



Strasbourg, 02 February 2026

T-PVS/Files(2026)2022-1_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting

Strasbourg, 7-11 December 2026

Bureau of the Standing Committee

7-9 April 2026

Strasbourg

Complaint on stand by: 2022/01

**Alleged habitat destruction in the area of Novi Sad due to
proposed infrastructure constructions
(Serbia)**

- COMPLAINANT REPORT -

Document prepared by NGO World and Danube



NGO WORLD AND
DANUBE
Novi Sad, Serbia
www.svetidunav.blogspot.com



January 2026 Update

Supplementary Submission to the Bern Convention Bureau

Case No. 2022/1 – Alleged habitat destruction in Novi Sad floodplains

Submitted by: **Daniela Stojković Jovanović**, NGO World and Danube

Date: **30 January 2026**

Introduction

This supplementary submission consolidates new evidence of systemic violations in Novi Sad's floodplain ecosystems and sanitary protection zones. It builds upon previous complaints and Bureau Decisions (2022–2025) and provides updated documentation of biodiversity loss, governance failures, and [direct threats to drinking water sources for more than 300,000 residents](#).

I. Biodiversity Loss and Habitat Degradation

The floodplain areas of Šodroš, Dunavac and Kamenička Ada host over 3,000 species of flora and fauna, including more than 150 protected species. Recent field research confirms:

- **Ancient Black Poplars (*Populus nigra*)** in Šodroš, aged 50–100 years, [are being destroyed by burial under 1–2 meters of mud and clay](#). This suffocates root systems, accelerates dieback, and has already led to collapse during storms. These trees are irreplaceable guardians of the riverbank, and their disappearance constitutes deliberate habitat degradation.
- **Eurasian Beavers (*Castor fiber*)** have established a small colony on Kamenička Ada, persisting for several years. Their presence demonstrates the ecological richness of the Danube floodplain and highlights the need to preserve intact wetland habitats.

- **Bird diversity** continues to expand. In 2025, 348 new records were documented. The eBird database now lists 161 species for the Dunavac–Šodroš area, confirming its importance as a migratory corridor.

During the entire 2025, biodiversity research continued around Dunavac, Šodroš, Kamenička Ada and Ribarsko ostrvo, with a focus on birds. Further in the appendix, we are listing data related to bird findings with their coordinates, dates, numbers, and finders. In total, 348 data is provided in Excel documents. The most important findings for data we are providing are records of Black Stork (*Ciconia nigra*), Eurasian Hobby (*Falco subbuteo*), Black Woodpecker (*Dryocopus martius*), Lesser Spotted Woodpecker (*Dryobates minor*), Linnet (*Carduelis cannabina*). Additionally, a list of 103 bird species is publicly available on eBird online database for Dunavac – Šodroš area: <https://ebird.org/hotspot/L3672113/bird-list>. With these data, the number of recorded species for the area has increased to 161 (*Botaurus stellaris*, *Platalea leucorodia*, *Himantopus himantopus*, *Tringa nebularia*, *Acrocephalus arundinaceus*, *Acrocephalus schoenobaenus*, *Saxicola rubicola*).

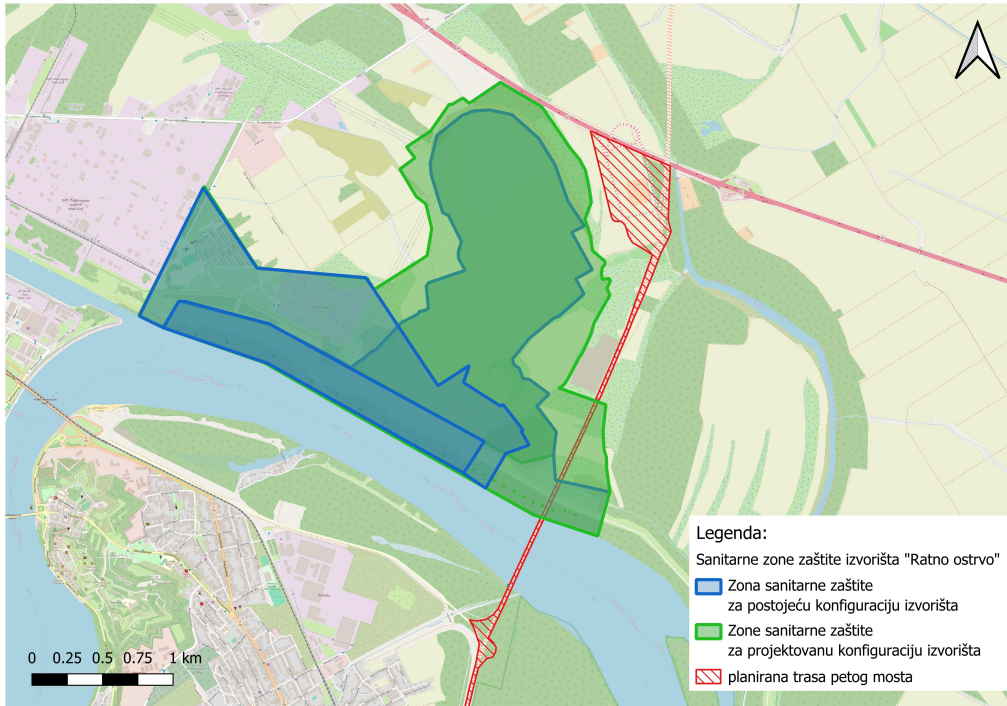
II. Sanitary Zones and Drinking Water Sources

Petrovaradinska Ada and Ratno Ostrvo are designated sanitary protection zones under Article 77 of the Serbian Water Law. GIS overlays reveal construction parcels overlapping with Zone I, where all activity is strictly prohibited. Preventive studies show elevated sodium and boron levels, confirming contamination risks.



Review of sanitary protection zoning of drinking water sources, based on Decisions No. 129-53-8622/2012-04 and No. 129-53-8621/2012-04 issued by the Expert Commission for determining sanitary protection zones of water sources for settlements and industrial facilities in the territory of AP Vojvodina.

Institutional contradictions are evident: bridge construction is permitted while housing is prohibited, exposing systemic negligence. Hydrogeological exploitation authorized in 2022 within Zone I areas constitutes a direct violation of Serbian law and undermines binding decisions on sanitary protection.



III. Governance Failures and Systemic Negligence

- CRBC, a company blacklisted by the World Bank, was enabled to operate within sensitive water zones. The operations of China Road and Bridge Corporation (CRBC), a company **previously debarred by the World Bank for fraudulent practices**, were facilitated within sensitive water protection zones in Novi Sad. Allowing a blacklisted company to operate in Zone I sanitary protection areas not only violates Serbian law but also disregards international compliance standards. This fact underscores systemic negligence and strengthens the case for urgent international oversight.
- Environmental Impact Assessments were retroactively produced or adopted without public water companies, civil society and experts, while public hearings were manipulated or bypassed.
- The Spatial Plan of the Republic of Serbia (2021–2035) and the Special Spatial Plan for the International Waterway E-80 require integration of sanitary zones and floodplain safeguards, yet Novi Sad's General Urban Plan contradicts these obligations.

- The Environmental Impact Assessment for Bridge V was never updated in 2023 to reflect cumulative impacts, breaching Serbian legislation and Bern Convention obligations.

IV. Consolidated Evidence

The cumulative evidence demonstrates:

- Destruction of keystone species (black poplars, beavers, migratory birds).
- Illegal landfills and embankment relocation undermining flood retention capacity.
- Overlaps between construction parcels and strictly protected sanitary zones.
- Hydrogeological exploitation within Zone I areas, endangering drinking water.
- Institutional inconsistency, negligence, and unlawful conduct documented through contradictory acts of the Provincial Sanitary Inspection.

V. Conclusion and Request

The disappearance of ancient black poplars, the vulnerability of beaver colonies, and the documented bird diversity all confirm the irreplaceable ecological value of Novi Sad's floodplains. Combined with systemic governance failures and direct threats to drinking water, this situation constitutes a clear breach of obligations under the Bern Convention, the Aarhus Convention, and the EU Water Framework Directive.

We therefore respectfully request that the Bern Convention Bureau:

1. Suspend all ongoing construction works within contested floodplain and sanitary protection zones.
2. Prohibit further urbanization within Kamenička Ada and Šodroš, ensuring preservation of the remaining 170 hectares as potential Nature Park zones.
3. Mandate independent ecological and hydrogeological assessments updated to reflect 2023 conditions and cumulative impacts.
4. Enable immediate and concrete protection of drinking water sources at Ratno Ostrvo and Petrovaradinska Ada.
5. Ensure international monitoring and accountability mechanisms to prevent further violations and safeguard drinking water sources for over 300,000 residents.

Specific Requests

In line with our previously submitted Initiative for Protection (2022), we reiterate the demand for:

1. **Legal designation and protection of the floodplain area** – approximately 170 hectares encompassing Kamenička Ada, Dunavac, and Šodroš – as a Nature Park zone. This remains the most effective instrument to safeguard biodiversity, flood retention capacity, and ecological continuity along the Danube.
2. **Revocation of the hydrogeological research permit** granted to CRBC within the most strictly protected Zone I in sanitary areas. Such authorization directly violates Article 77 of the Serbian Water Law, undermines binding decisions on sanitary protection, and endangers drinking water sources for more than 300,000 residents.

These measures are essential to ensure compliance with the Bern Convention, the Aarhus Convention, and the EU Water Framework Directive, and to prevent irreversible ecological and public health damage.

Timeline of Legal Actions and Institutional Responses

Year	Event	Legal Reference	Consequence
2010	Jaroslav Černi Institute prepares the Sanitary Protection Study (Elaborat) for Ratno Ostrvo and Petrovaradinska ada water sources.	Internal study	Defines hydrogeological vulnerability and recommends strict sanitary zones (Zone I, II, III).
2013	Provincial Secretariat for Health issues binding Decisions on sanitary protection zones (Štrand, Petrovaradinska Ada , Ratno Ostrvo).	Decisions No. 129-53-8620/2012-04, 129-53-8621/2012-04, 129-53-8622/2012-04	Prohibits construction and exploitation activities in Zone I and Zone II.
2020	Environmental Impact Assessment (EIA) for Bridge V prepared.	EIA documentation	Required updates in 2023 are not conducted; cumulative impacts are ignored.
2022	Provincial Secretariat for Energy, Construction and Transport authorizes CRBC to conduct hydrogeological research of underground waters for construction camps.	Decision No. 143-310-337/2022-03 (8 Sept 2022), valid until 31 Aug 2024	Permit overlaps with sanitary protection zones of Petrovaradinska Ada and Ratno Ostrvo; direct contradiction of binding decisions.

2025 (Sept–Nov)	Multiple contradictory institutional responses regarding Bridge V and sanitary zones.	Secretariat responses (30 Sept, 27 Oct, 13 Nov); Directorate for Waters (26 Nov)	Confirms zones in force, acknowledges illegal landfill, but ignores bridge construction; admits absence of permits and documentation.
18 Nov 2025	Bern Convention Bureau Decision (Complaint No. 2022/1).	Bureau Decision	Expresses strong concern, orders of suspension of works, and requests independent ecological and hydrogeological assessments.
27 Nov 2025	<u>Administrative Lawsuit filed before Administrative Court in Novi Sad by Daniela Stojković Jovanović against Provincial Sanitary Inspection.</u>	Court filing	Challenges legality of inspection responses; requests determination of illegality, enforcement of oversight, removal of landfill, and risk assessment of Bridge V.

Summary

- Binding sanitary protection zones exist since **2013**.
- CRBC was granted hydrogeological permits in **2022** in direct contradiction of those zones.
- Authorities failed to update the EIA in **2023** and ignored legal obligations.
- Multiple institutional responses in **2025** confirm lack of coordination, absence of permits, and systemic negligence.
- Domestic remedies have been activated through an **Administrative Lawsuit (Nov 2025)**.
- International oversight is now sought under the **Bern Convention** to ensure compliance with Serbian law, EU directives, and international treaties.