited progress in 2023 and 2024 suggest that these systemic problems persist.<sup>31, 32</sup>

This chronological overview reveals a pattern that can be described as a dialogue of the deaf. The European Commission has been repeating the same systemic recommendations year after year (operationalizing the Green Fund, earmarking revenues and ensuring investment transparency), while Serbia responds with formal but not substantive changes. For instance, progress is demonstrated through increases in the nominal amount of budget allocations, yet systemic issues such as the dysfunctional Green Fund or lack of spending transparency are ignored. Thus, while the environmental financing system

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26 [https://enlargement.ec.europa.eu/document/download/377c86c1-1cb6-49ca-8549-e40be2308643\\_en?filename=20180417-serbia-report.pdf](https://enlargement.ec.europa.eu/document/download/377c86c1-1cb6-49ca-8549-e40be2308643_en?filename=20180417-serbia-report.pdf)

27 [https://enlargement.ec.europa.eu/serbia-report-2019-0\\_en](https://enlargement.ec.europa.eu/serbia-report-2019-0_en)

28 [https://enlargement.ec.europa.eu/system/files/2020-10/serbia\\_report\\_2020.pdf](https://enlargement.ec.europa.eu/system/files/2020-10/serbia_report_2020.pdf)

29 <https://enlargement.ec.europa.eu/system/files/2021-10/Serbia-Report-2021.pdf>

30 <https://enlargement.ec.europa.eu/system/files/2022-10/Serbia%20Report%202022.pdf>

31 [https://enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_695\\_Serbia.pdf](https://enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf)

32 [https://enlargement.ec.europa.eu/document/download/3c8c2d7f-bff7-44eb-b868-414730cc5902\\_en?filename=Serbia%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/3c8c2d7f-bff7-44eb-b868-414730cc5902_en?filename=Serbia%20Report%202024.pdf)

may appear relatively well-structured on paper, in practice, there are numerous weaknesses that expose a significant gap between the legal framework and its implementation.

Most of the weaknesses in the domestic environmental financing system, as previously described in this chapter, have also been acknowledged in the Draft Environmental Protection Strategy – Green Agenda for the Republic of Serbia for the period 2024-2033,<sup>33</sup> which is expected to be adopted in the near future. It is commendable that this overarching strategic document, in addition to estimating the necessary funding, pays special attention to financing as a distinct pillar of reform and includes a list of objectives and measures in this area. However, the overall impression is that this section of the Draft Strategy lacks sufficient specificity and ambition. The planned activities are defined too broadly, without a clear strategic orientation regarding the direction that the reform of the environmental financing system should take, and some of the proposed deadlines already appear unrealistic. For example, key activities such as the Analysis of Sustainable Financing Instruments, and the Definition of Institutional and Legal Framework are scheduled to be completed by the end of 2025 – even though the strategy itself had not been adopted as of July 2025.

According to the Draft Strategy, the key measures include an analysis of existing instruments, the definition of a new framework, the development of a methodology for tagging green expenditures, the introduction of green budgeting and, ultimately, the full operationalization of the system by the end of 2026. Although the list of planned activities is comprehensive, their overly general formulation and unrealistic deadlines suggest that, for now, this appears to be more about formally fulfilling obligations than about having a clear plan and genuine readiness for a swift and decisive reform of the environmental financing system.

It is important to highlight that the implementation of one of the activities listed in the Draft Strategy has already begun during 2024. This refers to the development of a methodology for identifying and tracking projects and

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33 <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/javne-rasprave/javni-poziv-za-ucescenje-javnosti-u-procesu-konsultacija-u-vezi-sa-izradom-strategije-zastite-zivotne-sredine-zelena-agenda-republike-srbije-za-period-2024-2033-godine>

measures in the budget of the Republic of Serbia that have a positive impact on the environment and climate. This process, known as green tagging, is the first step toward introducing green budgeting, thereby aligning Serbia with global trends in public finance management. As a result, a special annex to the 2025 Budget Law of the Republic of Serbia has been published (Annex 1 – Green Budget),<sup>34</sup> which contains methodological explanations of this new budgeting tool, along with Annex 1a, which lists the identified green programs and projects in the budget. Although still in its early stages, this document represents a pioneering step that could, over time, contribute to improving the environmental financing system, and it certainly enhances transparency and facilitates a better understanding of public spending related to environmental protection.

According to the Ministry of Finance, as referenced in Annex 1, the tagging is carried out in accordance with the Roadmap and Methodology for Green Budget Tagging from December 2023, which defines several levels of criteria:

- *Primary criteria (light tagging):* This approach includes tagging only those budget items that are clearly environmentally beneficial and aligned with the EU Green List. It is sufficient for the intention or objective of the activity to have a positive impact (e.g., flood prevention, procurement of environmentally friendly products, etc.).
- *Secondary criteria:* For ambiguous cases that are not on the EU Green List, a counterfactual scenario is applied. The project is compared to a situation in which it would not be implemented; if the damage in that case would be greater, the project is tagged as green (e.g., rail transport is considered greener than road transport, even when using diesel trains).
- *Transitional technologies:* In line with the EU taxonomy, some activities that use transitional technologies can, under strict conditions, be tagged as green: 1) if there are no technologically

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34 <https://www.mfin.gov.rs/propisi/zakon-o-budzetu-republike-srbije-za-2025-godinu-slubeni-glasnik-rs-br-942024>

and economically feasible low-carbon alternatives; 2) with evidence that the specific activity contributes to the transition toward a climate-neutral economy, without creating a lock-in to carbon-intensive technologies.

Annex 1a of the 2025 Budget Law of the Republic of Serbia contains, for the first time, a published list of green budget projects. It includes 64 projects and program activities, with a total allocation of RSD 118.5 billion. In this initial phase of tagging, the projects included fall under the jurisdiction of five budget users: the Ministry of Environmental Protection, the Republic Water Directorate, the Forest Administration, the Ministry of Construction, Transport and Infrastructure and the Ministry of Mining and Energy. As presented in Table 1, all green projects have been categorized, in accordance with the methodology, into six groups based on their primary objective: climate change mitigation, climate change adaptation, pollution prevention and control, transition to circular economy, water resource sustainability and protection and biodiversity and ecosystem protection and restoration. The investment structure reveals a significant concentration of funds, with the largest share, as much as 56.7%, allocated to climate change mitigation, followed by 27.1% for pollution prevention and control, and 9.8% for climate change adaptation, while the remaining three categories collectively account for only 6.4% of the total funds.

**Table 1:** Green projects in the 2025 budget per primary environmental protection objectives

	No. of projects	Planned funds (in bil. RSD)
Climate Change Mitigation	19	67.2
Pollution Prevention and Control	25	32.1
Climate Change Adaptation	9	11.6
Transition to Circular Economy	2	3.6
Water and Marine Resource Sustainability and Protection	5	2.5
Biodiversity and Ecosystem Protection and Restoration	4	1.6
<b>Total</b>	<b>64</b>	<b>118.5</b>

**Source:** Calculation based on data from Annex 1a – List of Green Projects, 2025 Budget Law of the Republic of Serbia

It is important to understand why the value of the listed green projects (RSD 118.5 billion) is nearly twice as high as the estimated environmental protection expenditures (close to RSD 60 billion), as presented in the analysis in previous chapters. The explanation lies in the applied tagging methodology. Specifically, the list includes several large infrastructure projects that are tagged as green based on the secondary, counterfactual scenario. These projects, primarily investments in rail and river transport, do not directly improve environmental quality on their own, but are considered green because they are a more environmentally friendly alternative to road transport, which generates higher emissions of greenhouse gases and other pollutants.

The total value of such projects is around RSD 68 billion, of which over RSD 60 billion refers to just four infrastructure undertakings: the construction of the Zemun Polje–National Stadium railway line (RSD 18 billion), the Hungarian-Serbian railway project (RSD 18 billion), the reconstruction of the Niš–Dimitrovgrad railway (RSD 13 billion) and the construction of the Belgrade subway (RSD 11.5 billion). When their value is subtracted from the total amount, the remaining sum is about RSD 50 billion allocated directly to environmental protection and climate change, which is consistent with the estimate given in this analysis. It should be noted that the list of green projects in Annex 1a still does not include all budget users, nor does it account for general management, supervision, monitoring costs and similar expenses – including these would bring the total planned amount close to RSD 60 billion in 2025.

The process of introducing green budgeting in Serbia is still in a very early stage, making it difficult to assess the ultimate scope of the initiated reform. What already stands out as an added value, however, is increased transparency, which enables citizens to have easier insight into how the state directs a portion of taxpayers' money toward projects in the areas of environmental protection and climate change.

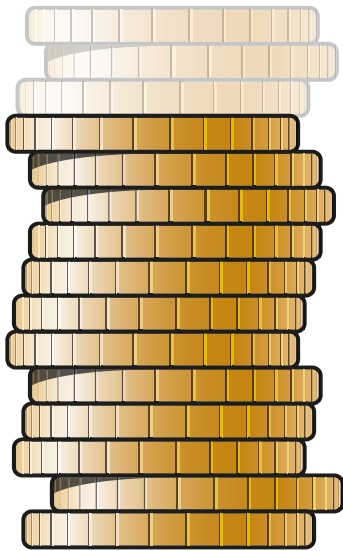
However, it is important to keep in mind that green budgeting is not just about financing green projects and presenting them with transparency. It is a systemic approach that should ensure the entire budget becomes a tool for achieving sustainable development and carbon neutrality objectives. This

process involves integrating the environmental perspective into all phases of the budget cycle – from planning and preparation, through adoption and execution, to monitoring and auditing – so that every decision regarding public revenues and expenditures is made with consideration of its environmental impact. The ultimate goal of green tagging is not only to identify projects with positive effects, as is currently the case in Serbia, but to enable clear tracking of budget items that have positive, neutral or negative impacts on the environment. Only such a systematic budget analysis allows governments to identify and gradually phase out subsidies and other incentives harmful to the environment (the so-called brown investments), such as those for fossil fuels, and to redirect those funds toward green priorities and innovations. This is a path that Serbia is yet to take.

# Recommendations

- 1.** Adopt all the by-laws that will enable the functioning of the Green Fund as the central entity for collecting and earmarking funds.
- 2.** Amend the Budget System Law and the Law on Environmental Protection to ensure that funds from all environmental fees are used exclusively for financing environmental protection.
- 3.** Reform the Law on Fees for the Use of Public Goods to align the distribution of revenues from environmental fees with the polluter pays principle at the source.
- 4.** Ensure complete transparency in the implementation of projects related to environmental protection and climate change, especially infrastructure projects, regardless of the source of funding.
- 5.** Continue increasing budget allocations for environmental protection from the national budget, with a particular focus on areas that currently receive limited funding.
- 6.** Increase the number of employees working in the fields of environmental protection and climate change, especially within inspection services, at both the central and local levels of government.
- 7.** Implement a legally mandated functional classification of budget expenditures at both the central and local levels of government to facilitate tracking of environmental protection spending.
- 8.** Continue the implementation of green budgeting in line with good practices and recommendations from international organizations, such as the European Commission and the OECD.

# FINANCING IN THE FIELD OF ENVIRONMENTAL PROTECTION AND CLIMATE CHANGE



+25% Planned growth continuation in 2025

Budget expenditures for environmental protection in 2024 reached a record high of

**RSD 48.3 billion**

Out of which 75% goes to the water and waste management sectors **75%**

The largest project is **Clean Serbia**, with RSD **12 billion** allocated

In the national budget for 2025, **64 green projects** were tagged for the first time, with RSD

**118.5**

billion allocated for that purpose

Out of the total allocated amount,

RSD

**68**

billion



were earmarked for large infrastructure projects (railways, metro), which were **tagged as green** only because they are a more environmentally friendly alternative to road traffic

**Sources:** Data from the Treasury Administration on the 2024 budget execution; 2025 Budget Law of the Republic of Serbia (Official Gazette of RS, no. 94/2025); <https://mjfn.gov.rs/propisi/zakon-o-budzetu-republike-srbije-za-2025-godinu-slubeni-glasnik-rs-br-942024>; Annex 1a – List of Green Projects from the 2025 Budget Law of the Republic of Serbia; <https://mjfn.gov.rs/propisi/zakon-o-budzetu-republike-srbije-za-2025-godinu-slubeni-glasnik-rs-br-942024>





# Horizontal Legislation

# Overview

The most significant advances in terms of legislation have been made through the adoption of the Law on Environmental Impact Assessment and the Law on Strategic Environmental Assessment. However, although the adoption of these Laws was long awaited and the new Laws bring certain improvements to the framework for environmental impact assessment and strategic environmental assessment, neither of the acts resulted in full alignment with Directives 2014/52/EU and 2001/42/EC. The session of the National Assembly during which both Laws were adopted, along with 52 other unrelated pieces of legislation, was marked by major procedural irregularities, thereby undermining fundamental democratic principles and decision-making transparency. The accompanying by-laws, necessary for the implementation of the new Laws, have not been adopted. There has also been no progress in alignment with the Directive on the Protection of the Environment through Criminal Law (Directive 2008/99/EC), nor with the Directive on Environmental Liability with Regard to the Prevention and Remedying of Environmental Damage (Directive 2004/35/EC).

In terms of conducting environmental impact assessments, the attention of the public, as well as the professional and academic communities, was focused on the procedure for determining the scope and content of the environmental impact assessment study for the project of mineral exploitation and processing of jadarite – Jadar Project. In August 2024, the project proponent submitted the request for the second time, and in November 2024, the Ministry of Environmental Protection issued a Decision on Determining the Scope and Content of the Study, thereby officially initiating the environmental impact assessment procedure for the Jadar Project. A large number of experts, citizens and civil society organizations exercised their legal right by submitting comments and objections to the submitted Request. Among the most significant was the objection that the project proponent applied the practice of dividing the project into smaller segments (the so-called salami slicing), which is not permitted under European and national environmental protection legislation.

During the reporting period, there was a noticeable deterioration in the rights guaranteed by the Aarhus Convention, particularly concerning public participation in decision-making processes. Timely notifications and early public consultations on public policy documents were often lacking; public debates were frequently held during holidays and vacation periods, hindering effective citizen participation. Additionally, there were instances of no live public debates and a lack of events outside Belgrade, as well as very short deadlines for the public presentation of urban planning projects. In this context, and prompted by irregularities related to nature protection conditions in the process of determining the scope and content of the environmental impact assessment study for the project of mineral exploitation and processing of jadarite – Jadar Project, civil society organizations suspended their membership in the Ministry of Environmental Protection’s Working Group for drafting the Strategy for the Implementation of the Aarhus Convention.

## Strategic and Legislative Framework

### Environmental Impact Assessment and Directive 2011/92/EU (Replaced by Directive 2014/52/EU)

The Law on Environmental Impact Assessment was adopted on November 27, 2024, nearly three years after the public debate was held. The session of the National Assembly during which the Law was adopted was marked by major procedural irregularities, thereby undermining fundamental democratic principles and decision-making transparency.<sup>35</sup> As many as 54 pieces of legislation were adopted that day.

35 <https://crta.rs/desetine-akata-nezakonito-usvojeno-na-jednoj-sednici-skupstine/>

Despite certain improvements, the provisions of the new Law on Environmental Impact Assessment are not fully aligned with the EU's Environmental Impact Assessment Directive (2014/52/EU). Moreover, the Law introduces provisions that further complicate and create confusion in the implementation of the environmental impact assessment procedure. Article 5 of the Law stipulates that the Government shall determine the lists of projects for which an environmental impact assessment is mandatory, as well as those for which a request must be submitted to decide whether an assessment is needed. However, Article 6 introduces a requirement to obtain an opinion from the Ministry on initiating the procedure, which contradicts Article 5, since the opinion is also required for projects for which an assessment is already mandatory. This arrangement raises concerns that obtaining the Ministry's opinion could be used to bypass the regular environmental impact assessment procedure.

The new Law expands the jurisdiction of the Ministry of Environmental Protection and leads to unnecessary centralization of environmental impact assessment procedures. This trend is contrary to the measures outlined in the Negotiating Position for Chapter 27, which states that, in order to improve the implementation of the requirements regarding environmental impact assessment, the capacities of employees responsible for environmental protection tasks at the local level should be strengthened. More detailed information about the content of the Law, the public debate process and the submitted comments is available in the previous reports of the Coalition 27.<sup>36</sup>

In order for the Environmental Impact Assessment Directive (Directive 2014/52/EU) to be fully transposed into domestic legislation, apart from the adoption of the new Law, the Regulation on Determining the List of Projects for Which the Impact Assessment is Obligatory (List I) and List of Projects for Which the Environmental Impact Assessment Can Be Required (List II) must be adopted, as well. Although the Law stipulates that this by-law must be adopted within six months of the new Law's entry into force, these regulations are yet to be

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36 <https://www.koalicija27.org/izvestaji-iz-senke/>

adopted, effectively suspending the implementation of the new Law. The latest version of this Regulation dates back to 2008.<sup>37</sup>

In addition to the Regulation, the following by-laws must be harmonized with the new Law on Environmental Impact Assessment:

- Rulebook on Contents of the Request on the Need for Environmental Impact Assessment and Contents of the Request for Determining the Scope and Content of Environmental Impact Assessment Study; Rulebook on the Content of the Environmental Impact Study;
- Rulebook on Public Insight, Presentation and Public Discussion about the Environmental Impact Assessment Study;
- Rulebook on the Work of the Technical Committee for Environmental Impact Assessment Study;
- Rulebook on the Format, Method, Content, Appearance and Management of the Electronic Database on Completed Procedures and Adopted Decisions on Environmental Impact Assessment;
- Rulebook on the Appointment and Work of the Expert Commission;
- Rulebook on the Method of Informing the Public and Conducting Public Debates on the Draft Plan and Program and the Strategic Environmental Assessment Reports.

## Strategic Assessment and Directive 2001/42/EC

The new Law on Strategic Environmental Assessment was adopted on November 27, 2024, during the same session of the National Assembly when 54 other pieces of legislation were adopted. The public debate on the Draft Law on Strategic Environmental Assessment took place three years prior, from December 24, 2021 to January 14, 2022.<sup>38</sup>

37 Official Gazette of RS, no. 114/2008, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2008/114/2/reg>

38 Ministry of Environmental Protection: Report on the Public Debate on the Draft Law on Strategic Environmental Assessment, available at: <https://www.ekologija.gov.rs/lat/informacije-od-javnog-znacaja/javne-rasprave/izvestaj-o-javnoj-raspravi-o-nacrtu-zakona-o-strateskoj-proceni-uticaja-na-zivotnu-sredinu>

The Negotiating Position states that the problem of poor coordination and information exchange between different levels of the Government in the implementation of the strategic assessment process will be solved through the development of a special database on activities related to impact assessment and strategic assessment procedures at the national, provincial and local levels. This database has not been created yet, despite the fact that the new Law stipulates that it shall be designed within three years following the adoption of the Law.

To achieve full harmonization with European legislation, it will be necessary to adopt:

- Rulebook on the Work of the Expert Commission for the Evaluation of Strategic Environmental Assessment Reports, and
- Rulebook on the Procedure for Public Insight, Presentation and Public Discussion of the Strategic Environmental Assessment Report.

The deadline for adopting these regulations is one year following the adoption of the Law.

## Public Participation in the Development of Certain Plans and Programs and Directive 2003/35/EC

For full compliance with this Directive, the adoption of the Law on Integrated Prevention and Control of Environmental Pollution and the Law on Amendments to the Water Law is necessary. The Negotiating Position of the Republic of Serbia for Chapter 27 states that the Directive was supposed to be fully transposed by the end of 2020.<sup>39</sup>

39 Government of the Republic of Serbia (2019): Negotiating Position of the Republic of Serbia for the Intergovernmental Conference on the Accession of the Republic of Serbia to the European Union for Chapter 27 — Environment and Climate Change, available at: [https://www.mei.gov.rs/upload/documents/pristupni\\_pregovori/pregovaracke\\_pozicije/pg\\_pozicija\\_27.pdf](https://www.mei.gov.rs/upload/documents/pristupni_pregovori/pregovaracke_pozicije/pg_pozicija_27.pdf)

## Environmental Crimes and Directive 2008/99/EC

Directive 2008/99/EC on the protection of the environment through criminal law is still only partially transposed into domestic legislation. The last amendments to the Criminal Code made in 2024 do not pertain to environmental protection.

## Responsibility for Preventing and Eliminating Environmental Damage and Directive 2004/35/EC

No progress has been made regarding the adoption of the Law on Liability for Environmental Damage, i.e., the transposition of the Environmental Liability Directive 2004/35/EC. The Directive is in the initial phase of transposition into domestic legislation and its full transposition requires the adoption of the said Law.<sup>40</sup>

# Implementation of Regulations

## Implementation of the law on environmental impact assessment in the case of the Jadar project

The exploitation of jadarite attracted public attention in **2017, when the Serbian Government made the decision<sup>41</sup> to develop the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral**, thereby officially presenting the project plan to the public. A few years later, in February 2020, the Government adopted the Decree on Determining the Spatial Plan of the Special Purpose Area for the

40 Government of the Republic of Serbia (2019): Negotiating Position of the Republic of Serbia for the Intergovernmental Conference on the Accession of the Republic of Serbia to the European Union for Chapter 27 — Environment and Climate Change, available at: [https://www.mei.gov.rs/upload/documents/pristupni\\_pregovori/pregovaracke\\_pozicije/pg\\_pozicija\\_27.pdf](https://www.mei.gov.rs/upload/documents/pristupni_pregovori/pregovaracke_pozicije/pg_pozicija_27.pdf)

41 Decision on Developing a Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 60/17), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2017\\_06/t06\\_0161.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2017_06/t06_0161.htm)

Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral.<sup>42</sup> Since then, the public has shown great interest in this project, and the first major local community resistance and protests occurred in 2021.

The company Rio Sava Exploration initiated the official environmental impact assessment process for the Jadar Project **in April 2021**, when it submitted a **Request for Determining the Scope and Content of the Environmental Impact Assessment Study for the Project of Underground Exploitation of Lithium and Boron Deposits**. A large number of civil society organizations, as well as experts and representatives of professional and scientific institutions (such as the Serbian Academy of Sciences and Arts), submitted their opinions to the Ministry of Environmental Protection, thereby formally participating in the environmental impact assessment process for part of the Jadar Project. In August 2021, the Ministry of Environmental Protection issued a Decision<sup>43</sup> on Determining the Scope and Content of the Environmental Impact Assessment Study.

After numerous protests, both small and large-scale, throughout 2021 and **early 2022**, during which citizens of Serbia expressed their disagreement with the plans for the jadarite mine, **the Government of the Republic of Serbia decided to halt the implementation of the Jadar Project** and suspend the legal and planning basis for its implementation.<sup>44</sup> As a result, the Decision on Determining the Scope and Content of the Environmental Impact Assessment Study, issued by the Ministry of Environmental Protection,<sup>45</sup> was also suspended, effectively terminating the formal, legally defined environmental impact assessment process.

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42 Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 26/20), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2020\\_03/SG\\_26\\_2020\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2020_03/SG_26_2020_001.htm)

43 Decision on Determining the Scope and Content of the Environmental Impact Assessment Study for the Jadar Project of Underground Exploitation of Lithium and Boron Deposits, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar.pdf>

44 Decree on Revoking the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project for the Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 8/2022), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2022\\_01/SG\\_008\\_2022\\_222.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2022_01/SG_008_2022_222.htm)

45 Government of the Republic of Serbia, Administrative Committee: Decision no. 353-9316/2021003 dated January 25, 2022, Revoking the Decision of the Ministry of Environmental Protection no. 353-02-1163/2021-03 dated August 18, 2021

However, it turned out that the Government of the Republic of Serbia's withdrawal from the Jadar Project was only temporary, given that on **July 11, 2024, the Constitutional Court ruled<sup>46</sup> that the Government's Decree on suspending the Jadar Project was adopted outside the constitutional competences of the Government.** On July 16, 2024, the Government of the Republic of Serbia adopted a new Decree,<sup>47</sup> effectively revoking its previous decision and reinstating the Decree from February 2020.

In doing so, the Government of the Republic of Serbia misled the public about its true intentions regarding the Jadar Project, first by unconstitutionally revoking its own decisions, and then by bringing the project back into the public spotlight using public resources. Citizens who oppose the Jadar Project responded to these actions with protests, and a mass protest against the project took place on August 10, 2024, when more than 30,000 people gathered in the streets of Belgrade.<sup>48</sup>

**In late August 2024,** the company Rio Sava Exploration reinitiated the impact assessment process by submitting a **Request for Determining the Scope and Content of the Environmental Impact Assessment Study for the Project of Underground Exploitation of Lithium and Boron Deposits.**<sup>49</sup> Once again, a large number of citizens, civil society organizations and experts became involved and submitted comments to the Ministry of Environmental Protection. In November 2024, the Ministry of Environmental Protection issued a Decision<sup>50</sup> on Determining the Scope and Content of the Environmental Impact Assessment

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46 Decision of the Constitutional Court of the Republic of Serbia no. IUO-39/2022 (Official Gazette of RS, no. 59/2024)

47 Decree on Reinstating the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 60/2024), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_07/SG\\_060\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_07/SG_060_2024_001.htm)

48 <https://www.nin.rs/politika/vesti/54834/protest-na-terazijama-u-beogradu-protiv-iskopavanja-litijuma-uzivo>

49 <https://www.ekologija.gov.rs/obavestjenja/procena-uticaja-na-zivotnu-sredinu/zahtevi/zahtevi-za-odredjivanje-obima-i-sadrzaja/rio-sava-exploration-doo-beograd-zahtev-za-odredjivanje-obima-i-sadrzaja-studije-o-proceni-uticaja-na-zivotnu-sredinu-projekta-podzemne-eksploatacije-lezista>

50 Decision on Determining the Scope and Content of the Environmental Impact Assessment Study for the Jadar Project of Underground Exploitation of Lithium and Boron Deposits, available at: <https://www.ekologija.gov.rs/obavestjenja/procena-uticaja-na-zivotnu-sredinu/doneta-resenja-i-zakljucci/resenje-o-odredjivanje-obima-i-sadrzaja/resenje-kojim-se-nosiocu-projekta-rio-sava-exploratlon-doo-beograd-odredjuje-obim-i-sadrzaj-studije-o-proceni-uticaja-na-zivotnu-sredinu>

Study, thereby officially bringing the Jadar Project back into the environmental impact assessment process.

## Scope and content of the environmental impact assessment study for the Jadar project – attempt one (2021)

In April 2021, the company Rio Sava Exploration submitted a request to the Ministry of Environmental Protection to determine the scope and content of the Environmental Impact Assessment Study for the Project.<sup>51</sup> The Ministry requested the company Rio Sava Exploration to provide additional information twice, and among the numerous deficiencies in the request that the Ministry of Environmental Protection pointed out were the following<sup>52</sup>:

- The company submitted the Request only for one part of the entire Jadar Project – for the underground exploitation zone of lithium and boron ore (including associated facilities and infrastructure), omitting the part of the project related to industrial waste disposal and the part involving the ore processing operations. The Ministry emphasized that, according to applicable regulations, the identification of environmental impacts cannot be conducted partially, but rather that the impacts must be considered comprehensively for all facilities when they are functionally and technologically connected within the complex, which is a spatial unit controlled by the operator, where hazardous substances are present in one or more facilities, including individual or shared infrastructure.
- The Request does not adequately consider the impact of floods on the mine and the mine tailings disposal site, and it stated that the solution for the Jadar Riverbed in the area of the future project zone was unknown, which needs to be addressed given the frequent flooding of the Jadar River.

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51 <https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar.pdf>

52 <https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar.pdf>

- The Request lists only positive impacts on the local community, without considering negative impacts, even though it states that agriculture accounts for 34% of the income of the city of Loznica, and the project involves activities on land that is currently predominantly agricultural. The Ministry pointed out that the Request did not consider how the loss of agricultural land will affect households that currently rely mainly on agriculture, and it required the company to provide data on the areas of forest and agricultural land that will change their use due to the project implementation.
- The Request does not specify the exact locations of local water sources that supply the population with drinking water, and the Ministry stated that this was one of the most significant potential negative impacts of the project, which must be addressed in the Request.
- The aspect of the project's impact on cultural heritage is very important and insufficiently developed in the Request, and the Ministry stated that protective archaeological research must be carried out before the project is developed or in its early design stages, given the large number of archaeological sites within the boundaries of the exploitation area.
- The Request does not provide information on the total amount of water that will be required for the operation of the entire mining complex, nor on all the sources from which this water will be supplied. This is one of the most significant impacts of the mine, and the Ministry points out that this example clearly illustrates the shortcomings of assessing environmental impacts in a segmented way, that is, assessing the environmental impact of only one part of the Jadar Project (in this case, only the underground mine). Given that the project proponent itself states that water supply will be centralized and that water balance is typically calculated at the level of the entire project complex, the Ministry

emphasizes that, due to the mixing of water between different parts of the process (which include underground exploitation, ore processing facilities and industrial waste disposal sites), it is difficult to determine the water balance in a segmented manner. Therefore, it is necessary to consider the total required quantities, sources and methods of water supply and use across the entire Jadar Project complex.

After the documentation was supplemented, the Ministry of Environmental Protection announced a public insight into the Request in July 2021, lasting 15 days.<sup>53</sup> During this period, 35 civil society organizations, environmental movements, experts and individual citizens, as well as seven institutions, authorities and organizations, submitted their comments. The public's comments primarily focused on the fact that the Request for Determining the Scope and Content submitted by the company was incomplete, that there were uncertainties regarding the total quantity and sources of water required for the mine's operation and that the Request for Determining the Scope and Content of the Environmental Impact Assessment Study was premature, given that the process of amending the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral was still ongoing, and this Plan served as the planning basis for the Project's implementation. Commenters also pointed out that the biodiversity assessment had been conducted on the basis of only ten days of fieldwork, which is insufficient to fully evaluate all species and habitats across all seasons.

The majority of public comments aligned with the position previously expressed by the Ministry of Environmental Protection when it requested that the company supplement its Request: that the company had submitted a Request for Determining the Scope and Content of the Assessment for only one part of the project, which is not in accordance with environmental protection regulations. Civil society organizations and experts from various fields pointed out in their comments that the company had engaged in an unlawful practice known as the

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53 [https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar\\_0.pdf](https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar_0.pdf)

so-called salami slicing,<sup>54</sup> whereby the project is divided into several smaller segments (which are functionally and technologically connected), each with a seemingly smaller individual environmental impact than the total, cumulative impact of the entire project.

After the public insight procedure was completed and the comments from the public and relevant authorities and organizations were processed, the Ministry of Environmental Protection issued a Decision<sup>55</sup> on Determining the Scope and Content of the Environmental Impact Assessment Study for the Project of Underground Exploitation of Jadarite Deposits. Many civil society organizations subsequently filed an appeal to the Government of the Republic of Serbia (as the second-instance authority), requesting that the Decision be annulled. According to the Law on General Administrative Procedure,<sup>56</sup> a submitted appeal suspends the implementation of the decision until the second-instance authority issues a ruling on the appeal, which must be done within 30 days. The Government of the Republic of Serbia did not act within the legal deadline, but nevertheless – following mass protests and public pressure – revoked<sup>57</sup> the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral.

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54 Report from the Commission to the European Parliament and the Council on the Application and Effectiveness of the EIA Directive (Directive 85/337/EEC as amended by Directive 97/11/EC) – How successful are the Member States in implementing the EIA Directive /\* COM/2003/0334 final, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52003DC0334>

55 Decision on Determining the Scope and Content of the Environmental Impact Assessment Study for the Jadar Project of Underground Exploitation of Lithium and Boron Deposits, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/resenje%20za%20obim%20i%20sadrzaj%20jadar.pdf>

56 Official Gazette of RS, nos. 18/2016, 95/2018 – authentic interpretation and no. 2/2023 – Decision of the Constitutional Court, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2016/18/2/reg>

57 Decree on Revoking the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project for the Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 8/2022), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2022\\_01/SG\\_008\\_2022\\_222.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2022_01/SG_008_2022_222.htm)

## Scope and content of the environmental impact assessment study for the Jadar project – attempt two (2024)

In July 2024, the Constitutional Court reached a decision<sup>58</sup> stating that the Government's previous decision to put an end to the Jadar Project was outside the constitutional competences of the Government. That same month, the company Rio Sava Exploration published documents on its website, which it referred to as "draft environmental impact assessment studies",<sup>59</sup> prepared separately for each part of the project under the following titles:

- Draft Environmental Impact Assessment Study of the Jadar Project – phased construction of the processing plant for the mineral jadarite, in accordance with the regulations of the Republic of Serbia;
- Draft Environmental Impact Assessment Study for the Jadar Project of underground exploitation of the lithium and boron deposits, including facilities for ore beneficiation and the disposal of tailings generated from mining activities;
- Draft Environmental Impact Assessment Study for the industrial waste landfill of the Jadar Project, in accordance with the regulations of the Republic of Serbia.

Each of the documents, spanning around a thousand pages, provided a wealth of information about the planned project. However, despite containing the terms "Environmental Impact Assessment Study" and "in accordance with the regulations of the Republic of Serbia" in their titles, these documents were in no way part of the official environmental impact assessment procedure, nor does the Law on Environmental Impact Assessment recognize a draft study. This was explicitly stated by the company itself within the documents. On the very first page of each document, Rio Sava Exploration indicated that the document

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58 Decision of the Constitutional Court of the Republic of Serbia, no. IUo-39/2022 (Official Gazette of RS, no. 59/2024), available at: <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-59-2024.html>

59 <https://web.archive.org/web/20240722102402/https://riotintoserbia.com/zivotna-sredina/radni-nacrti-studija-o-proceni-uticaja-na-zivotnu-sredinu/>

was a draft, a working version of a document of preliminary character. The company clearly stated that the documents provided no guarantees regarding their content, including the accuracy, completeness, reliability or adequacy of the information contained within. Furthermore, the drafts specified that the documents could not be considered, either implicitly or explicitly, as any kind of obligation or commitment by the company or any other interested party, and that the drafts were not based on any document, action, or regulation, including any decision, issued by the competent authorities during the legal process of granting approvals, permits or authorizations. Upon publication, these documents attracted significant public and media attention, with many referring to them as "Environmental Impact Assessment Studies". Representatives of the company and experts involved in preparing the documents publicly referred to them as "Environmental Impact Assessment Studies"<sup>60</sup> further creating confusion among the public about the current stage of the environmental impact assessment process for the Jadar Project. As a result, citizens were further misled, and the abundance of contradictory information led to even greater public distrust in the entire process.

On July 16, 2024, the Government of the Republic of Serbia adopted a Decree on Reinstating the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral,<sup>61</sup> effectively revoking its previous "putting an end to the project" decision<sup>62</sup> and reestablished the legal and planning foundations for its implementation.

Already in August 2024, the Government of the Republic of Serbia launched the Government Contact Center, aimed at informing citizens about the Jadar Project.<sup>63</sup> In the first days of its operation, the Minister of Mining and Energy

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60 <https://www.rts.rs/lat/vesti/ekonomija/5465911/rio-tinto-studija.html>

61 Decree on Reinstating the Decree on Determining the Spatial Plan of the Special Purpose Area for the Implementation of the Jadar Project of Exploitation and Processing of Jadarite Mineral (Official Gazette of RS, no. 60/2024), available at: [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_07/SG\\_060\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_07/SG_060_2024_001.htm)

62 <https://www.rts.rs/lat/vesti/politika/4675594/brnabic-apsolutno-stavljena-tacka-na-izgradnju-rudnika-danas-sastanak-sa-predstavnicima-ne-davimo-jadar.html>

63 <https://www.rts.rs/lat/vesti/drustvo/5507746/kontakt-centar-vlade-srbije-za-pitanja-o-projektu-jadar-danas-pocinje-sa-radom.html>

herself answered calls from citizens.<sup>64</sup> According to the Ministry of Mining and Energy, experts responded to citizens' questions based on the Draft Environmental Impact Assessment Studies,<sup>65,66</sup> despite the fact that the company had clearly stated it did not guarantee the reliability or accuracy of the data presented in the draft studies.

In September 2024, the company Rio Sava Exploration submitted a new Request for Determining the Scope and Content of the future environmental impact study (again, for only one part) of the Jadar Project.<sup>67</sup> This marked the second time the Jadar Project officially re-entered the environmental impact assessment procedure.

The Ministry of Environmental Protection has once again requested additional information from the company Rio Sava Exploration regarding the submitted Request for Determining the Scope and Content, citing the following deficiencies<sup>68</sup>:

- That, based on the information provided in the Request, it is not clear what the final Seveso classification of the facility is.
- That the company, in its Request, did not include the entire Jadar Project complex from the perspective of a chemical accident – the Seveso analysis. The Ministry cited the Law on Environmental Protection, according to which a Seveso installation is defined as a technical unit within a complex where hazardous substances are produced, used, stored or handled, and includes all equipment, buildings, pipelines, machinery, tools, internal tracks and

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64 <https://www.euronews.rs/srbija/politika/134666/ministarka-rudarstva-i-energetike-u-kontakt-centru-vlade-odgovarala-na-upite-gradana-o-jadru/vešt>

65 <https://www.insajder.net teme/ministarstvo-za-insajder-strucnjaci-u-kontakt-centru-ce-o-projektu-jadar-odgovore-davati-i-na-osnovu-nacrta-studije-koju-je-uradio-sam-rio-tinto>

66 <https://n1info.rs/vesti/mre-u-kontakt-centru-vlade-informacije-iz-nacrta-studije-rio-tinta-one-su-jedine-tacne/>

67 RIO SAVA EXPLORATION: Request for Determining the Scope and Content of the Environmental Impact Assessment Study for the Project of Underground Exploitation of Lithium and Boron Deposits, <https://www.ekologija.gov.rs/obavestjenja/procena-uticaja-na-zivotnu-sredinu/zahtevi/zahtevi-za-odredjivanje-obima-i-sadrzaja/rio-sava-exploration-doo-beograd-zahtev-za-odredjivanje-obima-i-sadrzaja-studije-o-proceni-uticaja-na-zivotnu-sredinu-projekta-podzemne-eksploatacije-lezista>

68 <https://www.ekologija.gov.rs/sites/default/files/inline-files/Resenje%20obim%20i%20sadrzaj%20Rio%20Sava.pdf>

depots, docks, unloading berths for the installation, storage facilities or similar structures, whether on land or water, which are necessary for the operation of the installation. The Law further states that a complex is a spatial unit under the control of the operator, where hazardous substances are present in one or more installations, including individual or shared infrastructure or activities. Therefore, the Ministry is requesting that the company supplement its Request by including consideration of other parts of the complex where mining and industrial waste will be located, as well as facilities for the preparation of backfill material for the excavated areas, the ore processing plant at the surface, the processing facility for converting concentrate into lithium carbonate, boric acid and sodium sulfate, as well as any other planned but unlisted facilities.

- The Request lacks adequate description of one of the most significant potential negative impacts, which is the impact on water intakes and water sources used for drinking water supply.
- The protection of cultural heritage and archaeological sites was not described in sufficient detail, considering that the Institute for the Protection of Cultural Monuments in Valjevo stated in its conditions that, should significant remains of immovable cultural property be discovered, the investor must plan for project modifications and relocation of structures. In this regard, the planned positions of the mining facilities in relation to the already registered archaeological sites (Paulje, the Hungarian Cemetery, the Bridge over the Korenita River, the prehistoric settlement at Brezjak and others) were not addressed.
- The Ministry states that the Request does not provide information on the location of the planned mining facilities in relation to areas where strictly protected plant and animal species have been registered, and refers to the conditions issued by the Institute for Nature Conservation of Serbia on August 21, 2024.

- The Request did not include the relevant European Union Reference Documents that define the best available techniques to be used, even though the project proponent refers to the application of best available techniques in several parts of the Request.

After the company Rio Sava Exploration supplemented the Request with the required information, in September 2024, the Ministry of Environmental Protection informed the relevant authorities, organizations and the public about the opportunity of insight into the submitted Request.

The public insight lasted 15 days (in accordance with the legal minimum) and was announced in national and local media, as well as on the official websites of Loznica and Krupanj, where citizens could also access the submitted Request and accompanying documents during the public insight period. This time, nearly 150 civil society organizations, environmental movements, experts, individual citizens, public bodies and organizations submitted comments. The public's comments covered a wide range of aspects of the Jadar Project, from procedural issues and legal grounds to the impact on water, nature and the local community, as well as the types and quantities of waste generated and its disposal, the impact on biodiversity, protected areas near the proposed mine and inconsistencies between the Request, accompanying documents and applicable regulations.

A large number of commenters once again pointed out that the company divided the project into several smaller parts (the so-called salami slicing), which is contrary to environmental protection regulations. The company submitted a Request for Determining the Scope and Content of the Study on Environmental Impact Assessment only for underground ore mining, while the parts of the project related to waste disposal and the ore processing plant were not included in the submitted Request. In the 2021 Decision on Scope and Content, the Ministry of Environmental Protection explicitly stated that environmental regulations required that the environmental impacts of the project must be considered comprehensively, for all facilities within the complex. The Ministry especially emphasized the need for a comprehensive approach when considering and establishing the water balance. However, in the 2024

Decision, the Ministry responded to these public comments by stating: "The fact is that these three parts can operate independently of each other, i.e., there is no causal link between the mine and the processing plant, and for that reason their potential functional connection cannot be taken into account as a standalone argument for combining the Requests for Determining the Scope and Content." In the Decision, the Ministry requires the company to consider the project comprehensively and for the entire mining-industrial complex Jadar, including underground ore mining (subzone 1A), production-industrial activities (subzone 2A) and the industrial waste landfill (subzone 3A) solely for the purpose of chemical accident protection. The Ministry's Decision states that the provisions of the Law on Environmental Protection requiring the identification of possible environmental impacts of a project or activity not to be done partially for each facility when they are functionally and technologically connected but rather for the entire complex, refer "specifically and only to chemical accident protection, and not, for example, to determining the scope and content of the Environmental Impact Assessment Study, which may be prepared separately, i.e., partially, for each facility within the project".<sup>69</sup> The Law on Environmental Protection defines a "Seveso installation" as a facility where activities are carried out involving hazardous substances present or potentially present in quantities equal to or greater than the prescribed limits, i.e., a technical unit within a complex where hazardous substances are produced, used, stored or handled. The facility includes all equipment, buildings, pipelines, machinery, tools, internal tracks and depots, docks, unloading berths for the facility, piers, warehouses or similar structures on water or land necessary for the operation of the facility. Furthermore, the Law defines a "complex" as a spatial unit under the control of the operator where hazardous substances are present in one or more facilities, including individual or shared infrastructure or activities.<sup>70</sup> However, the Law on Environmental Protection does not state that the Environmental Impact Assessment Study can be done partially for

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69 Page 35 of the Decision.

70 Official Gazette of RS, nos. 135/2004, 36/2009, 36/2009 – as amended, 72/2009 – as amended, 43/2011 – Decision of the Constitutional Court, 14/2016, 76/2018, 95/2018 – as amended, 95/2018 – as amended and 94/2024 – as amended), available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/135/8/reg>

each facility within the project. On the other hand, the Law on Environmental Impact Assessment<sup>71</sup> defines a project as:

- 1.** Construction of a facility, reconstruction of a facility, execution of construction works on a facility, capacity expansion or cessation of operation, installation or execution of installations, plants and equipment, their reconstruction, removal of or change in technology (work process technology, raw materials, auxiliary materials, energy sources and waste);
- 2.** Planning, construction, or execution of multiple temporally or spatially connected facilities, interventions and/or complex systems that constitute a single economic and/or technical-technological unit, which are considered a single project within the scope of this Law;
- 3.** Other activities, works and interventions in nature and the natural environment, including works and activities involving the exploitation of mineral resources or geological exploration, except for hydrogeological, hydrogeothermal, petrogeothermal and engineering-geological/geotechnical explorations.

Hence, the Law on Environmental Impact Assessment defines a project as consisting of multiple temporally or spatially connected facilities, interventions and complex systems that form a single economic and/or technical-technological unit. Accordingly, the Request for Determining the Scope and Content submitted by the company Rio Sava Exploration should have included all parts of the Jadar Project that are part of this economic and technical-technological whole.

On November 15, 2024, the Ministry of Environmental Protection issued the Decision on Determining the Scope and Content of the Environmental Impact Assessment Study for the Jadar Project of Underground Exploitation of Lithium and Boron Deposits.<sup>72</sup> The project proponent is required to submit

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71 Official Gazette of RS, no. 94/2024, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/29>

72 <https://www.ekologija.gov.rs/sites/default/files/inline-files/Resenje%20obim%20i%20sadrzaj%20Rio%20Sava.pdf>

the Environmental Impact Assessment Study to the Ministry within one year following the date when this decision enters into force.

In December 2024, the Renewables and Environmental Regulatory Institute, together with a large number of other organizations, activists and individuals, filed an appeal to the Government of the Republic of Serbia (as the second-instance authority) against the issued Decision, requesting its annulment. In accordance with the Law on General Administrative Procedure, this appeal has a suspensive effect, meaning that the issued Decision cannot be considered legally binding until the second-instance authority renders a decision on the appeal. The second-instance authority (in this case, the Government of the Republic of Serbia) is obligated to decide on the appeal within 30 days. As of the time of writing this report, more than five months after the appeal was filed, it remains unknown whether the Government of the Republic of Serbia has made a decision on the matter.

## Nature protection conditions in the environmental impact assessment of the Jadar project

In February 2025, the Center for Investigative Journalism of Serbia (CINS)<sup>73</sup> published an article revealing that on August 21, 2024, the Institute for Nature Conservation of Serbia issued nature protection conditions (which are an integral part of the Request for Determining the Scope and Content of the Environmental Impact Assessment Study) to the company Rio Sava Exploration. According to the article, the conditions issued by the Institute were in contradiction to the assessments and recommendations of the Institute's own experts. Some of these experts reportedly prepared official memos expressing their disagreement with the conditions issued during this procedure to the company Rio Sava Exploration and stated that key elements related to biodiversity protection had been omitted from the final version of the conditions. Inspecting the internal documents of the Institute, the media discovered that the then acting director of the Institute for Nature Conservation of Serbia significantly altered the conditions originally prepared by the expert departments of the

73 <https://www.cins.rs/procureli-mejlovi-rio-tintu-izdati-uslovi-zastite-prirode-bez-saglasnosti-strucnjaka/>

Institute removing therefrom entire sections of the text that describe critical requirements for the protection of nature and biodiversity (for instance, the issued conditions omitted a paragraph stating that the planned mining area encompasses habitats of strictly protected wild plant and animal species, as well as priority habitats for conservation). The internal correspondence between the employees at the Institute shows that experts believed there were no viable nature protection conditions that could prevent irreversible destruction of habitats and the designated area of the ecological network. Their professional opinion was that the only effective protection measure would be to abandon the project entirely. Nevertheless, on August 21, 2024, the Institute for Nature Conservation of Serbia officially issued nature protection conditions that did not reflect these internal expert assessments. These conditions were then included in the official documentation submitted by Rio Sava Exploration to the Ministry of Environmental Protection as part of its Request for Determining the Scope and Content of the Environmental Impact Assessment Study.

Due to these actions of the Institute for Nature Conservation of Serbia in the environmental impact assessment process for the Jadar Project, the member organizations of Coalition 27, along with thirty other organizations, called<sup>74</sup> for the accountability of those responsible, the resignation of the then acting director of the Institute and the sanctioning of competent officials at the Ministry of Environmental Protection. At the same time, civil society organizations involved in the preparation of the Strategy for the Implementation of the Aarhus Convention suspended their activities and froze their membership in the Ministry of Environmental Protection's working group,<sup>75</sup> demanding the resignation of the acting director of the Institute for Nature Conservation of Serbia, the establishment of responsibility and sanctions against those accountable within the Ministry of Environmental Protection and the issuance of a new decision on the Nature Protection Conditions for the Jadar Project by the Institute, in line with the assessments and recommendations of the Institute's own experts.

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74 <https://www.koalicija27.org/vesti/zahtev-za-odgovornost-za-neregularno-izdavanje-uslova-za-zastitu-prirode-projekat-jadar/>

75 <https://www.bos.rs/rs/vesti-ekz/256/2044/organizacije-civilnog-drustva-zamrzavaju-clanstvo-u-radnoj-grupi-za-izradu-strategije-za-primenu-arhuske-konvencije.html>

## Next steps in the environmental impact assessment process for the Jadar project

The Law on Environmental Impact Assessment requires the project proponent to prepare an Environmental Impact Assessment Study and submit a Request for Approval of the Study to the Ministry of Environmental Protection no later than one year following the date of receiving the final decision on determining the scope and content of the Environmental Impact Assessment Study for the project. Given that a significant number of individuals and civil society organizations filed an appeal in December 2024 against the Decision on Determining the Scope and Content of the Environmental Impact Assessment Study for the Jadar Project of Underground Exploitation of Lithium and Boron Deposits, and that it remains unknown whether the Government of the Republic of Serbia has ruled on the appeal, it is not currently possible to determine when this next step in the environmental assessment process will take place. So far, the entire process has been marked by widespread public distrust in the institutions of the Republic of Serbia, numerous contradictory statements and decisions by government bodies and multiple violations of environmental protection laws and procedures.

### **Environmental Protection Strategy**

The Draft Environmental Protection Strategy – Green Agenda for the Republic of Serbia for 2024–2033, in addition to the five key areas covered by the Green Agenda for the Western Balkans (decarbonization, circular economy, pollution reduction, sustainable agriculture and biodiversity), introduces a sixth pillar that encompasses horizontal issues such as: the capacities and level of knowledge for implementing EU Green Agenda standards at all governance levels, improvement of the implementation and enforcement of the three pillars of the Aarhus Convention, further development of systems for monitoring environmental quality factors and the impacts of climate change and enhancement of environmental protection financing systems. Although the adoption of the Strategy was initially planned for the end of 2023, the process was delayed due to its complexity and extensive intersectoral coordination. The draft document was made available for public debate from December 4

to December 24, 2024.<sup>76</sup> The report from the public debate was published in January 2025, but the Strategy has not yet been formally adopted.<sup>77</sup>

### **Strategy for the Implementation of the Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters (Aarhus Convention) with an Action Plan**

During the reporting period, the process of preparing the Draft Strategy for the Implementation of the Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters (Aarhus Convention) continued, and by February 2025, seven meetings of the Working Group had been held.

In February, civil society organizations that are members of the Working Group decided to suspend their participation in meetings and activities of the Working Group for the foreseeable future.<sup>78</sup> The membership of these organizations in this working body of the Ministry of Environmental Protection will remain frozen until the circumstances that led to the non-transparent and illegitimate process of issuing the decision on Nature Protection Conditions for the Jadar Project by the Institute for Nature Conservation of Serbia are clarified. According to experts and organizations, this decision undermines trust in institutions and opens the possibility of endangering nature and biodiversity in our country. This decision was also made in light of broader social circumstances, including student protests and demands for accountability from public officials. The Working Group has continued its work without the participation of civil society organizations.

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76 <https://ekologija.gov.rs/lat/informacije-od-javnog-znacaja/izvestaji-sa-javnih-rasprava/i-z-v-e-s-t-j-o-sprovedenom-javnom-uvidu-o-nacrtu-strategije-zastite-zivotne-sredine-zelena-agenda-za-srbiju-i-nacrtu-akcionog-plana>

77 <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/izvestaji-sa-javnih-rasprava/izvestaj-o-sprovedenoj-javnoj-raspravi-o-predlogu-strategije-zastite-zivotne-sredine-zelena-agenda-za-republiku-srbiju-za-period-2024-2033-godine-sa-akcionim-planom>

78 <https://www.bos.rs/rs/vesti-ekz/256/2044/organizacije-civilnog-drustva-zamrzavaju-clanstvo-u-radnoj-grupi-za-izradu-strategije-za-primenu-arhuske-konvencije.html>

## Environmental Protection Inspectorate

The Report on the Work of the Environmental Protection Inspectorate<sup>79</sup> states that the 2024 Inspection Supervision Plan was fully implemented across all areas, with particular attention also given to preventive action. Prevention was reflected in inspections carried out at the request of supervised entities, in educational activities conducted during initial regular inspections of businesses, as well as in informing the public by publishing the Inspection Supervision Plan and checklists for various areas of environmental protection on the website of the relevant ministry.

An analysis of the number of inspections by specific areas shows that, once again this year, the majority were related to integrated pollution and environmental protection from pollution, while the fewest inspections were conducted in the area of noise protection:

- field of integrated pollution and environmental protection from pollution – 658 inspections, 238 of which were unplanned;
- field of waste management – 504 inspections, 424 of which were unplanned;
- field of nature protection – 509 inspections, 241 of which were unplanned;
- field of control of chemicals and biocidal products – 184 inspections, 91 of which were unplanned;
- field of protection against chemical accidents – 137 inspections, 25 of which were unplanned;
- field of environmental noise protection – 14 follow-up inspections;
- field of soil protection – 21 inspections, three of which were unplanned;

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79 Ministry of Environmental Protection: 2024 Report on the Work of the Environmental Protection Inspectorate, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/Godi%C5%A1nji%20izve%C5%Aftaj%20o%20radu%20za%202024%20god%20%20Inspekcija%20zss.pdf>

- field of protection against non-ionizing radiation – 24 inspections, none unplanned.

At the end of 2024, the Environmental Supervision and Preventive Action Department employed a total of 69 individuals, including 56 environmental protection inspectors, which means that less than 65% of the 87 inspector positions defined by the Rulebook on Internal Organization and Job Classification were filled. This highlights the continued need to increase the number of inspectors in the Department, as hiring the approved number of inspectors is a prerequisite for improvement of preventive action and more effective implementation of environmental protection measures.

## Access to Information of Public Importance

### **Commissioner for Information of Public Importance and Personal Data Protection**

A significant part of the regular annual report by the Commissioner for Information of Public Importance and Personal Data Protection<sup>80</sup> is dedicated to pointing out abuses of the right to access information of public importance. Namely, it states that in the past year, the Commissioner's office received the largest number of complaints since the institution of the commissioner was established. The cause of the sudden increase in complaints is explained by the change in the judicial practice of the Constitutional Court in 2022, which determined that the reimbursement of legal representation costs incurred by applicants in procedures before the Commissioner was justified. Since this practice significantly complicates the Commissioner's work due to being overburdened with numerous requests, which are assessed as unfounded, a proposal was sent to the National Assembly to pass amendments to the Law on Free Access to Information of Public Importance as a matter of urgency. The proposal includes introducing an objective 15-day deadline within which a public authority must provide the requested information, while also allowing

80 Commissioner for Information of Public Importance and Personal Data Protection: 2023 Report of the Commissioner for Information of Public Importance and Personal Data Protection, available at: [https://www.poverenik.rs/images/stories/dokumentacija-nova/izvestajiPoverenika/2023/Godi%C5%A1nji\\_izve%C5%A1taj\\_2023lat.pdf](https://www.poverenik.rs/images/stories/dokumentacija-nova/izvestajiPoverenika/2023/Godi%C5%A1nji_izve%C5%A1taj_2023lat.pdf)

the Commissioner to dismiss an appeal if it is established to be unfounded during the second-instance procedure. In cases where the request for access to information is too broadly formulated and covers a large number of documents, public authorities would have the right to contact the applicant within eight days to narrow the scope of the request to a reasonable level, in line with the applicants' actual needs. The proposed amendments also cover rules regarding the collection of requested information, stipulating that if the applicant fails to appear within the agreed timeframe to collect the information, it will be considered that they have withdrawn the request.<sup>81</sup>

In 2024, the Commissioner's office processed 29,005 cases, the majority of which related to violations of the right to access information of public importance, with a total of 10,823 appeals received, which is a 34.6% decrease compared to the previous year. Overall, including cases carried over from 2023, the Commissioner handled 31,792 cases in the field of free access to information, resolving nearly half (15,282). The largest number of appeals was submitted by citizens and lawyers (62.21%), followed by civil society organizations (15.78%) and journalists (8.12%). In total, 7,691 appeals were resolved in 2024 by the Commissioner, of which **50.63% were due to authorities completely ignoring requests from applicants (the so-called administrative silence)**, while the rest concerned dismissals of requests as unfounded, incomplete responses of the authorities and so forth. In general, the data indicates a deterioration in the state of access to information compared to the previous year, as the percentage of well-founded appeals significantly increased from 30.95% in 2023 to 47.65% in 2024.

When it comes to the information of public importance related to the environment, it is emphasized that there is still a high percentage of information requests being denied, which is highly concerning, considering that this information is crucial for public health, which is why the provision of such information should be subject to shorter and urgent deadlines.

Addressing the issue of climate change and human rights, the Renewables and Environmental Regulatory Institute (RERI) has also compiled recommendations

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81 <https://www.paragraf.rs/dnevne-vesti/121224/121224-vest12.html>

related to the work of the Ombudsman. These include the necessity for creating a special report on the violation of the right to a healthy environment and other human rights related to the endangerment of the environment and excessive exploitation of natural resources, as well as special reports on the violation of human rights in cities and municipalities that are exposed to long-term, high-intensity pollution.<sup>82</sup>

## **Public Participation in Environmental Decision-Making**

The quality of public debates remains insufficient for effectively involving the public in environmental decision-making, as notifications about public consultations and debates are often untimely and frequently lack essential details such as the location of public presentations and the ways in which citizens can participate. Additionally, these events are still oftentimes scheduled during national or religious holidays or vacation periods, which significantly undermines meaningful participation. For example, the public debate on the Draft Environmental Protection Strategy with an Action Plan and the Strategic Environmental Assessment Report took place from December 4 to 24, 2024. The announcement was published just a day prior on the Ministry's website, and the public presentation was held already the following day, on December 4 at 9 a.m., offering the public no real opportunity to be informed or to attend, resulting in a meeting attended mostly by members of the Working Group that prepared the Draft and representatives of various institutions.

## **Criminal Acts Against the Environment**

According to the 2024 Report on the Work of the Public Prosecutor's Offices on the Suppression of Crime and Protection of Constitutionality and Legality,<sup>83</sup> reports were filed against 1,399 persons for criminal offenses against the environment. An increase in the number of reports compared to the previous year

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82 RERI – Renewables and Environmental Regulatory Institute: Guidelines for Climate Change and Human Rights, available at: <https://reri.org.rs/wp-content/uploads/2023/08/Smernice-za-klimatske-promene-i-ljudska-prava-final.pdf>

83 Supreme Public Prosecution Office: 2024 Report on the Work of the Public Prosecutor's Offices on the Suppression of Crime and Protection of Constitutionality and Legality, available at: <http://www.vrhovnojt.gov.rs/docs/Izvestaj-VrhJT-za-2024-godinu.pdf>

was recorded for criminal offenses such as illegal hunting, negligent provision of veterinary care, killing and abuse of animals, violation of the right to information on the state of the environment, import of hazardous substances into Serbia, unauthorized processing, disposal and storage of hazardous substances, as well as for the criminal offense of environmental damage.

For other criminal offenses, a decrease in the number of reports was recorded compared to the previous year, with particularly notable data showing that 767 individuals were reported for the criminal offense of timber theft, which is 212 fewer than the previous year, while 31 individuals were reported for the offense of environmental pollution, marking a decrease of 172 compared to the previous year.

### **Acting upon Reports Related to Economic Offenses under the Law on Environmental Protection, the Law on Nature Protection, the Law on Air Protection and the Law on Chemicals**

In 2024, the number of reports concerning economic offenses in the field of environmental protection remained consistent, with a total of 49 new reports filed and a total of 76 cases handled by prosecution offices, including unresolved cases from previous periods. Although the number of reports has remained stable compared to previous years, it still highlights an extremely low inflow of proceedings relative to the actual environmental situation, as evidenced by numerous reports of air, water and soil pollution. The low number of reports against business entities raises concerns about the capacity of inspection and supervision bodies to identify and report such economic offenses.

Most reports were related to non-compliance with prescribed protection measures during the operation of industrial facilities, as well as the prolonged and improper storage of hazardous substances. Out of the total number of cases, 89 individuals (both legal entities and responsible persons) were indicted, indicating a certain level of prosecution. However, the number of convictions (23), including four suspended sentences, and the fact that only one appeal was resolved in favor of the prosecution, point to the conclusion that penal policies remain lenient.

# Financing

Financing in the field of Horizontal Legislation is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

- 1.** Improve the quality of the processes of the Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) by adopting a new Law on Strategic Environmental Assessment and Law on Environmental Impact Assessment, as well as the necessary by-laws.
- 2.** Adopt by-laws in accordance with Article 5 of the Law and harmonize List I (the projects for which an impact assessment is necessary) and List II (the projects for which an impact assessment may be required) with Annexes I and II of Directive 2011/92/EU.
- 3.** Amend the new Law on Environmental Impact Assessment by removing Article 6.



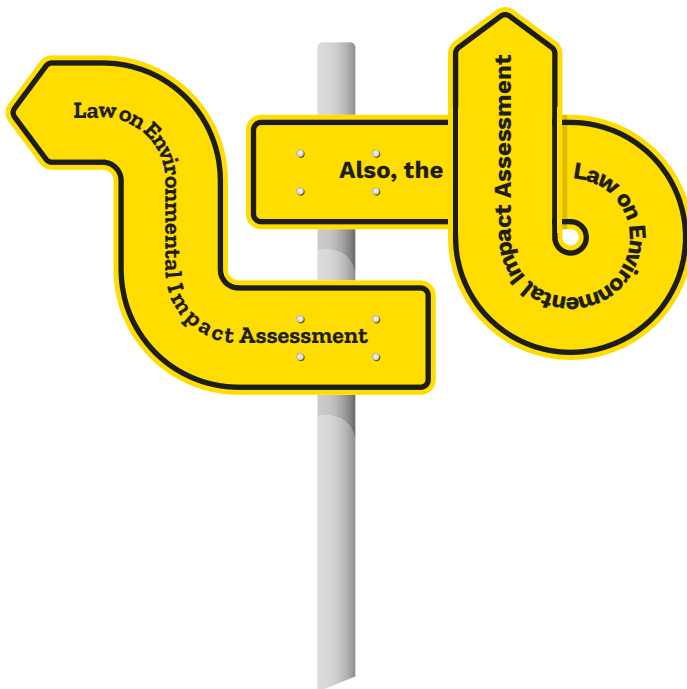
## Implementation of Regulations

- 4.** Provide transparent and timely information to the public about conducting public debates via the internet and increase public awareness. Improve the functionality of e-Consultation so that it meets the needs of the average user (access to documents, information about the beginning, duration and venue of public debates, etc.).
- 5.** Ensure the full implementation of the Regulation on the Methodology of Public Policy Management (Official Gazette of RS, no. 20/2025-18), Impact Analysis of Public Policies and Regulations (Official Gazette of RS, no. 20/2025-18) in the environmental protection sector.

- 6.** Fully implement the guidelines set out in the Rulebook on the Contents of the Request on the Need for Environmental Impact Assessment and Contents of the Request for Defining the Scope and Content of 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.** Tighten the penal provisions prescribed by the Law on Environmental Protection for economic offenses, including those committed by legal entities, entrepreneurs and individuals, as well as penal provisions for responsible persons within administrative bodies, local self-government units or organizations exercising public authority. Consistently apply, in particular, the Law on the Liability of Legal Entities for Criminal Offenses (Official Gazette of RS, no. 97/08) and the provisions of the Criminal Code (Official Gazette of RS, no. 94/2024) relating to environmental crimes and environmental pollution.



# HORIZONTAL LEGISLATION



## LAW ON ENVIRONMENTAL IMPACT ASSESSMENT:

The Government shall determine the projects for which an **environmental impact assessment is mandatory**, as well as those for which a **request** must be submitted to **decide whether an environmental impact assessment is needed** (Article 5).

## ALSO, THE LAW ON ENVIRONMENTAL IMPACT ASSESSMENT:

The project proponent must obtain an **opinion from the Ministry in charge of environmental affairs** on the need for initiating the environmental impact assessment procedure for projects referred to in Article 5. The opinion shall not exempt the project proponent from their obligation to initiate environmental impact assessment procedure (Article 6).

**Source:** Law on Environmental Impact Assessment (Official Gazette of RS, no. 94/2024):  
[https://www.paragraf.rs/propisi/zakon\\_o\\_proceni\\_uticaja\\_na\\_zivotnu\\_sredinu.html](https://www.paragraf.rs/propisi/zakon_o_proceni_uticaja_na_zivotnu_sredinu.html)







# Air Quality



# Overview

Air quality is perceived by citizens as one of the most pressing environmental issues. According to the 2024 Balkan Barometer survey, nearly 70% of respondents in Serbia are most concerned about air quality.<sup>84</sup> A new Law on Air Protection has been adopted which, by all accounts, will not address the root causes of pollution. Civil society organizations particularly highlight the issue of local air quality monitoring, lack of alignment with the National Emission Reduction Plan (NERP), as well as the fact that supervision and penal provisions have not been significantly improved.

The Air Quality Report was published six months later than the deadline prescribed by the Law, and it indicates that air pollution exceeded permissible levels in 13 cities and eight agglomerations, with Kruševac and Šabac appearing for the first time on the list of cities with excessively polluted air. Despite the expansion of the monitoring network, one-third of Serbia's population still lacks accurate insight into the quality of the air they breathe. Eight cities with excessively polluted air have not adopted an Air Quality Plan or a Short-Term Action Plan. Fires at landfills across Serbia in 2024 and 2025 have further endangered air quality and public health of citizens, while comprehensive air quality monitoring was lacking during these emergency situations, given that it was not possible to measure the concentrations of certain pollutants using official methods, as these substances are not part of the regular monitoring system.

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84 Regional Cooperation Council, 2024 Balkan Barometer.

# Strategic and Legislative Framework

On June 16, 2025, the Republic of Serbia adopted a new Law on Air Protection,<sup>85</sup> six months later than the planned deadline. According to the National Programme for the Adoption of the Acquis (NPAA) for 2024–2027, the deadline for adopting the Amendments to the Law on Air Protection was set for Q4 2024.

Instead of amending the existing one, a new Law on Air Protection was drafted. The drafting process faced strong criticism from civil society organizations, which expressed concern over the lack of transparency, limited engagement of experts and the broader public and a poorly conducted public consultation process. The public consultation on the draft lasted only 20 days and included just one hybrid presentation held in Belgrade, despite data from the Environmental Protection Agency showing that air pollution exceeds permitted levels in over 20 cities across Serbia.

The drafting of the Law began in February 2024, but the Working Group included only two civil society organizations, selected through a public call whose restrictive criteria excluded associations with relevant experience and proven expertise. As a result, the broader expert community was effectively excluded from the process from the very beginning of the document's preparation.

Additional confusion during the drafting process was caused by the conduct of an early public consultation, held in November 2024, and only for a portion of the Draft Law. Such a practice is unprecedented, as consultations have never before been organized for only part of a law, with public inspection being reserved exclusively for spatial and urban planning documents. The consultation process, as required for the preparation of legislation of such importance, was

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85 Official Gazette of RS, no. 51/2025, available at: [https://www.paragraf.rs/propisi/zakon\\_o\\_zastiti\\_vazduha.html](https://www.paragraf.rs/propisi/zakon_o_zastiti_vazduha.html); Although the information pertains to a period after the reporting period (May 2025), it has been included due to the importance (i.e., relevance) of the event for the period covered by the report.

conducted in violation of regulations. The Ministry of Environmental Protection failed to produce a regulatory impact assessment, and the starting points for the Law lacked the minimum elements prescribed by law.

## The new Law fails to address key issues in the field of air protection:

- **Local air quality monitoring** remains under the jurisdiction of local self-government units, without the establishment of a unified, mandatory and standardized system. The quality and scope of air quality monitoring will continue to depend on the technical and financial capacities of local self-governments, making it difficult to ensure consistent and effective monitoring of air pollution.
- **Emergency measurements** are scheduled to be conducted within a period of up to five days from the moment a need arises which, in the case of environmental incidents (such as landfill fires), may result in measurements being carried out only after the pollution has already subsided, thereby defeating the purpose of timely response.
- **The National Emission Reduction Plan (NERP)** for large combustion plants is mentioned in the Law only as one of the instruments of air protection policy and planning. While other instruments (the Air Quality Program, the National Air Pollution Control Program, air quality plans, short-term air quality action plans, and operators' emission reduction plans for stationary point sources) are specifically addressed in terms of content, adoption procedures and implementation, NERP is not mentioned anywhere else in the Law. This is particularly concerning given that thermal power plants operated by the public utility electricity producer Elektroprivreda Srbije (EPS) have emitted sulfur dioxide in quantities far exceeding legal limits for years, posing a serious threat to public health and the environment.

- **Supervision and penal provisions** have not been significantly improved. The Law does not provide for broadened inspection powers, nor does it establish adequate punitive mechanisms. In the absence of mandatory and effective sanctions, the implementation of legal provisions remains subject to the discretionary decisions of competent authorities, which undermines legal certainty and encourages non-compliance.<sup>86</sup>

The newly adopted legislative solution has missed a critical opportunity to align with EU legislation in the field of air quality. The new **Directive (EU) 2024/2881 on ambient air quality** establishes significantly stricter limit values for pollutants such as PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub>, which must be met by January 1, 2030. In addition, the Directive sets forth an ambitious objective to achieve air quality levels that pose no risk to human health or the environment by 2050. This Directive presents substantial challenges not only for EU Member States but also for candidate countries, including Serbia. The new regulatory framework requires the preparation of air quality plans for zones where pollutant levels exceed the prescribed limits, as well as mandatory remediation roadmaps for polluted areas. Furthermore, the Directive introduces obligations for precise monitoring, strengthens access to justice in cases of non-compliance, enhances transparency of information and imposes stricter punitive measures. Amendments to the current Law, or the adoption of an entirely new legislative act, will be necessary in the forthcoming period to ensure alignment with Directive (EU) 2024/2881.

**The National Emission Reduction Plan (NERP)**, aimed at reducing emissions from old large combustion plants, although adopted in 2020, is still not being implemented, given that the trend of exceeding the permitted SO<sub>2</sub> emission limits from thermal power plants covered by this document has continued.<sup>87</sup> The 2024 State of the Environment Report of the PC Elektroprivreda Srbije

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86 Belgrade Open School: The new Law on Air Protection fails to address the root causes of pollution – The legislative drafting process is unlawful and discriminatory <https://www.bos.rs/rs/vesti/3/2040/novi-zakon-o-zastiti-vazduha-ne-otklanja-sustinske-uzroke-zagadenja---proces-izrade-zakona-je-nezakonit-i-diskriminatoran.html>

87 National Emission Reduction Plan, NERP; Annex 5: The Maximum Emissions Defined by the National Emission Reduction Plan for Major Pollutants Originating from Old Large Combustion Plants, available at: <https://reg.pravno-informacioni-sistem.rs/api/Attachment/prilozi/429854/5.html>

revealed that the thermal power plants Nikola Tesla A and B, as well as Kostolac B, emitted a total of 153,959.54 and 66,843.58 units of SO<sub>2</sub>,<sup>88</sup> respectively. These values are five and six times higher than the SO<sub>2</sub> emission limits prescribed by the NERP.

**Table 2:** Comparative view of limit values of major air pollutants (Serbia/EU)

Pollutant	Aggregation	Serbia Regulation (Official Gazette of RS, nos. 11/2010, 75/2010 and 63/2013)	Directive (EU) 2024/2881 (Deadline January 1, 2030)
PM <sub>2.5</sub>	Annual limit value	25 µg/m <sup>3</sup> (20 µg/m <sup>3</sup> as of 1.1.2024)	10 µg/m <sup>3</sup>
	Daily limit value	Not defined	25 µg/m <sup>3</sup> (max. 18 exceedances/year)
PM <sub>10</sub>	Annual limit value	40 µg/m <sup>3</sup>	20 µg/m <sup>3</sup>
	Daily limit value	50 µg/m <sup>3</sup> (max. 35 exceedances/year)	45 µg/m <sup>3</sup> (max. 18 exceedances/year)
NO <sub>2</sub>	Annual limit value	40 µg/m <sup>3</sup>	20 µg/m <sup>3</sup>
	Daily limit value	85 µg/m <sup>3</sup>	50 µg/m <sup>3</sup> (max. 18 exceedances/year)
	Hourly limit value	150 µg/m <sup>3</sup> (max. 18 exceedances/year)	200 µg/m <sup>3</sup> (max. 3 exceedances/year)
SO <sub>2</sub>	Annual limit value	50 µg/m <sup>3</sup>	20 µg/m <sup>3</sup>
	Daily limit value	125 µg/m <sup>3</sup> (max. 3 exceedances/year)	50 µg/m <sup>3</sup> (max. 18 exceedances/year)
	Hourly limit value	350 µg/m <sup>3</sup> (max. 24 exceedances/year)	350 µg/m <sup>3</sup> (max. 3 exceedances/year)
CO	Annual limit value	3 mg/m <sup>3</sup>	
	Daily limit value	5 mg/m <sup>3</sup>	4 mg/m <sup>3</sup> (max. 18 exceedances/year)
	Maximum daily eight-hour mean value	10 mg/m <sup>3</sup>	10 mg/m <sup>3</sup>

**Source:** RERI, Analysis of the State of Air Quality in the Republic of Serbia in 2024, p. 20

88 State of the Environment Report at the JSC Elektroprivreda Srbije Belgrade for 2024, available at: <https://www.eps.rs/lat/Documents/lzve%20a1taj%20o%20stanju%20c5%20beivotne%20sredine%20u%20EPS%20AD%20za%202024.%20%20godinu.pdf>

# Implementation of Regulations

The 2023 Annual Air Quality Report for Serbia was published on the website of the Environmental Protection Agency (SEPA) in September 2024, six months later than the prescribed deadline. According to regulations, SEPA was responsible to make the Report for the previous year available by February 28 of the current year.<sup>89</sup>

## Air Quality Assessment

In 2023, air pollution exceeded permissible levels in as many as 13 cities and all of the eight agglomerations. The list includes the following cities: Belgrade, Novi Sad, Niš, Bor, Pančevo, Smederevo, Kosjerić, Užice, Subotica, Sombor, Kruševac, Pirot, Novi Pazar, Valjevo, Šabac, Kragujevac, Loznica, Čačak, Paraćin, Zaječar and Kraljevo. Compared to the previous report, the newly added cities are Kruševac and Šabac, while Kostolac and Zrenjanin are no longer on the list.

As in the previous years, the air was excessively polluted due to exceedances of the limit values for suspended  $PM_{10}$  and/or  $PM_{2.5}$  particles. These substances remain the most dominant sources of air pollution in Serbia, along with concentrations of sulfur and nitrogen oxides, carbon monoxide, arsenic, lead and other metals.

Valjevo is the city with the highest exceedance of the annual limit value for  $PM_{10}$  particles ( $60 \mu\text{g}/\text{m}^3$  compared to the permitted  $40 \mu\text{g}/\text{m}^3$ ), and also the city with the greatest number of daily limit value exceedances. On as many as 149 days in 2023, daily concentrations of  $PM_{10}$  particles in Valjevo exceeded the allowed limit, which is almost five times higher than the permitted number of exceedances (35 days). Daily limit values for  $PM_{10}$  particles were exceeded at as many as 60% of monitoring stations across Serbia. In Bor, the air was

<sup>89</sup> Environmental Protection Agency (2024): 2023 Annual Air Quality Report for the Republic of Serbia, available at: <https://sepa.gov.rs/wp-content/uploads/2024/10/Vazduh2023.pdf>

excessively polluted due to exceedances of limit values for particulate matter, lead, cadmium and arsenic, while in Belgrade, air pollution was caused by elevated levels of PM particles and nitrogen dioxide, as was also the case in 2022.

In 2023, increased concentrations of PM<sub>2.5</sub> particles were observed in Novi Sad, while nitrogen dioxide concentrations decreased in Niš. In Bor, lower concentrations of sulfur dioxide were recorded compared to 2022, which can be attributed to the temporary shutdown of the smelter's blast furnace due to maintenance work.

### **Kruševac and Šabac are Newcomers to the List of Cities with Excessively Polluted Air**

Šabac has been classified among the excessively polluted cities due to elevated concentrations of suspended PM<sub>10</sub> particles, while in Kruševac, in addition to PM<sub>10</sub>, excessive concentrations of suspended PM<sub>2.5</sub> particles were also recorded. This effectively means that 110,000 residents officially breathed excessively polluted air during 2023. It is highly likely that similar levels of pollution were present in previous years as well, but only this year has the official air quality monitoring, of sufficient scope, confirmed it. Residents of Šabac can as of recently access real-time air quality data through the website of the local Institute of Public Health, whereas citizens of Kruševac still do not have access to real-time monitoring data.

### **Is the Air Quality in Zrenjanin and Kostolac Truly Better Compared to 2022?**

According to data from the 2023 Air Quality Report for Serbia, Kostolac and Zrenjanin are now classified among first-category cities in terms of air quality. Just a year earlier, both cities were placed in the third category due to exceedances of the limit values for suspended PM<sub>10</sub> particles.

In 2023, no exceedances of PM<sub>10</sub> concentration limit values were recorded in Kostolac; however, elevated concentrations of other pollutants were observed. It is important to note that Kostolac was the only location in Serbia where the daily limit value for sulfur dioxide (125 µg/m<sup>3</sup>) was exceeded (once, out of the

maximum three allowed exceedances per calendar year). Kostolac also recorded the highest number of exceedances of the hourly sulfur dioxide concentration limit, with 12 hours of exceedance out of the permitted 24-hour limit.

This information is particularly significant given the results for 2022, when no daily exceedances of sulfur dioxide were recorded in Kostolac, and hourly exceedances were registered only four times (three times fewer than in 2023).

An examination of the data related to indicative measurements of heavy metals shows that daily limit values for lead and the target value for arsenic were exceeded in Zrenjanin during 2023, along with significant measured levels of cadmium. This indicates the presence of heavy metals in the air, a phenomenon not recorded in the previous year.

### **What is the Situation with Air Quality Monitoring in Sremska Mitrovica?**

It is particularly interesting to keep track of the air quality assessment in Sremska Mitrovica. Sremska Mitrovica was placed on the list of cities with excessively polluted air in 2018. However, in the following year, the 2019 Air Quality Report for the Republic of Serbia noted that the lack of suspended particle measurements in January and February resulted in an inadequate portrayal of air quality as first-category (i.e., good air quality). Subsequently, in the 2020 air quality assessment, Sremska Mitrovica was listed among cities with clean air, despite recording 48 days with exceedances of the daily limit values for suspended  $PM_{10}$  particles. During that year, the monitoring station measuring suspended  $PM_{10}$  concentrations collected slightly less than the required data availability threshold, 88% instead of the necessary 90%. This station operates under the jurisdiction of the local Institute of Public Health.

Subsequently, in 2021, the same monitoring station collected even less data (81%) and recorded fewer days with exceedances of the daily concentration limits for suspended  $PM_{10}$  particles (36 days) compared to the previous year. However, due to the number of days with excessive  $PM_{10}$  pollution, Sremska Mitrovica (once again) appeared on the list of cities with excessively polluted air. The 2022 Air Quality Report does not include measurement results from

the aforementioned station, leading to Sremska Mitrovica being classified that year among cities with clean air, but without an adequate basis for this classification.

Finally, the most recent report again raises grounds for doubt. It contains air quality data recorded at the local monitoring station, where no exceedances of limit values were observed, but the data availability was only 80%. Taking all factors into account, it is reasonable to question the adequacy of the air quality assessment in one of the few cities that, over recent years, have transitioned from the category of excessively polluted to that of clean air.

### **One-Third of Serbia's Population Lacks Access to Information about the Level of Air Pollution They Breathe**

Nearly two and a half million citizens of Serbia live in cities and towns that are not covered by air quality monitoring and thus lack data on the concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> particles which they are exposed to.

Although air quality monitoring has improved compared to the previous year in terms of the number of stations (55 more monitoring stations than in 2022) and monitoring locations (16 more sites than in 2022), efforts must continue to expand the network and establish monitoring in cities where no data currently exist. This should be done in parallel with maintaining the existing stations to ensure a high level of data availability.

In the absence of an official air quality report for 2024, RERI published its own analysis based on monthly reports available on the Agency's website. Cross-referencing this data, the analysis shows that the top locations for PM<sub>10</sub> exceedances in 2024 were Popovac (174 days), Valjevo (132 days), Novi Pazar (128 days), Užice (117 days) and Kosjerić (113 days).<sup>90</sup> The data indicate that in these places, the air was hazardous to human health on nearly one out of every three days, especially for individuals with chronic and respiratory conditions.

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90 RERI (2024): Analysis of the State of Air Quality in the Republic of Serbia in 2024, Chapter 4, available at: <https://reri.org.rs/wp-content/uploads/2025/06/Analiza-stanja-kvaliteta-vazduha-u-Republici-Srbiji-za-2024.-godinu.pdf>

## Measures for Clean Air at the National and Local Levels

**Air Quality Program of the Republic of Serbia** for the Period 2022-2030 with an Action Plan<sup>91</sup> with defined measures and activities to be implemented by 2026 was adopted in December 2022. The program foresees a total of 17 measures and 54 activities aimed at improving air quality over the period from 2022 to 2030. Most of the measures and activities outlined in the Action Plan were contingent upon the adoption of a new Law on Air Protection. In an analysis of the implementation of the Air Quality Program conducted by the Renewables and Environmental Regulatory Institute (RERI), it was found that the Ministry of Environmental Protection did not implement any of the measures with deadlines set for the last quarter of 2023. Furthermore, the analysis points to a noticeable trend by the Government of the Republic of Serbia to extend deadlines for the adoption of laws and by-laws through the National Program for the Adoption of the EU Acquis (NPAA), despite the deadlines for the implementation of activities established by the Air Quality Program. This practice effectively renders the deadlines prescribed by the Program meaningless, and delays the implementation of activities under the pretext that the necessary laws for their practical enforcement have not yet been adopted.<sup>92</sup>

Considering that the Program was adopted in late 2022, effectively losing one year for the implementation of the Action Plan (2022–2026), and that the delivery of the specified measures requires the adoption of by-laws based on the Law, there is justified doubt regarding the feasibility and full implementation of the Action Plan. The first report from the Ministry of Environmental Protection on the implementation of the Program could be expected in the first quarter of 2026.

As cities with excessively polluted air, Kruševac and Šabac are obligated to develop an Air Quality Plan, a fundamental document aimed at achieving appropriate limit values and improving air quality in local communities. Whether and when the drafting of these documents will begin remains an open question. Considering that cities which have been categorized in the third air quality

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91 [https://www.ekologija.gov.rs/sites/default/files/2022-12/program\\_zashtite\\_vazdukha\\_i\\_ap.pdf](https://www.ekologija.gov.rs/sites/default/files/2022-12/program_zashtite_vazdukha_i_ap.pdf)

92 Ibid, Chapter 4.

category for years are yet to adopt an Air Quality Plan, and that the adoption of these plans usually takes several years, it is likely that the residents of Šabac and Kruševac face a long road ahead before systemic solutions are achieved.

In 2022, the Ministry granted approval for the Short-Term Air Quality Plan for the city of Kruševac, two years after the Kruševac City Administration requested the Ministry's approval of the plan. The pace of public policy development evidently does not align with citizens' needs to address pressing issues, making it likely that the long-term Air Quality Plan will also face a multi-year wait.

According to records from the Ministry of Environmental Protection, the list of cities and municipalities for which the Ministry has approved air quality plans includes: Zrenjanin, Zaječar, Valjevo, Bor, Kraljevo, Pančevo, Novi Sad, Kosjerić, Smederevo, Belgrade and Kragujevac. The Air Quality Plan of the City of Užice expired in 2023.

Additionally, the list of cities and municipalities with approved Short-Term Action Plans includes: Kruševac, Trstenik, Bor, Leskovac, Sombor, Sremska Mitrovica, Užice and Kragujevac.<sup>93</sup> Except for the City of Užice, whose Short-Term Action Plan was approved back in 2016, approvals for other Short-Term Action Plans were issued in 2020 (Sombor), 2021 (Trstenik, Bor, Leskovac, Sremska Mitrovica, Kragujevac), and 2022 (Kruševac). Only the Short-Term Action Plan of the City of Sombor was explicitly stated to be valid until 2023. This means that the cities with excessively polluted air that have not yet adopted any public policy documents in this area are: Šabac, Pirot, Loznica, Čačak, Paraćin, Novi Pazar, Subotica, Niš and Sombor. Pirot has reached a decision to develop an Air Quality Plan. In Užice, a Draft Air Quality Plan was prepared and a public consultation was conducted ending on May 20, 2024.

According to the new Law on Air Protection, air quality plans and short-term air quality action plans adopted before the date this Law came into force remain valid until the end of the period for which they were adopted, if that period is time-limited, or for two years from the date the Law came into force if they were adopted for an indefinite period.

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93 The record of the Ministry of Environmental Protection can be found on the following link: <https://www.ekologija.gov.rs/dozvole-obrasci/zastita-vazduha-i-ozonskog-omotaca>

## Landfill Fires Across Serbia

According to the latest available 2023 State of the Environment Report in the Republic of Serbia, there are 129 unsanitary landfills and 2,526 illegal dumpsites,<sup>94</sup> while the unofficial number of illegal dumpsites is estimated to exceed 3,500. The number of strategically planned sanitary landfills is 26, of which only 12 currently exist.

During 2024 and 2025, incidents of fires at landfills have been recorded in many cities across Serbia.<sup>95</sup> In the first seven months of 2025 alone, the Ministry of Internal Affairs registered over 1,000 landfill fires.<sup>96</sup>

The Užice sanitary landfill Duboko was on fire for three weeks.<sup>97</sup> In addition, numerous fires were recorded in 2024 and 2025 at the landfill between Varvarin and Čičevac. In February and March 2025, fires broke out at the Valjevo landfill, and after protests by citizens and a blockade of the landfill entrance, inspections and the court banned further waste disposal. A fire at the landfill in Kraljevo was recorded in July 2025. The Golo Brdo landfill in Novi Pazar was on fire for almost four weeks.<sup>98</sup> Fires at the Kraljevo landfill were recorded several times during 2025.

When it comes to air quality measurements, institutions have made statements about monitoring in Užice and Novi Pazar. The Institute of Public Health of Užice announced that none of the air quality parameters they measure exceeded

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94 Environmental Protection Agency, 2023 State of the Environment Report in the Republic of Serbia, available at: <https://sepa.gov.rs/%D0%B8%D0%B7%D0%B2%D0%B5%D1%88%D1%82%D0%B0%D1%98-%D0%BE-%D1%81%D1%82%D0%B0%D1%9A%D1%83-%D0%B6%D0%B8%D0%B2%D0%BE%D1%82%D0%BD%D0%B5-%D1%81%D1%80%D0%B5%D0%B4%D0%B8%D0%BD%D0%B5-%D1%83-%D1%80%D0%B5%D0%BF/>

95 The data on landfill fires mentioned in the following paragraphs refer to the period after the reporting period covered by this Report and are included due to the importance (i.e., relevance) of the events for the period covered by the Report.

96 Statement from the Ministry of Environmental Protection: Two ministries proposed urgent measures to reduce landfill fires. <https://www.ekologija.gov.rs/lat/saopstenja/vesti/dva-ministarstva-dala-predlog-urgentnih-mera-za-manje-pozara-na-deponijama>

97 Free Europe: Fire at the Landfill near Užice is Extinguished <https://www.slobodnaevropa.org/a/ugasen-pozar-deponije-uzice/32961948.html>

98 SRDA: Already 1,000 Landfill Fires in 2025? – No Talk of Pollution, Health Risks or Solutions <https://srda.rs/vec-1-000-pozara-na-deponijama-u-2025-godini-o-zagadenju-opasnosti-po-zdravlje-i-resenju-problema-niko-nista/>

the permitted limits.<sup>99</sup> Reports on the installed mobile station for air quality monitoring are not publicly available. After the installation of the mobile air quality monitoring station, aimed at monitoring pollution parameters caused by fires and incidents at the landfill, the Institute of Public Health of Novi Pazar stated that no significant daily deviations in pollution levels were observed. “All parameters are in accordance with the Regulation and, in relation to maximum daily concentrations, fall under category 2, which means GOOD. Owing to the established monitoring system where all healthcare institutions report to the Institute, so far three adults have been reported, two with chronic illnesses and one healthy person, and one child. All have symptoms of difficulty breathing and asphyxiation,” the Institute of Public Health of Novi Pazar said in a response to Insajder.<sup>100</sup>

During the landfill fires in several Serbian cities in 2024 and 2025, the Belgrade Open School, in cooperation with partners in Užice, Varvarin, Kraljevo and Valjevo, conducted air quality monitoring using a sensor that records concentrations of suspended PM<sub>10</sub> and PM<sub>2.5</sub> particles, carbon monoxide, nitrogen dioxide, ozone, as well as total volatile organic compounds (TVOC). Some of the information about the landfill fires, as well as the results of air quality monitoring in the locations where the landfills caught fire, do not strictly pertain to the reporting period covered by this Report (up to the end of May 2025). However, these details are nevertheless included in this year’s Report because they form an integral part of the other citizen monitoring results near the landfills carried out during 2024 and 2025, and also due to the relevance and timeliness of the information, considering the time of the Report’s publication.

The World Health Organization (WHO, 1989) defined total volatile organic compounds (TVOC) as carcinogenic, toxic and irritating. Various volatile organic compounds are produced during the burning of plastics, and exposure even to the smallest concentrations can have harmful effects.

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99 Free Europe: There Is No Breathing Here: Fire Smolders for Days at Landfill Near Užice <https://www.slobodnaevropa.org/a/srbija-deponija-pozar-otpad-uzice-duboko/32948826.html>

100 Insajder.net: Fire at the Golo Brdo Landfill: Novi Pazar Announces Complete Extinguishing in 10 to 12 Days, Citizens Still Exposed to Pollution <https://www.insajder.net teme/pozar-na-deponiji-golo-brdo-novi-pazar-najavljuje-potpuno-gasenje-za-10-do-12-dana-gradani-i-dalje-trpe-zagadenje>

According to the results of this monitoring, deteriorated air quality was recorded in all cities and municipalities where monitoring was conducted, during the time of the landfill fires.

During the fire at the Duboko landfill in May and June 2024, elevated levels of volatile organic compounds were recorded in Užice, according to citizen air quality monitoring. In the second half of May, hourly values reached up to 29,000 ppb<sup>101</sup> (on May 16 and 17), with an average value of around 2,400 ppb over two weeks. In June, the average concentration of volatile organic compounds was slightly above 2,300 ppb.

In August and September 2024, hourly values of volatile organic compounds in Varvarin reached up to 30,000 ppb, with the average monthly value around 5,700 ppb in August and 4,700 ppb in September.

In Valjevo, according to citizen air quality monitoring, the average hourly values in March 2025 were nearly 4,200 ppb, slightly lower in April – almost 2,800 ppb – while the highest hourly values reached up to 30,000 ppb in March and around 28,000 ppb in April.

In July 2025, citizen monitoring recorded average hourly values of nearly 1,500 ppb in Kraljevo, with the highest value – almost 30,000 ppb – measured on July 4. According to these indicative measurements, only concentrations of volatile organic compounds up to 400 ppb are considered acceptable.

This monitoring, as well as the previously conducted citizen monitoring of suspended particle concentrations, carried out by the Belgrade Open School since 2019, is indicative in nature and aims solely to highlight shortcomings in the timing and comprehensiveness of official air quality measurements conducted by institutions.

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<sup>101</sup> ppb (parts per billion) stands for the ratio of one part of a substance per one billion parts of the total mixture or solution, and it is used to express very low concentrations of substances in water, soil or air.

# Financing

Financing in the field of Air Quality is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

1. Ensure citizen participation in the development of documents related to air quality at both national and local levels.



## Implementation of Regulations

2. Ensure that competent institutions enforce regulations related to legal deadlines for putting in place public policies concerning air quality, regulations related to air quality monitoring, exchange of air quality information and obligations under international agreements.
3. Monthly reports on detected exceedances of hourly and daily limit values (LV) must include information as to which monitoring stations were not operating during that month. In addition, it is necessary to provide a cumulative display of pollution exceedances in monthly tables, illustrating therein the exact number of days with excessive pollution recorded since the beginning of the year, up to and including the month concerned. This information is important because there are no monthly limits on the number of days with allowed exceedances – only annual limits exist.
4. Stakeholders responsible for monitoring air quality should guarantee proper maintenance of measurement systems and data availability and finance uninterrupted high-quality operation of air quality monitoring networks, especially for urban agglomerations such as Belgrade.

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

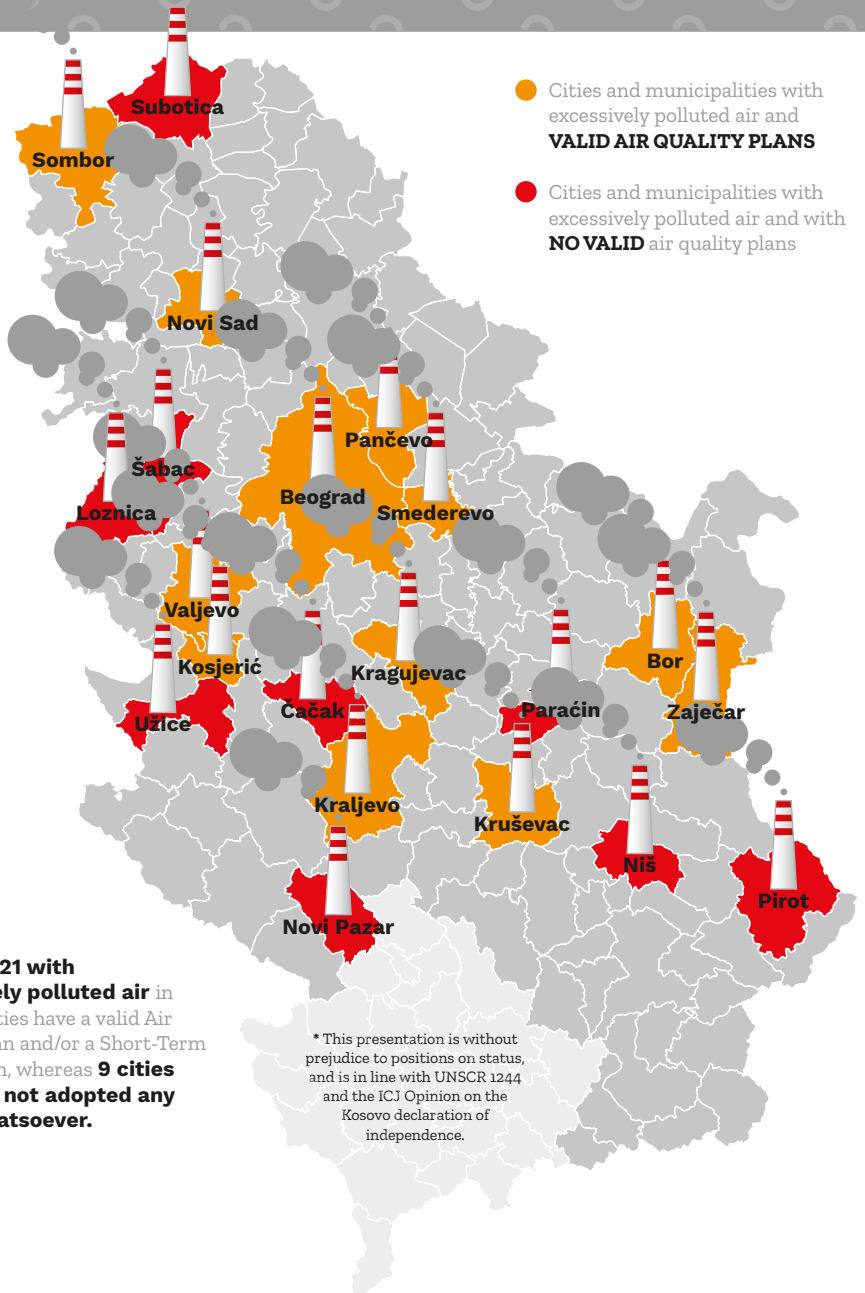


## Financing

6. Secure financing and proper conditions for the unobstructed work of inspectorates for environmental protection, in line with authorizations.



# AIR QUALITY



Out of the **21** with **excessively polluted air** in 2023, 12 cities have a valid Air Quality Plan and/or a Short-Term Action Plan, whereas **9 cities still have not adopted any plans whatsoever.**

\* This presentation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo declaration of independence.

Sources: Air Quality Report of the Environmental Protection Agency: <https://sepa.gov.rs/wp-content/uploads/2024/10/Vazduh2023.pdf>  
Ministry of Environmental Protection: <https://www.ekologija.gov.rs/dozvole-obraci/zastita-vazduha-i-ozonskog-omotaca>





# Waste Management

# Overview

In May 2024, another fire broke out at the regional sanitary landfill Duboko Užice, one which went on for 20 days, engulfing a surface area of approximately four hectares, which resulted in declaring a state of emergency. This was merely the last in a series of fires that revealed continuous problems in landfill management. The situation caused revolt among citizens, who started a blockade of the Duboko landfill out of concern for their health and environment. After the public and the media exerted pressure, suggesting the existence of serious issues, the national environmental protection inspectors carried out an extraordinary inspection and established a number of operational irregularities. On November 14, 2024, they adopted a Decision on Prohibition of Acceptance, Storage, Reuse and Disposal of Any Type of Waste at this location. This Decision unmasked the apparently successful project and investment in the first regional sanitary landfill in Serbia, which was established in 2005 at a cost of 13.9 million euros. The investment was funded through an EU donation, a loan from the EBRD and contributions from local self-governments and international partners. After a series of problems, it was supposed to resolve, it left behind, in addition to enormous costs, a region of 360,000 people, from nine local self-governments, without an adequate solution for waste disposal.

In October 2024, the Rulebook on Arranging, Managing, Disposing and Landfilling Construction Waste during Performance of Works came into force. It governs in further detail the treatment of construction waste during all stages of construction works. This Rulebook is one of the key by-laws adopted with the aim of implementing the provisions of the Law on Planning and Construction,<sup>102</sup> which prescribes that submission of documents on movement and storage of construction waste is a mandatory requirement for obtaining an exploitation permit. It is expected that this will improve the construction waste management system, reduce its negative impact on the environment, as well as encourage proper planning and tracking the movement of construction

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102 Official Gazette of RS, nos. 72/2009 ... 62/2023

waste. Despite the fact that the Rulebook provides solid grounds to resolve the matter of construction waste to a significant extent, it remains to be seen how it will be implemented in practice.

In February 2025, the Republic of Serbia adopted a Waste Prevention Plan, which once again enabled the evasion of the introduction of a deposit system and the continuance of the existing waste management practices at large, with certain minor positive corrections. Unfortunately, lack of ambition and will to transition from the 18th to the 21st century when it comes to waste management, not only on paper but also in practice, shows an essential lack of understanding among the administrative and executive state apparatus of the consequences that the present waste management practices have on human health and the environment in Serbia.

In 2024, a record number of landfill fires – as many as 2,171 was recorded in Serbia, the majority of which took place in the regions of Belgrade (369), Novi Sad (258) and Niš (200). This state of affairs shows that an average of six landfills were on fire every day. This count includes only those fires officially recorded by the Sector for Emergency Management of the Ministry of Interior, whereas the actual number of fires is much higher, given that not all fires have been officially reported.

## Strategic and Legislative Framework

Pursuant to the Law on Waste Management, a Waste Prevention Plan was adopted on February 20, 2025.

The general objective of the Plan is to develop a sustainable waste management system with the aim of preserving resources and human health, and to reduce

negative effects to the environment. This includes, without limitation, waste management with the aim of preventing waste generation, according to the principles of circular economy. This program defines strategic objectives for improving the waste management system and basic principles to be applied by all waste management stakeholders in order to achieve these objectives in the Republic of Serbia by 2031. In addition to reducing harmful effects to the environment and climate change, the implementation of the Plan should also enable the attainment of preconditions for using waste in circular economy, whose objectives and measures of development have been defined by a separate program.

The by-laws relevant to the field of waste management adopted in the reporting period are as follows:

- Rulebook on the Forms for Hazardous Waste Movement and Notification Documents, Method of Their Delivery and Instructions for Completing These Forms,<sup>103</sup>
- Rulebook on the Manner of Storing, Packaging and Labeling Hazardous Waste,<sup>104</sup>
- Rulebook on the Types of Waste for Which a Request Can be Submitted for the Conformity Assessment Procedure, Permitted Treatment Procedures and Technologies and Other Special Elements for Determining the Termination of the Status of Waste,<sup>105</sup>
- Rulebook on Arranging, Managing, Disposing and Landfilling Construction Waste during Performance of Works.<sup>106</sup>

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103 Official Gazette of RS, nos. 37/2025 and 47/2025

104 Official Gazette of RS, no. 95/2024

105 Official Gazette of RS, no. 19/2024

106 Official Gazette of RS, no. 81/2024

# Implementation of Regulations

In September 2024, the Serbian Environmental Protection Agency (SEPA) published its Report on Waste Management in the Republic of Serbia from 2011 to 2023, which provides a more detailed overview of the situation in this area.

The Reports showed the persistence of the continuity of reduction of the total quantity of generated waste on record, but also, for the first time since 2020, a decrease in the number of annual waste management reports which were submitted. In addition to this, in 2023, the quantity of generated waste per capita was reduced compared to the previous years and it was restored to 1.6 tonnes/per capita/per year, which was the quantity recorded in 2017. The Report shows that a number of public utility companies still fail to submit their reports to the Environmental Protection Agency on the quantities of collected and disposed of waste, and that in 2023 only 97 of them submitted the reports.<sup>107</sup> The Report also offers an overview of the Analysis of the State of Separate Waste Collection at the Local Self-Government Level, which was carried out as part of the ENVAP4 project, establishing that out of the 15% of the generated municipal waste which is recycled annually, only 3% comes from local self-government units, whereas the rest of the recycled waste comes from the informal sector. This is explained by the fact that most of the local self-government units (LSG) did not introduce a primary separation system. In addition to this, the analysis concludes that out of the 64 LSGs that have formally submitted information on waste quantity and waste mix, only five actually analyze them, whereas for the remaining ones who did submit information, the conclusion is that the information is unrealistic and unreliable. Also, one should keep in mind that there are 164 LSGs in Serbia. It is disheartening that one-third of them do not even submit annual reports on municipal waste, and that many that do, base

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<sup>107</sup> Ministry of Environmental Protection, Environmental Protection Agency (2024): Report on Waste Management in the Republic of Serbia from 2011 to 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2024/12/Otpad2011-2023.pdf>

their reports on mere estimates, not on actual measurement, which gravely impacts the reliability of such information.

The Report on Waste Management in the Republic of Serbia from 2011 to 2023 suggests that in 2023, the quantity of waste disposed of at sanitary landfills was reduced for the first time since 2018. The trend of disposing of large quantities of waste at unsanitary and illegal landfills continued. Taking into consideration that the average coverage of municipal waste collection in 2023 was merely 88.3%, and that only somewhat more than 40% of the population had access to sanitary landfills, this availability only further reduced in 2024 due to closure of the regional sanitary landfill Duboko, which lost its operational permit.

Eight operators are licensed to manage packaging waste: SEKOPAK, EKOSTAR PAK, DELTA-PAK, CENEKS, TEHNO EKO PAK, EKOPAK SISTEM, UNO EKO PAK and INTERZERO PAK. In 2023, these eight operators managed packaging waste for 1,996 legal entities or entrepreneurs that place packaged products in the market of our country.

By May 15, 2024, 200 reports were submitted to the Environmental Protection Agency by businesses or entrepreneurs who opted not to transfer their obligations to packaging waste management operators, in relation to which the Ministry of Environmental Protection shall define a packaging waste management fee. According to all available data, the total quantity of packaging placed in the market of the Republic of Serbia amounts to 403,011.1 tonnes. Operators reported 264,337.1 tonnes of reused packaging waste. Out of the said quantity, 250,994 tonnes of packaging waste were submitted for recycling. Based on this information, it is evident that the general national objectives of the Republic of Serbia for 2023 were met, i.e., to reuse 65.8% of the waste and to recycle 62.5% of the waste.<sup>108</sup> It is also evident that informal collectors make a significant contribution to the system's operation, despite the fact that they are usually not legally visible or properly rewarded for their efforts. Regardless of the fact that the national objectives were met, most of the packaging waste ends up illegally disposed of and at landfills, instead of being recycled, whereas

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108 Ministry of Environmental Protection, Environmental Protection Agency (2024): Report on Packaging and Packaging Waste Management in 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2024/10/Ambalaza-2023.pdf>

packaging waste management operators try to maximize their profit while complying with minimum legal requirements.

According to data from the Statistical Office of the Republic of Serbia, in 2023, the Serbian economy generated 180.2 million tonnes of waste. A total of 178.9 million tonnes of waste were treated. In 2023, in the Republic of Serbia, agriculture, forestry and fishing, mining and processing, electricity, gas, and steam supply, water supply and wastewater management, construction, and service sectors generated 180.2 million tonnes of waste, which is an increase of 3.2% compared to the previous year.<sup>109</sup>

By comparing the information of the Environmental Protection Agency and the Statistical Office of the Republic of Serbia, a discrepancy in the published amounts of generated and treated waste has been identified for years. Despite the fact that submitting annual waste reports is an obligation of relevant businesses and that the applicable waste management Laws and by-laws and the Law on Official Statistics prescribe penalties,<sup>110</sup> one of the problems is the inability to verify if the said businesses have submitted their reports both to the Statistical Office and the Agency for the ongoing year. Unfortunately, it turns out that in practice, the reports are usually submitted to the Agency, whereas submission to the Statistical Office is purely voluntary, which may be interpreted as lack of an appropriate system for monitoring, control and inspection supervision.

In its 2019 Report,<sup>111</sup> the State Audit Institution (SAI) said that the Environmental Protection Agency should establish efficient control of submitting information for the National Register of Pollution Sources, as well as control of accuracy of the submitted information. In the 2022 Report<sup>112</sup> concerning hazardous waste, the SAI states that the competent institutions must pay more attention to hazardous waste management, given that the objectives of reducing

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109 Statistical Office of the Republic of Serbia, Generated and Treated Waste in 2023, available at: <https://www.stat.gov.rs/vesti/statisticalrelease/?p=15202&a=25&s=2502?s=2502>

110 Official Gazette of RS, no. 104/2009

111 State Audit Institution (2019): Performance Audit Report on Industrial Waste Management, available at: [www.dri.rs/storage/upload/documents/revision/2019/2019-4-Upravljanje%20industrijskim%20otpadom.pdf](http://www.dri.rs/storage/upload/documents/revision/2019/2019-4-Upravljanje%20industrijskim%20otpadom.pdf)

112 State Audit Institution (2022): Performance Audit Report on Industrial Waste Management, available at: [www.dri.rs/storage/newaudits/2022-2-SV%20Upravljanje%20opasnim%20otpadom.pdf](http://www.dri.rs/storage/newaudits/2022-2-SV%20Upravljanje%20opasnim%20otpadom.pdf)

hazardous waste, establishing exact quantities and improving treatment of hazardous waste remain unmet. Finding 2.3 confirms that information on the generated quantities and treatment of hazardous waste is not reliable. There are discrepancies between information on the amount of generated hazardous waste of the Environmental Protection Agency and of the Statistical Office of the Republic of Serbia, as well as between the quantities of hazardous waste temporarily stored in the reporting year as at December 31 and the amount of hazardous waste temporarily stored as at January 1 the following year.

In order to remedy the said finding, a higher level of coordination and cooperation was established between these two institutions with the aim of publishing identical information of the quantities of generated waste in the Republic of Serbia, and a permanent Working Group for these affairs was formed. Given that the said Finding 2.3 in the 2022 Report persists also in the Post-Audit Report on Remedial Actions in 2023,<sup>113</sup> discrepancies are also identified in the published quantities of generated and treated waste in 2023.

Large businesses, with more than 250 employees, submit their reports to the Agency and the Statistical Office on a more regular basis; it is estimated that the accuracy of the submitted information is far higher compared to micro and small businesses. Generally speaking, some of the potential causes of discrepancies are:

- errors in completing the information by businesses;
- the Statistical Office processes data through stratification (technique used in combination with other data analysis tools);
- unlike the Agency, the Statistical Office collects information only from businesses listed in the Statistical Register of Businesses, and questionnaires are sent only to these businesses (e.g., for collecting data on generated waste, questionnaires are sent to businesses with ten or more employees, save for the construction

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113 State Audit Institution (2023): Post-Audit Report on Remedial Actions of the Environmental Protection Agency, Belgrade, following Performance Audit on Industrial Waste Management, available at: [www.dri.rs/storage/newaudits/2022-2-SV%20PR%20Upravljanje%20opasnim%20otpadom%20Agencija%20za%20zastitu%20zivotne%20sredine.pdf](http://www.dri.rs/storage/newaudits/2022-2-SV%20PR%20Upravljanje%20opasnim%20otpadom%20Agencija%20za%20zastitu%20zivotne%20sredine.pdf)

and services sectors, where random sampling method is employed based on certain requirements being met);

- reporting methods are different, the forms of data requested are different, which additionally confuses businesses while completing the forms (e.g., the Statistical Office reports to Eurostat on dry waste sludge, whereas the Agency collects information on liquid waste sludge);
- the accuracy of the submitted data is not verified nor are data collected by these two institutions compared in detail, but a Working Group was established to support better coordination in publishing information on hazardous waste;
- in the event that major discrepancies are identified subsequently in data submitted to the Agency, which have been previously publicly announced as part of the annual reporting process, these cannot be amended retroactively;
- in the event that Eurostat changes its methodology or manner of reporting, the Statistical Office shall retroactively correct its own database, which might lead to changes in the calculated quantities for certain waste/field;
- when it comes to e-waste, Eurostat does not offer a unified conversion factor to ensure consistent reporting and enable comparison of data obtained by employing different methodologies;
- accuracy of submitted information on the quantities of construction waste cannot be verified, especially in terms of micro and small businesses, and it was also identified that certain businesses report their quantities either to the Statistical Office or the Agency, and very rarely to both institutions;
- there is also a discrepancy in the quantities of medical waste, which could be interpreted so as to say that dental offices and smaller community health centers are not properly familiar with their obligations.

## Inspection Supervision

In accordance with the Inspection Supervision Annual Plan, the Environmental Protection Inspectorate planned 340 regular, extraordinary and control inspections in 2024.

In 2024, 504 inspections of businesses were conducted, those being: 18 regular inspections, 80 extraordinary inspections, 240 extraordinary fact-establishing inspections, 104 extraordinary confirmative inspections, three complementary inspections, 51 control inspections, five mixed inspections, three inspections with the aim of taking urgent actions and one official advisory visit.<sup>114</sup>

Taking into consideration the number of businesses that generate, transport, treat, dispose of, export and import waste, as well as the general situation observed in Serbia when it comes to waste management, it is necessary to additionally enhance the capacities of inspection services and to significantly increase the coverage of supervision and advisory work.

## Special Waste Streams

Article 5 of the Law on Waste Management<sup>115</sup> defines special waste streams. Articles 47 through 58 of the Chapter 7 thereof, Special Waste Streams Management, prescribe the obligation of managing certain special waste streams, as well as the obligation of the owners of the respective types of waste to report and submit appropriate information to the Environmental Protection Agency. Article 75 governs the reporting procedure. The Law on Charges for the Use of Public Goods<sup>116</sup> sets forth the amount of charges for the products that become special waste streams after use and specifies these products, method and deadlines for submitting annual reports.

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114 Ministry of Environmental Protection, Sector for Environmental Oversight and Preventive Action (2025): Report on the Work of the Environmental Protection Inspectorate 2024, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/Godi%C5%A1nji%20Izve%C5%Ataj%20o%20radu%20za%202024%20god%20%20Inspekcija%20zss.pdf>

115 Official Gazette of RS, nos. 36/09, 88/10, 14/16 and 95/2018-as amended)

116 Official Gazette of RS, nos. 95/2018, 49/2019, 86/2019 – adjusted RSD amounts, 156/2020 – adjusted RSD amounts, 15/2021 – amended adjusted RSD amounts.

## *Tires*

By July 8, 2024, 2033 businesses subject to charges for managing special waste streams submitted to the Agency, through the information system of the National Register of Pollution Sources, their reports on tires placed in the market of the Republic of Serbia. According to the reports of the operators of facilities for reuse of waste, 64,899 tonnes of tire waste were reused in 2023. Based on the submitted waste import forms, 417 tonnes of this type of waste were imported in 2023. During the same period, 72 tonnes of this type of waste were disposed of.<sup>117</sup>

## *Waste containing asbestos*

Waste containing asbestos is usually found in construction waste. According to information submitted by operators with a license to dispose of this type of waste, 277 tonnes of waste comprised of construction and insulation materials containing asbestos which are classified in Group 17 in the Waste Catalogue were disposed of.

## *Batteries and accumulators*

The Agency received reports on this type of products available in the market of the Republic of Serbia from 2,474 businesses. The quantity of batteries and accumulators placed in the market in 2023 was 17,722.12 tonnes.

## *Oils*

By July 8, 2024, through the information system of the National Register of Pollution Sources, the Agency received reports on oils placed in the market of the Republic of Serbia from 771 businesses subject to charge for managing special waste streams.

The quantity of oil placed in the market in 2023 was 40,310.57 tonnes. Based on the Annual Waste Reports from operators of facilities for reuse of waste, 440 tonnes of waste oil were treated in 2023. According to the reports of ex-

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117 Ministry of Environmental Protection, Environmental Protection Agency (2024): Products that Become Special Waste Streams After Use in the Republic of Serbia in 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2024/11/PTO-2023.pdf>

porters of this type of waste, 1,660 tonnes of waste oil were exported. Taking into consideration the vast discrepancy between the quantities of oil placed in the market and the quantities that were treated and exported, a conclusion can be made that most of the waste oil ends up either illegally disposed of or used inappropriately, most likely as a source for generating heating energy.

#### *Electrical and electronic products*

By July 8, 2024, through the information system of the National Register of Pollution Sources, the Agency received reports on electrical and electronic products placed in the market of the Republic of Serbia from 5,449 businesses subject to charge for managing special waste streams. The quantity of electrical and electronic products placed in the market in 2023 was 18,485.41 tonnes. According to the submitted information, 35,373 tonnes of waste were treated in 2023. This kind of ratio between the quantity of products placed in the market and the treated quantities shows that regular disbursement of treatment remunerations creates high interest and agility in collecting and treating the respective waste stream.

#### *Vehicles*

By July 8, 2024, through the information system of the National Register of Pollution Sources, the Agency received reports on vehicles placed in the market of the Republic of Serbia from 560 businesses subject to charge for managing special waste streams. The quantity of vehicles placed in the market in 2023 was 102,973.85 tonnes. Operators of facilities for reuse of waste reported to the Agency that they treated 5,913 tonnes of this type of waste.

The Ministry of Environmental Protection continued to announce public calls for awarding funds to local self-government units for co-financing the implementation of projects for rehabilitation and closure of unsanitary landfills,<sup>118</sup> removal of illegal landfills,<sup>119</sup> construction of a waste management system,<sup>120</sup> prevention of illegal waste disposal<sup>121</sup> and as a form of support to local self-governments to improve their waste management systems and remove illegal landfills in their territory, although previous experience has shown that many of the illegal landfills that have been removed are created again very soon in the exact same spot from where they were removed.

In accordance with Article 7, paragraph 8, of the Regulation on the Type of Financial Guarantees and Equivalent Insurance Ensuring the Performance of Waste Management Activities,<sup>122</sup> the Ministry of Environmental Protection announced the adjusted amounts of financial guarantees necessary to ensure the performance of these activities. The updated amounts were officially published in the Official Gazette of RS, no. 28, dated March 28, 2025, which additionally increased security in this field.

What remains evident is that since 2012 and since the abolishment of the dedicated Fund for Environmental Protection and the dedicated character of funds collected from ecological taxes, the authority to manage funds collected from ecological taxes and charges is no longer held by the Ministry of Environmental Protection, but rather the Ministry of Finance which distributes the funds

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118 [www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-sanacije-i-zatvaranja-nesanitarnih-deponija-u-2024-godini-0](http://www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-sanacije-i-zatvaranja-nesanitarnih-deponija-u-2024-godini-0)

119 [www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-izgradnje-sistema-upravljanja-otpadom-u-2024-godini](http://www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-izgradnje-sistema-upravljanja-otpadom-u-2024-godini)

120 [www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-izgradnje-sistema-upravljanja-otpadom-u-2024-godini](http://www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-izgradnje-sistema-upravljanja-otpadom-u-2024-godini)

121 <http://www.ekologija.gov.rs/informacije-od-javnog-znacaja/konkursi/javni-konkurs-za-dodelu-sredstava-za-sufinansiranje-realizacije-projekata-prevenicije-nelegalnog-odlaganja-otpada-i-uklanjanje-u-2025-godini>

122 Official Gazette of RS, no. 103/23.

collected from ecological taxes arbitrarily, meaning that the ecological tax is now directed into the national budget, losing its dedicated purpose. The result of this is that only about one-half of the funds collected from ecological taxes is actually used in a dedicated manner to protect the environment, whereas the rest of the funds is used for other state purposes.

Since 2021, the Ministry of Environmental Protection has also stopped announcing open calls for support to civil society organizations. The only form of engaging civil society organizations that the Ministry continues to implement regularly is volunteering work without compensating even the essential costs in working groups for adopting proposals of new regulations.

Due to the nontransparent operation, continued attacks by the highest state officials against civil society organizations and the decline of principles of democracy, many civil society organizations have either exited or suspended their membership in these working groups and stopped responding to these calls.

The remaining part of the Financing in the field of Waste Management is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

1. Build partnerships with civil society and the business sector when adopting regulations, and establish clear communication with the public.
2. Improve the legal framework in order to enable the effective application of the principle of extended liability and the “polluter pays” principle.
3. Harmonize regional and local waste management plans with strategic documents at the national level.
4. Involve industry in the application of the circular economy.
5. Adopt a regulation to regulate the delivery of hazardous waste by natural persons to authorized operators.



## Implementation of Regulations

6. Prevent the creation of new illegal landfills by expanding the coverage of municipal waste collection to 100% and increasing inspection supervision.
7. Introduce the obligation to monitor water, air and soil at all municipal waste landfills to prevent fires and environmental pollution.
8. Raise public awareness of the importance of establishing a waste management system and the consequences of inappropriate waste management to public health and the environment.

- 9.** Provide for appropriate management of hazardous waste generated in Serbia in anticipation of the expected ban on exporting hazardous waste.
- 10.** Create capacity for the treatment and permanent storage of hazardous waste, in those cases where waste cannot be exported.
- 11.** Introduce more intense inspection supervision over the implementation of the Law on Packaging and Packaging Waste.
- 12.** Create a unified methodology for collecting and sending data to the Statistical Office of the Republic of Serbia and the Environmental Protection Agency and ensure the reliability of the data obtained.
- 13.** Establish a systemic solution for textile waste management through clear regulations, incentive measures, and adequate infrastructure.
- 14.** Ensure the implementation of the Law on Waste Management in practice.
- 15.** Ensure that the quantities of collected municipal waste are measured and that its morphological composition is determined by monitoring the implementation of the Law on Waste Management, supporting the procurement of necessary scales at unsanitary landfill sites, and providing training for employees at utility companies so that they can apply the Rulebook on the Methodology for the Collection of Data Regarding the Content and Quantities of Municipal Waste on the Territory of the Local Self-Government Unit.
- 16.** Improve the existing data collection system, as well as data reliability.
- 17.** Introduce an independent Fund for Environmental Protection to distribute funds collected from the ecological taxes.
- 18.** Provide financial support to the civil sector.

- 19.** Ensure transparency in the process of financing projects in the field of waste management.
- 20.** Perform a revision of the planned regional waste management systems.
- 21.** Intensify inspection supervision of the implementation of the Law on Waste Management and the Law on Packaging and Packaging Waste.
- 22.** Create a legal framework for introducing a deposit system for packaging.
- 23.** Conduct a detailed investigation into the failures in the operation of the Regional Waste Management Center Duboko Užice, identify persons responsible and take appropriate actions in accordance with the law, including penalties for those responsible for the identified irregularities.



## Financing

- 24.** Introduce economic instruments to reduce the amount of waste that ends up at landfills without treatment.
- 25.** Make a final decision regarding the introduction of a deposit system.
- 26.** Due to the likelihood that medicines may become hazardous waste after their expiration date, a bylaw should be adopted to define the fee for the import and placing of medicines on the market.
- 27.** Ensure transparency and easy access to information regarding the costs of building infrastructure in the area of waste management (regional centers, landfills, equipment, etc.) and sources of financing.

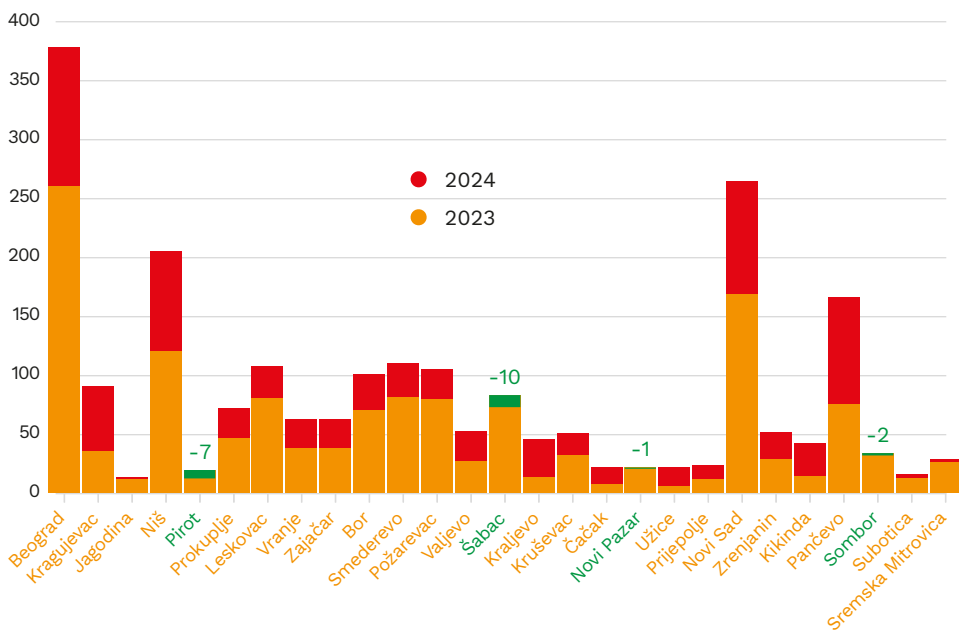
- 28.** Ensure realistic financing of the costs of collection, transportation, treatment, and disposal of waste, according to the “polluter pays” principle.
- 29.** Ensure that waste management costs are included in the price of products and services in order to avoid shifting costs from consumers to citizens.
- 30.** Develop capacity and political will to use available EU funds and grants instead of credit arrangements for infrastructure construction.
- 31.** Introduce subsidies for opening small businesses that perform on-site packaging waste recycling.
- 32.** Restore the dedicated character to all the funds collected from ecological taxes.



# WASTE MANAGEMENT

## NUMBER OF LANDFILL FIRES

Number of **fires on an annual basis** per organizational unit of the Sector for Emergency Management of the Ministry of Interior



TOTAL NUMBER OF FIRES

2023

2024

0

1400

2171

The number of landfill fires in 2024  
**REACHED A RECORD OF**

# 2171

Source: Sector for Emergency Management of the Ministry of Interior





# **Water Quality**

# Overview

The Water Council has not been established. The new Water Law, the General Flood Defense Plan and a regulation that would closer define the method for defining water land boundaries have not been adopted. The Action Plan for the Implementation of the Water Management Strategy and the Flood Risk Management Plan remain mere drafts, and the annual Water Management Program has been amended multiple times. Only those plans that are updated annually on a smaller scale, such as the Operational Flood Defense Plan and the Annual Water Status Monitoring Program, can be said to have been timely adopted.

The continued practice of delays in (non)adopting key documents and multiple revisions of annual plans suggests systematic challenges in planning and implementing water management policies. When plans remain at the level of drafts, this might create room for flexible interpretation of obligations and responsibilities, given that the lack of officially defined obligations and deadlines leaves room for not taking action without visible consequences. When public debates are initiated only after the implementation was already supposed to have started or when multiple amendments are being made, one gets the impression that the plans are not there to steer the activities, but only to accompany them.

If one were to look for the causes of this kind of practice exclusively in the water management sector, one might presume that this is a result of a complex inter-department coordination, limited capacities or insufficiently developed mechanisms for long-term planning. However, taking into consideration that the key strategic document for spatial development of the country, the Spatial Plan of the Republic of Serbia from 2021 to 2035, has yet to be adopted, it is clear that the only thing implemented consistently on a national level is a sustained postponement. Even if there are just causes for this, they were not presented to the public. It is evident that it is necessary to improve decision-making

and planning processes by strengthening transparency and more consistent adherence to the defined procedures, all in order to ensure a responsible and efficient water resource management.

The water management sector in Serbia still relies extensively on an outdated approach that prioritizes physical control of watercourses by meander cut-offs, channel lining, construction of embankments and disconnection of watercourses from their natural floodplains, oftentimes at the expense of nature. Even though the practice of deliberate drainage of wetlands may have ceased, they are often left to gradual decay due to succession and desiccation. Despite the fact that the strategic documents such as the Water Management Strategy and River Basin Management Plan formally acknowledge the importance of preserving ecosystems, the environmental aspects remain marginalized in practice.

What is necessary is a shift towards an approach that identifies healthy aquatic ecosystems as key to adapting to climate change and to sustainable development. With empowerment and better coordination between institutions and active engagement of the public, Serbia has the opportunity to modernize water management and demonstrate that protection of aquatic ecosystems is not an obstacle to development, but rather its precondition.

## Strategic and Legislative Framework

The adoption of the new Water Law has been announced and postponed year after year. Despite the fact that the fifth revised National Program for the Adoption of the EU Acquis,<sup>123</sup> adopted on October 24, 2024, states that its preparation is underway, with a view to adopting it by the end of that respec-

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123 <https://www.mei.gov.rs/srl/dokumenta/nacionalna-dokumenta/npaa>

tive year, this never happened. The reporting period for this Report did not see any subsequent revisions of the National Plan and therefore, there is no information on the new deadline for adopting this Law.

A public debate on the Draft Action Plan for the Implementation of the Water Management Strategy on the territory of the Republic of Serbia from 2024 to 2026 was conducted with a minimum duration period of 20 days during the summer of 2024. Whereas the report on the conducted public debate states that no objections or suggestions were received during the defined timeframe, the Action Plan says that the suggestions received pertained to the wording of the Plan and correcting and amending certain measures/activities. After acting upon the objections, and based on the conclusions made by the Committee for Implementing the Public Debate Procedure on the Draft Action Plan, preparations of the final text of the Action Plan started, even though the document is still labeled as "Draft". The Action Plan lists the results achieved in the previous period, without comparison of the funds planned and spent. Excel spreadsheets<sup>124</sup> published annually on the website of the Republic Water Directorate also offer only a description. However, the 2024 report was not available during the preparation of this Report. Activities planned for the 2024-2026 period, with estimated funds, are provided further in the text.

Regulation on Determining the Water Management Program in 2024,<sup>125</sup> adopted by the Government in early February 2024, was subsequently amended through five new regulations (in March, July, twice in November, and in December, respectively). The Program defines works of general interest in water management which are funded in the current year and in the fields of (1) water management and use, (2) water protection, (3) river training and protection against harmful effects of water, (4) planning and international cooperation in the field of water, as well as the amount of funds for performing these works. The most important changes that brought about the adoption of the new regulations refer to increasing funds for financing new works on river training and

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124 <https://rdvode.gov.rs/dokumenti/strateski-i-planski-dokumenti/>

125 Regulation on Determining the Water Management Program in 2024 (Official Gazette of RS, no. 14 dated February 23, 2024, no. 26 dated March 29, 2024, no. 59 dated July 12, 2024, no. 89 dated November 8, 2024, no. 90 dated November 15, 2024, no. 101 dated December 20, 2024), available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2024/14/3/reg>

protection against harmful effects of water, repair and investment maintenance of flood, erosion and torrents protection structures, and drainage systems; for financing the construction of the dam with reservoir Arilje – Svrackovo Profile, it being intended for design and expert supervision and investment affairs, as well as works concerning the preparation of technical documentation with the aim of innovating the technical solution; for financing new works on the construction of hydraulic structures for water supply to parts of the municipalities of Sjenica, Tutin (Pešter water supply system), Nova Varoš and Bosilegrad; for continuing the preparation of the technical documentation for restoration and reclamation of the area from which sand and gravel were extracted and the area used for disposing of materials, and for financing the design activities during the construction of the Morava Corridor motorway. On the other hand, funds for planning and international cooperation in the field of water were reduced compared to their initial amount, despite the fact that the latest amendment additionally envisages a study on legal, economic, technical and security aspects of managing high dams in Serbia, instead of financing the preparation of a study on sanitary protection zones.

Regulation on Determining the Water Management Program in 2025<sup>126</sup> was adopted in February 2025. Compared to the final amendment of the program for 2024, much less funds are allocated in 2025 for water management and use, and much more funds for river training and protection against harmful effects of water. The funds for water protection remain the same as last year, and are somewhat larger when it comes to planning and international water cooperation. It remains to be seen whether this time the funds and works have been adequately planned at the beginning of the year or if the regulation will undergo amendments.

Regulation on establishing the previous General Flood Defense Plan was adopted with a validity period that expires on March 23, 2025. As on the date of completing this Report, the new General Plan has not been adopted due to

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126 Regulation on Determining the Water Management Program in 2025 (Official Gazette of RS, no. 12 dated February 7, 2025, no. 47 dated May 30, 2025), available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/12/5/reg>

lengthy procedures for obtaining consent from the relevant institutions. It is unknown whether amendments to the previous Plan are planned.

Through the Order on Establishing the Operational Flood Defense Plan for 2025, the Plan was adopted in due time in its standard form. Adding the names of pumping stations also to the part of the Plan referring to inland waters (for every hydro-melioration system) would contribute to its completeness.

In June 2024, the Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management, in cooperation with the public water management companies Srbijavode and Vode Vojvodine, updated and amended the Draft Flood Risk Management Plan for the Territory of the Republic of Serbia by 2027,<sup>127</sup> originally published in 2023. The amendment refers to two chapters on climate change and their impact on floods and the implemented nature-based solutions. The document remains a draft, despite the fact that most of the implementation period has lapsed. It was announced that public inspection and public debate would be held after preparing the Strategic Environmental Assessment of the Flood Risk Management Plan. Since the document was not adopted at the Government's session, it was never posted on the relevant webpage on the website of the Republic Water Directorate (Documents – Strategic and Planning Documents), where all the officially adopted documents are generally made available. Instead, it is only available as a link in the news dated June 24, 2024. Once the news is archived or when the website is modified, only those who already know to look within the specific piece of news will be able to find the document, given that browsing the website will not provide access to it.

Given that the Preliminary Flood Risk Assessment was updated in 2019, it is expected that it will be revised during 2025 and amended if necessary. By making the Preliminary Flood Risk Assessment available to the public, the competent institution would abide by the requirement referred to in Article 10 of the EU Floods Directive, the implementation of which requires that this

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127 [https://arhiva.rdvode.gov.rs/doc/Predlog\\_PURP-RS\\_27.pdf](https://arhiva.rdvode.gov.rs/doc/Predlog_PURP-RS_27.pdf)

document be developed. Flood hazard maps and flood risk maps,<sup>128</sup> as well as the abovementioned Draft Flood Risk Management Plan, whose publication is required in the abovementioned article of the Directive, are available to the public.

Plan for Water Protection against Pollution is yet to be adopted. According to information on the website of the National Water Directorate, drafting of this plan was in its final stages and was expected to be adopted ten years ago.

Regulation on Establishing the Annual Water Status Monitoring Program for 2025 was adopted in March 2025. While the observed parameters remained the same, the number of monitoring sites is slightly different compared to last year.

A regulation that would closer define the methodology for determining water land boundaries is one of many documents which are yet to be adopted.

With respect to the documents required by the Water Law, it is safe to conclude that certain annual plans are being revised multiple times throughout the year, whereas preparation of plans with a longer implementation period is often postponed. Draft plans and calls for public debate are announced only after the implementation period is well underway, and documents are often not adopted officially, effectively making them mere drafts.

One of the reasons for the inconsistencies in the preparation and adoption of the required documents can be found in the fact that the Water Council, although clearly mandated by the Water Law, has never been established. This has deprived the system of an institutional mechanism that would enable expert-based, inclusive and transparent decision-making in the field of water management. Instead, the role of the Council remains unfulfilled, and its legally defined functions are carried out in practice within a narrow administrative framework, without the systematic involvement of relevant experts and the public concerned.

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128 <https://www.srbijavode.rs/karte-ugrozenosti-i-karte-rizika-od-poplava.html>,  
<https://vodevojvodine.com/o-nama/delatnosti/odbrana-od-poplava/>

A similar issue has been observed also in connection with the National Water Conference, which is envisioned by the Water Law as a mechanism for public participation and cross-sectoral dialogue on water management. However, according to available information, only one session has been held to date, in 2022, during which the Rules of Procedure and staffing matters were discussed, without addressing substantive topics within the Conference's mandate, such as reviewing strategic documents or providing recommendations for policy improvement. This approach, which prioritizes administrative matters while lacking further activity, indicates that the Conference has not been materialized as a functional forum for dialogue and public engagement, despite its clearly defined legal role.

The fifth revised National Program for the Adoption of the EU Acquis foresees the adoption of additional documents related to water quality, but only in the upcoming period, and these will therefore be covered in the next Shadow Report.

## Implementation of Regulations

Certain aspects of the Water Law proved ineffective shortly after their entry into force, which is why the adoption of a new law has been announced for several years now. There is a noticeable deviation from the deadlines prescribed by the Law, while some of the provisions are being implemented selectively and with evident flexibility, possibly under the assumption that they will be redefined in the future legal framework. For example, the Law envisages the adoption of a river basin management plan for the Danube River Basin, for river basin districts, as well as a special river basin management plan. To date, only the River Basin Management Plan for the Territory of the Republic of Serbia has been adopted, leaving it unclear whether plans for other territorial units are to be expected. Similarly, the Flood Risk Management Plan is supposed to

be adopted both for the territory of the Republic of Serbia and for river basin districts, but so far, only the former exists, it being only as a draft.

Although the River Basin Management Plan is one of the few strategic documents that are formally in force, the current situation on the ground gives the impression that its primary objective is not “to prevent the deterioration of the status of water bodies, as well as to restore and protect the good status of surface water and groundwater bodies”, but rather to merely describe the existing state. While the general public likely remains unaware of many cases of harmful effects on water, it is particularly concerning that projects deemed to be of special national importance to the Republic of Serbia, such as the construction of the Morava Corridor motorway, are among the main drivers of river ecosystem degradation. As part of this project, a systematic meander cut-off on the Zapadna Morava River is being carried out, which artificially shortens the river’s course, increases flow velocity and disrupts sediment dynamics. Such interventions inevitably lead to significant hydrodynamic and morphological changes that cause habitat loss or affect the habitat conditions for numerous aquatic species. Having in mind that the current River Basin Management Plan does not recognize meander cut-offs as either a hydro-morphological pressure or a factor influencing the ecological status of water bodies, and that Chapter 7.5 of the Plan (Future Infrastructure Projects and Application of Article 4(7) of the WFD) provides clear instructions for justifying exemptions from achieving good ecological status of water bodies, as a result, in the next cycle of updating the Plan, the competent institutions will only be able to acknowledge that the Zapadna Morava River, along much of its course, has lost the characteristics of a natural watercourse. Judging by the amount of stone currently being placed on the banks and bottom of the newly formed riverbed, one gets the impression that an entire hill has been sacrificed to prevent the river from ever reestablishing its natural flow. It would not be surprising if this watercourse were one day formally classified as construction land in the cadaster – something its appearance, unfortunately, already justifies.



**Map illustrating meander cut-offs on the Zapadna Morava River as part of the construction of the Morava Corridor motorway**



**Construction works on meander cut-off on the Zapadna Morava River**



### **Meander cut-off on the Zapadna Morava River as part of the construction of the Morava Corridor motorway**

In addition to the riverbed itself, the riverbanks of the Zapadna Morava have undergone significant transformation due to intensive gravel and sand extraction – an activity formally carried out in accordance with the current Sediment Extraction Plan. Large excavation pits remain at the extraction sites, which have since filled with water, thus forming new water bodies. Although these interventions were not aimed at creating wetland habitats, but rather resulted from sediment exploitation for infrastructure works, the formation of new bodies of water raises important questions about their future role within the ecosystem.

If these areas are approached systematically, through proper planning and environmental monitoring, they could become functional wetland habitats, which are important for biodiversity conservation and for mitigating the effects of climate change. Such an approach would align with the goals of the United Nations Convention to Combat Desertification (UNCCD) and the concept of land degradation neutrality, which entails compensating for lost land functions by restoring or creating new ecologically valuable areas.

However, the question remains whether stable aquatic habitats will develop in these excavated areas – habitats that can withstand increasingly frequent droughts and low water levels. In addition, there is a growing concern that

the characteristics of these pits, including their potentially greater depth compared to the riverbed, could contribute to disruptions in the regime of both groundwater and surface water.

According to available information, technical documents for the development of these areas<sup>129</sup> have likely already been prepared, but are not publicly accessible. It remains to be seen whether these plans include solutions that not only prevent further degradation, but also enable the development of new valuable habitats, or whether the competent institutions will show willingness to adapt their interventions in accordance with the ecological potential of these transformed riparian zones.

If these steps are implemented, the transformation of the riparian excavation sites along the Zapadna Morava River could be seen as an opportunity to enhance the ecological value of the area, rather than merely a measure to mitigate previous degradation – fully aligning with the principles and objectives of the UNCCD.

Gravel extraction in the riparian zone of the Zapadna Morava River as part of the construction of the Morava Corridor motorway

There are significant challenges in monitoring and implementing (local) operational flood defense plans for 2nd order streams, primarily due to the absence of a centralized repository. These plans are rarely available, unless individual local self-government units (LSGs) choose to publish them independently. In practice, many municipalities lack flood protection structures on 2nd order streams, making the implementation of preventive measures technically and logistically unfeasible. In addition to the lack of infrastructure, LSGs often also lack the capacity to prepare the necessary technical documentation, despite being legally obligated to do so under several laws. It is particularly noteworthy that much of the data expected in the operational plans is also processed

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129 Public Procurement Portal, 2024/S F02-04748; The service of preparing technical documentation (Construction Permit Design – PGD and Construction Design – PZI) and design activities during the construction of hydraulic structures within the river training works on the Zapadna Morava River, including the management, use and protection against harmful effects of water and land reclamation within the scope of borrow pits and disposal sites, for the purposes of the construction of the E-761 Pojate-Preljina motorway (Morava Corridor), Public Water Management Company Srbijavode, Decision on Awarding the Contract, no. Ou.5/15/6-2024 dated January 13, 2025.

within the documents required by the Law on Disaster Risk Reduction and Emergency Management.<sup>130</sup>

If access to local operational flood defense plans is already a challenge, monitoring the development of such plans by legal entities whose property is at risk of flooding is practically impossible, and the provision of the Water Law that mandates this stands out as one of the most illogical. The assumption is that legal entities should independently inform themselves about flood risks, which is only feasible for companies whose assets are located near water-courses for which public water management companies have developed flood hazard maps and made them available. When a company is located within a flood protected area, where flood defense falls under the jurisdiction of public water management companies, it raises the question of why legal entities are expected to bear the same level of responsibility. The General Flood Defense Plan for 2019–2025 (which is currently no longer in effect) partially clarified this issue by limiting the responsibility of legal entities only to those whose facilities are located within protective structures, but this was mentioned in just a single paragraph. Nevertheless, even in that plan, uncertainties remain, as it defines responsibilities of legal entities whose assets are located on water land the borders of which have not been delineated.

The absence of a legal act prescribing the method for determining the water land boundaries prevents its formal delineation and registration in the real estate cadaster. The need to regulate this issue has been recognized both by competent institutions and the wider public. Matters concerning the lease and sale of water land are particularly sensitive, as is the increasing pressure to build structures, not only along riverbanks but also in the space between the main riverbed and flood protection embankments, despite the fact that the permitted uses, prohibitions and restrictions on its use are clearly defined by the Water Law. Although the Law clearly states that the water land of flowing waters includes the high-water channel and riparian land, in practice, cases have been documented where even parts of the main riverbed of major rivers,

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130 Law on Disaster Risk Reduction and Emergency Management (Official Gazette of RS, no. 87/2018), available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/87/1/reg>

such as the Danube in Novi Sad and the Sava in Belgrade, have been recorded in the cadaster as urban construction land.

The public can learn about the implementation of activities defined in strategic and planning documents in the field of water management through the annual reports on the implementation of the Action Plan for the Implementation of the Water Management Strategy. It is possible that many other activities were carried out during the reporting period, but were omitted from this Shadow Report, as the annual report for 2024, which would serve as a source of necessary information, has not been published (since not even the final version of the Action Plan for 2024–2026 had been adopted at the moment of preparing this report).

The website of the Republic Water Directorate provides only information about the ceremonial opening of the Čačak-Parmenac hydro-melioration system in May 2024. According to the Draft Action Plan, this system was completed during the validity period of the previous Action Plan (2021–2023).

On the other hand, public water management companies (PWMCs) offer more information about their activities, allowing for a partial insight into the flow and intended use of funds allocated under the Water Management Program.

For example, the PWMC Srbijavode carried out a range of activities during the reporting period, including the preparation of technical documentation and the construction of flood protection structures in certain settlements along the rivers of Zapadna Morava, Drina, Kolubara and Raška and their tributaries. It also conducted emergency and regular maintenance works on flood protection and drainage structures, as well as flood defense drills involving the deployment of mobile protection equipment. In addition, Srbijavode actively participated in international projects in the Danube River Basin and worked on strengthening the capacity of its employees through training and participation in conferences and professional events. It also engages the public, for instance, during the observance of Sava Day and Danube Day, serving as an example of good practice.

In the area under the jurisdiction of the PWMC Vode Vojvodine, the flood protection system has long reached an adequate level of development and nowadays it primarily requires regular maintenance work. During the reporting period, most activities focused on the revitalization of the canal network and the conversion of certain drainage canals into dual-purpose systems, enabling both drainage and irrigation. In addition to technical activities, the company also carries out afforestation on its land along watercourses and lakes, participates in numerous international projects and strives to involve the public in its activities.

Although certain activities and information are available and presented to the public, there is still room for improving transparency and the systematic presentation of the implementation of plans and the achievement of objectives set out in strategic and planning documents.

The low percentage of wastewater treatment remains a key issue in the protection of surface and groundwater on the territory of the Republic of Serbia. According to data from the Statistical Office of the Republic of Serbia,<sup>131</sup> only about 18% of municipal wastewater was treated in 2024. This refers to wastewater that underwent at least secondary treatment. The situation is even more concerning when it comes to industrial wastewater, with only around 12% treated through secondary or tertiary processes.<sup>132</sup> Compared to 2023, there was a 3.9% increase in the amount of treated municipal wastewater, but at the same time, there was also a 3.5% increase in the total volume of discharged wastewater.<sup>133</sup>

The Report on the Performance of Utility Services in the Territory of the Republic of Serbia, prepared by the Ministry of Construction, Transport and Infrastructure (MCTI), is available only for 2023.<sup>134</sup> This Report also notes that

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131 Source Statistical Office of the Republic of Serbia:  
<https://data.stat.gov.rs/Home/Result/25010307?languageCode=sr-Cyrl>

132 Source Statistical Office of the Republic of Serbia:  
<https://data.stat.gov.rs/Home/Result/25010302?languageCode=sr-Cyrl>

133 Source Statistical Office of the Republic of Serbia:  
<https://publikacije.stat.gov.rs/G2025/Html/G20251141.html>

134 Source MCTI (2024): Report on the Performance of Utility Services on the Territory of the Republic of Serbia in 2023, available at: [https://www.mgsi.gov.rs/sites/default/files/izvestaj\\_o\\_obavljanju\\_komunalnih\\_delatnosti\\_na\\_teritoriji\\_republike\\_srbije\\_u\\_2023\\_godini\\_-\\_konacno.docx](https://www.mgsi.gov.rs/sites/default/files/izvestaj_o_obavljanju_komunalnih_delatnosti_na_teritoriji_republike_srbije_u_2023_godini_-_konacno.docx)

the growth of sewage infrastructure and wastewater treatment facilities does not keep pace with the expansion of the water supply infrastructure. The sewage network covers less than 60% of the constructed water supply network. The total length of the sewage network is 18,681 km, which is approximately 180 km more than in 2022.

Based on all the available data, it can be inferred that wastewater treatment is continuing to follow a mildly positive trend or is experiencing a modest increase.

Investment in wastewater treatment infrastructure (sewage networks and wastewater treatment facilities) continued both in 2024 and in 2025, primarily through the Clean Serbia project. Unfortunately, the available data on the implementation of this project is very limited and does not provide a comprehensive overview of the implementation dynamics. The most recent, somewhat consolidated data is presented in the Annual Report on the Delivery of the Action Plan for the Implementation of the Water Management Strategy, and it indicates significant delays in the preparation of technical documentation and in construction activities.

The MCTI report shows that water loss in water supply systems remains very high and is at levels similar to those of previous years. Only 43% of the produced water is billed, while loss amounts to approximately 22 m<sup>3</sup> per kilometer of network, or as much as 469 liters per connection per day. It is evident that with such a low percentage of billed water and significant losses, the public utility companies responsible for water supply cannot operate profitably. In 2023, the total revenues of these companies amounted to approximately 39 billion dinars, while expenditures reached around 40 billion dinars. The unfavorable situation is further exacerbated by the low price of water. In 2023, the average price for 1 m<sup>3</sup> of water was 63.08 dinars.

In conclusion, it should once again be emphasized that, although this is an exceptionally complex field involving numerous planning and legal documents relevant to EU accession, the institutions responsible for water management in Serbia still lack adequate capacity. In recent years, there has been no significant progress in strengthening the capacities of institutions such as the

Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management and the Water Inspectorate.

## Financing

Financing in the field of Water Quality is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# 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 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.
- 3.** Adopt strategic and planning documents in accordance with the obligations arising from relevant EU policies.
- 4.** Adopt the new Water Law without further delay, along with the necessary by-laws, to ensure a coherent and effective legal framework for water management policy planning and implementation. Prolonged postponement of this legislation has contributed to legal uncertainty, impeded the execution of strategic and planning documents, and obstructed the practical enforcement of numerous legal obligations.



## 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 the sectors to be established.
- 7.** Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities for participation 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 consider ecosystem services more seriously. Specific capacities for these needs should be developed within the competent institutions.
- 9.** Improve control and mitigation of key threats (poorly planned small hydroelectric power plants which are being constructed intensively, gravel extraction, pollution, uncontrolled use of groundwater and illegal construction on riverbanks). River habitats, wetlands, and water resources in general are highly endangered in Serbia. Urgent action is needed at the national level.

- 10.** Develop an integrated database on planning and constructing WWTPs that is available to the public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.
- 11.** Enhance the capacities of the Water Inspectorate and increase the number of water inspectors.
- 12.** Establish water quality monitoring in full accordance with the requirements of the Water Framework Directive.
- 13.** Establish the water land boundaries in the cadaster.
- 14.** Establish a Water Council as a professional and advisory body prescribed by the Water Law, which would provide systematic, expert and inclusive support in the decision-making process. At the same time, it is necessary to ensure continuity in the work of the National Water Conference, envisioned as a forum for public discussion and inter-sectoral dialogue. The effective establishment of these two mechanisms would contribute to a more transparent, accountable and efficient implementation of water management policies, through improved information sharing, consultations and coordination among all relevant stakeholders.



## Financing

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



# **Nature Protection**

## Overview

During the reporting period, pressures and negative practices in nature protection continued and even increased. Progress in developing new policies and regulations, as well as in implementing existing ones, was very limited.

According to data from the Central Register of Protected Natural Assets, last updated on February 24, 2025, the protected areas in the Republic of Serbia cover a total surface of 826,757 hectares. This represents 9,34% of the country's total territory.

In February 2025, a group of more than 30 organizations called for accountability from the Ministry of Environmental Protection and the Institute for Nature Conservation of Serbia regarding the Decision on Nature Protection Conditions for Establishing the Scope and Contents of the Environmental Impact Assessment Study for the Project for the Underground Exploitation of Lithium and Boron Deposits – Jadar.

The Working Group for the Development of the Nature Protection Program of the Republic of Serbia met regularly and worked intensively on defining national objectives in line with the Kunming-Montreal Global Biodiversity Framework. In November 2024, civil society organizations were invited to submit comments on the Action Plan for closing the final benchmarks in Chapter 27.

In May 2025, the United Nations Development Programme (UNDP), in cooperation with the Ministry of Environmental Protection, launched the project BIOFIN — The Biodiversity Finance Initiative, aimed at supporting the development of biodiversity financial plans. As part of this initiative, the development of a National Biodiversity Finance Plan is envisaged.

More than fifteen years of work on establishing Natura 2000 in Serbia has not yielded the planned, expected or the desired results. Work on the Regulation on the Ecological Network has significantly slowed down. The last meeting

of the Working Group for Preparing the Draft Regulation on the Ecological Network was held in March 2024. Despite years of announcements, the process of drafting the Regulation on Appropriate Assessment has not yet begun.

The Bird Protection and Study Society of Serbia reported a total of 26 cases of threats to wildlife and natural habitats in the past year. Among them were 10 cases of poisoning, 11 cases of poaching, three cases of illegal trade and bird keeping, one case of disease and one case of habitat destruction. These figures point to the ongoing presence of significant pressures on nature and highlight the urgent need for institutional responses.

Rangers of protected areas are a key link in the system of preserving the natural heritage of the Republic of Serbia. However, their role is not sufficiently recognized or valued to the extent it deserves, despite their invaluable contribution to the protection of natural assets. There is little public awareness of what their job actually entails, what their responsibilities are and what challenges they face on the ground.

In July 2025<sup>135</sup>, a public call was announced for civil society organizations to join the working group for drafting the Law on Nature Protection. Coalition 27 did not apply, believing that the socio-political circumstances do not allow for a transparent, inclusive and fair law-making process. Coalition 27 holds the view that the Law on Nature Protection should be developed in line with European Union legislation, ratified international agreements, best practices in the field and the specific needs of nature protection in Serbia.

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135 Although the data refers to the period after the reporting period (May 2025), it was added due to the importance (ie, topicality) of the event for the period covered by the report.

# Strategic and Legislative Framework

During the reporting period, the Working Group for the Development of the Nature Protection Program of the Republic of Serbia from 2025 to 2033 met regularly and worked intensively on defining national objectives in line with the Kunming-Montreal Global Biodiversity Framework. Young Researchers of Serbia are the only civil society organization represented in this working group, and the absence of other sectors (the Ministry of Agriculture, Forestry and Water Management, the Ministry of Health, and others) has been noticeable, slowing down the process and affecting the quality of the document. The Nature Protection Program is also to be aligned with the Working Version of the Environmental Protection Strategy of the Republic of Serbia—specifically Pillar IV titled Protection and Investment in Biodiversity and Ecosystems. Despite the held consultations and a public debate in October 2024, this strategy has not yet been adopted. Although UNEP and other international partners are supporting the development of the Nature Protection Program through various means, including financial and technical assistance, the Program still lacks more ambitious targets and stronger integration with other planning documents.

The Government's 2024 Annual Report<sup>136</sup> contains no information about the drafting of the Law on Nature Protection, the Regulation on the Ecological Network and several other regulations whose development has been planned and announced for years. The process of establishing the Working Group for Preparing the Draft Law on Nature Protection began in the first half of 2025.

In November 2024, civil society organizations were invited to submit comments on the Action Plan for closing the final benchmarks in Chapter 27. Numerous comments were submitted regarding the section of the Action Plan related

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136 [https://www.srbija.gov.rs/extfile/sr/879406/izvestaj-o-radu-vlade2024\\_cyr.pdf](https://www.srbija.gov.rs/extfile/sr/879406/izvestaj-o-radu-vlade2024_cyr.pdf)

to nature protection, but they were neither properly interpreted nor accepted by the Ministry of Environmental Protection. The main criticism concerned the consultation process itself, as organizations were invited during the final stage, without a clear explanation of how and why the Ministry selected certain elements of the European Union's Common Position on nature protection to include in the Action Plan, while other equally relevant observations were left out. This approach to consultations has become the Ministry of Environmental Protection's standard practice when engaging the civil society, characterized by a lack of adequate information and very short deadlines for submitting comments.

The reporting period saw no progress in improving the Law on Game and Hunting<sup>137</sup>. Many of the amendments proposed in September 2023, when the Ministry of Agriculture initiated a public consultation on the Draft Law on Amendments to the Law on Game and Hunting, were not adopted. The proposed 2023 amendments aimed, among other things, to strengthen safety measures and oversight of hunting activities. They included the introduction of mandatory training for hunters, to be organized by the Serbian Hunting Association, with a curriculum covering not only theoretical aspects of game management but also safety measures while hunting. The draft also envisioned penalties for violating hunting regulations, as well as stricter sanctions for illegal hunting.

BioNET — the Regional Biodiversity Network — is part of the Biodiversity Task Force of the Western Balkans (BDTF WB), jointly coordinated by the Regional Cooperation Council (RCC) and the International Union for Conservation of Nature (IUCN). In early 2025, information and plans for further work on Pillar V of the Green Agenda for the Western Balkans were shared within this group, and civil society organizations expressed their willingness to cooperate. However, this alone is not sufficient for the effective participation of CSOs in the implementation of the Green Agenda's biodiversity objectives at the regional level. As a result, CSOs submitted a written appeal to the European Commission, RCC and other partners, calling on them to strengthen civil society involvement and allocate more resources for the implementation of the Green Agenda.

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137 Official Gazette of RS, nos. 18/2010, 95/2018 — as amended and 92/2023 — as amended, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2010/18/8/reg>

In May 2025, in cooperation with the Ministry of Environmental Protection, UNDP launched the project Umbrella Program to Support Development of Biodiversity Finance Plans. The project aims to develop a National Biodiversity Finance Plan, which will first assess the current state and root causes of biodiversity loss, identify biodiversity financing gaps and define a plan to direct resources in ways that do not harm biodiversity. It will also explore potential sources of additional funding and improve the efficiency of resource exploitation. The first meeting under this initiative brought together representatives from various stakeholders, including civil society organizations.

Work on the Regulation on the Ecological Network has significantly slowed down. The last meeting of the Working Group for Preparing the Draft Regulation on the Ecological Network was held in March 2024. There were no activities during the reporting period.

Despite years of announcements, the process of drafting the Regulation on Appropriate Assessment has yet to start.

More than fifteen years of work on establishing Natura 2000 in Serbia has not delivered the planned, expected or the desired results. The process began in 2010 through the project Strengthening Administrative Capacities for Protected Areas in Serbia (Natura 2000) — Twinning Project SR 2007/IB/EN-02, and continued through numerous other projects, mostly supported by the EU and other foreign donors. However, the investments and efforts of the Ministry of Environmental Protection and its affiliated organizations and institutions have never been sufficient. As a result, Serbia currently lacks a functional ecological network. This is despite the transposition of the Habitats Directive, which has created legal obligations for managing the ecological network and the implementation of the appropriate assessment.

According to data available on the website of the Ministry of Environmental Protection, five protection acts for areas within the territory of the Republic of Serbia were adopted during the reporting period. Four acts established protection for new areas, whereas one act revised the previous protection status of the Golija Nature Park. Among the new protected areas, three larger ones exceeding 10,000 hectares each were designated. The total increase in the

size of protected areas amounts to 23,519 hectares. An overview of the areas for which protection acts were adopted between May 2024 and May 2025 is provided in Table No. XX.

**Table 3:** Areas that were declared protected in the period from May 2024 to May 2025

Name of the area	Category	Surface area	Official Gazette number
<b>Rajac</b> Area of Outstanding Characteristics	Category II	1,772	Official Gazette of RS, no. 68/2024
<b>Mount Rudnik</b> Area of Outstanding Characteristics	Category I	10,018	Official Gazette of RS, no. 99/2024
<b>Veliki Jastrebac</b> Nature Park	Category I	20,034	Official Gazette of RS, no. 98/2024
<b>Vučjanka River Canyon</b> Natural Monument	Category II	49	Official Gazette of RS, no. 10/2025
<b>Golija</b> Nature Park	Category I	75,839 (revision from 75,183)	Official Gazette of RS, no. 88/2024

In December 2024, a public consultation was held on the draft Regulation on the Protection of the Mount Jelica Area of Outstanding Characteristics. The protection acts for this area, which is planned to cover 6,196 hectares, had not been adopted at the time of this report's preparation. Additionally, during the reporting period, the protection procedure was initiated for six new areas: Hadži-Prodan's Cave Natural Monument, Veliki Rzav Special Nature Reserve, Srednja Mostonga Area of Outstanding Characteristics, Zlatar Special Nature Reserve, City Park in Bačka Topola Natural Monument, and Povlen and Sušica Canyon Area of Outstanding Characteristics.

According to data from the Central Register of Protected Natural Assets<sup>138</sup>, last updated on February 24, 2025, the protected areas in the Republic of Serbia cover a total surface of 826,757 hectares. This represents 9.34% of the country's total territory.

138 <https://zzps.rs/%d1%86%d0%b5%d0%bd%d1%82%d1%80%d0%b0%d0%bb%d0%bd%d0%b8-%d1%80%d0%b5%d0%b3%d0%b8%d1%81%d1%82%d0%b0%d1%80-%d0%b7%d0%b0%d1%88%d1%82%d0%b8%d1%9b%d0%b5%d0%bd%d0%b8%d1%85-%d0%bf%d1%80%d0%b8%d1%80%d0%be/>

In April 2024, the total size of protected areas was 765,527 hectares (8.65%), which means that the increase in protected areas over the past year, according to data from the Central Register, amounted to approximately 65,000 hectares. Based on the available information, it is not possible to precisely determine the reason for the discrepancy between the data from the Central Register and the data published on the website of the Ministry. However, it can be assumed that the Register has since been updated and corrected with respect to some of the previously protected areas.

## Implementation of Regulations

Effective environmental governance and preservation of natural resources of the Republic of Serbia should be grounded in the competent functioning of institutions, enforcement of legislation, adherence to procedures and the application of scientific data and expert opinions. The institutional capacity of the Ministry of Environmental Protection in the field of nature protection is inadequate. This also applies to both the provincial and national institutes for nature protection, which face a shortage of qualified personnel and lack adequate technical resources, significantly hindering the implementation of environmental regulations.

In February 2025, a group of more than 30 organizations called for accountability from the Ministry of Environmental Protection and the Institute for Nature Conservation of Serbia regarding the Decision on Nature Protection Conditions for Establishing the Scope and Contents of the Environmental Impact Assessment Study for the Project for the Underground Exploitation of Lithium and Boron Deposits – Jadar. The decision was issued on August 21, 2024, at the request of the company Rio Sava, by the Institute for Nature Conservation of Serbia. Following the publication of information by the

Center for Investigative Journalism of Serbia (CINS), the public was presented with confirmation of their concerns that the nature protection conditions for the Jadar Project were prepared in violation of established standards, altered and adopted without the consent of certain experts employed at the Institute and that they are aligned with the interests of the company—at the expense of nature and the citizens of Serbia.

While understanding the complexity of procedures involved in project approvals, we believe that the fundamental responsibility of the Institute is to, through the issuance of decisions on nature protection conditions, comprehensively present all available information regarding the presence of natural values in the respective area, without resorting to selective identification of only “some of the more significant species”. The Institute must assess potential impacts and propose appropriate protection measures. The principles of prevention, precaution and conservation of natural values, as defined by the Law on Environmental Protection<sup>139</sup>, require that natural values be identified and listed, and that every potential impact on them be evaluated in accordance with the best available scientific knowledge, without compromise.

It is deeply concerning that the management of the Institute for Nature Conservation of Serbia disregards the knowledge and professional opinions of its employees and, driven by political decisions, undermines long-standing practices that have been developed over the years, thereby significantly endangering the nature of the Republic of Serbia and its citizens.

Management of protected areas remains a significant challenge, with numerous issues being addressed slowly. As noted in previous reports, the main problems in protected area management include: the misalignment of lower-level spatial plans and other sectoral documents with the legal act declaring the protected area; insufficient cooperation between supervisory authorities and

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139 Official Gazette of RS, nos. 135/2004, 36/2009, 36/2009 — as amended, 72/2009 — as amended, 43/2011 — Decision of the Constitutional Court, 14/2016, 76/2018, 95/2018 — as amended, 95/2018 — as amended and 94/2024 — as amended, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/135/8/reg>

the managers of protected areas, ecological network areas and areas beyond, as well as inadequate punitive policy; insufficient capacities at all levels for the implementation of regulations, monitoring, and management; and inadequate organizational form and system of financing and management of protected areas, ecological networks, and species.

Although the Law on Nature Protection<sup>140</sup> recognizes protected area rangers as official personnel, in practice they are often marginalized and insufficiently protected, particularly when dealing with economic offenses and criminal acts within protected areas. Rangers are frequently unable to detect and respond to harmful activities in nature in a timely and appropriate manner. In addition to professional expertise, technical equipment is crucial, including field vehicles, communication devices, GPS units, cameras, and protective gear, in order for rangers to perform their duties effectively. Close cooperation with inspection services and the police is also essential for preventing illegal activities that threaten natural values. According to the current Rulebook on the Conditions to Be Fulfilled by the Manager of Protected Area<sup>141</sup>, one ranger is expected to cover up to 3,000 hectares. Although this requirement is formally met in most cases, in practice, a single ranger cannot ensure continuous presence and supervision across an entire area throughout the day. This challenge becomes even more pronounced in difficult-to-access terrain, where there is a heightened need for a greater number of trained and properly equipped rangers.

In the reporting period, there were no significant activities on establishing the European ecological network, Natura 2000, in Serbia.

According to the EU Birds Directive, Serbia is obliged to harmonize its legislation, which includes reducing hunting activities targeting endangered bird species. Expert organizations have pointed out that populations of certain bird species classified as game are in decline. For example, the proposed strict moratorium on the hunting of the European turtle dove (*Streptopelia turtur*) led to a temporary hunting ban from 2021 until August 2024. The Bird Protection

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140 Official Gazette of RS, nos. 36/2009, 88/2010, 91/2010 — corr., 14/2016, 95/2018 — as amended and 71/2021, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/36/9/reg>

141 Official Gazette of RS, no. 85/2009, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2009/85/2/reg>

and Study Society of Serbia has assessed that only the shortening of the hunting season for quail and the three-year moratorium on turtle dove hunting have shown some positive results. However, the organization emphasizes that there is still no clear management plan for these species in Serbia.

Civil society organizations and ornithologists emphasize the need to permanently protect other game species whose populations are severely threatened. Among them are the lesser white-fronted goose (*Anser erythropus*), whose global population has declined by nearly 80%, the common pochard (*Aythya ferina*), and the garganey (*Anas querquedula*). Previous initiatives of the Coalition of NGOs for Bird Protection and of the Birdsong Project highlight the need to amend legislation so that these species are no longer classified as game. Government measures introduced in 2021 imposed temporary hunting bans on certain species (the turtle dove (*Streptopelia turtur*), grey partridge (*Perdix perdix*), and common quail (*Coturnix coturnix*)) effective until 2024. However, upon the expiration of the moratorium, the Forest Directorate of the Ministry of Agriculture failed to announce any further steps. When the moratorium expired, there were still no indications of a permanent hunting ban, even though the turtle dove is listed as a Vulnerable (VU) species on the Red List, with only 49,000–68,000 pairs remaining and a continuing decline in population.

After much postponement, the Brown Bear Population Management Plan in Serbia was adopted on March 14, 2025, for the 2025–2033 period, following a proposal by the Ministry of Environmental Protection<sup>142</sup>. This document aims to conserve and establish a stable brown bear population through a series of measures, including population monitoring, reducing human–bear conflicts, compensating for damages caused by the species and raising public awareness. The Plan also envisions the establishment of specialized educational and response teams, and its implementation contributes to both national and international obligations of Serbia in the field of nature protection.

In December 2024, during the meeting of the Standing Committee of the Bern Convention, a decision was made to lower the protection status of the wolf,

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142 <https://www.ekologija.gov.rs/saopstenja/vesti/usvojen-plan-upravljanja-populacijama-mrkog-medveda-za-period-od-2025-do-2033-godine>

reclassifying it from a “strictly protected species” to a “protected species”. The decision was also supported by Serbia, along with around ten other European countries, while Montenegro, Bosnia and Herzegovina, Albania and Monaco opposed it. The reclassification came into effect on March 7, 2025, following the expiration of the three-month period for potential objections. This decision allows countries more flexibility in managing wolf populations, including the possibility of limited culling in cases where wolves pose a risk to livestock or public safety. However, the decision was not based on scientific evidence, which has sparked criticism from the public, the scientific community and organizations working in this field<sup>143</sup>. Despite lowering the degree of protection, the wolf remains a legally protected species in Serbia, with a continued obligation to monitor the population and implement appropriate conservation measures.

For the 2024–2025 period, Coalition 27 was unable to identify specific publicly available data on seizures or investigations related to the illegal trade of taxidermized specimens of strictly protected species in Serbia. To date, institutions have not published (through CITES reports, customs and police reports) information on new incidents of this nature for the specified period. In previous years, cases of smuggling protected tortoises and birds were recorded (for example, customs reports mentioned seizures of birds or tortoises hidden under car seats), but in the sources available for 2024/2025, no specific examples of seizures or initiated investigations have been documented.

Unlike previous years, comprehensive and up-to-date data on the number of environmental inspections conducted in the field of nature protection for 2024 and the first half of 2025 were not publicly available up to and including end of May 2025. However, according to the available 2024 Inspection Report of the Ministry of Environmental Protection<sup>144</sup>, environmental inspectors from the Nature Division conducted a total of 509 inspections across various areas of environmental protection. Of this number, 225 were regular inspections, 241 extraordinary inspections, 23 follow-up inspections, two preventive inspections,

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143 <https://www.wwfadria.org/sr/?16170416/Na-Bernskoj-konvenciji-izglasano-smanjenje-stepena-zatite-vukova>

144 Ministry of Environmental Protection (2025): 2024 Inspection Report – Environmental Inspection Department, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/Godi%C5%A1nji%20izve%C5%Aftaj%20o%20radu%20za%202024%20god%20%20Inspekcija%20zss.pdf>

10 advisory visits and eight inspections of unregistered entities. However, the report does not provide information on whether these inspections were carried out in response to reports submitted by citizens, civil society organizations or other stakeholders, or if they were initiated *ex officio*, based on internal inspection plans. Furthermore, there is still a lack of data on the outcomes of submitted reports – such as the number of measures imposed, misdemeanor or criminal proceedings initiated, or cases dismissed – which hinders a comprehensive analysis of the effectiveness of institutional responses in practice.

From April 2024 to April 2025, the Bird Protection and Study Society of Serbia reported a total of 26 cases of threats to wildlife and natural habitats. Of these, 12 cases were recorded in 2024, and 14 in 2025. Among them were 10 cases of poisoning, 11 cases of poaching, three cases of illegal trade and bird keeping, one case of disease and one case of habitat destruction. These figures point to the ongoing presence of significant pressures on nature and highlight the urgent need for institutional responses.

During the reporting period, the work of the Unit for the Suppression of Environmental Crime and Environmental Protection of the Ministry of Internal Affairs and the competent public prosecutor's offices was significantly improved – more cases were processed within shorter timeframes, and cooperation with civil society organizations was more concrete and effective. In contrast, institutions responsible for nature protection, primarily the Institute for Nature Conservation of Serbia and the Ministry of Environmental Protection, continued the practice of slow responses to reports concerning the discovery of injured or endangered specimens of strictly protected species, as well as to requests related to tagging, telemetry and other research activities. An additional issue is the lengthy procedures for issuing necessary permits, as well as the continued absence of representatives from these institutions at key conferences and expert meetings organized by civil society organizations.

# Financing

Financing in the field of Nature Protection is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

- 1.** Draft and adopt the new Law on Nature Protection in accordance with EU legislation, ratified international agreements, good practices in this area, and the specific needs related to nature protection in Serbia through a transparent and inclusive process.
- 2.** Regulate the appropriate assessment procedure for the ecological network, define biosphere reserve as a category of protected area and prescribe competencies and key conditions for managing such areas through the Law on Nature Protection.
- 3.** Amend the Rulebook on the Declaration and Protection of Strictly Protected Wild Species of Plants, Animals, Fungi, and Mushrooms and the Rulebook on Declaring Closed Hunting Season for the Protected Wild Game Species in order to fully transpose the provisions of the Habitats Directive and the Birds Directive related to hunting.
- 4.** Create and adopt a protocol to precisely determine the sequence and manner of action that the competent authorities need to take when detecting cases of poisoning, as well as other cases of illegal actions against wild species.
- 5.** Form an inter-ministerial working group for protected areas and an ecological network to coordinate work on the development of planning documents, protection studies, management plans, and area protection acts.
- 6.** Adopt the Regulation on Appropriate Assessment and enable its proper implementation.



## Implementation of Regulations

- 7.** Improve the capacities of the sector for nature protection of the Ministry of Environmental Protection and the provincial and national institutes for nature protection, by increasing the number of qualified personnel and technical resources.
- 8.** Continue building the capacities of the police, inspectorates, prosecution and judiciary for the implementation of regulations related to protecting species and habitats in cooperation with professional civil society organizations. Furthermore, strengthen the capacities of the Unit for the Suppression of Environmental Crime and Environmental Protection of the Ministry of Internal Affairs and its coordination with other sectors.
- 9.** Improve the planning and implementation of inspection supervision over protected areas, i.e., ecological network sites.
- 10.** Provide free access to the online database comprising decisions on nature protection conditions issued by the Ministry of Environmental Protection of the Republic of Serbia and the institutes for nature conservation to all interested parties.
- 11.** Improve cooperation with interested parties regarding the implementation of international agreements in the field of nature protection through regular information exchange and consultations.
- 12.** Form a National Council for the Natura 2000 ecological network in order to ensure inter-sectoral cooperation and continuous institutional support.
- 13.** Compile an effectiveness assessment of the management of protected areas, establish mechanisms for monitoring management effectiveness and ensure the availability of reports to the public.

14. Create appropriate, targeted guides for more detailed explanations of the appropriate assessment procedure and practical examples from practice (preferably, illustrations of good and bad practices). Familiarize stakeholders with the appropriate assessment procedure using the guide and supporting materials.
15. Provide public access to the electronic Central Register of Protected Natural Assets and develop its functionalities so that each protected area contains, *inter alia*, a ten-year management plan, annual management programs, and reports on the implementation of the annual management program.



## Financing

16. Maintain regular financing of the activities aimed at establishing the ecological network of the Republic of Serbia and Natura 2000, with full and regular reporting on the activities carried out and the funds spent.
17. Provide greater financial resources from the budget of the Republic of Serbia for managing protected areas, including constant and appropriate funds for hiring new wildlife rangers in protected areas, their training and procurement of necessary equipment.





# **Chemicals Management**

# Overview

Ten years after the signing, the Republic of Serbia finally ratified the Minamata Convention on Mercury in December 2024 by adopting the Law on the Ratification of the Minamata Convention on Mercury.<sup>145</sup> By doing so, it has undertaken the obligation to implement a series of measures in the coming years to align with the provisions of this convention.

Although amendments were made to the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals<sup>146</sup> during the reporting period, the Rulebook has not been fully updated in accordance with Annex XVII of the EU REACH Regulation. In 2024, a ban on synthetic polymer microparticles (microplastics) in certain products was also announced and presented, but by the end of the reporting period, this ban had not yet been officially adopted.<sup>147</sup>

There is a significant delay in the transposition of the EU Directive 2015/863/EU (RoHS III), which restricts the use of four toxic phthalates in electrical and electronic products (such as large and small household appliances, IT and communication equipment, audio and video equipment, electrical and electronic tools, toys, etc.), particularly cables, chargers and headphones which citizens are exposed to on a daily basis, thus increasing the health risks.

With regard to updating regulations related to the classification and labeling of chemicals in line with technical and scientific advancements, positive progress has been made. In early 2025, a new Rulebook on the List of Classified Substances was adopted.

During the reporting period, there were no changes to the Candidate List of Substances of Very High Concern compared to the previous report. Given that

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145 Official Gazette of RS – International Agreements, no. 9/2024

146 Official Gazette of RS, no. 29/2024

147 Chamber of Commerce and Industry of Serbia/Ban on Microplastics by the End of the Year, available at: <https://www.pks.rs/vesti/zabrana-mikroplastike-do-kraja-godine-10725>

the EU list has been updated multiple times in the meantime and currently contains 247 entries, there is a discrepancy of 23 substances compared to the national regulation. This discrepancy limits the right of consumers in Serbia to access information about the presence of these substances in products. On the other hand, the List of Substances of Very High Concern (the so-called SVHC list) is currently fully aligned with the relevant EU list.

As for inspection supervision, according to the 2024 Report on the Work of the Environmental Protection Inspectorate<sup>148</sup> in the section on chemical and biocidal product management, there is no information indicating that any inspections were carried out regarding the enforcement of regulations on the restriction and ban of production, placing on the market and use of chemicals within the scope of their jurisdiction.

During the reporting period, a jurisdictional issue was identified between the Sanitary Inspection of the Ministry of Health and the Environmental Protection Inspectorate of the Ministry of Environmental Protection regarding supervision of the implementation of provisions of the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals, specifically those relating to consumer products. This concerns a very important group of consumer goods that all citizens, especially children, come into contact with on a daily basis, posing a serious health risk. While both inspection bodies claim a lack of jurisdiction, toxic products remain available on the Serbian market.

Information regarding the implementation of all conventions under the jurisdiction of the Ministry of Environmental Protection is not publicly available.

As for the green public procurements, the Public Procurement Office has published model tender documents for certain groups of goods, services and works.<sup>149</sup> However, what is concerning is that the criteria for green public procurements, particularly in the section on technical specifications, are not aligned with the EU GPP criteria defined by the European Commission.

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148 Ministry of Environmental Protection (2025): 2024 Report on the Work of the Environmental Protection Inspectorate, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/Godi%C5%A1nji%20Izve%C5%A1taj%20o%20radu%20za%202024%20god%20%20Inspekcija%20zss.pdf>

149 Model documents GPP/2019 – Public Procurement Office, available at: <https://www.ujn.gov.rs/strucna-pomoc-kancelarije/>

# Strategic and Legislative Framework

Ten years after the signing, **the Republic of Serbia finally ratified the Minamata Convention on Mercury in December 2024** by adopting the Law on the Ratification of the Minamata Convention on Mercury.<sup>150</sup> By doing so, it has undertaken the obligation to implement a series of measures in the coming years to align with the provisions of this Convention. It has been announced that in the upcoming period, a map of contaminated sites will be created, with a special focus on industrial landfills where devices containing mercury have been disposed of for years.<sup>151</sup> In the available statements,<sup>152</sup> representatives of the Ministry note that Serbia implemented six projects from 2014 to 2023 aimed at assessing readiness for acceding to the Minamata Convention. However, detailed information about these projects is not publicly available.

In 2024, the process of developing the new National Environmental Protection Strategy from 2024 to 2033 and the accompanying Action Plan continued. This is the overarching public policy document in the field of environmental protection, which also includes chemicals management. The Ministry of Environmental Protection initiated a public consultation on December 4 which concluded on December 24, 2024. However, **the public presentation of the Draft Strategy was not conducted in accordance with the Aarhus Convention, nor with directives on public participation and strategic environmental assessment.** During the public consultation, ALHem organization submitted comments regarding chemicals management, along with comments from partner organizations forming Coalition 27, only a small number of which were accepted. By the end

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150 Official Gazette of RS – International Agreements, no. 9/2024

151 <https://www.ekologija.gov.rs/lat/saopstenja/vesti/sonja-rogljic-za-srbiju-je-veoma-vazan-zakon-o-potvrdivanju-minamata-konvencije-o-zivi>

152 <https://www.ekologija.gov.rs/lat/saopstenja/vesti/sonja-rogljic-za-srbiju-je-veoma-vazan-zakon-o-potvrdivanju-minamata-konvencije-o-zivi>

of the reporting period for this year's Shadow Report, the new Strategy and Action Plan had still not been adopted.

Although amendments were made to the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals<sup>153</sup> during the reporting period, the Rulebook has not been fully updated in accordance with Annex XVII of the EU REACH Regulation. The list of restrictions and bans on the production, placing on the market and use of certain hazardous substances, mixtures or products currently contains 77 entries,<sup>154</sup> while the European Chemicals Agency's website lists 81. This indicates that the Republic of Serbia has not transposed the latest four bans (synthetic polymer microplastic particles, PFHxA, DMAC and NEP).

In 2024, a **ban on synthetic polymer microparticles (microplastics) in certain products, such as detergents and some cosmetic products, was announced and presented; however, by the end of the reporting period, this ban had not yet been officially adopted.**<sup>155</sup> Once adopted, this ban will align national regulations with Commission Regulation (EU) 2023/2055 of September 25, 2023 amending Annex XVII to Regulation (EC) No. 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles.

**We emphasize that there is a significant delay in the transposition of the EU Directive 2015/863/EU (RoHS III), which restricts four toxic phthalates in electrical and electronic products** (such as large and small household appliances, IT and communication equipment, audio and video equipment, electrical and electronic tools, toys, etc.), and particularly cables, chargers and headphones that we come into contact with on a daily basis. In this regard, in October 2024, ALHem submitted an advocacy initiative to the Ministry of Environmental Protection calling for the transposition of this Directive into national legislation. The initiative was supported by 15 civil society organizations from Serbia.

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153 Official Gazette of RS, no. 29/2024, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2013/90/1/reg>

154 Official Gazette of RS, no. 29/2024, available at: <https://reg.pravno-informacioni-sistem.rs/api/Attachment/prilozi/437081/p1-d1.htm>

155 <https://www.pks.rs/vesti/zabrana-mikroplastike-do-kraja-godine-10725>

Despite the initiative being accompanied by an informational campaign, no statements whatsoever have been issued by the Ministry in respect thereof. As a result, **even though six years have passed since the restriction on the four phthalates in electrical and electronic products became mandatory in the EU, products containing these toxicants can still legally be found in the Serbian market, a fact confirmed by ALHem's laboratory testing results in 2024.**<sup>156</sup>

With regard to updating regulations related to the classification and labeling of chemicals in line with technical and scientific advancements, positive progress has been made. In early 2025, a **new Rulebook on the List of Classified Substances was adopted.**<sup>157</sup>

In cooperation with the European Food Safety Authority (EFSA), the European Chemicals Agency (ECHA) published an updated version of the Guidance on the Application of CLP Criteria on November 13, 2024, following consultations with stakeholders. The update includes guidelines on new hazard classes. The Guidance is particularly important for Serbian exporters of substances to the EU, as the application of the new hazard classes for new substances placed on the EU market became mandatory as of May 1, 2025, and for new mixtures it shall become mandatory as of May 1, 2026. At this time, it is not known when the revised EU CLP Regulation is planned to be transposed into national legislation.

As before, we emphasize that the regular harmonization of regulations governing the classification, labeling and packaging of chemicals with EU regulations is extremely important, given that delays in updating them result in deviations of data on harmonized classified substances in Serbia and the EU, which can lead to inconsistent application of regulations to the same substances and mixtures. Such discrepancies contradict the core objective of the GHS system – that chemicals are classified and labeled according to the same rules on all markets, i.e., in the same way – and may hinder imports as well as jeopardize the protection of human health and the environment.

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156 Soft Plastic, Harsh Truth 2, available at: [https://alhem.rs/wp-content/uploads/2013/12/A4\\_2024\\_serbia\\_report-for-print-in-printing-place.pdf](https://alhem.rs/wp-content/uploads/2013/12/A4_2024_serbia_report-for-print-in-printing-place.pdf)

157 Official Gazette of RS, no. 11/2025, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2023/41/1>

During the reporting period, there were no changes to the **Candidate List of Substances of Very High Concern** compared to the previous report. Given that the EU list has been updated multiple times in the meantime and currently contains 247 entries, **there is a discrepancy of 23 substances compared to the national regulation**. This discrepancy limits the right of consumers in Serbia to access information about the presence of these substances in products.

On the other hand, the List of Substances of Very High Concern (the so-called SVHC list) is currently fully aligned with the relevant EU list.

In early 2025, the following by-laws in the field of biocidal products were updated:<sup>158</sup>

1. Program for Inclusion of Active Substances in List I and List Ia;
2. List of Active Substances To Be Included in the Program for Inclusion of Active Substances in List I or Ia;
3. List of Biocidal Products Registered in the Biocidal Products Register in 2023;
4. List of Active Substances in Biocidal Products;
5. List on Amendment to the List of Active Substances in Biocidal Products.

In terms of administrative capacities for implementation of regulations, there were no significant changes compared to the previous period.

The legislative framework must be further developed – both through additional harmonization with the new EU regulations, making amendments to the existing regulations, as well as strengthening the capacities necessary for their implementation.

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158 Official Gazette of RS, no. 11/2025

# Implementation of Regulations

The Department of Chemicals at the Ministry of Environmental Protection is responsible for tasks related to the implementation of administrative procedures in the field of chemicals management. The prescribed administrative procedures are carried out on a regular basis, but taking into account the scope and content of the documentation required by these procedures, as well as the confidentiality of certain data, the system must be continuously improved.

As for inspection supervision, based on the 2024 Report on the Work of the Environmental Protection Inspectorate for the area of chemicals and biocidal products management, inspection activities were carried out covering the following: verification of the content and submission of safety data sheets for chemicals and biocidal products; verification of labeling chemicals and biocidal products; control of placing on the market of biocidal products for which a decision on inclusion in the Temporary List of Biocidal Products Requiring Technical Dossier Submission had previously been issued; control of the inclusion of biocidal products in the Temporary List based on information gathered by the inspectors about unregistered economic operators; and verification of the keeping of the prescribed records on chemicals and their registration in the Chemicals Register.<sup>159</sup> However, the Report contains no information indicating that supervision was carried out regarding the **implementation of regulations on the restriction and ban of the production, placing on the market and use of chemicals within the competence of the Environmental Protection Inspectorate.**<sup>160</sup>

In 2024, ALHem conducted a study on the presence of toxic phthalates in products from the domestic market, with the aim of verifying the implementation of regulations that limit the concentration of the four phthalates in products

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159 Ministry of Environmental Protection (2025): 2024 Report on the Work of the Environmental Protection Inspectorate, available at: <https://www.ekologija.gov.rs/sites/default/files/inline-files/Godi%C5%A1tjaj%20o%20radu%20za%202024%20god%20%20Inspekcija%20zss.pdf>

160 Official Gazette of RS, no. 57/22

intended for general use, specifically, Ban No. 51 from the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals.

The Rulebook stipulates a ban effective as of July 7, 2023, on placing products on the market that contain, individually or in any combination, di(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP) and diisobutyl phthalate (DIBP) in a concentration equal to or greater than 0.1% by mass in the plasticized material of the product. These substances are classified in accordance with chemical regulations as reproductive toxicants (category 1B) and they possess endocrine-disrupting properties.

As part of the study, a laboratory testing was conducted on 30 products purchased on the domestic market in Belgrade retail stores. These products were mostly made of soft PVC plastic and included items such as children's backpacks, raincoats, cosmetic bags, household and recreational items. The laboratory analysis was carried out at the Institute of Public Health of Serbia Dr Milan Jovanović Batut, using an accredited method for testing the presence of the respective phthalates.

**The results showed that out of 30 tested samples, phthalates (most commonly DEHP) were found in 19 samples (63% of the total number) in concentrations ranging from 0.15% to as high as 50% (w/w).** Although the number of tested samples was limited, the percentage of positive samples is very high, and the concentrations of toxic phthalates found in them exceeded the permitted limit by up to 500 times. The findings were published in a Report available on the ALHem's official website.<sup>161</sup>

**In October 2024, with the support of 15 civil society organizations from Serbia, ALHem submitted a complaint regarding non-compliant products, accompanied by the research findings and detailed information on the products, to the Sanitary Inspection of the Ministry of Health.** According to Article 86 of the Law on Chemicals,<sup>162</sup> a sanitary inspector is responsible for

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161 Soft Plastic, Harsh Truth 2, available at: [https://alhem.rs/wp-content/uploads/2013/12/A4\\_2024\\_serbia\\_report-for-print-in-printing-place.pdf](https://alhem.rs/wp-content/uploads/2013/12/A4_2024_serbia_report-for-print-in-printing-place.pdf)

162 Official Gazette of RS, nos. 36/2009, 88/2010, 92/2011, 93/2012 and 25/2015, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/36/5/reg>

supervision of the implementation of restrictions and bans on the production, placing on the market and use of chemicals and products intended for general use. The complaint requested urgent action to initiate extraordinary inspection supervision with the aim of removing non-compliant products from the market and initiating a product recall from consumers; submitting information on the non-compliant products and the measures taken to the Ministry of Trade, which is responsible for managing the NEPRO rapid alert system for unsafe products in the Republic of Serbia, so that the information can be entered into the NEPRO database and made publicly available to Serbian citizens; as well as planning targeted inspections to monitor compliance with Ban No. 51 in the next annual inspection work plan.

However, **the Sanitary Inspection declared itself not competent for this group of products** and forwarded the complaint to the Market Inspection, which in turn referred it to the Environmental Protection Inspectorate. **Upon reviewing the documentation, the Environmental Protection Inspectorate concluded that only one out of the 30 tested products (a car floor mat) fell under its jurisdiction. It then conducted an inspection, removed the product from the market and initiated misdemeanor proceedings before the Basic Public Prosecutor's Office.** Additionally, information about this non-compliant product and the measures taken by the inspectorate was entered into the NEPRO database.

For all other non-compliant products, the Environmental Protection Inspectorate informed ALHem that it was not competent and that the complaint had been forwarded back to the Sanitary Inspection of the Ministry of Health. Thus, **after five months of being passed between institutions, the complaint ultimately returned to its starting point – the Sanitary Inspection of the Ministry of Health.**

Although a meeting was held between the Environmental Protection Inspectorate and the Sanitary Inspection, **ALHem has yet to receive a clear and concrete response regarding which authority is competent for the group of non-compliant consumer products in question.**

Given that all three inspection bodies involved in the enforcement of the Law on Chemicals declared themselves not competent for this group of products (with the exception of one), ALHem addressed the **Coordination Commission for Inspection Supervision** in early May 2025. This interdepartmental body is tasked with “monitoring the level of coordination among inspections, initiating measures, establishing guidelines and issuing instructions to improve inspection coordination and the effectiveness of inspection supervision and monitoring their implementation”. ALHem called on the Commission to take action in resolving the issue of jurisdiction over the enforcement of chemical bans and restrictions for this highly important group of consumer products, in order to reduce risks to public health and the environment in Serbia. To date, the Commission has not responded to this request.

**While the inspection bodies continue to declare themselves not competent, toxic soft plastic products remain available on the Serbian market.**

## Projects

In 2023, the Ministry of Environmental Protection initiated a project called Further Strengthening of National Capacities for Risk Management of Hazardous Substances Throughout Their Life Cycle, which was financed by the UNEP Special Programme. The agency responsible for the implementation of this project is the United Nations Development Programme (UNDP).

The previous report provided a more detailed overview of the planned activities within the project. However, during the current reporting period, neither the Ministry of Environmental Protection nor UNDP Serbia published any new information regarding the progress in the implementation of project activities.

Information related to the implementation of all conventions under the jurisdiction of the Ministry of Environmental Protection is not publicly available. It is necessary to ensure public access to all information concerning the Stockholm, Minamata, Basel and Rotterdam Conventions.

## Consumer Products

The Rulebook on Establishing the Program for Health Safety Monitoring of Consumer Goods for the year 2024 envisages the inspection of the same number of consumer products as in the previous year – a total of 1,662 samples. Supervision includes products that may contain substances defined in the regulations on bans and restrictions in line with the Law on Chemicals, the Law on the Health Safety of Consumer Goods and corresponding by-laws. The planned inspection supervision includes testing of:

- 1.** children's toys made of polymer materials and combinations of polymer and other materials – a total of 1,074 samples – in order to examine irregularities in the declaration, deviations from the fastness of colors, and the presence of plasticizers (phthalates); and
- 2.** cosmetic products – a total of 298 samples, with the aim of examining irregularities in the declaration, the concentration of preservatives and microbiological defects.

Compared to the previous year, the 2024 plan foresees an increase in the number of analyzed samples of children's toys, while at the same time there has been a decrease in the number of inspected samples of cosmetic products.

In cases where testing reveals the presence of physical, chemical or biological contaminants, or non-compliance with the prescribed values, the sanitary inspector undertakes appropriate measures in accordance with the law. These measures include withdrawal of the product from the market and banning its further distribution. Products withdrawn from the market due to identified chemical risks should be publicly disclosed within the NEPRO system – the national rapid alert system for unsafe products in the Republic of Serbia. This system is an integral part of the market surveillance system and serves the purpose of providing consumers with better protection from unsafe products, while also educating all market participants and raising awareness of the importance of product safety.

**According to data from the NEPRO database, a total of nine products were withdrawn from the market due to chemical risk in 2024. In the period from the beginning of 2025 to the end of May of the same year, two additional products were withdrawn for the same reason.**

The 2024 Annual Report of the Sanitary Inspection Department of the Ministry of Health reveals that, based on information received through the RAPEX system, 15 products were withdrawn from the Serbian market due to chemical risks to consumer health. However, this number does not correspond with the number of product withdrawals recorded in the NEPRO database, indicating a lack of consistency between notification and record-keeping systems among the competent state authorities.

The Institute of Public Health Dr Milan Jovanović Batut prepares an Annual Report on the Health and Safety of Consumer Goods in the Republic of Serbia, which should be publicly available on the Institute's official website so as to comply with transparency and public interest needs. However, since 2021, these reports are no longer publicly available, and the reasons for this lack of access are unknown.

## Green public procurements

Although the field of public procurements falls under Chapter 5, it is important to emphasize that green public procurements are a significant economic instrument that can contribute to economic development while reducing environmental impact throughout the entire life cycle of products. The implementation of green public procurements in the public sector could improve communication about hazardous substances in products, thereby reducing risks to human health and the environment.

The Draft Environmental Protection Strategy – Green Agenda for the Republic of Serbia for 2024-2033 includes a review of green public procurements and recognizes their importance for the circular economy, but also notes that this area is not sufficiently developed. The Public Procurement Office has adopted a Rulebook on the Types of Goods for Which the Contracting Authorities Are

Obligated to Apply Environmental Aspects in Public Procurement Procedures<sup>163</sup> covering five product groups (photocopier paper, computer equipment, office electronic equipment, air conditioners and cleaning products). Additionally, it prescribes that the share of procurement items with environmental aspects in public procurement procedures for goods must be at least 10% of the total subject of the public procurement.

Until now, the Law on Public Procurement allowed contracting authorities to use quality criteria but did not obligate them to do so. With this Rulebook entering into force, green public procurements became mandatory as of January 1, 2024. This means that contracting authorities will no longer be able to use price as the sole criterion for awarding contracts for certain product categories. The selection of the bid will also be influenced by a range of environmental aspects such as product lifespan, maintenance costs, water and electricity consumption and recycling of goods once they become waste.

The Public Procurement Office published model tender documents for certain groups of goods, services, and works,<sup>164</sup> but **what is disconcerting is that the criteria for green public procurements, especially in the part thereof related to technical specifications, are not aligned with the EU GPP criteria as defined by the European Commission.**<sup>165</sup> For example, in the procurement of cleaning products or cleaning services for buildings, the model tender documentation proposes holding of an ecolabel as a criterion instead of criteria such as toxicity to aquatic organisms and the prohibition/restriction of substances classified under certain hazard classes (in accordance with chemicals management regulations). According to the EU Guidance, the EU Ecolabel or another Type 1 ecolabel is used only as one of the proofs of compliance with the specified criteria. A criterion defined in the abovementioned manner could lead to discrimination against suppliers (especially domestic manufacturers of cleaning products) whose products meet the EU GPP criteria for technical

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163 Official Gazette of RS, no. 115/2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/drugidrzavniorганиorganizacije/pravilnik/2023/115/5/reg>

164 Model documents GPP/2019 – Public Procurement Office, available at: <https://www.ujn.gov.rs/strucna-pomoc-kancelarije/>

165 GPP Criteria and Requirements – European Commission, available at: [https://green-forum.ec.europa.eu/green-business/green-public-procurement/gpp-criteria-and-requirements\\_en](https://green-forum.ec.europa.eu/green-business/green-public-procurement/gpp-criteria-and-requirements_en)

specifications, but do not possess a Type 1 ecolabel. Therefore, it is necessary to harmonize the green criteria in the model tender documents with the EU Guidance for GPP criteria.

**The effective establishment of a green public procurement system in the Republic of Serbia would have great significance for creating a sustainable economy, promoting the circular economy, fostering innovation and improving the quality of life for all citizens in Serbia.**

## Financing

Financing in the field of Chemicals Management is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

- 1.** Continue with the development of the legislative framework through further harmonization of regulations by taking into account new EU regulations and amendments to the existing ones, as well as by strengthening the capacities necessary for their implementation.
- 2.** Update the National Implementation Plan for the implementation of the Stockholm Convention and the Action Plan.
- 3.** Adopt the Law on the Implementation of the REACH Regulation.
- 4.** Adopt the Law on the Implementation of the BPR Regulation.
- 5.** Harmonize the Rulebook on the List of Electrical and Electronic Products, Measures Restricting or Prohibiting the Use of Electric and Electronic Equipment Containing Hazardous Substances, the Manner and Procedure for Management of Waste Originating from Electrical and Electronic Products with EU Directive 2015/863/EU (RoHS III), as well as relevant provisions of the Law on Waste Management.



## Implementation of Regulations

- 6.** Strengthen administrative and professional capacities in this area, especially the registration of chemicals and biocidal products in the Register, statistical analysis of collected data, management of biocidal products, creation of guides and guidelines for the info desk and instructions for inspection supervision.

- 7.** Make data from the Chemicals Register on the number of reported chemicals by hazard class available on the website of the Ministry of Environmental Protection and update them regularly on an annual basis.
- 8.** Establish a joint body for the integrated management of chemicals in order to establish satisfactory cooperation and coordination between all relevant sectors and ensure the safe management of chemicals throughout the entire life cycle — that is, the adoption and implementation of the Integrated Chemicals Management Program. The joint body should consist of representatives of competent state authorities in the field of chemicals management and representatives of the industry, scientific researchers and non-governmental organizations.
- 9.** Strengthen inspection supervision over chemical and biocidal product control activities by strengthening the capacities of the inspection bodies themselves and increasing the number of inspection supervisions. Supervise the implementation of Article 27 of the Law on Chemicals, protect the rights of consumers and check compliance with the bans and restrictions on chemicals, i.e., non-consumer goods.
- 10.** Strengthen inspection supervision over the implementation of the Law on Consumer Goods by strengthening the capacities of the inspection bodies themselves and increasing the number of inspection supervisions, as well as the capacity for entering unsafe products from the market into the NEPRO rapid alert system for unsafe products, in order to ensure adequate information for citizens about the products withdrawn from the market due to chemical risks.

- 11.** Improve the information available on the Chemicals Info Desk by posting the guides and guidelines of the European Chemicals Agency, which are used in practice and which are insisted on within the training and exams for chemicals advisers, in the Serbian language, as well as the administrative procedure itself and the section with the most frequently asked questions.
- 12.** Make the information in the NEPRO rapid alert system for unsafe products publicly available and update it regularly.
- 13.** Make the information on the implementation of all conventions under the jurisdiction of the Ministry of Environmental Protection publicly available.
- 14.** 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 for monitoring the market placement and use of chemicals, their metabolites and the path of chemicals in the environment and living organisms.
- 15.** Publish updated data from the Chemicals Register on the entry of substances of concern and assess whether the risk reduction measures applied by businesses are sufficient to control the risk these chemicals pose.
- 16.** Harmonize the jurisdiction between the Sanitary Inspection and the Environmental Protection Inspectorate regarding the supervision of the implementation of the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals, which applies to a specific group of consumer products for which both inspections have declared themselves not competent.

- 17.** Post information on the Chemicals Info Desk clearly indicating the sequence and date of each amendment to the regulation related to the classification, packaging and labeling of chemicals in accordance with the relevant ATP. This information is of key importance for international companies operating in Serbia and the EU, as it enables them to track progress and harmonize labels of chemicals and products that often apply to multiple markets simultaneously, including Serbia.



## Financing

- 18.** Amend the domestic system governing the collection of fees and charges by adopting the EU model of financing the system for the management of chemicals and biocidal products to ensure that the fees for regulatory procedures regarding chemicals and biocidal products are used to improve the chemicals and biocidal products management system.
- 19.** Secure financial resources for strengthening the administrative and professional capacities of the Department of Chemicals in the Ministry, as well as the inspection authorities that control compliance with the Law on Chemicals and the new Law on Biocidal Products, so that administrative procedures can be carried out without breaking deadlines, bearing in mind their scope and complexity.



# CHEMICALS MANAGEMENT

## Phthalates attack our health, **BUT WHO ATTACKS THE PHTHALATES?**

Phthalates in  
concentrations exceeding  
0.1% were found in  
**19 out of 30**  
samples.

i.e. in  
**63%**  
of the tested  
products



children's raincoats contain

**AS MUCH AS 50%  
OF PHTHALATES**

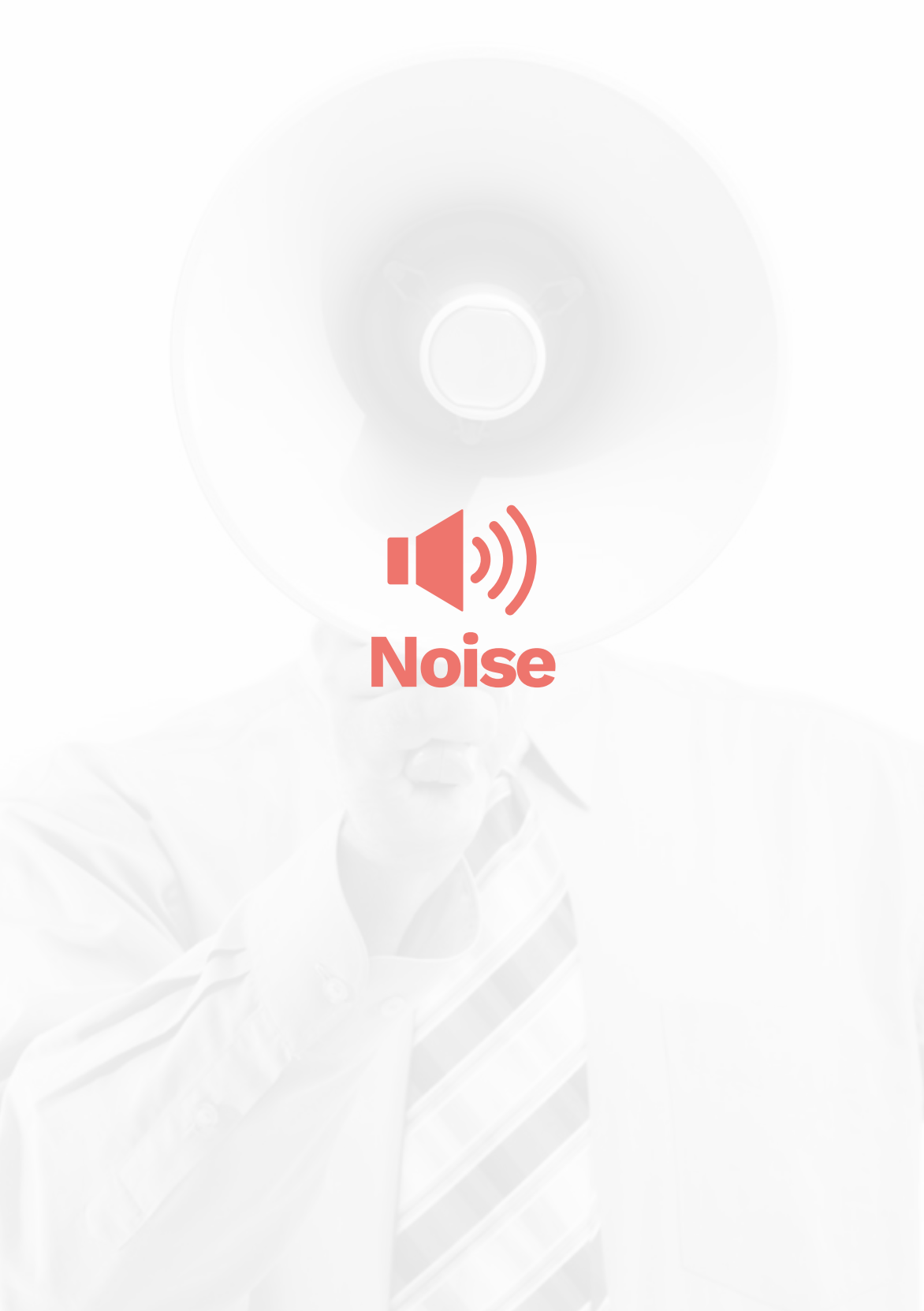
### **LIST OF PRODUCTS WITH IDENTIFIED PRESENCE OF PHTHALATES:**

children's raincoat » cosmetic bags » children's backpacks »  
faux leather and PVC foils » anti-slip bathroom mat » boxing gloves

Source: Mart V, Randelović J, Brabcova K, Moller M. Soft Plastic, Harsh Truth 2, ALHem, 2024:  
<https://amika.org/en/publications/soft-plastic-harsh-truth-2>



KOALICIJA 27



**Noise**

# Overview

Minimum progress was recorded in the field of noise protection. There is still no continuous noise monitoring in Serbia – 24 hours a day, 365 days a year – only indicative monitoring. Although the Law on Environmental Noise Protection (which came into force in October 2021) set a one-year deadline for the adoption of by-laws, only four out of a total of seven had been adopted by the end of May 2025. The by-laws that would define in detail the methods for assessing noise indicators, determining acoustic zones and managing the noise information system have still not been enacted.

Article 40 of the Law set a deadline of June 30, 2024, for the development and adoption of strategic noise maps for agglomerations and major roads, railways and airports. However, this obligation has so far been fulfilled only by Novi Sad, JSC Serbian Railways Infrastructure, PC Roads of Serbia and JSC Nikola Tesla Airport Belgrade. Although the Strategic Noise Maps for the Niš agglomeration were completed in 2019, they still have not been adopted.

The City of Belgrade has initiated the process of developing strategic noise maps and an action plan. Kragujevac has carried out only noise level monitoring activities.

Only 51 local self-government units have conducted environmental noise monitoring and submitted data to the Environmental Protection Agency.

The Republic of Serbia has still not set about addressing the problem of environmental noise. None of the agglomerations or local self-government units have started implementing measures aimed at reducing environmental noise levels.

Strategic and Legislative Framework

The new Law on Environmental Noise Protection<sup>166</sup> was adopted in October 2021. Full compliance with EU legislation is expected after the adoption of all regulations, which should be drafted in accordance with Directive 2015/996 (CNOSSOS-EU). The new Law calls for a total of 7 regulations, which should have been adopted by October 2022 at the latest. However, only 4 have been adopted so far. During the period from April 2024 to the end of May 2025, no new by-laws were enacted, while the preceding period saw the adoption of the Rulebook on the Content and Method of Development of Strategic Noise Maps and Action Plans, the Manner of Their Presentation to the Public, and Their Forms,<sup>167</sup> the Rulebook on the Conditions To Be Fulfilled by a Professional Organization for Environmental Noise Measurement and Documentation To Be Submitted with the Application for Acquiring the Authorization for Noise Measurement, Permit Procedure, Content of Permits and the Content, Scope, and Validity Period of Noise Measurement Reports,<sup>168</sup> the Rulebook on the Methods of Noise Measurement, Content, and Scope of the Environmental Noise Measurement Reports<sup>169</sup> and the Rulebook on the Conditions to Be Met by a Municipal Police Officer to Measure Noise from Hospitality Establishments.<sup>170</sup> By-laws prescribing the methodology for defining acoustic zones, the methodology for developing and maintaining the information system, as well as the regulation that would define in detail noise indicators, limit values, methods for assessing noise indicators, disturbance and the harmful effects of environmental noise on human health, have not yet been adopted.

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166 <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2021/96/5/reg>

167 [https://www.ekologija.gov.rs/sites/default/files/2023-10/pravilnik\\_o\\_sadrzini\\_i\\_metodama\\_izrade\\_strateske\\_karte\\_buke\\_i\\_akcionog\\_plana\\_nacinu\\_njihove\\_izrade\\_i\\_prikazivanja\\_javnosti\\_kao\\_i\\_o\\_njihovim\\_obrascima\\_-\\_sluz.pdf](https://www.ekologija.gov.rs/sites/default/files/2023-10/pravilnik_o_sadrzini_i_metodama_izrade_strateske_karte_buke_i_akcionog_plana_nacinu_njihove_izrade_i_prikazivanja_javnosti_kao_i_o_njihovim_obrascima_-_sluz.pdf)

168 [https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik\\_o\\_uslovima\\_koje\\_mora\\_da\\_ispunjava\\_strucna\\_organizacija\\_za\\_merenje\\_buke\\_u\\_zivotnoj\\_sredini\\_-\\_sluzbeni\\_glasnik\\_rs\\_br\\_139-22.pdf](https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik_o_uslovima_koje_mora_da_ispunjava_strucna_organizacija_za_merenje_buke_u_zivotnoj_sredini_-_sluzbeni_glasnik_rs_br_139-22.pdf)

169 [https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik\\_o\\_metodama\\_merenja\\_buke\\_sadrzini\\_i\\_obimu\\_izvestaja\\_o\\_merenju\\_buke\\_u\\_zivotnoj\\_sredini\\_-\\_sluzbeni\\_glasnik\\_rs\\_br\\_139-22.pdf](https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik_o_metodama_merenja_buke_sadrzini_i_obimu_izvestaja_o_merenju_buke_u_zivotnoj_sredini_-_sluzbeni_glasnik_rs_br_139-22.pdf)

170 <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2021/132/8>

# Implementation of Regulations

In 2024, the **City of Belgrade** conducted regular noise monitoring in accordance with the Environmental Noise Level Measurement Program.<sup>171</sup> The 2024 Annual Report on the Implementation of the Environmental Noise Level Measurement Program for the Territory of Belgrade<sup>172</sup> was published. The monitoring covered key areas of the city, including residential, commercial and industrial zones. Noise levels were measured at 40 locations, continuously over 24 hours, during the spring and autumn cycles. The Report was prepared in accordance with the applicable Rulebook on the Methods of Noise Measurement, Content and Scope of the Environmental Noise Measurement Reports.<sup>173</sup> In June 2024, a contract was signed for the service of Development of Strategic Noise Maps and the Environmental Noise Protection Action Plan,<sup>174</sup> with a completion deadline of 500 days.<sup>175</sup> These documents are still being developed. Additionally, a Decision on the Development of a Strategic Assessment of the Noise Protection Action Plan for the City of Belgrade<sup>176</sup> was adopted.

In 2024, the **City of Novi Sad** conducted regular noise monitoring in accordance with the Environmental Noise Level Measurement Program for the Territory of the City of Novi Sad for 2022, 2023 and 2024.<sup>177</sup> The 2024 and 2025 Annual Report on the Implementation of the Environmental Noise Level Measurement Program for the Territory of Novi Sad<sup>178</sup> was published. Noise levels were measured at 12 locations, during the spring and autumn cycles. In May 2025, the Environmental Noise Level Measurement Program for 2025,

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171 <https://static.beograd.rs/Binary/7203/Programi-monitoringa-za-2024-2025.-godinu-n.rar>

172 <https://static.beograd.rs/Binary/10698/Godisnji-izvestaji-2024.zip>

173 [https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik\\_o\\_metodama\\_merenja\\_buke\\_sadrzini\\_i\\_obimu\\_izvestaja\\_o\\_merenju\\_buke\\_u\\_zivotnoj\\_sredini\\_-\\_sluzbeni\\_glasnik\\_rs\\_br\\_139-22.pdf](https://www.ekologija.gov.rs/sites/default/files/2023-01/pravilnik_o_metodama_merenja_buke_sadrzini_i_obimu_izvestaja_o_merenju_buke_u_zivotnoj_sredini_-_sluzbeni_glasnik_rs_br_139-22.pdf)

174 <https://jnportal.ujn.gov.rs/tender-eo/177369>

175 <https://jnportal.ujn.gov.rs/contract-eo/551565>

176 <https://sllistbeograd.rs/pdf/2023/61-2023.pdf#view=Fit&page=7>

177 [http://demo.paragraf.rs/demo/combined/Old/t/t2022\\_01/NS\\_001\\_2022\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2022_01/NS_001_2022_001.htm)

178 [https://www.ekourbapv.vojvodina.gov.rs/wp-content/uploads/2025/06/Monitoring-buke-Novi-Sad-2024\\_2025.pdf](https://www.ekourbapv.vojvodina.gov.rs/wp-content/uploads/2025/06/Monitoring-buke-Novi-Sad-2024_2025.pdf)

2026 and 2027<sup>179</sup> was adopted. This program introduces environmental noise level monitoring once a month, conducted continuously over a 24-hour period at eight measurement sites selected as representative of different parts of the city, in accordance with the defined acoustic zones.<sup>180</sup> Reporting is carried out on a monthly basis and for the calendar year.

The Strategic Noise Map of the City of Novi Sad<sup>181</sup> was adopted. The development of the Environmental Noise Protection Action Plan for the City of Novi Sad began in 2024, but has not yet been completed.<sup>182</sup>

The **City of Niš** has adopted the Environmental Noise Level Measurement Program for the Territory of the City of Niš for 2024/2025.<sup>183</sup> It stipulates that only one measuring point with continuous environmental noise level measurement will be established for the purposes of the Program. As a reminder, the Strategic Noise Maps for the agglomeration of the City of Niš<sup>184</sup> were created in 2019. However, the Strategic Noise Maps have not been adopted by the competent authority. After being put on pause since 2021, noise level monitoring was reestablished in November 2024. By the Decision on the Budget of the City of Niš for 2024,<sup>185</sup> funds have been allocated for the development of the Action Plan for the Environmental Noise Protection for the Agglomeration of Niš.

The **City of Kragujevac** adopted the Environmental Noise Level Measurement Program for 2024,<sup>186</sup> as well as for 2025.<sup>187</sup> Environmental noise was measured at six locations, within the acoustic zones, once a month for 24 hours, in two daytime intervals and one evening interval. The Report on the implementation of the Environmental Noise Measurement Program for 2024 is not publicly

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179 <https://environovisad.rs/wp-content/uploads/2025/08/Програм-мерења-нивоа-буке-у-животној-средини-на-територији-Града-Новог-Сада-за-2025-2026.-и-2027.-годину.pdf>

180 [https://novisad.rs/sites/default/files/odluka\\_o\\_odredivanju\\_akustickih\\_zona\\_na\\_teritoriji\\_grada\\_novog\\_sada\\_32-17.pdf](https://novisad.rs/sites/default/files/odluka_o_odredivanju_akustickih_zona_na_teritoriji_grada_novog_sada_32-17.pdf)

181 <https://skupstina.novisad.rs/wp-content/uploads/2023/12/sl-61-2023.pdf?lang=lat>

182 <https://environovisad.rs/wp-content/uploads/2025/08/lzvestaj-za-Program-zzs-2015-2024-do-31.12.2024.pdf>

183 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_05/NIS\\_048\\_2024\\_001.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_05/NIS_048_2024_001.htm)

184 <https://sepa.gov.rs/wp-content/uploads/2024/05/Analiza-stanja-iz-podataka-strateskih-karata-Nis.pdf>

185 <https://www.ni.rs/wp-content/uploads/2024/02/%D0%9E%D0%B4%D0%BB%D1%83%D0%BAa-%D0%BE%D0%B1%D1%83%D1%9F%D0%B5%D1%82%D1%83-2024.docx>

186 [http://demo.paragraf.rs/demo/combined/Old/t/t2024\\_04/KG\\_018\\_2024\\_005.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2024_04/KG_018_2024_005.htm)

187 [http://demo.paragraf.rs/demo/combined/Old/t/t2025\\_03/KG\\_005\\_2025\\_003.htm](http://demo.paragraf.rs/demo/combined/Old/t/t2025_03/KG_005_2025_003.htm)

available, but the summarized data can be found in the Program for 2025. During the observed period, no activities were initiated for the development of Strategic Noise Maps for the city of Kragujevac.

The adopted Environmental Protection Program of the City of Kragujevac for the 2023–2033 period<sup>188</sup> recognizes the problem of environmental noise and sets short-term goals for 2023–2025: creating a strategic noise map and action plan for noise reduction, acoustic zoning of the territory of the City of Kragujevac and improving environmental noise monitoring, but the report on the progress made in preparing these documents is yet to be made publicly available.

Article 40 of the Law on Environmental Noise Protection stipulates that strategic noise maps for agglomerations, main roads, main railway lines and main airports must be developed and adopted no later than June 30, 2024, while noise protection action plans must be adopted no later than one year after the adoption of the strategic noise maps.

So far, the strategic noise maps have been adopted by Novi Sad, JSC Serbian Railways Infrastructure, PC Roads of Serbia and JSC Nikola Tesla Airport Belgrade. No agglomeration or legal entity has adopted action plans yet.

**Table 4:** Status of the development of strategic noise maps and action plans<sup>189</sup>

Agglomeration / Legal entity	Strategic noise maps	Noise protection action plan
Belgrade	NO	NO
Novi Sad	YES	NO
Niš	YES, but not adopted	NO
Kragujevac	NO	NO
JSC Serbian Railways Infrastructure	YES	NO
PC Roads of Serbia	YES	NO
JSC Nikola Tesla Airport Belgrade	YES	NO

188 [https://www.eupropisi.com/dokumenti/KG\\_014a\\_2023\\_001.pdf](https://www.eupropisi.com/dokumenti/KG_014a_2023_001.pdf)

189 <https://www.dri.rs/storage/newaudits/2024-2-SV%20Zastita%20od%20buke%20u%20zivotnoj%20sredini.pdf>

Although the Rulebook on the Conditions To Be Met by a Municipal Police Officer to Measure Noise from Hospitality Establishments was adopted back in 2021, only the municipal police of the City of Belgrade carries out noise measurement control from hospitality establishments, and does so without accreditation.<sup>190</sup>

For the year 2024, a total of 51 LSGs submitted data on noise monitoring in their territories, those being: Ada, Arandjelovac, Babušnica, Bajina Bašta, Bačka Palanka, Bački Petrovac, Beograd, Bor, Valjevo, Vranje, Vršac, Gornji Milanovac, Dimitrovgrad, Žitište, Zrenjanin, Kanjiža, Kikinda, Kladovo, Kovin, Kostolac, Kragujevac, Kraljevo, Kruševac, Kula, Lapovo, Leskovac, Negotin, Niš, Nova Crnja, Novi Bečej, Novi Kneževac, Novi Pazar, Novi Sad, Osečina, Pančevo, Pirot, Požarevac, Ruma, Senta, Sečanj, Smederevo, Sombor, Srbobran, Sremska Mitrovica, Subotica, Temerin, Trstenik, Užice, Čačak, Čoka and Šabac.<sup>191</sup>

The other LSGs did not submit data on noise monitoring within the legally prescribed timeframe, but they did submit statements that they did not perform noise monitoring in their territories, primarily due to lack of funds in their respective budgets.

Three LSGs failed to submit data on noise monitoring or statements confirming they did not perform noise monitoring within the legally stipulated period, those being: Žitorađa, Svilajnac and Rekovac.

The data obtained from noise monitoring may not be used for a comprehensive analysis because the data provided by local self-government units vary significantly in terms of the selection of measurement locations, the length of measurement intervals, the number of annual measurements and the periods when the measurements are conducted (weekday or weekend).<sup>192</sup>

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190 <https://www.dri.rs/storage/newaudits/2024-2-SV%20Zastita%20od%20buke%20u%20zivotnoj%20sredini.pdf>

191 Response of the Environmental Protection Agency to the Request for Access to Public Information, no. 011-00-0000/75/2025-02, dated June 7, 2025.

192 <https://www.dri.rs/storage/newaudits/2024-2-SV%20Zastita%20od%20buke%20u%20zivotnoj%20sredini.pdf>

# Financing

Financing in the field of Noise is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

1. Adopt all by-laws necessary to harmonize the legislative framework with Directive 2002/49/EC.
2. Adopt all by-laws necessary to harmonize the legislative framework with Directive 2015/996 (CNOSSOS-EU).



## Implementation of Regulations

3. Implement acoustic zoning in all local self-government units.
4. Introduce 24-hour continuous noise monitoring and make data available through a unified presentation of automatic noise monitoring.
5. Develop strategic noise maps for the other two agglomerations (Belgrade and Kragujevac), as well as actions plans for all agglomerations, including for main roads, main railways, and main airports.
6. Local self-governments should adopt decisions to allow municipal police officers to conduct noise measurements from hospitality establishments.
7. Implement noise monitoring training (especially at a local level).
8. Introduce local self-government control over the implementation of noise monitoring and submission of noise monitoring results to the Environmental Protection Agency.
9. Assess the harmful effects of noise on human health and the environment.

- 10.** Control whether 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 systems and other devices may exceed the prescribed limit values.
- 11.** Encourage the use of quieter technologies and vehicles through subsidies and incentives for the use of equipment and transportation with lower noise levels.
- 12.** Establish a publicly accessible noise information system.
- 13.** Conduct campaigns together with public information and education programs to raise public awareness about environmental noise.



## Financing

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



# Climate Change

## Overview

Even though the Law on Climate Change was adopted in early 2021, it still cannot be fully implemented, because a substantial number of by-laws are missing. During this reporting period, only one such document was adopted – the Regulation on the List of Authorities and Organizations Responsible for Implementing Adaptation Measures and on the Content and Format of Reports on Implemented Climate Change Adaptation Measures. The adoption of amendments to the Law on Energy in November 2024 marked a step forward in the further development of the electricity market, renewable energy sources, energy storage and mechanisms for integrating decentralized production. However, full implementation of the Law requires the adoption of accompanying by-laws. The Draft Environmental Protection Strategy for the 2024–2033 Period stipulates the introduction of a mechanism for alignment with the greenhouse gas (GHG) emissions trading system and/or the establishment of mechanisms for carbon emission pricing, although it does not set ambitious decarbonization targets. The Low Carbon Development Strategy of the Republic of Serbia 2023–2030 With Projections Until 2050 still cannot be implemented, as the Action Plan has not been adopted, even though the Strategy itself was adopted in June 2023. Despite certain legislative and strategic progress, the share of renewable energy sources in gross final energy consumption in Serbia is declining – from 26.3% in 2020 to 25.43% in 2023, which is far from the 2030 target of 33.6% set in the INECP. The transport sector shows stagnation, with only 0.60% of RES share compared to the target of 3.2%; the heating and cooling sector remains nearly unchanged (35.68% in 2020 and 35.88% in 2023) compared to the target of 41.4%; while the electricity sector shows moderate growth, from 30.7% to 31.75%, still falling short of the 45.2% target.

# Strategic and Legislative Framework

## Law on Climate Change

The Law on Climate Change, which is intended to regulate the system for limiting greenhouse gas (GHG) emissions, introduce a system for monitoring, reporting and verification of these emissions and establish a framework for adaptation to changed climate conditions, was adopted in March 2021, with a one-year deadline for the adoption of all regulations stemming from the Law. By May 2025 (four years after the adoption of the Law), only seven regulations have been enacted, with just one in the past year. The Regulation on the List of Authorities and Organizations Responsible for Implementing Adaptation Measures and on the Content and Format of Reports on Implemented Climate Change Adaptation Measures<sup>193</sup> was adopted in December 2024. This Regulation elaborates on the measures outlined in the Program for Adaptation to Changed Climate Conditions (adopted in December 2023) and establishes a list of authorities and organizations responsible for implementing the adaptation measures contained in the Program, as well as for developing and implementing public policy documents in sectors most affected by climate change and planning documents of the autonomous province and local self-government units. The Regulation stipulates that the identified authorities and organizations must submit a report on the implemented adaptation measures, as well as on occurrences such as floods, extreme temperatures, droughts and others, and on their consequences, to the Ministry of Environmental Protection – Environmental Protection Agency, by March 15 of the current year for the previous year.

193 Official Gazette of RS, no. 101 dated December 20, 2024, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2024/101/10>

In addition to this Regulation, six other pieces of legislation were adopted in the previous years:

- Regulation on the Types of Activities and Greenhouse Gases<sup>194</sup> (adopted in February 2022);
- Regulation on the Types of Data, Bodies, and Organizations and Other Natural and Legal Persons Submitting Data for the Preparation of the National GHG Inventory<sup>195</sup> (adopted in May 2023);
- Rulebook on Verification and Accreditation of Verifiers of Greenhouse Gas Emissions Reports<sup>196</sup> (adopted in November 2021);
- Rulebook on the Content of the National Greenhouse Gas Inventory and the National Greenhouse Gas Inventory Report<sup>197</sup> (adopted in July 2023);
- Rulebook on Fuel Economy Data and CO<sub>2</sub> Emissions from New Passenger Vehicles<sup>198</sup> (adopted in August 2023);
- Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions<sup>199</sup> (adopted in December 2023).

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194 Official Gazette of RS, no. 13 dated February 4, 2022, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2022/13/1/reg>

195 Official Gazette of RS, no. 43 dated May 26, 2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2023/43/7/reg>

196 Official Gazette of RS, no. 107 dated November 12, 2021, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2021/107/6>

197 Official Gazette of RS, no. 55 dated July 7, 2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2023/55/3>

198 Official Gazette of RS, no. 107 dated September 16, 2022, no. 71 dated August 25, 2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2022/107/1/reg>

199 Official Gazette of RS, no. 118 dated December 18, 2023, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2023/118/6/reg>

## Law on Energy

With the aim of harmonizing national legislation with the Fourth Energy Package, the Law on Amendments to the Law on Energy was adopted in November 2024.<sup>200</sup>

The amendments to the Law are, or will be, to a large extent aligned, once the relevant by-laws are adopted, with the following EU regulations:<sup>201</sup> Directive 2019/944, as well as Regulations 2019/941, 2019/942, 2019/943, 2015/1222, 2022/869, 2017/2195, and 2017/219.

The new Law specifically addresses the development of the electricity market, renewable energy sources, energy storage and mechanisms for the integration of decentralized generation.

One of the most significant changes is the removal of the moratorium on the use of nuclear energy in the Republic of Serbia, which had been in place since 1989. The Law envisions the adoption of a **Program for the Development of Peaceful Use of Nuclear Energy**.

It also stipulates the adoption of a **Program for Hydrogen Development and Utilization**, as well as a **Program for the Development of Heat Energy Production and Utilization**.

## Integrating the Electricity Market

A provision on the Nominated Electricity Market Operator (NEMO) has been introduced, enabling the coupling of organized electricity markets in the Republic of Serbia with the unified European organized electricity markets.

200 Law on Amendments to the Law on Energy: Official Gazette of RS, no. 145 dated December 29, 2014, no. 95 dated December 8, 2018 – as amended, no. 40 dated April 22, 2021, no. 35 dated April 29, 2023 – as amended, no. 62 dated July 27, 2023, no. 94 dated November 28, 2024, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2014/145/1/reg>

201 Full harmonization is expected once the Republic of Serbia is an EU Member State.

## Change in Billing for Households and Residential Community Prosumers

Net metering will be abolished no later than December 31, 2026, and will be replaced by net billing. This change applies only to prosumers who acquire this status after December 31, 2026.

## Active Customer

The concept of the active customer has been introduced, primarily for companies. An active customer is defined as a final customer (or a group of final customers) who consumes electricity generated within its premises, stores it, sells it on the market or participates in flexibility services or energy efficiency measures. To obtain this status, the active customer is required to register with the distribution system operator.

## Citizen Energy Communities

An opportunity has been created for natural persons, local self-government units and micro and small businesses located on the territory of the same local self-government to join together in order to secure economic, environmental or social benefits for their members or shareholders. Citizen energy communities may participate in electricity production, including from renewable energy sources, supply, consumption, aggregation, provision of electricity storage services, energy efficiency, electric vehicle charging or the provision of other services to their members. The adoption of two regulations is planned to further define the field of citizen energy communities, within six months from the date of adoption of the law.

## Draft Environmental Protection Strategy

In December 2024, the Ministry of Environmental Protection conducted a public consultation on the Draft Environmental Protection Strategy for the 2024–2033 Period. Once adopted, the Strategy is intended to serve as the overarching public policy document for environmental protection in the

Republic of Serbia. The structure of the Strategy follows the Green Agenda for the Western Balkans, an instrument used to implement the provisions of the Sofia Declaration in the region.

Just like the Green Agenda for the Western Balkans, the Environmental Protection Strategy is structured around five pillars, i.e., general objectives:

- 1.** Contributing to carbon neutrality and increasing resilience to climate change, in line with the Green Agenda;
- 2.** Applying the principles of the circular economy to improve environmental protection and resource efficiency;
- 3.** Improving environmental quality by reducing pollution;
- 4.** Enhancing nature protection, biodiversity conservation and the sustainable use of natural resources;
- 5.** Increasing the contribution of the agri-food sector to environmental protection and resilience to climate change.

In addition to the five pillars of the Green Agenda for the Western Balkans, the Draft Environmental Protection Strategy of the Republic of Serbia includes a sixth general objective (Improving the integrated approach to environmental protection and management in accordance with international and EU standards), which is a horizontal objective, dedicated to enhancing the environmental protection financing system, strengthening capacities at all levels and addressing issues covered by the Aarhus Convention, among others.

The section of the Strategy related to decarbonization and climate change includes two specific objectives: 1) reducing GHG emissions, and 2) increasing resilience to climate change. The Action Plan for this objective of the Strategy contains 18 measures (12 in the field of decarbonization and six related to adaptation to changed climate conditions). The measures and activities cover various aspects, from regulatory measures (e.g., amendments to the Law on Climate Change), to capacity-building and integration of climate change into other sectoral policies (such as energy, transport, construction, agriculture, etc.).

The section of the Draft Environmental Protection Strategy on decarbonization indicates that the document will not introduce new climate policy measures or instruments, nor will it set more ambitious targets than those already defined in previously adopted public policy documents relevant to climate change in the Republic of Serbia. The Strategy adopts the greenhouse gas emission reduction targets from the Low Carbon Development Strategy of the Republic of Serbia 2023–2030. The adaptation targets are aligned with the Program for Adaptation to Changed Climate Conditions for the 2023–2030 Period, while the targets in the fields of energy and mobility have been aligned with the Integrated National Energy and Climate Plan (INECP) for the period up to 2030.

What is new is that the Action Plan accompanying the Draft Strategy stipulates the introduction of a mechanism for alignment with a greenhouse gas (GHG) emissions trading system and/or the establishment of carbon pricing mechanisms. This measure has been directly taken from the Action Plan for the Implementation of the Green Agenda for the Western Balkans. Although at first glance it appears to be a step toward alignment with the EU Emissions Trading System (EU ETS), the measure did not provide concrete steps or precise solutions, but instead set a deadline for 2028. In the meantime, the Draft Strategy does not make it clear whether a strategic decision has been made on whether Serbia will implement a carbon pricing system or establish a GHG emissions trading system comparable to the EU ETS. This creates significant uncertainty for the Serbian economy, making it difficult for businesses to adequately and timely prepare for these measures.

## Just Transition

In the adopted INECP, the planned policy measure is Just Transition Action Plan Monitoring and Revision. In addition to the implementation and monitoring of the Just Transition Action Plan,<sup>202</sup> the INECP does not contain additional, specific

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202 The Action Plan was not adopted during the reporting period. This year, the Ministry of Mining and Energy conducted a public consultation on the Just Transition Action Plan from May 21 to June 10. During the consultation period, only one public presentation was held, it being in Belgrade on June 9. No public presentations were organized in Lazarevac, Obrenovac, Kostolac, Požarevac or other locations whose residents will be most directly and significantly affected by the transition process.

policy measures related to just transition. The Economic Reform Program<sup>203</sup> stipulates that the proposed reforms shall support a just transition through the establishment of a Just Transition Mechanism and a Just Transition Fund aimed at addressing energy poverty and implementing reskilling and upskilling policies in regions traditionally dependent on coal. However, in Serbia, a Just Transition Roadmap has not yet been developed.

## Reform Agenda of the Republic of Serbia

As part of the Reform and Growth Facility for the Western Balkans, the Reform Agenda of the Republic of Serbia was adopted in October 2024. It includes an entire section dedicated to the Green and Digital Transition, providing measures for the transformation of the entire energy sector; measures for the implementation of various Clean Energy Package elements; a Just Transition Plan; and the introduction of a Monitoring, Reporting, and Verification system (MRV system).

Many of the listed measures have an implementation timeframe set for the end of 2024/2025. However, no significant progress in their implementation has been recorded as yet, nor has a system for monitoring the overall implementation of policy measures from the Reform Agenda of the Republic of Serbia been established.

The Government of the Republic of Serbia informed the European Commission that it had followed the prescribed consultation procedures during the drafting of the Reform Agenda, as required by national legislation, although stakeholder involvement remained very limited and non-transparent.

### **The First Biennial Transparency Report of the Republic of Serbia under the UN Framework Convention on Climate Change and the Paris Agreement, and Serbia's Nationally Determined Contributions (NDCs)**

Serbia published its first Biennial Transparency Report (BTR) under the UN Framework Convention on Climate Change (UNFCCC) on January 16, 2025. The

203 Economic Reform Program 2025–2027, available at: [https://www.mfin.gov.rs/upload/media/uBUxab\\_67a098e0286d2.docx](https://www.mfin.gov.rs/upload/media/uBUxab_67a098e0286d2.docx)

Government then initiated the development of its third Nationally Determined Contribution (NDC), which is expected to provide projections up to 2035 and be aligned with the development pathways outlined in the INECP. Although the draft is not yet publicly available, the competent authorities have informed the public during international technical meetings that the document is currently undergoing inter-ministerial consultations.

The new NDC should provide revised and enhanced economy-wide greenhouse gas (GHG) emission reduction targets for 2030 and 2035, as well as sector-specific targets that would lay the foundation for achieving carbon neutrality by 2050. In addition to this, it is essential that the NDC includes a clear plan for the gradual fossil fuel phase-out, including: a halt to the development of new coal projects, elimination of coal use by 2040, redirecting subsidies from fossil fuels to renewable energy sources, termination of all permits and financing (both public and private) for new coal, oil and gas projects, and halting the expansion of existing oil and gas reserves.

Additionally, given that the Western Balkans region is facing serious climate impacts, Serbia's new Nationally Determined Contribution must recognize the critical importance of adaptation and reflect a level of ambition that contributes to building resilience. The process of developing and subsequently implementing NDC 3.0 must be participatory and transparent. As a country not listed in Annex I of the UN Framework Convention on Climate Change (UNFCCC), Serbia must clearly outline in its NDC the plans for accessing international climate finance, as well as assess the economic and financial costs and benefits of achieving its targets, including strategies for financing their implementation.

2024 Implementation Report of the Energy Community Secretariat<sup>204</sup>:

In the 2024 Implementation Report, the Energy Community Secretariat, addressing the decarbonization of the energy sector, states that the Republic of Serbia has achieved 73% in the area of climate policy governance and implementation. The Report notes that the National Accreditation Body should complete internal processes and procedures in order to enable the accredi-

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204 2024 Implementation Report of the Energy Community Secretariat, available at: [https://www.energy-community.org/dam/jcr:8d72faa0-61f4-4266-b0b0-82c435d6e670/IR2024\\_Serbia.pdf](https://www.energy-community.org/dam/jcr:8d72faa0-61f4-4266-b0b0-82c435d6e670/IR2024_Serbia.pdf)

tation of greenhouse gas (GHG) verifiers. Furthermore, Serbia is expected to continue meeting its climate reporting obligations, complete the alignment of its legislative framework with the Energy Performance of Buildings Directive and introduce billing based on actual consumption for district heating.

The Republic of Serbia has not defined a 2030 greenhouse gas (GHG) emissions reduction target in its national legislation, but such a target has been established in the INECP.

## Implementation of Regulations

### Law On Climate Change

Not all the by-laws necessary for the full implementation of the Law on Climate Change have been adopted even after four years. The delay in relation to the deadlines defined by the Law and the undertaken international obligations continues to pose a significant challenge. The Action Plan for the implementation of the Strategy has not been adopted, making it impossible to assess the implementation of the Law on Climate Change.

### Low Carbon Development Strategy

The Low Carbon Development Strategy of the Republic of Serbia 2023–2030 With Projections Until 2050 was adopted in June 2023.<sup>205</sup> It envisions that by 2050, the Republic of Serbia will become a low-carbon society with a competitive and resource-efficient economy, providing citizens with new green jobs and a high quality of life in a climate-resilient society. Carbon neutrality by 2050 is not set as a target, and the selected scenario stipulates a reduction of

<sup>205</sup> Government of the Republic of Serbia (2023): Low Carbon Development Strategy of the Republic of Serbia 2023–2030 With Projections Until 2050, Official Gazette of RS, no. 46/2023

GHG emissions by 33% by 2030 and of 65.4% by 2050, compared to the 1990 levels. The Strategy is to be implemented through the adoption of an Action Plan for its implementation (Law on Climate Change, Article 10). The Action Plan is yet to be adopted, despite the legal obligation of the Government to do so, the obligation of the Ministry of Environmental Protection to monitor its implementation (Article 10) and report to the Government of the Republic of Serbia to that effect, as well as the Government's obligation to submit reports to the National Assembly (Article 64). According to the conclusion of the meeting of the National Climate Change Council held in December 2024<sup>206</sup> (and contrary to the Law on Climate Change), the Ministry of Environmental Protection does not plan to adopt an Action Plan for the Implementation of the Low Carbon Development Strategy, but instead intends for the Strategy to be implemented through the INECP Action Plan.

## Carbon Border Adjustment Mechanism – CBAM

In response to the risk of carbon leakage, the European Union has announced through the European Climate Law the introduction of the Carbon Border Adjustment Mechanism (CBAM).<sup>207</sup> The European Commission Regulation 2023/956 establishing the CBAM entered into force on October 1, 2023, and full implementation of the mechanism is scheduled for January 1, 2026. The purpose of the mechanism is to encourage EU's trading partners to take steps toward reducing their dependence on fossil fuels and to adopt stricter measures in their national climate policies. This Mechanism applies to all countries outside the EU ETS,<sup>208</sup> including Serbia. Through the CBAM, carbon dioxide equivalent<sup>209</sup> emissions will be charged on imported products, in amounts that would have been charged if the production processes had taken place within the European Union. CBAM covers both direct emissions (those generated during the pro-

206 Minutes of the 4th session of the National Climate Change Council, available at: [https://www.ekologija.gov.rs/sites/default/files/2025-01/zapisnik\\_iv\\_sednica\\_nacionalnog\\_saveta\\_za\\_klimatske\\_promene\\_16.12.24.pdf](https://www.ekologija.gov.rs/sites/default/files/2025-01/zapisnik_iv_sednica_nacionalnog_saveta_za_klimatske_promene_16.12.24.pdf)

207 European Climate Law, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R1119>

208 EU ETS 4 is applicable and implemented in the EU Member States, the European Free Trade Association (EFTA) countries (Iceland, Liechtenstein and Norway), as well as in Northern Ireland, specifically to the energy sector, i.e., in the production of electricity.

209 Carbon dioxide equivalent (CO<sub>2</sub>eq) is a measure used to express the total effect of different greenhouse gases in a single unit, as if all those gases were carbon dioxide (CO<sub>2</sub>).

duction process) and indirect emissions (resulting from electricity use and cooling/heating) of carbon dioxide (CO<sub>2</sub>), as well as, when applicable, nitrogen oxide (NOx) and perfluorocarbon (PFCx) emissions. CBAM thus applies to both direct and indirect greenhouse gas (GHG) emissions.<sup>210</sup>

Exemption from the application of the Mechanism is possible at the state level, but not at the company level, under the following conditions:

If a country has established a domestic carbon pricing system (the so-called carbon tax) in the relevant sectors, the actually collected carbon tax may serve as a basis for exemption, provided that the tax amount corresponds to the current EU ETS allowance price.

If a country's electricity market is integrated with the EU market and meets a number of additional criteria (such as setting a climate neutrality target by 2050, adopting the EU *acquis* in the fields of electricity, renewable energy sources and environmental protection, as well as introducing a carbon price for electricity), that country's electricity sector will be exempt from obligations arising from the CBAM.

The Energy Community advocates for the establishment of a regional Emissions Trading System (ETS) in the Western Balkans, while the Republic of Serbia is considering the introduction of a national carbon pricing system,<sup>211</sup> but no significant progress has been made so far. Specifically, it was only at the end of 2024 that Serbia, in the Draft Environmental Protection Strategy, outlined the steps and timelines for potentially determining and introducing a carbon price. According to the planned dynamics, an amendment to the Law on Climate Change to introduce a carbon tax mechanism is scheduled for 2027. The transposition of all necessary electricity market-related objectives and policies into national legislation has not yet been completed. A roadmap for achieving climate neutrality by 2050, which would include both carbon pricing

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210 Regulation (EU) 2023/956, CBAM

211 In the Draft Environmental Protection Strategy, presented during the public consultation in December 2024, one of the planned activities was the development of a cost-benefit analysis for the implementation of a carbon pricing instrument. Based on this analysis, a decision will be made regarding the carbon pricing mechanism to be applied in the territory of the Republic of Serbia. (Ministry of Environmental Protection, Action Plan for the Implementation of the Environmental Protection Strategy, Measure 1.1.5, Belgrade, 2024, pp. 9-11; and Draft Environmental Protection Strategy, p. 135)

and an emissions trading system for the electricity sector by 2030, has not yet been submitted to the European Commission, nor has such a target been incorporated into domestic legislation.

On February 26, 2025, the European Commission submitted a proposal for amendments titled the Omnibus Package<sup>212</sup> to the European Parliament, aiming to simplify the CBAM and extend the timeline for the start of embedded emissions pricing. With these February 2025 amendments, the Commission proposes broader exemptions from CBAM obligations through the so-called *de minimis* exception, which would exempt importers not exceeding a single 50-tonne threshold of imported goods per year. This measure is expected to exempt, in most cases, small and medium-sized enterprises and individuals who import small or negligible quantities of goods covered by the CBAM regulation.<sup>213</sup> The proposed amendment postpones the obligation for the purchase of CBAM certificates for embedded GHG emissions by authorized importers from early 2026 to February 2027, in order to address relevant ambiguities following the transitional phase that began in October 2023. CBAM certificates will be sold at the EU ETS emission allowance price in 2026, which differs from the original CBAM concept that envisioned determining the certificate price based on the average weekly price of EU ETS allowances.<sup>214</sup> The European Commission has reached a provisional political agreement with the European Parliament and the Council on the proposed amendments,<sup>215</sup> and their adoption is expected by the end of September 2025.<sup>216</sup>

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212 The set of simplified rules proposed by the European Commission on February 26, 2025, titled Simplification Omnibus, includes amendments to several different regulatory areas, including CBAM, CSRD, CSDDD and the EU Taxonomy, within a single comprehensive legislative package.

213 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0087>

214 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0087>

215 European Commission. Commission Welcomes Political Agreement to Simplify and Strengthen the Carbon Border Adjustment Mechanism. Press release, Brussels, June 18, 2025. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_25\\_1563](https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1563)

216 Council of the EU. Carbon Border Adjustment Mechanism (CBAM): Council and Parliament Strike a Deal on Its Simplification. Press release, June 18, 2025. <https://www.consilium.europa.eu/en/press/press-releases/2025/06/18/carbon-border-adjustment-mechanism-cbam-council-and-parliament-strike-a-deal-on-its-simplification/>

## Renewable Energy Sources

Although some progress has been made at the legislative and strategic level in the previous period, the results regarding the share of renewable energy sources in certain sectors remain limited.

Between 2020 and 2023, there was a gradual decline in the overall share of renewable energy sources in gross final energy consumption, from 26.3% in 2020 to 25.43% in 2023.

The electricity sector shows a slight increase, from 30.7% in 2020 to 31.75% in 2023. The transport sector records a negative trend, with a significant decline in the share of RES, from 1.17% in 2020 to just 0.60% in 2023. The heating and cooling sector shows relative stability in the share of renewables, rising slightly from 35.68% in 2020 to 35.88% in 2023.

**Table 5:** Share of energy from RES  
in gross final energy consumption <sup>217</sup>

Share of energy from RES	2020	2021	2022	2023	2030 TARGET <sup>218</sup>
Gross Final Energy Consumption	26.3%	25.26%	24.67%	25.43%	33.6%
Electricity Sector	30.7%	29.9%	30.14%	31.75%	45.2%
Heating and cooling sector	35.68%	35.4%	34.73%	35.88%	41.4%
Transport sector	1.17%	0.62%	0.60%	0.60%	3.2%

With the Law on the Use of Renewable Energy Sources,<sup>219</sup> adopted in 2021, the Republic of Serbia established a premium system as a new incentive mechanism for the production of electricity from renewable energy sources, specifically for wind power plants larger than 3 MW and solar power plants larger than 500

217 Share of energy from RES in gross final energy consumption in the Republic of Serbia, May 5, 2025, Statistical Office of the Republic of Serbia, available at: <https://data.stat.gov.rs/Home/Result/SDGUN070201?languageCode=sr-Latn>

218 Targets defined in INECP.

219 Official Gazette of RS, nos. 40/2021, 35/2023 and 94/2024 – as amended, available at: <https://www.paragraf.rs/propisi/zakon-o-koriscenju-obnovljivih-izvora-energije.html>

kW. This system replaced the previous model based on feed-in tariffs,<sup>220</sup> which remains applicable only for small-scale facilities and demonstration projects. The law stipulated that the first Incentive System Plan must be adopted no later than the end of February 2022. However, the Plan was adopted only in June 2023. The Incentive System Plan for the Use of Renewable Energy Sources for the 2023-2025 Period<sup>221</sup> envisions the allocation of market premiums for a total of 1.3 GW of solar and wind power capacity. So far, two auction rounds,<sup>222,223</sup> have been conducted, within which **market premiums have been awarded for projects totaling 1.2 GW in capacity.**

The Law on the Use of Renewable Energy Sources also introduced the concept of the prosumer and created the opportunity for households, residential communities and companies to produce energy for their own consumption. **As at March 31, 2025, the electric power grid included nearly 93 MW of installed capacity from prosumer power plants.**<sup>224</sup>

## National Climate Change Council

After the new Government of the Republic of Serbia was formed in May 2024, and due to organizational and personnel changes in the bodies whose representatives make up the National Climate Change Council, the Government of the Republic of Serbia issued a new Decision on Appointment of Representatives and Members of the National Climate Change Council in October 2024.

The National Climate Change Council held its fourth session in December 2024.<sup>225</sup> The Ministry of Environmental Protection reported on the establishment

220 In 2009, based on the provisions of the Law on Energy, Serbia introduced an incentive system for the production of electricity from renewable energy sources, which allowed for granting of feed-in tariffs depending on the applied technology and the type of source used.

221 Incentive System Plan for the Use of Renewable Energy Sources for the 2023-2025 Period, <https://www.mre.gov.rs/extfile/sector/sr/505/План%20система%20подстицаја%20коришћења%20обновљивих%20извора%20енергије%20за%20период%202023-2025.pdf>

222 <https://www.mre.gov.rs/vest/1718/zavrsene-prve-aukcije-za-premije-za-zelene-megavate.php>

223 <https://www.mre.gov.rs/vest/sr/9162/zavrsene-druge-aukcije-za-oie-rezultat-novih-10-zelenih-elektrana-i-782-miliona-evra-investicija-dodatna-sigurnost-za-gradjane-i-privredu-srbije.php>

224 The REGISTERS section on the website of Serbia's electricity distribution company Elektrodistribucija Srbije (EDS), available at: <https://elektrodistribucija.rs/>

225 Minutes of 4th session of the National Climate Change Council, available at: [https://www.ekologija.gov.rs/sites/default/files/2025-01/zapisnik\\_iv\\_sednica\\_nacionalnog\\_saveta\\_za\\_klimatske\\_promene\\_16.12.24.pdf](https://www.ekologija.gov.rs/sites/default/files/2025-01/zapisnik_iv_sednica_nacionalnog_saveta_za_klimatske_promene_16.12.24.pdf)

of the system for monitoring and verifying GHG emissions, issuing emission allowances and preparing the third revision of the Nationally Determined Contribution (NDC). Work on transparency reports was also presented, along with the announcement of priorities for the upcoming period.

The results of Serbia's participation at COP29 were also discussed, while UN agencies presented a joint offer of support to strengthen climate ambition. The Ministry of Mining and Energy presented the Integrated Energy and Climate Plan.

During the discussion, representatives of the scientific community and civil society emphasized the need for greater accessibility of climate data and more inclusive participation of CSOs in the development and implementation of policies.

Although the Council formally brings together representatives of all relevant sectors and has the mandate to monitor the implementation of climate policies, advise the Government and ensure their integration into other sectoral policies, this potential has not yet been fully utilized.

## Financing

Financing in the field of Climate Change is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

- 1.** Adopt all necessary by-laws in order for the Law on Climate Change to be applied.
- 2.** Adopt an action plan for the implementation of the Low Carbon Development Strategy for 2023 to 2030 with projections to 2050.
- 3.** Integrate climate change issues into the process of drafting development plans by local self-government units and by adopting the necessary by-laws. Based on the Law on Climate Change, establish a mechanism for monitoring the development and work of local self-government units on the issues of climate change mitigation.
- 4.** Harmonize the INECP with the Decision of the Ministerial Council of the Energy Community no. 2022/02/MC-EnC and set objectives that are in line with Serbia's obligations assumed as part of the Energy Community and the Green Agenda for the Western Balkans.
- 5.** In accordance with the Law on Climate Change, Article 15, define and adapt 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 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.

7. Adopt all necessary by-laws in order for the Law on Energy to be applied.



## Implementation of Regulations

8. Improve the work of the National Climate Change Council through holding of regular sessions, making recommendations to the Government of Serbia on issues relevant to climate change, and public reporting on the Council's activities.
9. Make information on the GHG inventory publicly available, 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.
10. Enhance the number and skills of civil servants (at the Ministry, Environmental Protection Agency and local self-government units) dealing with climate change in various sectors and focus on building their capacities.



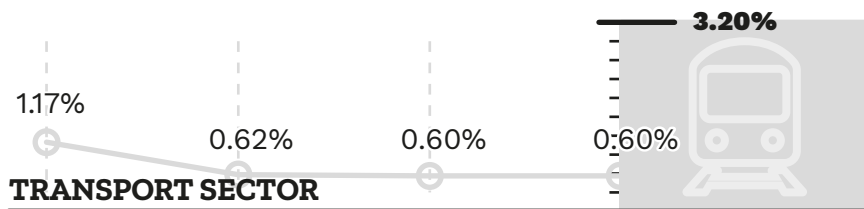
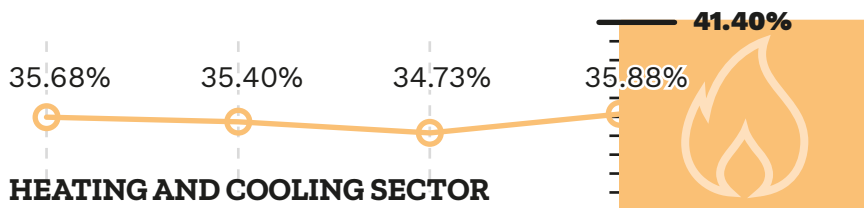
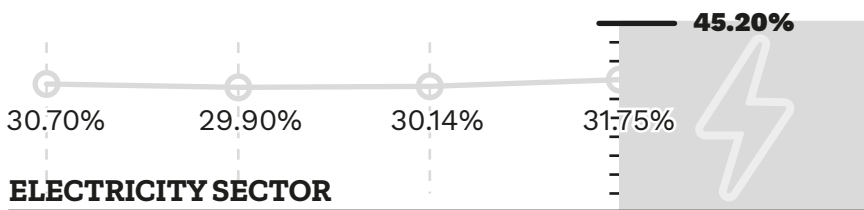
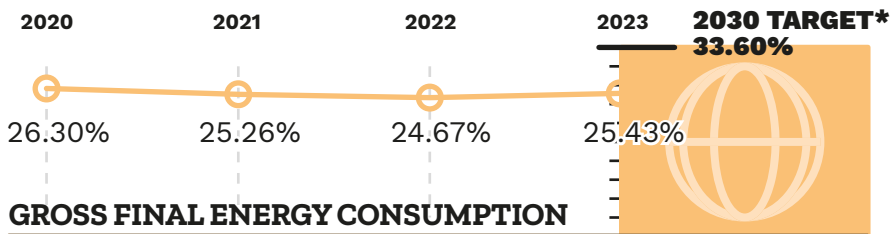
## Financing

11. Significantly increase state investments in climate change adaptation and mitigation, and develop financial mechanisms to support the implementation of the priorities outlined in the Low Carbon Development Strategy (which must be aligned with Serbia's EU accession process and the objective of achieving climate neutrality by 2050).



# CLIMATE CHANGE

## SHARE OF RENEWABLE ENERGY SOURCES IN GROSS FINAL ENERGY CONSUMPTION



\* Targets defined in INECP

Source: Share of Renewable Energy Sources in Gross Final Energy Consumption in the Republic of Serbia, May 5, 2025, Statistical Office of the Republic of Serbia, available at: <https://data.stat.gov.rs/Home/Result/SDGUN070201?languageCode=sr-Latn>



# Forestry

## Overview

During the reporting period, no significant changes occurred in the overall state of forestry in the Republic of Serbia. The main challenges from the previous period remain relevant, with particular emphasis on the need to improve the legislative framework and align it with European Union requirements. The forestry sector continues to face issues related to inadequate management of privately-owned forests, the widespread occurrence of illegal logging and limited capacities for effective control and monitoring of forest resources. In 2025, one of the key developments was the start of the drafting of a new law on placing timber and timber products on the market, continuing the process of aligning national legislation with EU regulations.

## Strategic and Legislative Framework

The legislative framework in the field of forestry was marked by the start of the drafting of the Law on Placing Timber and Timber Products on the Market, aimed at regulating the implementation of the FLEGT Regulation and the CITES Convention. This law is a significant step toward harmonization with EU requirements, which are part of the Republic of Serbia's obligations within the EU accession negotiation process.

The FLEGT Regulation, as a key EU legislative document in the field of forestry, sets out measures to control the legality of the origin of timber and timber products, aiming to reduce the entry of illegally harvested wood into the EU

market. On the other hand, the CITES Convention governs international trade in endangered species of flora and fauna, including certain tree species.

The Law on Placing Timber and Timber Products on the Market introduces a due diligence system, requiring all participants in the timber supply chain, including processors, traders and others, to assess the risk of placing illegal timber on the market and to take appropriate measures to prevent it. However, as highlighted by representatives of the forestry sector, there are certain shortcomings and inconsistencies in the Law. The most significant criticism concerns the exclusion of natural persons from the system, despite estimates that around 50% of timber on the domestic market originates from private individuals. Lawmakers attempted to include natural persons, but legal experts rejected this option due to limitations in the current accounting and tax legislation.

In addition to this, the concept of a logging concession, which grants rights to harvest timber within a specific region, has been introduced into domestic legislation for the first time. Although the concession model is familiar and has been applied already through the allocation of rights to public enterprises, such as Srbijašume and Vojvodinašume, the civil sector is closely monitoring the potential implications of this new term, particularly in light of the possible broader application of the concession system.

Given the necessity to align the Law with EU regulations, the possibility of deviating from the prescribed standards is limited, which has caused some frustration among domestic experts who believe that the current national legal framework would be more effective and precise.

# Implementation of Regulations

Despite the initiated changes in the legislative framework, the implementation of regulations in the forestry sector continues to face numerous challenges. The new Law (as well as the FLEGT Regulation itself) does not define how the due diligence system should be implemented, but rather leaves it to timber market participants to establish their own system based on the principles outlined in the FLEGT Regulation. This is the main reason why domestic experts believe that national legal solutions are more applicable and clearer.

Persistent issues from previous years remain unresolved, including weak control over illegal logging, especially in private forests, where ownership relations are often unclear or unresolved, and professional and technical capacities for forest management are insufficient.

Official data on the volume of timber harvested, forest damage and reforestation efforts for 2025 are not yet available, making it difficult to perform an accurate analysis of the current situation. However, trends from previous years indicate a continued prevalence of damage caused by natural disasters, largely resulting from windthrows and storms, as well as a high rate of illegal logging, particularly in the southern and eastern regions of Serbia.

Forest fires remain relatively rare, but it is necessary to maintain a high level of preparedness and preventive measures in order to prevent potential incidents.

Afforestation recorded a slight increase in the previous year, which is a positive trend in the field of sustainable forest resource management. However, the effectiveness of these activities depends on improvements to the legislative framework, adequate financing and strengthening the capacities of the competent institutions.

In conclusion, it can be said that the successful implementation of the new legal framework will largely depend on the readiness of all participants in the sector, as well as on continuous supervision and evaluation of the implementation of regulations.

# Financing

Financing in the field of Forestry is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# 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 that includes 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 for 2030 and other documents from the Green Deal package).
- 2.** Develop an institutional framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.



## Implementation of Regulations

- 3.** Adopt the practice of regular national consultations as mandatory events for all managers of protected areas (PA).
- 4.** Set up systemic capacity strengthening of competent institutions in forestry for 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 forest management plans).
- 6.** Value and promote ecosystem services provided by forests, other than timber, 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, and water management) in order to integrate forest ecosystems management, with special emphasis on systemic strengthening of cooperation.
9. Establish an inter-ministerial working group that will coordinate efficient development of afforestation plans in areas of need (e.g., Autonomous Province of Vojvodina).



## Financing

10. More funding from the Budget Fund for Forests should be directed toward financing afforestation, maintenance and forest protection measures.





# **Industrial Pollution and Risk Management**



## Overview

Industry is one of the main sources of pollution in Serbia due to outdated technologies and equipment, as well as low energy and raw material efficiency. All of these are consequences of insufficient investments aimed at improving the current state of affairs, but also of the slow pace of application of regulations governing the issuance of integrated permits that ensure prevention and control of environmental pollution.

This report covers industrial pollution from the following industries: the metal processing and production industry, within which 22 operators are required to obtain an integrated permit; the mineral industry, with integrated permits necessary for 25 operators; and the chemical industry, where 11 operators are required to hold integrated permits. Given that industrial pollution primarily affects the quality of air, water and soil, as well as waste management, in this sense, the report presents data on the impact of industrial pollution on the respective areas in particular.

The most important legal regulation for industrial emissions, for which harmonization with EU regulations (specifically with the Industrial Emissions Directive – IED)<sup>226</sup> has begun, is the Law on Integrated Prevention and Control of the Environment Pollution<sup>227</sup> with the appropriate by-laws. For the purposes of further harmonization with the IED, the preparations for drafting a new law began in early 2025, and the Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution were published.<sup>228</sup> According to information in the Starting Points, since the start of the Law's implementation, 57 integrated permits were issued (for 36% of the total number

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226 Industrial Emissions Directive 2010/75/EU

227 Official Gazette of RS, no. 135/2004, 25/2015 and 109/2021, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/135/7/reg>

228 Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution, <https://www.ekologija.gov.rs/saopstenja/najave/obavestenje-o-pocetku-izrade-nacrta-zakona-o-integrisanom-sprecanvanju-i-kontroli-zagadjivanja-zivotne-sredine>

of metal processing and production industry operators, 52% of the mineral industry operators and 45% of the chemical industry operators).

In addition to this Law and the by-laws, this important legislative framework also includes the laws on environmental impact assessment and on strategic environmental assessment, which were adopted in late 2024 after extensive preparations, as well as strategic documents on air protection, water management, the application of clean production principles, environmental protection, industrial safety, etc.

## Strategic and Legislative Framework

One of the most significant legal instruments for reducing industrial pollution is the Directive 2010/75/EU<sup>229</sup>, which replaced the previous Directive on Integrated Pollution Prevention and Control in 2010. The post-screening document for Chapter 27<sup>229</sup> stated that Directive 2010/75/EU would be fully transposed into the legal system of the Republic of Serbia by 2018 through amendments to the Law on Integrated Prevention and Control of the Environment Pollution, which was adopted back in 2004 as one of the first laws passed in the process of harmonizing Serbia's legislation with the EU acquis. However, after multiple amendments to the Law, mainly reflected in extending deadlines for obtaining integrated permits, the process of preparing a new law, with the aim of full harmonization with the Directive, was started only in 2025, and the Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution were published.

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229 [https://www.ekologija.gov.rs/sites/default/files/eu\\_integracije/Radna\\_verzija\\_Post\\_skrining\\_dokumenta.pdf](https://www.ekologija.gov.rs/sites/default/files/eu_integracije/Radna_verzija_Post_skrining_dokumenta.pdf)

A significant contribution to the implementation of the Industrial Emissions Directive has been made by the multi-year project called Green Transition — Implementing Industrial Emissions Directive in Serbia 2021–2027.<sup>230</sup> In addition to the preparation of specific implementation plans for the Directive and facilitating the process of obtaining integrated permits (which resulted in the development and adoption of two by-laws at the beginning of 2024 concerning the request for issuance, and the content and appearance of the integrated permit), it also includes efforts to improve administrative capacities and work of the Inspectorate, etc.

The implementation of the Law on Integrated Prevention and Control of the Environment Pollution is accomplished through by-laws. Four by-laws were adopted back in 2005 — namely, the Rulebook regarding the content and manner of keeping the Register of Issued Integrated Permits;<sup>231</sup> the Regulation establishing the criteria for determining the best available techniques, for the application of environmental quality standards, as well as for determining the limit values of emissions in the integrated permit;<sup>232</sup> the Regulation prescribing the detailed content of the program of measures to adapt the operation of existing facilities or activities to the prescribed conditions for issuing an integrated permit<sup>233</sup> and the Regulation prescribing the types of activities and facilities for which an integrated permit is issued.<sup>234</sup> Subsequently, two more regulations were adopted, which were amended at the beginning of 2024. One regulated the content, appearance, and method of filling out the application for the issuance of an integrated permit,<sup>235</sup> while the other regulated the content and appearance of the integrated permit.<sup>236</sup>

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230 <https://iedserbia.org/o-projektu/>

231 Official Gazette of RS, no. 69/2005, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/4>

232 Official Gazette of RS, no. 84/2005, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2005/84/2>

233 Official Gazette of RS, no. 84/2005, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2005/84/3/reg>

234 Official Gazette of RS, no. 84/2005, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2005/84/1>

235 Rulebook on the Content, Appearance, and Manner of Filling in the Application for the Issuance of Integrated Permit, Official Gazette of RS, no. 30/2006, 32 dated March 30, 2016, 44 dated June 8, 2018 – as amended, 4 dated January 19, 2024.

236 Rulebook on the Content and Appearance of the Integrated Permit, Official Gazette of RS, no. 30/2006; no. 4 dated January 19, 2024, available at: <https://www.ekologija.gov.rs/dokumenta/integrirane-dozvole>

The purpose of the integrated permit is to minimize the environmental pollution caused by the operation of the plant by applying the best available techniques (BAT),<sup>237</sup> thus eliminating the risk to human health and the environment that may arise from the operation. The Law on Integrated Prevention and Control of the Environment Pollution was amended twice, in 2015 and 2021, without the participation of the general public and without public discussion. Amendments to the Law, as assessed in the analysis of the Renewables and Environmental Regulatory Institute (RERI) in March 2024, did not eliminate obstacles and problems in the application of the Law but extended the deadline for issuing integrated permits twice. Amendments to the Law from 2021 extended the deadline for issuing permits for existing facilities and activities until December 31, 2024.<sup>238</sup> Preparation and publishing of the Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution in early 2025 initiated the process of adopting a new law with the participation of the general public.

The Starting Points of the Draft of the new Law on Integrated Prevention and Control of the Environment Pollution are based on the document titled Negotiating Position of the Republic of Serbia for Chapter 27 — Environment and Climate Change,<sup>239</sup> which among other things specifies the basic points for revision and harmonization of the existing legal framework governing integrated prevention and control of pollution through air, water and land protection and waste management control.

According to the Starting Points, the effects of adopting the new law are expected to bring about qualitative improvement of the level of environmental protection against industrial pollution: high level of harmonization with the IED; finalizing the regulatory framework by adopting by-laws necessary to introduce new policy instruments for environmental protection against

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237 BAT (Best Available Techniques) – techniques and technologies that, at a given stage of development, have the least negative impact on the environment, are reproducible, and economically viable

238 Renewables and Environmental Regulatory Institute (2024): Analysis of the Implementation of the Law on Integrated Prevention and Control of the Environment Pollution, available at: <https://reri.org.rs/wp-content/uploads/2024/03/Analiza-sprovodjenja-Zakona-o-integrisanom-sprecavanju-i-kontroli-zagadjivanja-zivotne-sredine.pdf>

239 Negotiating Position of the Republic of Serbia for Chapter 27, available at: [https://www.mei.gov.rs/upload/documents/pristupni\\_pregovori/pregovaracke\\_pozicije/pg\\_pozicija\\_27.pdf](https://www.mei.gov.rs/upload/documents/pristupni_pregovori/pregovaracke_pozicije/pg_pozicija_27.pdf)

industrial pollution; possibility to issue permits in a simplified procedure; an integrated approach taking into consideration the entire environmental impact of the facility; a clear system of responsibilities, procedures and competent institutions involved in the process of issuing integrated permits; synergy between various administrative procedures that require coordinated issuance of permits/authorizations, particularly in respect to water permits, construction and exploitations permits, as well as procedures put in place in order to prevent major accident hazards involving dangerous chemical substances; a more efficient procedure for reissuance/revision of integrated permits by introducing an information system to be used as a tool; making sure that the requirements in the integrated permit, including limit values of emissions, are primarily based on best available techniques (BAT); improved access to information, through public participation and access to justice; better connection with the registers of documents necessary to obtain IPPC permits (documents concerning impact assessment, protection against major accident chemical hazards, waste management permits, water permits, Business Registers Agency, etc.); strengthening inspection supervision and penal policy.

The Republic of Serbia submitted the Negotiating Position for Chapter 27 — Environment and Climate Change (Negotiating Position) in 2020, and therewith, the Draft Specific Implementation Plan of the Industrial Emissions Directive (Specific Implementation Plan), which contains the plan for achieving full compliance of 68 plants for which transitional periods have been requested and for which the Specific Implementation Plan has been prepared. Full compliance is expected only in 2032. Transitional periods have been requested for 19 facilities in the area of metal processing and production industry, mineral industry and chemical industry (for Serbia Zijin Bor Copper, HBIS GROUP Serbia Iron & Steel Smederevo, and Lafarge BFC Beočin and CRH (Srbija) doo Popovac cement plants, among others).

**Table 6:** Number of plants for which transitional periods have been requested

Sector	Number of plants	Planned period of implementation
Metal processing and production	6	2025–2027
Mineral industry	10	2026–2028
Chemical industry	3	2026–2028

The potential emission reductions after the full implementation of the Directive are determined in percentages for each sector:<sup>240</sup>

- In the metal processing and production industry, the Plan envisages up to a 70% reduction of PM particles, NO<sub>x</sub>, and heavy metals released into the atmosphere; when it comes to wastewater, less water pollution is expected due to the removal of organic compounds and metals; and as for waste, there should be less generation and better management of hazardous waste.
- Regarding the chemical industry, significantly lower emissions of NO<sub>x</sub> (up to 50%) and VOC from chemical processes and combustion processes are foreseen for air emissions; as for wastewater, up to a 50% reduction is expected in the emission of organic compounds into surface water by improving the treatment of wastewater.
- When it comes to the mineral industry, 50% to 80% lower emissions of organic compounds from the production of ceramics are expected. In addition, 25% to 70% lower emissions of PM particles and heavy metals from the production of cement and magnesium, as well as up to 30% lower emissions of NO<sub>x</sub>, are foreseen on an annual basis.

240 The Implementation of the Industrial Emissions Directive in Serbia project, Specific Implementation Plan for the Industrial Emissions Directive, IED Serbia, <https://iedserbia.org/wp-content/uploads/specificali-plan-implementacije-direktive-o-industrijskim-emisijama.pdf>

The National Program for the Adoption of the EU Acquis for the period from 2024 to 2027<sup>241</sup> projects that the new Law on Integrated Prevention and Control of the Environment Pollution shall be adopted in the third quarter of 2026. The Law also needs to be aligned with the amendments to the national legislation.

In accordance with the Law on Integrated Prevention and Control of the Environment Pollution, the Register of Issued Permits is maintained by the authorities responsible for issuing integrated permits. The Law stipulates that the Register of Issued Permits is public. The content and manner of keeping the Register are regulated by the Rulebook on the Content and Manner of Keeping the Register of Issued Integrated Permits. Based on the Register, it can be concluded that the first permit was issued by the Ministry in 2011. The last permit in the Register is from March 2025.<sup>242</sup>

In late 2024, a new Law on Environmental Impact Assessment, as well as the Law on Strategic Environmental Assessment, was adopted.<sup>243</sup> In terms of reducing and controlling industrial emissions, it is important that these laws regulate the impact assessment procedure for projects that may have significant environmental impact, the content of the environmental impact assessment study, the participation of interested bodies, organizations, and the public, etc.

The Air Protection Program in the Republic of Serbia for the period from 2022 to 2030 with an Action Plan<sup>244</sup> was adopted in December 2022 (Air Protection Program). During the second half of 2024, preparations for the new Law on Air Protection started. A public hearing on the Draft Law was held in early 2025, and the Air Protection Bill<sup>245</sup> was adopted in early May 2025. The implementation of the Industrial Emissions Directive is recognized as one of the key objectives set in this document.

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241 National Program for the Adoption of the EU Acquis (NPAA), [https://www.mei.gov.rs/upload/documents/nacionalna\\_dokumenta/npaa/npaa\\_2024-2027.pdf](https://www.mei.gov.rs/upload/documents/nacionalna_dokumenta/npaa/npaa_2024-2027.pdf)

242 <https://www.ekologija.gov.rs/obavestjenja/integrisane-dozvole/registar-izdatih-dozvola/registar-izdatih-dozvola>

243 Official Gazette of RS, no. 94/202a 4

244 Official Gazette of RS, no. 140/2022, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/drugiakt/2022/140/1>

245 <https://www.paragraf.rs/dnevne-vesti/190525/190525-vest12.html>

In April 2023, the Water Management Plan on the territory of the Republic of Serbia for the period from 2021 to 2027<sup>246</sup> was adopted, which is also significant in terms of industrial wastewater management.

During the second half of 2024, the Ministry of Environmental Protection hosted a public hearing on the Draft Environmental Protection Strategy – Green Agenda for the Republic of Serbia for the period 2024-2033, with an Action Plan for Implementing the Strategy for the period 2024-2028, as well as on the Draft Report on Strategic Environmental Assessment of the Strategy.<sup>247</sup> Solving problems in the field of industrial pollution is necessary for achieving the goals of the Environmental Protection Strategy. The draft of the Environmental Protection Strategy states that the previous implementation of the Law on Integrated Prevention and Control of the Environment Pollution revealed the unwillingness of operators to respond to the requirements set by this Law, as well as problems in obtaining the necessary permits, decisions, consents, or approvals from other state authorities and institutions. It also stated that the list of existing operators required to obtain an integrated permit will be expanded to include around 70 new plants. The identified weaknesses indicate the need to strengthen the normative framework and administrative capacities, as well as to educate and train operators in the industrial sector to increase their readiness to respond to the requirements of this Law.

Industrial Policy Strategy of the Republic of Serbia from 2021 to 2030<sup>248</sup> defines as one of its objectives that industry should grow based on resource effectiveness, the potential of new products and technologies in the field of environmental protection, stipulating incentives for industrial production to use high technologies that offer significant levels of environmental protection as one of the measures to be introduced.

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246 Water Management Plan on the Territory of the Republic of Serbia until 2027, available at: [https://www.minpolj.gov.rs/download/Plan\\_upravljanja\\_vodama\\_do\\_2027-FINAL.pdf?script=lat](https://www.minpolj.gov.rs/download/Plan_upravljanja_vodama_do_2027-FINAL.pdf?script=lat)

247 The Draft Environmental Protection Strategy etc., <https://ekonsultacije.gov.rs/topicOfDiscussionPage/371/3> and <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/javne-rasprave/javni-poziv-za-ucesece-u-javnoj-raspravi-o-predlogu-strategije-zivotne-sredine-zelena-agenda-za-republiku-srbiju-za-period-2024-2033-godine-sa-akcionim-planom>

248 Official Gazette of RS, no. 35/2020, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2020/35/1/reg>

The Strategy for the Introduction of Cleaner Production in the Republic of Serbia,<sup>249</sup> which was adopted back in 2009, highlights the importance of the implementation of the Law on Integrated Prevention and Control of Pollution, because the concept of cleaner production as a preventive strategy for environmental protection implies reducing environmental emissions and waste generation in addition to the more efficient use of raw materials and energy. In 2018, the Ministry of Environmental Protection prepared the Program for the Introduction of Cleaner Production in the Republic of Serbia with an action plan for 2019–2021. The activities foreseen in the Program for the Introduction of Cleaner Production in the Republic of Serbia with an action plan should be outlined and implemented through the Circular Economy Development Program in the Republic of Serbia.<sup>250</sup>

The Law on Control of Major Accident Hazards was adopted in 2024<sup>251</sup>. It governs rules for preventing major accident hazards involving dangerous substances and limiting their consequences to the human health and environment for the purposes of securing a high level of protection in the Republic of Serbia in a consistent and efficient manner, the rights and obligations of the facility operators, obligations of the competent institutions, courses of action after a major accident hazard, information, information system, supervision and penal provisions, as well as other issues concerning the matter.

The European Commission Report<sup>252</sup> on the results of the accession process and harmonization with EU regulations for 2024 estimates that, when it comes to industrial pollution and risk management, the harmonization with the majority of the EU *acquis* is moderate. In the report period, 265 companies were assessed in terms of their full compliance with the EU Industrial Emissions Directive and 52 integrated permits were issued. Reporting methodology was adopted and rulebooks were revised.

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249 Strategy for the Introduction of Cleaner Production in the Republic of Serbia, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2009/17/2/reg>

250 Circular Economy Development Program in the Republic of Serbia, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/drugiakt/2022/137/1>

251 Official Gazette of RS, no.94/2024, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/31>

252 2024 Report, [https://www.mei.gov.rs/upload/documents/eu\\_dokumenta/2024/izvestaj\\_24.pdf](https://www.mei.gov.rs/upload/documents/eu_dokumenta/2024/izvestaj_24.pdf)

# Implementation of Regulations

The effects of the implementation of regulations related to the reduction of industrial pollution can best be assessed by examining the current state of industrial pollution through air, water and soil emissions, generation of industrial waste, etc., dependent on the type of industry and technology applied.

The cement and construction materials industry, ferrous and non-ferrous metallurgy and the chemical industry are large emitters of sulfur, carbon and nitrogen oxides, the total suspended particles that contain heavy metals and gasses containing long-term organic pollutants. The cement plants are located in populated areas near the sites where the raw materials are excavated (Beočin, Kosjerić, Popovac), the insulation construction material production plant is in Surdulica, lime is produced in Požega, the ferrous metallurgy facility is situated in Smederevo while the non-ferrous one is in Bor, metal processing industry plants are located in Sevojno, Guča, Sremska Mitrovica, Nova Pazova, Kikinda and Čoka, and chemical industry plants operate in Šabac, Pančevo and Prahovo, where, according to the population survey from 2022, approximately 700,000 people live, which is close to 10% of the total population in Serbia. The relatively small population in these local communities compared to the total population of Serbia, non-existence of or insufficient or inadequate environmental monitoring, lack of implementation of regulations, nonfunctional national institutions, non-existent or incapacitated (in terms of organization, expertise and staff) local institutions and lack of availability of public information are the reasons behind the inappropriate approach to handling issues concerning environmental pollution.

The Republic of Serbia has ratified the Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.<sup>253</sup>

The Environmental Protection Agency has compiled a register of major polluters<sup>254</sup> in accordance with the Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. This list includes seven chemical industry plants, six metallurgy and metal processing plants, ten mineral industry plants and one paper production plant and one surface treatment plant. In accordance with the Council Directive 96/61/EC, the Ministry of Environmental Protection has prepared a list of plants that are required to obtain the integrated permit.<sup>255</sup> According to this list, the integrated permit is to be obtained by 66 industrial facilities. In 2024, the Ministry updated the register of SEVESO plants<sup>256</sup> in line with the provisions of the Law on the Control of Major Accident Hazards Involving Dangerous Substances.<sup>257</sup> The register lists upper-tier SEVESO plants - 14 chemical plants and two metallurgy plants; and lower-tier SEVESO plants - ten chemical, eight mineral industry and three metallurgy and metal processing plants.

The register includes 11 chemical plants that are required to obtain the integrated permit, and there is a total of 24 SEVESO chemical plants. All SEVESO plants are required to obtain the integrated permit, which suggests that 13 chemical plants were not registered as mandatory for obtaining the integrated permit.

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253 Law on Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, Official Gazette of RS – International Contracts, no. 8/2011.

254 Law on the Ratification of the Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, Official Gazette of RS – International Contracts, no. 8/2011.

255 Ministry of Environmental Protection, List of plants that are required to obtain the integrated permit <https://www.ekologija.gov.rs/sites/default/files/2022-10/spisak.pdf>

256 Ministry of Environmental Protection, Register of SEVESO plants, <https://www.ekologija.gov.rs/dokumenta/zastita-od-hemijskih-udesu/registar-seveso-postrojenja>

257 Law on the Control of Major Accident Hazards Involving Dangerous Substances <https://www.ekologija.gov.rs/dokumenta/zastita-od-hemijskih-udesu/registar-seveso-postrojenja>

**Table 7:** Number of operators required to obtain the integrated permit, SEVESO plants and major polluters

Industry	Number of plants required to obtain integrated permit	SEVESO plants		Major polluters
		Upper-tier	Lower-tier	
Metal processing and production	22	2	3	5
Mineral industry	25		8	10
Chemical industry	11	14	10	7
Paper production	4			1
Surface treatment plants	4			1
<b>TOTAL</b>	<b>66</b>	<b>16</b>	<b>21</b>	<b>24</b>

It is necessary to revise and update all the registers, given that some of them are outdated, and that there are conspicuous discrepancies in the numbers of major polluters, SEVESO plants and plants that are required to obtain the integrated permit.

## Air Emissions and Air Quality in Industrial Local Communities

The European Union further prescribes the obligations of its Member States to adopt an integrated regulation pertaining to industrial pollution. The Council Directive 96/61/EC<sup>258</sup> of 24 September 1996 concerning integrated pollution prevention and control (IPPC Directive) applies to industrial and other plants and activities classified according to the level of pollution and risk to the human health and environment potentially caused by these activities. Based on this Directive, the European Union has prepared documents on best available technologies for certain industries, pollution reduction and prevention systems, monitoring and air quality management methodology. Implementation of this

258 COUNCIL DIRECTIVE 96/61/EC of 24 September 1996 concerning integrated pollution prevention and control <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31996L0061>

Directive in Serbia has been ratified by the Law on Integrated Prevention and Control of the Environment Pollution.<sup>259</sup>

In 2024, Serbia prepared an official Informative Inventory Report (IIR)<sup>260</sup> in line with the UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP).

Industry takes up third place, coming up after the energy industry and traffic, in emissions of PM<sub>2,5</sub> and PM<sub>10</sub> particles, total suspended particles, nitrogen oxides and carbon monoxide; it takes up second place in emissions of sulfur dioxide, arsenic, cadmium and mercury and is the largest emitter of lead and nickel.

Table 3 shows the total air emissions and industry emissions in 1990 and 2022, the share of industry in the total emissions in the respective years, as well as emission trends during the 1990-2022 and 2021-2022 periods.

**Table 8:** Total pollutant air emissions, industry emissions and trends<sup>261</sup>

Polluting matter	Total annual emissions in kt		Annual industry emissions in kt		Share of industry in total emissions in %		Industrial emissions trend, in %	Industrial emissions trend, in %
	1990	2022	1990	2022	1990	2022	1990–2022	2021–2022
NO <sub>x</sub>	183.0165	184.9173	18.0917	14.3169	9.73	7.74	-19.61	3.95
SO <sub>2</sub>	576.5929	184.9173	29.9822	13.9327	5.70	3.69	-53.53	3.66
CO	517.8765	366.7421	20.1935	42.5996	3.90	11.62	110.96	6.95
NH <sub>3</sub>	126.0121	71.0173	8.3014	0.3347	6.75	0.47	-96.06	71.17
PM <sub>2,5</sub>	54.6950	60.2295	4.7792	3.7391	8.74	6.21	-21.76	27.30
PM <sub>10</sub>	73.2571	78.3041	10.6249	8.2671	14.50	10.56	-22.19	18.59
TSP	158.1582	94.3478	77.5659	18.5830	49.04	19.70	-76.04	9.29
Pb	372.1959	42.1402	9.3093	22.9811	2.50	54.53	-146.86	-5.83
Cd	3.9904	2.1778	2.4832	0.6336	62.23	29.10	-74.48	-38.77

259 Official Gazette of RS, no. 135/2004, 25/2015, 109/2021, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/135/7/reg>

260 Ministry of Environmental Protection, Environmental Protection Agency (2024): REPUBLIC OF SERBIA INFORMATIVE INVENTORY REPORT TO LRTAP CONVENTION FOR 2024, available at: <https://sepa.gov.rs/wp-content/uploads/2024/09/INFORMATIVE-INVENTORY-REPORT-2022.pdf> (reviewed on 5/9/2025)

261 Environmental Protection Agency, Republic of Serbia Informative inventory report to L RTP convention for 2024

Polluting matter	Total annual emissions in kt		Annual industry emissions in kt		Share of industry in total emissions in %		Industrial emissions trend, in %	Industrial emissions trend, in %
	1990	2022	1990	2022	1990	2022	1990–2022	2021–2022
Hg	2.7684	1.3678	1.3103	0.4629	50.62	33.84	-66.97	-13.96
As	7.7583	4.8501	2.1222	1.0795	27.35	22.26	-49.13	27.35
Ni	16.8907	15.4103	8.3378	8.9518	49.36	58.09	-7.36	-2.87

## Abstraction of Water and Discharge of Industrial Wastewater

Water resource management is very important for the Republic of Serbia due to the fact that transit water flowing through Serbia has its most important use in industry. Climate change has a negative effect on international river flows, and especially on availability of water from medium-sized and small domestic watercourses for industrial use. Water management and protection falls under the jurisdiction of multiple ministries and institutions. This is why there are no integrated methodologies and records of the industry's impact on the quality of water in Serbia.

Statistical Office of the Republic of Serbia provides information in its Statistical Yearbooks on abstraction, consumption and discharge of wastewater. According to the information from the 2024 Statistical Yearbook,<sup>262</sup> in 2023 industry abstracted 66 million cubic meters of water. Out of the total abstracted water quantity, industry used 18 million cubic meters for cooling. Out of the remaining 48 million cubic meters, 28 million cubic meters were discharged. There are no data on the amounts of wastewater released after and without treatment, respectively.

The Environmental Protection Agency is monitoring the quality of surface and underground water and prepares annual reports<sup>263</sup>, but it does not offer assessment of the industry's impact on the current state of affairs. The Report

262 Statistical Office of the Republic of Serbia (2024): 2024 Statistical Yearbook, available at: <https://publikacije.stat.gov.rs/G2024/Pdf/G20242057.pdf>

263 Environmental Protection Agency (2024): Results of testing the quality of surface and underground water 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2024/12/KvalitetVoda2023.pdf>

on the State of the Environment in the Republic of Serbia for 2023<sup>264</sup> provides a list of major nitrogen and phosphorus water polluters, which does not include industrial plants. Industry is the largest heavy metal water polluter.

The share of heavy metal emissions in the total emissions of pollutants in the Republic of Serbia is merely 0.1%, but their monitoring is necessary due to high toxicity and negative impact, primarily to human health.

Over the last six years, emissions of copper and zinc have been declining, whereas emissions of arsenic and chrome have stayed virtually the same. Emissions of other metals have been increasing. It is necessary to revise the methodology of monitoring metal emissions in wastewater, given that large fluctuations over several years raise doubts about the accuracy of these records.

**Table 9:** Emissions of heavy metals (in t)  
in wastewater in the Republic of Serbia, per year

Heavy metals in t	2018	2019	2020	2021	2022	2023
Zinc and zinc compounds (Zn)	109	71.8	150	121	121	94.5
Copper and copper compounds (Cu)	55.8	36	23	107	39.2	52.3
Arsenic and arsenic compounds (As)	13.2	21	1.4	11.5	16.7	13.3
Lead and lead compounds (Pb)	12	10	20.3	8.2	13	23.2
Cadmium and cadmium comp. (Cd)	4.3	1.6	4	5.6	3.7	6
Chrome and chrome compounds (Cr)	16.9	24.5	5.2	4.7	12.2	17
Nickel and nickel compounds (Ni)	11.6	5.6	3	3	18.4	20.4
Mercury and mercury comp. (Hg)	0.6	0.1	0.07	0.05	0.2	0.7

**Source:** Environmental Protection Agency<sup>265</sup>

264 Environmental Protection Agency (2024): Report on the State of the Environment in the Republic of Serbia for 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2025/02/ZivotnaSredina2023.pdf>

265 Environmental Protection Agency (2024): Report on the State of the Environment in the Republic of Serbia for 2023, available at: <https://sepa.gov.rs/wp-content/uploads/2025/02/ZivotnaSredina2023.pdf>, table 3.2.2, p. 97.

## Industrial Waste

In 2023, the activities of economic operators in Serbia generated 7,754,291 tons of waste, 90,147 tons of which were hazardous waste. Industrial plants generated 138,273 tons of non-hazardous and 15,084 tons of hazardous waste. This makes up for 1.78% of non-hazardous waste (mining waste not included) and 16.73% of hazardous waste generated by economic operations. The total amounts of both non-hazardous and hazardous waste are lower than in 2022.

## Industrial Soil Pollution

Soil is a natural resource necessary for sustainable development. Its formation in nature is slow, but it is quickly destroyed in processes of degradation and contamination.

The new EU Soil Strategy for 2030<sup>266</sup> sets the framework and specific key actions aimed at protection and restoration of soil and securing sustainable exploitation. The Strategy defines vision and objectives for achieving optimal soil health by 2050, with specific actions by 2030, and will contribute to the objectives of the European Green Deal<sup>267</sup>. In addition to the basic Law on Soil Protection<sup>268</sup> the Republic of Serbia also adopted the Rulebook on the Content and Manner of Keeping the Cadaster of Contaminated Sites<sup>269</sup> and the list of activities that might cause soil pollution and degradation, procedure, content of information, deadlines, and monitoring requests.<sup>270</sup> The Environmental Protection Agency carries out an annual Soil Testing program, it collects and processes data on soil, prepares indicators of state of affairs and risk of soil degradation. It also keeps the Cadaster of Contaminated Sites, which is to represent a collection of information on threatened, polluted and degraded soil. The document envisaged by the Rulebook is not publicly available on the

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266 [https://environment.ec.europa.eu/topics/soil-health/soil-strategy-2030\\_en](https://environment.ec.europa.eu/topics/soil-health/soil-strategy-2030_en)

267 [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en)

268 Official Gazette of RS, no. 11/2015, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2015/112/19/reg>

269 Official Gazette of RS, no. 58/2019, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/58/4/reg>

270 Official Gazette of RS, no. 102/2020, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2020/102/6/reg>

Agency's website.<sup>271</sup> However, there is a list<sup>272</sup> of sites where it was established that the limits of remediation have been exceeded. The list includes 33 sites, 29 of which are industrial facilities.

## Integrated Permits

The Law on Integrated Prevention and Control of the Environment Pollution is implemented by issuing integrated permits for facilities that are subject to this obligation. As specified in the Starting Points, an ex-post analysis of the implementation of the Law on Integrated Prevention and Control of the Environment Pollution was carried out. It was then estimated that lack of necessary documents (exploitation and water permits) has exceptionally slowed down the process of issuing integrated permits, that the problems in issuing integrated permits are usually caused by unresolved property-legal relations, lack of necessary documents for this procedure, procedures at the Land Registry that were left unfinished, incomplete technical documents etc. When it comes to water permits, failures to complete procedures of issuing water permits are usually caused by lack of necessary documents.

According to the Starting Points, the total number of operators in the Republic of Serbia who are subject to the obligation of obtaining the integrated permit is 220, out of which 22 facilities operate in the metal processing and production industry, 25 operators are in the mineral, and 11 operators in the chemical industry, all of which makes up for 26.4% of the total number of all economic operators in Serbia who are required to obtain the integrated permit.

Since the beginning of implementation of the Law on Integrated Prevention and Control of the Environment Pollution, a total of 57 integrated permits were issued. Integrated permits were issued to 36% of the metal processing and production industry operators, 52% of the mineral industry operators and to 45% of the chemical industry operators.

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271 <https://sepa.gov.rs/katastar-kontaminiranih-lokacija/katastar/>

272 <https://sepa.gov.rs/wp-content/uploads/2024/12/Industrijski-kompleksi-2017-2023.pdf>

**Table 10:** Overview of the number of plants per type of industry and share of issued permits

Type of industry	Number of IPPC plants	Share of issued permits (%)
1. Metal processing and production	22	36
2. Mineral industry	25	52
3. Chemical industry	11	45
<b>Total</b>	<b>58</b>	<b>133</b>

The Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution estimate that the fact that few requests were filed during the recent period was also affected by extremely high costs of harmonization of the existing facilities with the best available techniques and limit values of emissions defined in the BAT conclusions and that these facts are also necessary to be analyzed in detail through financial analysis.

In the Industrial Policy Strategy of the Republic of Serbia from 2021 to 2030<sup>273</sup>, the Government defined as one of the key measures (Measure 3.2) an incentive program for investments in industrial production encouraging the use of high technologies that produce less impact on the environment, whose application is expected to make a significant contribution to the environmental protection. The effects of this measure will be measured by the investment volume and user satisfaction.

According to the assessment in the Starting Points, inspection supervision of the IPPC facilities was conducted pursuant to the Law on IPPC and Law on Inspection Supervision<sup>274</sup> in line with annual plans for inspection supervision and control lists. This supervision included a complete verification of all the requirements prescribed in the integrated permits. The problem that permeates the present situation refers to facilities that do not hold an integrated permit. This is reflected in divided jurisdiction for separate control of various environmental impacts (e.g., separate for water, separate for air, separate for

273 Official Gazette of RS, no. 35/2020, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2020/35/1/reg>

274 Official Gazette of RS, no. 36/16, 44/18 – as amended and 95/18.

waste management etc.), but also in separate supervision between inspectorates on the national, provincial and local levels.

In addition to this, according to the assessment in the Starting Points, the competent institutions have so far, in their application of the Law, published requests for issuance of integrated permits, drafts of permits and permits issued, as well as the related documents, both in the daily press and on their websites.

## Financing

Financing in the field of Industrial Pollution and Risk Management is covered in more detail in the chapter Financing in the Field of Environmental Protection and Climate Change.

# Recommendations



## Strategic and Legislative Framework

- 1.** Fully implement the Industrial Emissions Directive (IED), especially through adoption and implementation of the new Law on Integrated Prevention and Control of the Environment Pollution and other regulations; harmonize the Law on Planning and Construction with international standards; implement consistently the new Law on Environmental Impact Assessment (EIA) and the Law on Strategic Environmental Assessment (SEA), as well as the Air Protection Program and the new Law on Air Protection.
- 2.** As part of the preparation for the adoption of the new Law on Integrated Prevention and Control of the Environment Pollution, conduct a comprehensive and objective analysis of its application so far and implement a comprehensive and participatory consultative process.
- 3.** Competent authorities should accelerate the issuance of integrated permits and implement the Action plan for the development of administrative capacities, improve all administrative procedures in the process of issuing and controlling integrated permits, as well as increase capacities at all levels of administrative management, including inspections.



## Implementation of Regulations

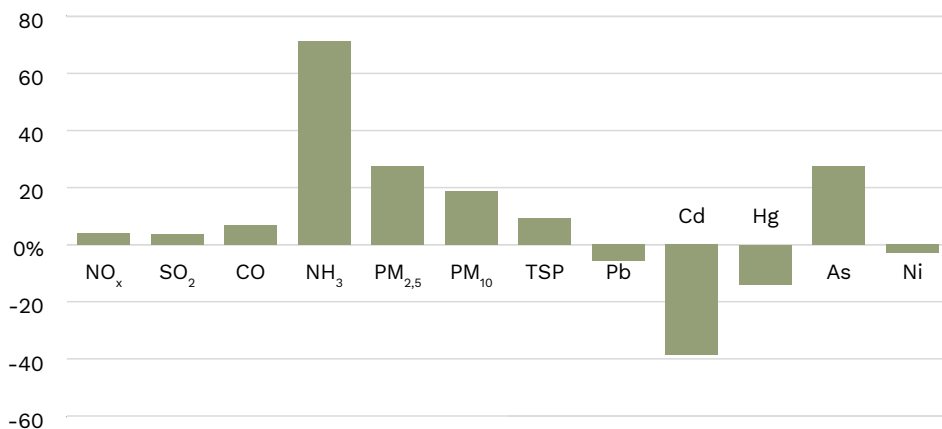
- 4.** Strengthen the capacities of local communities for the application of regulations both in the field of industrial pollution and in the entire field of environmental protection.

- 5.** Through the implementation of the new Law, improve the existing public Register of Integrated Permits so that it is more up to date and accurate, and make the updated information available to the interested public.
- 6.** Through implementation of the new Law on Integrated Prevention and Control of the Environment Pollution, develop a unique electronic system to support administrative procedures for issuing and controlling integrated permits, which would significantly increase the efficiency of the process.
- 7.** Strengthen monitoring systems for water, air, and soil quality in the zones affected by industrial facilities.
- 8.** Educate the business sector, professional institutions, CSOs and citizens on industrial emissions and provide timely and objective information to the public.
- 9.** Through the implementation of the new Law on Integrated Prevention and Control of the Environment Pollution and other regulations, increase public participation in the process of issuing integrated permits and improve communication between competent authorities and the public.

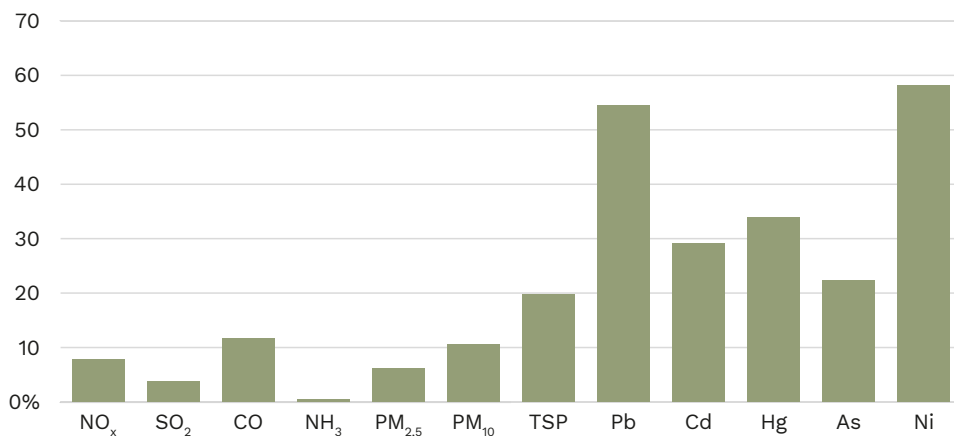


# INDUSTRIAL POLLUTION

## Pollutant air emissions trends, 2021-2022



## Share of industry in the total emissions in 2022



Source: Environmental Protection Agency, Republic of Serbia Informative Inventory Report to LRTAP Convention for 2024





A person is shown from the chest up, holding a transparent globe of the Earth with both hands. The person's face is partially visible in the background, looking towards the camera. The globe is the central focus, with the word 'Appendices' overlaid on it in a bold, yellow-green font. The background is a soft, out-of-focus indoor setting.

# **Appendices**

# Appendix 1

## List of Abbreviations

<b>ALHem</b>	Safer Chemicals Alternative
<b>BAT</b>	Best Available Techniques
<b>BPR</b>	Biocidal Product Regulation
<b>BIOFIN</b>	Biodiversity Finance Initiative
<b>BOS</b>	Belgrade Open School
<b>BTR</b>	Biennial Transparency Report
<b>CBAM</b>	Carbon Border Adjustment Mechanism
<b>CITES</b>	The Convention on International Trade in Endangered Species of Wild Fauna and Flora
<b>CLRTAP</b>	Convention on Long-Range Transboundary Air Pollution
<b>CLP</b>	Classification, Labelling and Packaging
<b>CNOSSOS</b>	Common Noise Assessment Methods
<b>CO<sub>2</sub></b>	carbon-dioxide
<b>CRBC</b>	China Road and Bridge Corporation
<b>CSO</b>	civil society organization
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EC</b>	European Council
<b>ECHA</b>	European Chemicals Agency
<b>EFSA</b>	European Food Safety Authority
<b>EIA</b>	Environmental Impact Assessment

<b>ENVAP</b>	Environment Accession Project
<b>EU</b>	European Union
<b>EU ETS</b>	EU Emission Trading System
<b>EUR</b>	euro
<b>EUTR</b>	EU Timber Regulation
<b>FLEGT</b>	Forest Law Enforcement, Governance and Trade
<b>GHG</b>	Greenhouse Gas
<b>GHS</b>	Globally Harmonized System)
<b>GDP</b>	Gross Domestic Product
<b>GPP</b>	Green Public Procurement
<b>IED</b>	Industrial Emissions Directive
<b>IPPC</b>	Integrated pollution prevention and control
<b>INECP</b>	Integrated National Energy and Climate Plans
<b>IPA</b>	Instrument for Pre-Accession Assistance
<b>IPPC</b>	Integrated Pollution Prevention and Control
<b>IUCN</b>	International Union for Conservation of Nature
<b>LSGs</b>	Local self-government units
<b>MCTI</b>	Ministry of Construction, Transport and Infrastructure
<b>MRV framework</b>	Monitoring, Reporting and Verification
<b>MEP</b>	Ministry of Environmental Protection
<b>NC</b>	National Communications
<b>NEMO</b>	Nominated Electricity Market Operator
<b>NDCs</b>	Nationally Determined Contribution
<b>NEPRO</b>	System for rapid exchange of information about unsafe products in the Republic of Serbia
<b>NERP</b>	National Emission Reduction Plan

<b>NPAA</b>	National Programme for the Adoption of the Acquis
<b>O<sub>3</sub></b>	Ozone
<b>RES</b>	renewable energy sources
<b>PA</b>	protected areas
<b>PFCx</b>	perfluorougljenici
<b>PGD</b>	Construction Permit Design
<b>PM<sub>10</sub></b>	particulate matter up to 10 micrometers
<b>PM<sub>2.5</sub></b>	particulate matter up to 2.5 micrometers
<b>PWMC</b>	public water management company
<b>PZI</b>	Construction Design
<b>RAPEX</b>	Rapid Exchange of Information System
<b>RCC</b>	The Regional Cooperation Council
<b>REACH</b>	Registration, Evaluation, Authorization and Restriction of Chemicals
<b>RERI</b>	Renewables and Environmental Regulatory Institute
<b>RHMSS</b>	the Republic Hydrometeorological Service
<b>RS</b>	The Republic of Serbia
<b>RSD</b>	Serbian Dinar
<b>SAI</b>	State Audit Institution
<b>SEPA</b>	Serbian Environmental Protection Agency
<b>SO<sub>2</sub></b>	sulfur-dioxide
<b>SORS</b>	Statistical Office of the Republic of Serbia
<b>SEA</b>	Strategic Environmental Assessment
<b>SVHC</b>	Substance of Very High Concern
<b>TVOC</b>	Total Volatile Organic Compounds
<b>UN</b>	United Nations

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<b>UNCCD</b>	United Nations Convention to Combat Desertification
<b>UNDP</b>	United Nations Development Programme
<b>UNECE</b>	The United Nations Economic Commission for Europe
<b>UNEP</b>	The United Nations Environment Programme
<b>UNFCCC</b>	United Nations Framework Convention on Climate Change
<b>WHO</b>	World Health Organization
<b>WWTPs</b>	Wastewater Treatment Plants
<b>YUCOM</b>	The Lawyers' Committee for Human Rights

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# Appendix 2

## Comparative Table of Recommendations for 2024 and 2025

**Legend:**  Not adopted  Partially adopted  Adopted



## Horizontal Legislation

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
<p>Improve the quality of the processes of the strategic impact assessment (SEA) and environmental impact assessment (EIA) by adopting a new Law on Environmental Impact Assessment and Law on Strategic Environmental Impact Assessment, as well as the necessary by-laws.</p>		<p>The Law on Environmental Impact Assessment (EIA) and the Law on Strategic Environmental Assessment (SEA) were adopted in November 2024. Given that the deadline for adopting the accompanying new by-laws under the Law on EIA is two years (with the exception of the regulation prescribing the list of projects requiring mandatory impact assessment, for which the deadline is six months from the date of the adoption of the Law on EIA), and that the deadline for adopting the by-laws under the Law on SEA is one year, the new laws are not yet effectively implemented. As a result, it is not possible to determine whether EIA and SEA processes have been qualitatively improved.</p>	<p>Improve the quality of the processes of the Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) by adopting a new Law on Strategic Environmental Assessment and Law on Environmental Impact Assessment, as well as the necessary by-laws.</p>

**Recommendation for 2024 from the previous report**

**Status Comment**

**Recommendation for 2025**

Harmonize List I (the projects for which an impact assessment is necessary) and List II (the projects for which an impact assessment may be required) with Annexes I and II of Directive 2011/92/EU.



Adopt by-laws in accordance with Article 5 of the Law and harmonize List I (the projects for which an impact assessment is necessary) and List II (the projects for which an impact assessment may be required) with Annexes I and II of Directive 2011/92/EU.

Create a list of plans and programs for which a strategic environmental impact assessment is mandatory and a list of plans and programs for which a strategic environmental impact assessment may be required.



In the new Law on Strategic Environmental Assessment, Article 5 has been amended to now specify which plans and programs require a mandatory strategic environmental assessment.

The recommendation is revoked

Provide transparent and timely information to the public about conducting public hearings via the internet and increase public awareness. Improve the functionality of eConsultation so that it meets the needs of the average user (access to documents, information about the beginning, duration, and venue of public hearings, etc.).



The e-Consultations portal was improved during the observed period but remains neither user-friendly nor adapted to the average internet user. The new laws on EIA and SEA foresee the creation of a central database and a central web portal through which competent authorities for EIA and SEA procedures inform interested bodies, organizations and the public about initiated procedures, process phases, deadlines and methods for submitting opinions, the time and place of public consultations and discussions, cross-border consultations, and enable electronic access to decisions and documentation. A three-year deadline has been set for establishing the central database and web portal. Such a centralized portal should significantly facilitate public participation in EIA and SEA processes. However, given the long timeframe for implementation, it is not possible to assess whether transparent and timely information dissemination is truly ensured.

Provide transparent and timely information to the public about conducting public debates via the internet and increase public awareness. Improve the functionality of e-Consultation so that it meets the needs of the average user (access to documents, information about the beginning, duration and venue of public debates, etc.).

**Recommendation for 2024 from the previous report**

**Status Comment**

**Recommendation for 2025**

Ensure the full implementation of the Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents (8/2019-79) in the environmental protection sector.



In March 2025, two new by-laws were adopted, replacing the Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents.

Ensure the full implementation of the Regulation on the Methodology of Public Policy Management (Official Gazette of RS, no. 20/2025-18), Impact Analysis of Public Policies and Regulations (Official Gazette of RS, no. 20/2025-18) in the environmental protection sector.

Fully implement the guidelines set out in the Rulebook on the Contents of the Request on the Need for Environmental Impact Assessment and Contents of the Request for Defining the Scope and Content of Environmental Impact Assessment Study when drafting environmental impact assessment studies.



The new Law on Environmental Impact Assessment (EIA), adopted in November 2024, set a two-year deadline for the adoption of by-laws. During this period, the old by-laws remain in effect.

Fully implement the guidelines set out in the Rulebook on the Contents of the Request on the Need for Environmental Impact Assessment and Contents of the Request for Defining the Scope and Content of Environmental Impact Assessment Study when drafting environmental impact assessment studies.

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



The new Law on Environmental Impact Assessment (EIA), adopted in November 2024, the same as its previous version, requires the description and assessment of cumulative environmental impacts, but this is still not consistently applied in practice.

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 5 years.



The recommendation is revoked

**Recommendation  
for 2024 from the  
previous report**

**Status Comment**

**Recommendation for 2025**

Tighten the penal provisions for environmental pollution, and consistently apply the Law on Liability of Legal Entities for Criminal Offenses (Official Gazette of the Republic of Serbia, no. 97/08).



Tighten the penal provisions prescribed by the Law on Environmental Protection for economic offenses, including those committed by legal entities, entrepreneurs and individuals, as well as penal provisions for responsible persons within administrative bodies, local self-government units or organizations exercising public authority. Consistently apply, in particular, the Law on the Liability of Legal Entities for Criminal Offenses (Official Gazette of RS, no. 97/08) and the provisions of the Criminal Code (Official Gazette of RS, no. 94/2024) relating to environmental crimes and environmental pollution.

## New recommendation

- Amend the new Law on Environmental Impact Assessment by removing Article 6. **Comment:** Article 5 of the Law on Environmental Impact Assessment clearly defines which projects require a mandatory impact assessment and which require the project proponent to submit a request for a decision on the need for an environmental impact assessment. However, Article 6 contradicts Article 5 by stipulating that projects listed in Article 5 (for which the mandatory assessment obligation is already prescribed), require an opinion of the Ministry in charge of environmental protection on the need to initiate the impact assessment procedure during the issuance of location conditions in accordance with

the law governing planning and construction. The purpose of requesting an opinion on the need to initiate an impact assessment within a procedure where the obligation for such projects is already clearly established is unclear. Further confusion is created by the last paragraph of Article 6 stating that the said opinion by the Ministry in charge of environmental protection does not exempt the project proponent from the obligation to initiate the environmental impact assessment procedure.

# Air Quality

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
<p>Start the process of establishing binding standards for low-power combustion appliances used in households (stoves and solid fuel stoves) in accordance with the Ecodesign Directive (2009/125/ EC). Given the widespread use of inefficient stoves and solid fuel ovens in households, consider the accelerated transposition of this directive.</p>		<p>The Rulebook on Ecodesign Requirements for Solid Fuel Boilers (Official Gazette of the Republic of Serbia, no. 120/2023) will come into effect on January 1, 2026.</p>	<p>Not applicable</p>
<p>Enable citizens to participate in the adoption of documents concerning air quality at both national and local levels.</p>		<p>During the past year, a public debate was held on the Draft Law on Air Protection. The Working Group responsible for its development included only two civil society organizations, selected through a competition with conditions that preemptively excluded certain associations with proven expertise and many years of contribution to the fight for clean air. Additional confusion was caused by holding of an early public inspection, but only for a part of the Draft Law in November 2024. Until now, consultations have never been organized on just a portion of a law, as the practice of public inspection has been applied exclusively to spatial and urban planning documents.</p>	<p>Ensure citizen participation in the development of documents related to air quality at both national and local levels.</p>

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

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.



The Environmental Protection Agency once again experienced a several-month delay in publishing the Air Quality Report. In more than 20 cities and agglomerations, the air is excessively polluted, and only eight cities have an approved Air Quality Plan.

Ensure that competent institutions enforce regulations related to legal deadlines for putting in place public policies concerning air quality, regulations related to air quality monitoring, exchange of air quality information and obligations under international agreements.

Monthly reports on detected exceedances of hourly and daily limit values (LV) must include information about which monitoring stations were/were not operating during that month.



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Monthly reports on detected exceedances of hourly and daily limit values (LV) must include information as to which monitoring stations were not operating during that month. In addition, it is necessary to provide a cumulative display of pollution exceedances in monthly tables, illustrating therein the exact number of days with excessive pollution recorded since the beginning of the year, up to and including the month concerned. This information is important because there are no monthly limits on the number of days with allowed exceedances – only annual limits exist.

Stakeholders responsible for monitoring air quality should guarantee proper maintenance of measurement systems and data availability and finance uninterrupted high-quality operation of air quality monitoring networks, especially for urban agglomerations such as Belgrade.



The number of air quality monitoring stations has increased, but problems with local monitoring persist, as in many areas it is not continuous and not all air quality parameters are being tracked.

Stakeholders responsible for monitoring air quality should guarantee proper maintenance of measurement systems and data availability and finance uninterrupted high-quality operation of air quality monitoring networks, especially for urban agglomerations such as Belgrade.

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

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



Out of eight agglomerations with excessively polluted air, four have no information about air quality on their city or municipal websites. The Municipality of Kosjerić has posted a link to the Environmental Protection Agency's website, but the link is broken. Užice, Bor and Belgrade do have air quality information available on their websites.

On the websites of six cities with excessively polluted air, there is no information about air quality. Four cities with excessively polluted air offer real-time air quality information. Two cities have sections dedicated to air quality, but the data is outdated or the links are broken. The Šabac Institute of Public Health has created a page for monitoring air quality, but this page is not linked to the city's official website.

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

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



According to the Analysis of Inspection Control and Supervision in the Field of Environmental Protection through Criminal Law in the Republic of Serbia,<sup>275</sup> prepared by YUCOM, it was found that, at least at the municipal level, there is no specifically allocated budget for inspection needs such as equipment, laboratory analyses, vehicles, training, and so on. Additionally, funds designated for expert evaluations, specialized analyses – laboratories and similar purposes are also not available.

Secure financing and proper conditions for the unobstructed work of inspectorates for environmental protection, in line with authorizations.

275 <https://yucom.org.rs/analiza-inspekcijskog-nadzora-i-kontrole-u-oblasti-krivicnopravne-zastite-zivotne-sredine-u-republici-srbiji/>

**Recommendation for 2024  
from the previous report**

**Status    Comment**

**Recommendation for 2025**

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Introduce a regulation according to which local self-governments shall be obliged to allocate a portion of the funds for financing the Energy Rehabilitation Program toward family houses and apartments belonging to socially vulnerable citizens. This should be implemented by local self-governments and city municipalities in cooperation with the Ministry of Mining and Energy.



According to information about the project Clean Energy and Energy Efficiency for Citizens, implemented by the Ministry of Mining and Energy, starting this year all socially vulnerable citizens, and not just energy-vulnerable consumers, will be eligible to apply for subsidies covering up to 90% of the total cost of energy renovation. This change enables a greater number of citizens to apply for this type of support. Applications can be submitted in all local self-government units participating in the program, unlike in the previous year.









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# Waste Management






Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Build partnerships with civil society and the business sector when adopting regulations, and establish clear communication with the public.	⊗	/	Build partnerships with civil society and the business sector when adopting regulations, and establish clear communication with the public.
Improve the legal framework in order to enable the effective application of the principle of extended liability and the “polluter pays” principle.	⊗	/	Improve the legal framework in order to enable the effective application of the principle of extended liability and the “polluter pays” principle.
Harmonize regional and local waste management plans with strategic documents at the national level.	⊗	/	Harmonize regional and local waste management plans with strategic documents at the national level.
Adopt the Draft Waste Prevention Plan.	✓	At the proposal of the Ministry of Environmental Protection, the Government of the Republic of Serbia adopted the Waste Prevention Plan in the Republic of Serbia on February 20, 2025. <sup>276</sup>	/
Involve industry in the application of the circular economy	⊗		Involve industry in the application of the circular economy.
Adopt a regulation to regulate the delivery of hazardous waste by natural persons to authorized operators.	⊗	/	Adopt a regulation to regulate the delivery of hazardous waste by natural persons to authorized operators.
Prevent the creation of new illegal landfills by expanding the coverage of municipal waste collection to 100% and increasing inspection oversight.	⊗		Prevent the creation of new illegal landfills by expanding the coverage of municipal waste collection to 100% and increasing inspection supervision.

276 [https://www.ekologija.gov.rs/sites/default/files/2025-03/plan\\_prevenicije\\_stvarana\\_otpada\\_1.pdf](https://www.ekologija.gov.rs/sites/default/files/2025-03/plan_prevenicije_stvarana_otpada_1.pdf)

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Introduce the obligation to monitor water, air, and soil at all municipal waste landfills to prevent fires and environmental pollution.		/	Introduce the obligation to monitor water, air and soil at all municipal waste landfills to prevent fires and environmental pollution.
Raise public awareness of the importance of establishing a waste management system and the consequences of inappropriate waste management on public health and the environment.		There is still no national informational campaign with widely accessible materials (TV, radio, internet) about the establishment of a waste management system and environmental impacts.	Raise public awareness of the importance of establishing a waste management system and the consequences of inappropriate waste management to public health and the environment.
Provide for appropriate management of hazardous waste generated in Serbia in anticipation of the expected ban on exporting hazardous waste			Provide for appropriate management of hazardous waste generated in Serbia in anticipation of the expected ban on exporting hazardous waste.
Create capacity for the treatment or permanent storage of hazardous waste, in those cases where waste cannot be treated.			Create capacity for the treatment and permanent storage of hazardous waste, in those cases where waste cannot be exported.
Introduce more intense inspection oversight over the implementation of the Law on Packaging and Packaging Waste.		A total of 151 environmental protection inspections were carried out in 2024, some of which included packaging waste.	Introduce more intense inspection supervision over the implementation of the Law on Packaging and Packaging Waste.
Create a unified methodology for collecting and sending data to the Statistical Office of the Republic of Serbia and the Environmental Protection Agency and ensure the reliability of the data obtained.		A new version of the information system of the National Register of Pollution Sources began operating on December 2, 2024.	Create a unified methodology for collecting and sending data to the Statistical Office of the Republic of Serbia and the Environmental Protection Agency and ensure the reliability of the data obtained.
Systematically organize textile waste management. Organize a separate collection of textile waste and ensure that collected textile waste does not end up in landfills or incinerators			Establish a systemic solution for textile waste management through clear regulations, incentive measures, and adequate infrastructure.
Ensure the implementation of the Law on Waste Management in practice.			Ensure the implementation of the Law on Waste Management in practice.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
<p>Ensure that the quantities of collected municipal waste are measured and that its morphological composition is determined by monitoring the implementation of the Law on Waste Management, supporting the procurement of necessary scales at unsanitary landfill sites, and providing training for employees at utility companies so that they can apply the Rulebook on the Methodology for the Collection of Data Regarding the Content and Quantities of Municipal Waste on the Territory of the Local Self-Government Unit.</p>			<p>Ensure that the quantities of collected municipal waste are measured and that its morphological composition is determined by monitoring the implementation of the Law on Waste Management, supporting the procurement of necessary scales at unsanitary landfill sites, and providing training for employees at utility companies so that they can apply the Rulebook on the Methodology for the Collection of Data Regarding the Content and Quantities of Municipal Waste on the Territory of the Local Self-Government Unit.</p>
<p>Establish a control system for the cross-border import, export, and transit of waste.</p>		<p>A system for controlling import, export and transit of transboundary waste movement is put in place and is operational: It is regulated by the Law and through several by-laws that define clear procedures; The required permits are issued by the Ministry, with mandatory documentation and insurance; There are control mechanisms and sanctions in place for non-compliance with the regulations.</p>	<p>Not applicable</p>
<p>Improve the existing data collection system, as well as data reliability.</p>		<p>A new version of the information system of the National Register of Pollution Sources began operating on December 2, 2024.</p>	<p>Improve the existing data collection system, as well as data reliability.</p>
<p>Introduce an independent Fund for Environmental Protection to distribute funds collected from the ecotax.</p>			<p>Introduce an independent Fund for Environmental Protection to distribute funds collected from the ecological taxes.</p>

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Provide financial support to the civil sector.		On January 31, 2025, the Ministry announced that there would be no public call for proposals to support civil society projects, as the 2025 Budget Law does not allocate funds for these purposes.	Provide financial support to the civil sector.
Ensure transparency in the process of financing projects in the field of waste management.		The 2025 Budget Law allocated expenditures for the “implementation of projects for the construction of waste management systems” in the amount of RSD 700 million (approximately EUR 6–7 million) as transfers to local authorities, and RSD 1.35 billion for the remediation of unsanitary landfills.	Ensure transparency in the process of financing projects in the field of waste management.
Introduce economic instruments to reduce the amount of waste that ends up at landfills without treatment.			Introduce economic instruments to reduce the amount of waste that ends up at landfills without treatment.
Make a final decision regarding the introduction of a deposit system.			Make a final decision regarding the introduction of a deposit system.
Introduce umbrella insurance for hazardous waste operators so that insurance covers the costs of hazardous waste remediation and resulting damages if an operator’s license is revoked.		According to the Law on Waste Management and the accompanying Regulation on the Type of Financial Guarantees and Equivalent Insurance Schemes, operators of all waste activities (collection, transport, treatment, storage, disposal, transboundary movement) must submit a financial guarantee or an insurance policy.	Not applicable
Adopt a by-law to define fees for importing medicines and placing them on the market due to the possibility that they will become hazardous waste after their expiration date.			Due to the likelihood that medicines may become hazardous waste after their expiration date, a bylaw should be adopted to define the fee for the import and placing of medicines on the market.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Ensure transparency and easy access to information regarding the costs of building infrastructure in the area of waste management (regional centers, landfills, equipment, etc.) and sources of financing.		The 2025 Budget Law allocated expenditures for the “implementation of projects for the construction of waste management systems” in the amount of RSD 700 million (approximately EUR 6–7 million) as transfers to local authorities, and RSD 1.35 billion for the remediation of unsanitary landfills.	Ensure transparency and easy access to information regarding the costs of building infrastructure in the area of waste management (regional centers, landfills, equipment, etc.) and sources of financing.
Ensure realistic financing of the costs of collection, transportation, treatment, and disposal of waste, according to the “polluter pays” principle.			Ensure realistic financing of the costs of collection, transportation, treatment, and disposal of waste, according to the “polluter pays” principle.
Ensure that waste management costs are included in the price of products and services in order to avoid shifting costs from consumers to citizens.			Ensure that waste management costs are included in the price of products and services in order to avoid shifting costs from consumers to citizens.
Develop capacity and political will to use available EU funds and grants instead of credit arrangements for infrastructure construction.		The 2025 Budget Law allocated expenditures for the “implementation of projects for the construction of waste management systems” in the amount of RSD 700 million (approximately EUR 6–7 million) as transfers to local authorities, and RSD 1.35 billion for the remediation of unsanitary landfills.	Develop capacity and political will to use available EU funds and grants instead of credit arrangements for infrastructure construction.
Introduce subsidies for opening small businesses that perform on-site packaging waste recycling.			Introduce subsidies for opening small businesses that perform on-site packaging waste recycling.

## New recommendations

- Perform a revision of the planned regional waste management systems.
- Intensify inspection supervision of the implementation of the Law on Waste Management and the Law on Packaging and Packaging Waste.
- Create a legal framework for introducing a deposit system for packaging.
- Conduct a detailed investigation into the failures in the operation of the Regional Waste Management Center Duboko Užice, identify responsible persons and take appropriate actions in accordance with the law, including penalties for those responsible for the identified irregularities.
- Restore the dedicated character to all the funds collected from ecological taxes.



# Water Quality

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
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.			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 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).		Plans prescribed by the Law need to be adopted in a timely manner, i.e., before the start of their implementation period, and in accordance with the legal procedure, so as to enable the timely execution of planned activities. Plans that remain at the draft or proposal stage cannot serve as a basis for implementing measures.	Adopt strategic and planning documents in accordance with the obligations arising from relevant EU policies.

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

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 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 the sectors to be established.



Develop structured cooperation with other relevant sectors (environmental protection, energy, agriculture and spatial planning). This requires constant communication and exchange of information between the sectors to be established.

Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities for participation than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.










Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities for participation than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.

Integrate nature-based solutions into water management practices and consider ecosystem services more seriously. Specific capacities for these needs should be developed within the competent institutions.



Integrate nature-based solutions into water management practices and consider ecosystem services more seriously. Specific capacities for these needs should be developed within the competent institution.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
<p>Improve control and mitigation of key threats (poorly planned small hydroelectric power 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.</p>			<p>Improve control and mitigation of key threats (poorly planned small hydroelectric power plants which are being constructed intensively, gravel extraction, pollution, uncontrolled use of groundwater and illegal construction on riverbanks). River habitats, wetlands, and water resources in general are highly endangered in Serbia. Urgent action is needed at the national level.</p>
<p>Develop a single database on planning and constructing WWTPs that is available to the public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.</p>			<p>Develop an integrated database on planning and constructing WWTPs that is available to the public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.</p>
<p>Raise the capacities of the Water Inspectorate and increase the number of water inspectors.</p>		<p>A systematic improvement of the water inspectorate capacity is recommended through increasing the number of inspectors, continuous training and technical empowerment, in order to ensure consistent enforcement of the Law and effective supervision in the field of water management.</p>	<p>Enhance the capacities of the Water Inspectorate and increase the number of water inspectors.</p>
<p>Establish water quality monitoring in accordance with the requirements of the Water Framework Directive.</p>		<p>The Annual Water Status Monitoring Program is currently being developed.</p>	<p>Establish water quality monitoring in full accordance with the requirements of the Water Framework Directive.</p>
<p>Determine the borders of water land in the cadaster.</p>		<p>Adopt a regulation that would closer define the methodology for determining water land boundaries.</p>	<p>Establish the water land boundaries in the cadaster.</p>

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
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.		It is necessary to permanently secure increased budget funds for water management and protection to ensure long-term sustainability and effective implementation of activities in this field.	Gradually increase water prices and fees for wastewater collection and treatment services in order to provide for the construction of the necessary facilities for water collection and treatment and their normal operation.
Permanently increase budget funds for financing water management activities and water protection.			Permanently increase budget funds for financing water management activities and water protection.

## New recommendations

- Adopt the new Water Law without further delay, along with the necessary by-laws, to ensure a coherent and effective legal framework for water management policy planning and implementation. Prolonged postponement of this legislation has contributed to legal uncertainty, impeded the execution of strategic and planning documents, and obstructed the practical enforcement of numerous legal obligations.
- Establish a Water Council as a professional and advisory body prescribed by the Water Law, which would provide systematic, expert and inclusive support in the decision-making process. At the same time, it is necessary to ensure continuity in the work of the National Water Conference, envisioned as a forum for public discussion and inter-sectoral dialogue. The effective establishment of these two mechanisms would contribute to a more transparent, accountable and efficient implementation of water management policies, through improved information sharing, consultations and coordination among all relevant stakeholders.



# Nature Protection

## Recommendation for 2024 from the previous report

Status Comment

## Recommendation for 2025

Draft and adopt a new Law on Nature Protection in accordance with EU legislation, ratified international agreements, good practices in this area, and the specific needs related to nature protection in Serbia through a transparent and inclusive process.



Draft and adopt the new Law on Nature Protection in accordance with EU legislation, ratified international agreements, good practices in this area, and the specific needs related to nature protection in Serbia through a transparent and inclusive process.

Regulate the appropriate assessment procedure for the ecological network through the Law on Nature Protection and the Regulation on Appropriate Assessment.



The recommendation remains, but has been combined with other recommendations related to the Law on Nature Protection.

Regulate the appropriate assessment procedure for the ecological network, define biosphere reserve as a category of protected area and prescribe competencies and key conditions for managing such areas through the Law on Nature Protection.

Amend the Rulebook on the Declaration and Protection of Strictly Protected Wild Species of Plants, Animals, Fungi, and Mushrooms and the Rulebook on the Criteria for the Separation of Habitat Types, Types of Habitats, Vulnerable, Endangered, Rare, and Priority Protection Habitat Types in order to fully transpose the provisions of the Habitats Directive and the Birds Directive related to hunting.



Amend the Rulebook on the Declaration and Protection of Strictly Protected Wild Species of Plants, Animals, Fungi, and Mushrooms and the Rulebook on Declaring Closed Hunting Season for the Protected Wild Game Species in order to fully transpose the provisions of the Habitats Directive and the Birds Directive related to hunting.






Create and adopt a protocol to precisely determine the sequence and manner of action that the competent authorities need to take when detecting cases of poisoning, as well as other cases of illegal actions against wild species.



Create and adopt a protocol to precisely determine the sequence and manner of action that the competent authorities need to take when detecting cases of poisoning, as well as other cases of illegal actions against wild species.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Form an inter-ministerial working group for protected areas and the ecological network to coordinate work on the development of planning documents, protection studies, management plans, and area protection acts.	⊗		Form an inter-ministerial working group for protected areas and an ecological network to coordinate work on the development of planning documents, protection studies, management plans, and area protection acts.
Define the biosphere reserve as a type of protected area in the Law on Nature Protection, and prescribe the competencies and basic measures for managing those areas.	⊗	The recommendation has been combined with another recommendation related to the Law on Nature Protection.	Not applicable
Improve the capacities of the Ministry of Environmental Protection in the field of nature protection by increasing the number of employees in the sector as a matter of priority.	⊗		Improve the capacities of the sector for nature protection of the Ministry of Environmental Protection and the provincial and national institutes for nature protection, by increasing the number of qualified personnel and technical resources.
Improve the capacities of nature protection institutes (both at the provincial and national level) by increasing the number of professional staff and procurement of technical equipment.	⊗	Integrated into the previous recommendation.	Not applicable

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Continue building the capacities of the police, inspectorates, prosecution, and judiciary for the implementation of regulations related to protecting species and habitats in co-operation with professional civil society organizations.	⊗	The recommendation has been combined with a similar recommendation and thus expanded.	Continue building the capacities of the police, inspectorates, prosecution and judiciary for the implementation of regulations related to protecting species and habitats in co-operation with professional civil society organizations. Furthermore, strengthen the capacities of the Unit for the Suppression of Environmental Crime and Environmental Protection of the Ministry of Internal Affairs and its coordination with other sectors.
Improve the planning and implementation of inspection supervision over protected areas, i.e., ecological network sites.	⊗		Improve the planning and implementation of inspection supervision over protected areas, i.e., ecological network sites.
Provide free access to the online database comprising decisions on nature protection conditions issued by the Ministry of Environmental Protection of the Republic of Serbia and the Institute for Nature Conservation to all interested parties.	⊗		Provide free access to the online database comprising decisions on nature protection conditions issued by the Ministry of Environmental Protection of the Republic of Serbia and the institutes for nature conservation to all interested parties.
Improve cooperation with interested parties regarding the implementation of international agreements in the field of nature protection through regular information exchange and consultations.	⊗		Improve cooperation with interested parties regarding the implementation of international agreements in the field of nature protection through regular information exchange and consultations.
Form a National Council for the Natura 2000 ecological network in order to ensure intersectoral cooperation and continuous institutional support.	⊗		Form a National Council for the Natura 2000 ecological network in order to ensure inter-sectoral cooperation and continuous institutional support.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Compile an effectiveness assessment of the management of protected areas, establish mechanisms for monitoring management effectiveness, and ensure the availability of reports to the public.			Compile an effectiveness assessment of the management of protected areas, establish mechanisms for monitoring management effectiveness and ensure the availability of reports to the public.
Improve the capacities of the Unit for the Suppression of Environmental Crime and Environmental Protection, as well as its coordination with other sectors.		This recommendation still stands, it has only been combined with another recommendation due to their similarities.	Not applicable
Create appropriate, targeted guides for more detailed explanations of the appropriate assessment procedure and practical examples from practice (preferably, illustrations of good and bad practices). Familiarize stakeholders with the appropriate assessment procedure using the guide and supporting materials.			Create appropriate, targeted guides for more detailed explanations of the appropriate assessment procedure and practical examples from practice (preferably, illustrations of good and bad practices). Familiarize stakeholders with the appropriate assessment procedure using the guide and supporting materials.
Provide public access to the electronic Central Register of Protected Natural Assets and develop its functionalities so that each protected area contains, <i>inter alia</i> , a ten-year management plan, annual management programs, and reports on the implementation of the annual management program.			Provide public access to the electronic Central Register of Protected Natural Assets and develop its functionalities so that each protected area contains, <i>inter alia</i> , a ten-year management plan, annual management programs, and reports on the implementation of the annual management program.
Maintain regular financing of the activities aimed at establishing the ecological network of the Republic of Serbia and Natura 2000, with full and regular reporting on the activities carried out and the funds spent.			Maintain regular financing of the activities aimed at establishing the ecological network of the Republic of Serbia and Natura 2000, with full and regular reporting on the activities carried out and the funds spent.

**Recommendation for 2024  
from the previous report**

**Status**   **Comment**

**Recommendation for 2025**

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Provide greater financial resources for the management of protected areas, as well as for the protection of species and habitats at the national and local levels.



The recommendation has been expanded.

Provide greater financial resources from the budget of the Republic of Serbia for managing protected areas, including constant and appropriate funds for hiring new wildlife rangers in protected areas, their training and procurement of necessary equipment.

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## New recommendation

- Adopt the Regulation on Appropriate Assessment and enable its proper implementation.



# Chemicals Management

Recommendation for 2024	Status	Comment	Recommendation for 2025
Continue with the development of the legislative framework through further harmonization of regulations by taking into account new EU regulations and amendments and additions to the existing ones, as well as by strengthening the capacities necessary for the implementation of regulations.			Continue with the development of the legislative framework through further harmonization of regulations by taking into account new EU regulations and amendments to the existing ones, as well as by strengthening the capacities necessary for their implementation.
Ratify the Minamata Convention on Mercury.		The Republic of Serbia ratified the Minamata Convention on Mercury in December 2024 by adopting the Law on the Ratification of the Minamata Convention on Mercury.	Not applicable
Update the National Implementation Plan for the implementation of the Stockholm Convention and the Action Plan.			Update the National Implementation Plan for the implementation of the Stockholm Convention and the Action Plan.
Adopt the Law on the Implementation of the REACH Regulation.			Adopt the Law on the Implementation of the REACH Regulation.
Adopt the Law on the Implementation of the BPR Regulation.			Adopt the Law on the Implementation of the BPR Regulation.

Recommendation for 2024	Status	Comment	Recommendation for 2025
<p>Harmonize the Rulebook on the List of Electrical and Electronic Products, Measures Restricting or Prohibiting the Use of Electric and Electronic Equipment Containing Hazardous Substances, the Manner and Procedure for Management of Waste Originating from Electrical and Electronic Products with EU Directive 2015/863/ EU (RoHS III).</p>			<p>Harmonize the Rulebook on the List of Electrical and Electronic Products, Measures Restricting or Prohibiting the Use of Electric and Electronic Equipment Containing Hazardous Substances, the Manner and Procedure for Management of Waste Originating from Electrical and Electronic Products with EU Directive 2015/863/ EU (RoHS III), as well as relevant provisions of the Law on Waste Management.</p>
<p>Strengthen administrative and professional capacities in this area, especially the registration of chemicals and biocidal products in the Register, statistical analysis of collected data, management of biocidal products, creation of guides and guidelines for the info desk, and instructions for inspection supervision.</p>			<p>Strengthen administrative and professional capacities in this area, especially the registration of chemicals and biocidal products in the Register, statistical analysis of collected data, management of biocidal products, creation of guides and guidelines for the info desk and instructions for inspection supervision.</p>
<p>Make data from the Chemicals Register on the number of reported chemicals by hazard class available on the website of the Ministry of Environmental Protection, and update them regularly on an annual basis.</p>			<p>Make data from the Chemicals Register on the number of reported chemicals by hazard class available on the website of the Ministry of Environmental Protection and update them regularly on an annual basis.</p>

**Recommendation for 2024**    **Status**    **Comment**

**Recommendation for 2025**

Establish a joint body for the integrated management of chemicals in order to establish satisfactory co-operation and coordination between all relevant sectors and ensure the safe management of chemicals throughout the entire life cycle — that is, the adoption and implementation of the Integrated Chemicals Management Program. The joint body should consist of representatives of competent state authorities in the field of chemicals management and representatives of the industry, scientific researchers, and non-governmental organizations.







Establish a joint body for the integrated management of chemicals in order to establish satisfactory co-operation and coordination between all relevant sectors and ensure the safe management of chemicals throughout the entire life cycle — that is, the adoption and implementation of the Integrated Chemicals Management Program. The joint body should consist of representatives of competent state authorities in the field of chemicals management and representatives of the industry, scientific researchers and non-governmental organizations.

Strengthen inspection supervision over chemical and biocidal product control activities by strengthening the capacity of the inspectorates themselves and increasing the number of inspection supervisions. Supervise the implementation of Article 27 of the Law on Chemicals, protect the rights of consumers, and check compliance with the bans and restrictions on chemicals, i.e., non-consumer goods.



Strengthen inspection supervision over chemical and biocidal product control activities by strengthening the capacities of the inspection bodies themselves and increasing the number of inspection supervisions. Supervise the implementation of Article 27 of the Law on Chemicals, protect the rights of consumers and check compliance with the bans and restrictions on chemicals, i.e., non-consumer goods.

Recommendation for 2024	Status	Comment	Recommendation for 2025
<p>Strengthen inspection supervision over the implementation of the Law on Consumer Goods by strengthening the capacity of the inspectorates themselves and increasing the number of inspections, as well as the capacity for entering unsafe products from the market into the NEPRO rapid notification system for unsafe products, in order to ensure adequate information for citizens about the products withdrawn from the market due to chemical risks.</p>			<p>Strengthen inspection supervision over the implementation of the Law on Consumer Goods by strengthening the capacities of the inspection bodies themselves and increasing the number of inspection supervisions, as well as the capacity for entering unsafe products from the market into the NEPRO rapid alert system for unsafe products, in order to ensure adequate information for citizens about the products withdrawn from the market due to chemical risks.</p>
<p>Improve the information available on the Chemicals Info Desk by posting the guides and guidelines of the European Chemicals Agency, which are used in practice and which are insisted on within the training and exams for chemicals advisers, in the Serbian language, as well as the administrative procedure itself and the section with the most frequently asked questions.</p>			<p>Improve the information available on the Chemicals Info Desk by posting the guides and guidelines of the European Chemicals Agency, which are used in practice and which are insisted on within the training and exams for chemicals advisers, in the Serbian language, as well as the administrative procedure itself and the section with the most frequently asked questions.</p>
<p>Make the information in the NEPRO rapid alert system for unsafe products publicly available, and update it regularly.</p>			<p>Make the information in the NEPRO rapid alert system for unsafe products publicly available and update it regularly.</p>
<p>Make the information on the implementation of all conventions that the Ministry of Environmental Protection is responsible for publicly available.</p>			<p>Make the information on the implementation of all conventions under the jurisdiction of the Ministry of Environmental Protection publicly available.</p>

**Recommendation for 2024**    **Status**    **Comment**

**Recommendation for 2025**

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 for monitoring the market placement and use of chemicals, their metabolites, and the path of chemicals in the environment and living organisms.



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 for monitoring the market placement and use of chemicals, their metabolites and the path of chemicals in the environment and living organisms.

Publish updated data from the Chemicals Register on the entry of substances of concern, and assess whether the risk reduction measures applied by businesses are sufficient to control the risk of these chemicals.




Publish updated data from the Chemicals Register on the entry of substances of concern and assess whether the risk reduction measures applied by businesses are sufficient to control the risk these chemicals pose.

Amend the domestic system governing the collection of fees and charges by adopting the EU model of financing the system for the management of chemicals and biocidal products to ensure that the fees for regulatory procedures regarding chemicals and biocidal products are used to improve the chemicals and biocidal products management system.










Amend the domestic system governing the collection of fees and charges by adopting the EU model of financing the system for the management of chemicals and biocidal products to ensure that the fees for regulatory procedures regarding chemicals and biocidal products are used to improve the chemicals and biocidal products management system.





Recommendation for 2024	Status	Comment	Recommendation for 2025
<p>Secure financial resources for strengthening the administrative and professional capacities of the Department of Chemicals in the Ministry, as well as the inspection authorities that control compliance with the Law on Chemicals and the new Law on Biocidal Products, so that administrative procedures can be carried out without breaking deadlines, bearing in mind their scope and complexity.</p>			<p>Secure financial resources for strengthening the administrative and professional capacities of the Department of Chemicals in the Ministry, as well as the inspection authorities that control compliance with the Law on Chemicals and the new Law on Biocidal Products, so that administrative procedures can be carried out without breaking deadlines, bearing in mind their scope and complexity.</p>

## New recommendations

- Harmonize the jurisdiction between the Sanitary Inspection and the Environmental Protection Inspectorate regarding the supervision of the implementation of the Rulebook on the Restrictions and Ban of Production, Placing on the Market and Use of Chemicals, which applies to a specific group of consumer products for which both inspection bodies have declared themselves not competent.
- Post information on the Chemicals Info Desk clearly indicating the sequence and date of each amendment to the regulation related to the classification, packaging and labeling of chemicals in accordance with the relevant ATP. This information is of key importance for international companies operating in Serbia and the EU, as it enables them to track progress and harmonize labels of chemicals and products that often apply to multiple markets simultaneously, including Serbia.

# Noise

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Adopt all by-laws necessary to harmonize the legislative framework with Directive 2002/49/EC.			Adopt all by-laws necessary to harmonize the legislative framework with Directive 2002/49/EC.
Adopt all by-laws necessary to harmonize the legislative framework with Directive 2015/996 (CNOSSOS-EU).			Adopt all by-laws necessary to harmonize the legislative framework with Directive 2015/996 (CNOSSOS-EU).
Implement acoustic zoning in all local self-government units.			Implement acoustic zoning in all local self-government units.
Introduce 24-hour continuous noise monitoring and make data available through a unified presentation of automatic noise monitoring.			Introduce 24-hour continuous noise monitoring and make data available through a unified presentation of automatic noise monitoring.
Develop strategic noise maps for the other two agglomerations (Belgrade and Kragujevac), as well as for the main roads, main railways, and main airports, alongside action plans.		Strategic noise maps have been adopted for main roads, railway lines and airports.	Develop strategic noise maps for the other two agglomerations (Belgrade and Kragujevac), as well as actions plans for all agglomerations, including for main roads, main railways, and main airports.
Local self-governments should adopt decisions to allow communal police officers to conduct noise measurements from hospital establishments.			Local self-governments should adopt decisions to allow municipal police officers to conduct noise measurements from hospital establishments.
Implement noise monitoring training (especially at a local level).		The Environmental Protection Agency provided technical and educational assistance in filling out the forms, but systematic training is missing.	Implement noise monitoring training (especially at a local level).

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Introduce local self-government control over the implementation of noise monitoring and submission of noise monitoring results to the Environmental Protection Agency.			Introduce local self-government control over the implementation of noise monitoring and submission of noise monitoring results to the Environmental Protection Agency.
Assess the harmful effects of noise on human health and the environment.			Assess the harmful effects of noise on human health and the environment.
Control whether 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 systems and other devices may exceed the prescribed limit values.			Control whether 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 systems and other devices may exceed the prescribed limit values.
Provide funds for the implementation of plans (and obligations) in the area of noise protection.			Provide funds for the implementation of plans and obligations in the field of noise protection.

## New recommendations

- Encourage the use of quieter technologies and vehicles through subsidies and incentives for the use of equipment and transportation with lower noise levels.
- Establish a publicly accessible noise information system.
- Conduct campaigns together with public information and education programs to raise public awareness about environmental noise.



# Climate Change

**Recommendation for 2024  
from the previous report**

**Status**

**Comment**

**Recommendation for 2025**

Adopt all necessary by-laws in order for the Law on Climate Change to be applied.



The Regulation on the List of Authorities and Organizations Responsible for Implementing Adaptation Measures and on the Content and Format of Reports on Implemented Climate Change Adaptation Measures was adopted in December 2024.

Adopt all necessary by-laws in order for the Law on Climate Change to be applied.

Adopt an action plan for the implementation of the Low Carbon Development Strategy for 2023 to 2030 with projections to 2050.



Adopt an action plan for the implementation of the Low Carbon Development Strategy for 2023 to 2030 with projections to 2050.

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 by adopting appropriate by-laws based on the Law on Climate Change.



The Regulation on the List of Authorities and Organizations Responsible for Implementing Adaptation Measures and on the Content and Format of Reports on Implemented Climate Change Adaptation Measures was adopted.

The Regulation stipulates that the identified authorities and organizations must submit a report on the implemented adaptation measures, as well as on occurrences such as floods, extreme temperatures, droughts and others, and on their consequences, to the Ministry of Environmental Protection – Environmental Protection Agency, by March 15 of the current year for the previous year.

Integrate climate change issues into the process of drafting development plans by local self-government units and by adopting the necessary by-laws. Based on the Law on Climate Change, establish a mechanism for monitoring the development and work of local self-government units on the issues of climate change mitigation.

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

Harmonize the INECP with the Decision of the Ministerial Council of the Energy Community no. 2022/02/MC-EnC and set goals that are in line with Serbia's obligations assumed as part of the Energy Community and the Green Agenda for the Western Balkans.



Harmonize the INECP with the Decision of the Ministerial Council of the Energy Community no. 2022/02/MC-EnC and set objectives that are in line with Serbia's obligations assumed as part of the Energy Community and the Green Agenda for the Western Balkans.

In accordance with the Law on Climate Change, Article 15, define and adapt 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.



In accordance with the Law on Climate Change, Article 15, define and adapt 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.

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.






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.

Improve the work of the National Council for Climate Change through holding regular sessions, making recommendations to the Government of the Republic of Serbia issues relevant to climate change, and public reporting on the Council's activities.



Improve the work of the National Climate Change Council through holding of regular sessions, making recommendations to the Government of Serbia on issues relevant to climate change, and public reporting on the Council's activities.





Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
<p>Make information on the GHG inventory publicly available, 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.</p>		<p>The 2023 State of the Environment Report in the Republic of Serbia includes information on greenhouse gas (GHG) emissions for 2022. However, this information cannot be considered as a Report on GHG Inventory, in accordance with the Rulebook on the Content of the National Greenhouse Gas Inventory and the National Greenhouse Gas Inventory Report (Official Gazette of RS, no. 55/2023).</p>	<p>Make information on the GHG inventory publicly available, 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.</p>
<p>Increase the capacities of civil servants (in terms of both number and skills) in ministries and local self-government units dealing with climate change in various sectors and focus on enhancing their capacities.</p>			<p>Enhance the number and skills of civil servants (at the Ministry, Environmental Protection Agency and local self-government units) dealing with climate change in various sectors and focus on building their capacities.</p>
<p>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), inter alia by redirecting funds intended for the fossil fuel industry to the measures meant to mitigate and adapt to climate change.</p>			<p>Significantly increase state investments in climate change adaptation and mitigation, and develop financial mechanisms to support the implementation of the priorities outlined in the Low Carbon Development Strategy (which must be aligned with Serbia's EU accession process and the objective of achieving climate neutrality by 2050).</p>







## New recommendation

- Adopt all necessary by-laws in order for the Law on Energy to be applied.



# Forestry

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
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 that includes 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 Deal package).			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 that includes 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 for 2030 and other documents from the Green Deal package).
Develop an institutional framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.	 in the process of adoption	The FLEGT Regulation also lacks clearly defined competencies, which makes it particularly important to further specify these responsibilities when transposing it into national legislation.	Develop an institutional framework with clearly defined responsibilities for the implementation of the EUTR and FLEGT regulations.
Strengthen the capacities of the competent institutions for the implementation of EU legislation and international agreements in the field of nature protection (the Habitats Directive, the Birds Directive, CITES Convention, etc.).		Permanent training for protected area managers exists, but it needs to be at a higher level and include other relevant stakeholders in addition to the Institute for Nature Conservation of Serbia.	Adopt the practice of regular national consultations as mandatory events for all managers of protected areas (PA).
Strengthen the capacities of competent institutions in forestry for EU integration in the field of climate change and energy.		Capacity building is more ad hoc in nature and part of various project activities, rather than being a systemic strengthening of capacities.	Set up systemic capacity strengthening of competent institutions in forestry for EU integration in the field of climate change and energy.

Recommendation for 2024 from the previous report	Status	Comment	Recommendation for 2025
Enable effective public participation in the development of key documents regulating forest use (including forest management plans).		It is not systemically regulated, but has rather occurred on an ad hoc basis.	Enable effective public participation in the development of key documents regulating forest use (including forest management plans).
Value and promote ecosystem services provided by forests, other than wood, and use them in forest management planning.			Value and promote ecosystem services provided by forests, other than timber, and use them in forest management planning.
Improve the quality of data on privately owned forests and strengthen control over their use.			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, and water management) in order to integrate forest ecosystems.		The improvement of cooperation is more ad hoc in nature and part of various project activities, rather than a systemic enhancement of cooperation.	Improve cooperation with other sectors (nature protection, energy, climate change, and water management) in order to integrate forest ecosystems management, with special emphasis on systemic strengthening of cooperation.
Establish an inter-ministerial working group that will coordinate the efficient development of afforestation plans in areas where it is necessary (e.g. the Autonomous Province of Vojvodina).			Establish an inter-ministerial working group that will coordinate efficient development of afforestation plans in areas of need (e.g., Autonomous Province of Vojvodina).
More funding from the Budget Fund for forests should be directed toward financing the protection and improvement of forest ecosystems that provide services beneficial to all.		The funds for 2025 have been further reduced.	More funding from the Budget Fund for Forests should be directed toward financing afforestation, maintenance and forest protection measures.



# Industrial pollution and Risk Management

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

Fully implement the Industrial Emissions Directive (IED), especially through amendments to the Law on Integrated Prevention and Control of the Environment Pollution and other regulations; harmonize the Law on Planning and Construction with international standards; adopt the Law on Environmental Impact Assessment (EIA) and the Law on Strategic Environmental Assessment (SEA); consistently apply the Air Protection Program.



The aim of drafting the new Law, which has already begun (with the Starting Points of the Draft Law prepared), is to harmonize the legislative framework with the IED Directive.

Fully implement the Industrial Emissions Directive (IED), especially through adoption and implementation of the new Law on Integrated Prevention and Control of the Environment Pollution and other regulations; harmonize the Law on Planning and Construction with international standards; implement consistently the new Law on Environmental Impact Assessment (EIA) and the Law on Strategic Environmental Assessment (SEA), as well as the Air Protection Program and the new Law on Air Protection.

As part of the preparation of amendments to the Law on Integrated Prevention and Control of the Environment Pollution, conduct a comprehensive and objective analysis of its application so far and implement a comprehensive and participatory consultative process.








As part of the Starting Points of the Draft Law on Integrated Prevention and Control of the Environment Pollution, a brief analysis of the implementation to date was conducted (including an ex-post analysis of the Law's implementation) and a brief consultative process on the Starting Points was organized.

As part of the preparation for the adoption of the new Law on Integrated Prevention and Control of the Environment Pollution, conduct a comprehensive and objective analysis of its application so far and implement a comprehensive and participatory consultative process.

**Recommendation for 2024  
from the previous report**

**Status Comment**

**Recommendation for 2025**

<p>Competent authorities should accelerate the issuance of integrated permits and implement an action plan for the development of administrative capacities, improve all administrative procedures in the process of issuing and controlling integrated permits, as well as increase capacities at all levels of administrative management, including inspections.</p>		<p>Competent authorities should accelerate the issuance of integrated permits and implement the Action plan for the development of administrative capacities, improve all administrative procedures in the process of issuing and controlling integrated permits, as well as increase capacities at all levels of administrative management, including inspections.</p>
<p>Strengthen the capacities of local communities for the application of regulations both in the field of industrial pollution and in the entire field of environmental protection.</p>		<p>The Starting Points of the new Law on Integrated Prevention and Control of the Environment Pollution also envisage strengthening the role of local self-governments.</p>
<p>Improve the existing public register of issued permits so that it is more up to date and accurate, and make updated information available to the interested public..</p>		<p>The public Register of Integrated Permits should be one of the components of the unified information system.</p>
<p>Develop a unique electronic system to support administrative procedures for issuing and controlling integrated permits, which would significantly increase the efficiency of the process.</p>		<p>The objective of the new Law on Integrated Prevention and Control of the Environment Pollution, the drafting of which has begun, is also the establishment of a unified information system for conducting the integrated permit issuance procedure and inspection supervision.</p>
<p>Strengthen the monitoring system for water, air, and soil quality in the zones affected by industrial facilities.</p>		<p>Strengthen monitoring systems for water, air, and soil quality in the zones affected by industrial facilities.</p>

**Recommendation for 2024  
from the previous report**

**Status    Comment**

**Recommendation for 2025**

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Educate the business sector, professional institutions, CSOs, and citizens on industrial emissions and provide timely and objective information to the public.



Educate the business sector, professional institutions, CSOs and citizens on industrial emissions and provide timely and objective information to the public.

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Increase public participation in the process of issuing integrated permits and improve communication between competent authorities and the public.



One of the expected effects of implementing the new Law on Integrated Prevention and Control of the Environment Pollution and other regulations is improved access to information.

Through the implementation of the new Law on Integrated Prevention and Control of the Environment Pollution and other regulations, increase public participation in the process of issuing integrated permits and improve communication between competent authorities and the public.

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# Appendix 3

## 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>• Analysis of Environmental Protection Expenditures in 2024 and 2025: An estimate of the total amount; analysis of expenditures per budget users, economic classification, and environmental protection sectors; analysis of the 2025 Green Budget of the Republic of Serbia.</li> <li>• Policy Analysis: Review of national legal and strategic documents and their implementation in the context of EU legislation and European Commission recommendations.</li> <li>• Data from the Treasury Administration on the execution of the 2024 Budget of the Republic of Serbia and the budgets of local self-government units for 2024; the 2025 Budget Law of the Republic of Serbia; programs for the use of funds from the Environmental Protection Budget Fund; and other publicly available and official data sources.</li> </ul>	<ul style="list-style-type: none"> <li>• Slobodan Minić, public finance expert</li> <li>• Coalition 27 member organizations</li> </ul>
Horizontal Legislation	<ul style="list-style-type: none"> <li>• Policy analysis:</li> <li>• 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>• Data related to the implementation of EIA and SEIA procedures were collected through participation in public consultations and consultations with local authorities and CSOs.</li> </ul>	<ul style="list-style-type: none"> <li>• Belgrade Open School</li> <li>• Young Researchers of Serbia</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>

<b>Field</b>	<b>Methodology</b>	<b>List of authors (organizations)</b>
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>• Environment Engineering Group</li> <li>• Young Researchers of Serbia</li> </ul>
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 the Ministry of Environmental Protection).</li> </ul>	<ul style="list-style-type: none"> <li>• World Wide Fund for Nature Adria — Serbia (WWF Adria — Serbia)</li> <li>• The Nature Conservancy<sup>277</sup></li> <li>• Young Researchers of 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 fieldwork: collecting and analysing data on habitats and species;</li> <li>• Participation in working groups for drafting bylaws and national implementation plans (organized by the Ministry of Environmental Protection).</li> </ul>	<ul style="list-style-type: none"> <li>• Young Researchers of Serbia</li> <li>• Bird Protection and Study Society of Serbia</li> <li>• World Wide Fund for Nature Adria — Serbia (WWF Adria — Serbia)</li> <li>• The Nature Conservancy</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 capacities and implementation.</li> </ul>	<ul style="list-style-type: none"> <li>• Safer Chemicals Alternative</li> </ul>

277 The Nature Conservancy is not a member of the Coalition 27 network.

<b>Field</b>	<b>Methodology</b>	<b>List of authors (organizations)</b>
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>• Civic Initiative “TRN”<sup>278</sup></li> <li>• Environment Improvement Center</li> </ul>
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>• Environment Improvement Center</li> <li>• Belgrade Open School</li> <li>• CAN Europe</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 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 forestry (meetings, workshops).</li> </ul>	<ul style="list-style-type: none"> <li>• World Wide Fund for Nature Adria — Serbia (WWF Adria — Serbia)</li> <li>• The Nature Conservancy</li> <li>• The Association of Private Forest Owners “BOR”<sup>279</sup></li> </ul>
Industrial Pollution and Risk 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 relevant studies and projects;</li> <li>• Analysis of institutional and administrative capacities and implementation;</li> <li>• Analysis of relevant statistical data available online.</li> </ul>	<ul style="list-style-type: none"> <li>• The Association of Young Researchers of Bor<sup>280</sup></li> </ul>

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279 The Association of Private Forest Owners “BOR” is not a member of the Coalition 27 network.

280 The Association of Young Researchers of Bor is not a member of the Coalition 27 network.



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