Strasbourg, 15 June 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
17-18 June 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

Update report June 2026

VI Supplement to Case-file 2022/01: Serbia – Alleged habitat destruction in Novi Sad due to proposed infrastructure constructions

Submitted to:

Standing Committee of the Bern Convention

Submitted by:

Daniela Stojković Jovanović, NGO World and Danube, Novi Sad, Serbia **Subject:**

VI Supplement – Novi Sad urbanisation of the Danube riverbanks Date:

15/06/2026, Novi Sad, Serbia

VI Supplement to Case-file 2022/01: Serbia – Alleged habitat destruction in Novi Sad due to proposed infrastructure constructions **0**
Introduction 1
2. Failure of National Authorities 1
2a. Lack of Response from the Provincial Institute for Nature Protection 2
3. Key Violations 2
4. Evidence 2
5. Outputs Produced 3
Requests to the Bern Convention 3

1. Introduction

In our initial complaint we warned that the construction of a bridge across protected habitats of wild species (Šodroš, Kamenička Ada, and Dunavac) represented the *cornerstone* of the "Novi Sad on the Water" project. For six years we have consistently raised concerns that the ruling political party has pursued a systematic policy of urbanising the Danube riverbanks, including floodplains and sanitary zones, **in violation of national laws and international obligations**.



The newly proposed **General Regulation Plan for Liman 3 and 4** directly intrudes into the protective flood embankment and the international ecological corridor.
This continuation of the same urbanisation strategy is now documented through:

- ☐ A **criminal complaint signed by 1,760 citizens of Novi Sad**, alleging abuse of office and negligent conduct in the preparation of the plan.
- ☐ An **objection submitted by NGO "Svet i Dunav"**, demonstrating that the plan is unlawful, technically unsustainable, and contrary to the Bern and Aarhus Conventions as well as the EU Floods Directive.

2. Failure of National Authorities

We must emphasise that the **Ministry of Environmental Protection has not reacted to the previous two decisions of the Bern Convention (November 2025 and April 2026)**. Despite clear calls for suspension of works until independent ecological and hydrological assessments are completed, construction has continued without interruption, including both the planned **Fifth and Fourth bridges**.

Furthermore, the Ministry of Environmental Protection has **failed to respond to our letters and questions** regarding compliance with the Bern Convention decisions. This silence

demonstrates institutional disregard for international obligations and undermines the credibility of Serbia's commitments under the Convention.

2a. Lack of Response from the Provincial Institute for Nature Protection

In addition to the Ministry's failure to act, we must also note that we have **formally requested monitoring from the Provincial Institute for Nature Protection** regarding the ongoing works within the protected habitat NSA22a "Ribarsko ostrvo" and the Danube ecological corridor. Despite our urgent submission dated 7 May 2026, **no response has been received to date**.

This silence, combined with the Ministry of Environmental Protection's refusal to react to Bern Convention decisions or to answer our letters, demonstrates a broader institutional failure to uphold both **national laws and international obligations**. It further confirms that civil society has been left without effective remedies at the national level, making international oversight indispensable.

3. Key Violations

- **Procedural sabotage:** Deliberate concealment of mandatory documentation from 17 public authorities, violating the Aarhus Convention.
- **Illegal change of land use:** Conversion of the "Neimar" site from sport–recreation use (as defined in the valid General Urban Plan) into a residential–commercial block.
- **Ignoring geological unsuitability:** Planning towers up to 14 floors on terrain officially classified as "very unsuitable for construction."
- **Threat to flood defence:** Deep foundations and underground garages directly undermine the stability of the first line of flood defence.
- **Overloading of wastewater infrastructure:** Connection of a mega-complex to an already insufficient sewage system, risking ecological disaster.
- **Simulation of public interest**: Parks and squares formally labeled "public," but legally left in private ownership, enabling transformation into a gated community.
- **Illegal poaching of ducks,** Mallard in particular, was recorded by Chinese workers with the construction area is another proof of degradation of legal activities in the area.

4. Evidence

- Criminal complaint (1,760 signatures) made by unofficial organization Zborovi Novog Sada.

  https://nszbor.org/urbanisticki-rulet-na-limanu/?fbclid=IwY2xjawSawupleHRuA2FlbQIxMABicmlkETFkQkdWcEw4WGs0NlI3UG9Tc3J0YwZhcHBfaWQQMjIyMDM5MTc4ODIwMDg5MgABHu404ysPDTALJtAiJ-YERza83m-woWLu4nXDPY8iQy_yjQjwjk8n_2FzkJVC_aem_DTR_9yL7LocbFm8PBS1h6A

https://autonomija.info/zborovi-novog-sada-uz-1-760-potpisa-gradjana-podneli-krivicnu-prijavu-zbog-projekta-novi-sad-na-vodi/

https://nova.rs/vesti/drustvo/zborovi-gradjana-novog-sada-krivicna-prijava-zbog-plana-gradnje-novog-sada-na-vodi/

https://www.mojnovisad.com/potpisivanje-primedbi-i-krivicnih-prijava-protiv-nadleznih-zbog-novog-sada-na-vodi-danas-i-sutra-na-nekoliko-lokacija/

Other official evidence: Official draft of the General Regulation Plan. Written response of JP "Urbanizam" denying obligation to disclose conditions of public authorities.
Engineering–geological map confirming unsuitability of terrain. Report of the City Planning Commission. Report of the City Planning Commission.

5. Outputs Produced

In the meantime, we are sharing all completed outputs produced:

- The scientific article published in *Biodiversity Journal* https://www.biodiversityjournal.com/images/pubblicazioni/biodiversity-journal-2026/biodiversity-journal-2026-17-01/biodiversity-journal-2026-17-01_79-86.pdf

- Public Announce on TV NOVA In this TV report, we talk about a new technique for killing threes, concrete century-old black poplars, on the banks of Novi Sad, on a plot that is not included in the detailed regulation plan for the construction of a bridge across the Danube to Sremska Kamenica.

- Continuation of biodiversity monitoring by local NGOs and individuals which led to additional data collected and new discoveries for the area (the first breeding of Northern Lapwing in the oxbow).These outputs further demonstrate the seriousness of the risks to biodiversity, water sources, and public safety, and underline the importance of international oversight.

5. Requests to the Bern Convention

- To take into account the existence of a criminal complaint and mass civic support as evidence of systemic abuse.
- To order the **immediate suspension of all works**, including bridge construction, until the criminal proceedings in Serbia are concluded and independent assessments are carried out.
- To remind the Republic of Serbia of its obligations under the Bern and Aarhus Conventions and the EU Floods Directive.

- To note the **failure of the Ministry of Environmental Protection** to react to previous Bern Convention decisions and to respond to civil society correspondence.

Conclusion

The VI Supplement demonstrates that the Novi Sad riverbank urbanisation project is not only environmentally destructive but also the subject of criminal proceedings for corruption and abuse of office. The continued construction of bridges and riverbank complexes, despite Bern Convention decisions, shows deliberate disregard by national authorities. Adoption of the plan would gravely endanger protected habitats, flood defence infrastructure, and public health.

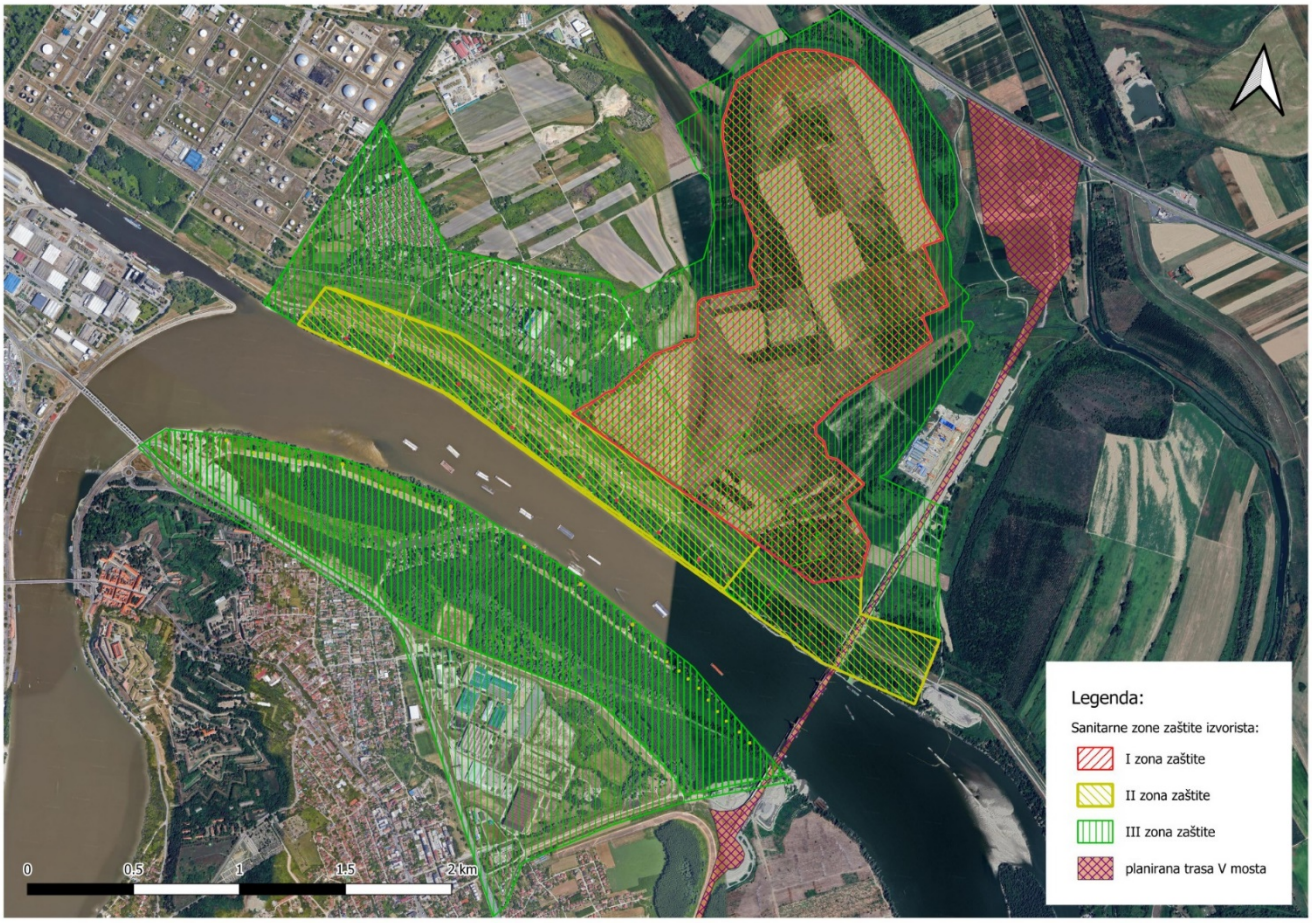
The construction works are taking place during the bird breeding season, which means that every day of delay in reaction produces irreversible damage to biodiversity. The protected habitat at Kamenička Ada has been almost completely devastated, and we therefore request urgent monitoring by the competent institutions, both domestic and international, in order to prevent further destruction and to ensure compliance with the international obligations of the Republic of Serbia.

We therefore urge the Bureau of Bern Convention to act decisively to safeguard international obligations and the rights of citizens.

Update report February 2026

Supplementary Submission

Map of the sanitary protection zone of Novi Sad's water sources:



Publication: ***Water Is Not and Cannot Be a Political Game***


VODA
NIJE I
NE MOŽE BITI
POLITIČKA
IGRA

1

Ozelenjavanje PRAVDE
Pravna zaštita životne sredine

Naslov: *Voda nije i ne može biti politička igra*

Autor: Daniela Stojković Jovanović

GeO Map: V.Kartalović

Podrška: Ekološki front Novi Sad

Asistencija: Tekst je pripremljen uz podršku AI asistenta Copilot, korišćenog kao alat za istraživanje i strukturiranje sadržaja.

Izdavač: Nevladina organizacija *Svet i Dunav*

Mesto i godina izdavanja: Novi Sad, 2026

Fotografije: Dušan Marković

ISBN:

Podrška: Publikacija je pripremljena u okviru projekta 'Ozelenjavanje pravde', koji zajednički sprovode YUCOM i UTS uz podršku Švedske agencije za međunarodni razvoj i saradnju (SIDA). Stavovi i mišljenja izneti u ovoj publikaciji isključiva su odgovornost autora i ne odražavaju nužno zvanične stavove Švedske agencije za međunarodni razvoj ili Vlade Kraljevine Švedske.

Napomena: Publikacija je dvojezična (srpski i engleski) i namenjena je aktivistima, pravnicima i široj javnosti radi podizanja svesti o zaštiti izvorišta pijaće vode i institucionalnim obavezama.

Title: *Water Is Not and Cannot Be a Political Game*

Author: Daniela Stojković Jovanović

GeO Map: V.Kartalović

Support: Ekološki front Novi Sad

Assistant: The text was prepared with the support of the AI assistant Copilot, used as a tool for research, and content structuring.

Publisher: Non-Governmental Organization *World and Danube*

Place and Year of Publication: Novi Sad, 2026

Photo by Dušan Marković

ISBN:

Support: This publication was prepared within the project *"Greening Justice"*, jointly implemented by YUCOM and UTS with the support of the Swedish International Development Cooperation Agency (SIDA). The views and opinions expressed in this publication are solely those of the author and do not necessarily reflect the official positions of the Swedish International Development Cooperation Agency or the Government of the Kingdom of Sweden.

Note: The publication is bilingual (Serbian and English) and intended for activists, legal professionals, and the general public to raise awareness about the protection of drinking water sources and institutional obligations.

SADRŽAJ

IV most – ugrožavanje biodiverziteta

Zaštita plavnog područja

Aneksi: Tabele zaštićenih vrsta

Pet godina borbe za Šodroš i Dunav

V most – ugrožavanje sanitarnih zona

Tehnički zahvati u zoni izvorišta

Ugrožavanje aktivnih bunara

Zanemarivanje sanitarne zaštite

Dokazi i elaborati

JKP „Vodovod i kanalizacija" – ključni citati (2025)

Uporedni pregled odgovora nadležnih institucija

Elaborat „Petrovaradinska ada" (Institut J. Černi, 2010)

Elaborat „Ratno ostrvo" (Institut J. Černi, 2010)

Rešenja o zonama sanitarne zaštite (2013)

Studija o proceni uticaja na životnu sredinu 10215-ST2-IDP

Ključni nalazi (Deonica 3, Kać–Petrovaradin)

Zaključak

Dozvola za istraživanje podzemnih voda u zoni sanitarne zaštite

Istraživanje = eksploatacija

Zakonske direktive i regulativa

Zaključak

Institucionalni propusti i međunarodne žalbe

Uputstvo za Bernsku žalbu (Aneks)

CONTEST

The Fourth Bridge – Threat to Biodiversity

Protection of the Floodplain Area

Annexes: Tables of Protected Species

Five Years of Struggle for Šodroš and the Danube

The Fifth Bridge – Threat to Sanitary Zones

Technical Interventions in the Source Zone

Endangerment of Active Wells

Neglect of Sanitary Protection

Evidence and Expert Studies

Public Utility "Waterworks and Sewerage" – Key Quotes (2025)

Comparative Review of Responses from Competent Institutions

Study "Petrovaradinska Ada" (Jaroslav Černi Institute, 2010)

Study "Ratno Ostrvo" (Jaroslav Černi Institute, 2010)

Decisions on Sanitary Protection Zones (2013)

Environmental Impact Assessment Study 10215-ST2-IDP

Key Findings (Section 3, Kać–Petrovaradin)

Conclusion

Permit for Groundwater Exploration in the Sanitary Protection Zone

Exploration = Exploitation

Legal Directives and Regulations

Conclusion

Institutional Failures and International Complaints

Guidance for Submitting a Bern Convention Complaint (Annex)

3

Borba

za očuvanje biodiverziteta za plavno područje od 170 ha koje obuhvata deo Ribarskog ostrva, Šodroš, Kameničku adu i Dunavac, u Novom Sadu, započela je kao otpor protiv izgradnje IV mosta u nastavku Bulevara Evropa, Novi Sad preko Dunava ka Sremskoj Kamenici. Projekat kojim se pretnja po jedinstvene ekosisteme Ribarskog ostrva, Kameničke ade, Dunavca i Šodroša nažalost dokumentovano realizuje od 2022. godine do danas.

Upravljačke strukture grada, pokrajine i države, sa zapanjujućom odlučnošću, sprovode ključne infrastrukturne projekte mimo zakona, procedura i pravila. Ne shvataju da močvarna i prirodna područja nisu tek staništa ptica, riba i retkih biljnih vrsta, niti samo brana koja štiti grad od plavljenja Dunava – ona su deo živog tkiva grada, mesta gde se priroda i lokalna zajednica susreću.

Izgradnja IV mosta, lažne saobraćajne zaobilaznice a zapravo otvaranje nove tranzitne saobraćajnice u novonaseljenom delu grada Novog Sada, postao je simbol ugrožavanja prirode i biodiverziteta, ali i opasnost po bezbednost grada direktnim ugrožavanjem vodoplavne, nebranjene zone vodnog zemljišta leve obale Dunava na ulasku u grad Novi Sad.

Nažalost, ubrzo se pokazalo da je nebriga o živom i zaštićenom svetu Dunava bila samo uvod u još opasniju pretnju: ugrožavanje najznačajnijeg izvorišta pijaće vode u Vojvodini. **Planirana izgradnja V mosta i prateće saobraćajne infrastrukture ne narušavaju samo ekološku ravnotežu, već direktno zadiru u sanitarne zone zaštite izvorišta „Ratno ostrvo“ i „Petrovaradinska ada“.**



The struggle to preserve the biodiversity of the 170-hectare floodplain area, encompassing parts of Ribarsko Island, Šodroš, Kamenička Ada, and Dunavac in Novi Sad, began as resistance against the construction of the Fourth Bridge, extending Bulevar Evropa across the Danube towards Sremska Kamenica. Unfortunately, this project, which threatens the unique ecosystems of Ribarsko Island, Kamenička Ada, Dunavac, and Šodroš, has been documented as ongoing since 2022. City, provincial, and state authorities, with astonishing determination, are implementing key infrastructure projects outside the framework of laws, procedures, and rules. They fail to understand that wetlands and natural areas are not merely habitats for birds, fish, and rare plant species, nor simply barriers protecting the city from Danube floods – they are part of the living fabric of the city, places where nature and the local community meet. The construction of the Fourth Bridge, a false traffic bypass but in reality the opening of a new transit corridor in the newly urbanized part of Novi Sad, has become a symbol of environmental destruction and biodiversity loss, as well as a danger to the city's safety by directly threatening the floodplain, unprotected water land on the left bank of the Danube at the city's entrance. Sadly, it soon became clear that neglect of the living and protected world of the Danube was only a prelude to an even greater threat: the endangerment of the most important drinking water sources in Vojvodina. The planned construction of the Fifth Bridge and its accompanying infrastructure not only disrupts ecological balance but directly intrudes into the sanitary protection zones of the "Ratno Ostrvo" and "Petrovaradinska Ada" water sources.

4

V most je postao simbol ugrožavanja javnog zdravlja i prava na vodu.

U međunarodnom procesu ispred Bernske konvencije u Strazburu, za sada dugom 4 godine, borba za biodiverzitet evoluirala je u borbu za pravo na zdravu i sigurnu vodu. Dokumenti institucija, stručni elaborati i rešenja o zonama sanitarne zaštite jasno pokazuju da su ova izvorišta od vitalnog značaja za Novi Sad i Vojvodinu – ona obezbeđuju najveći deo pijaće vode za grad i okolna naselja a imaju potencijal koji zadovoljava potrebe stanovništva Autonomne pokrajine Vojvodina. Svako narušavanje njihovih zona predstavlja ne samo ekološki, već i zdravstveni rizik za stotine hiljada ljudi. Dosadašnja pravna i društvena borba više nije samo borba za ptice, šume i reke. Ona je borba za osnovno ljudsko pravo – pravo na čistu pijaću vodu i zdravu i bezbednu životnu sredinu.

Voda ne može biti politička igra, jer ona ne sme biti predmet pregovora, kompromisa ili političkog interesa.

Voda je život!

The Fifth Bridge has become a symbol of the threat to public health and the right to water.

In the international process before the Bern Convention in Strasbourg, now lasting four years, the struggle for biodiversity has evolved into a struggle for the right to safe and clean water. Institutional documents, expert studies, and sanitary protection decisions clearly show that these water sources are of vital importance for the city of Novi Sad and Vojvodina – they provide most of the drinking water for the city and surrounding settlements and have the potential to meet the needs of the entire Autonomous Province of Vojvodina. Any violation of their zones represents not only an ecological but also a health risk for hundreds of thousands of people. The ongoing legal and social struggle is no longer just a fight for birds, forests, and rivers. It is a fight for a fundamental human right – the right to clean drinking water and a healthy, safe environment.

Water cannot be a political game, because it must never be subject to negotiation, compromise, or political interest.

Water is life!



IV most – ugrožavanje biodiverziteta

Lokacija: Ribarsko ostrvo, Kamenička ada, Dunavac, Šodroš

Problem: Planirana izgradnja mosta zadire u zakonom zaštićena staništa divljih vrsta

Implikacija: Uništavanje ekosistema i kršenje međunarodnih obaveza (Bernska konvencija, Dunavska konvencija, Ramsar, Aarhus)

Zaštita plavnog područja

Od izvora do ušća u Crno more, Dunav prelazi put od preko 2.800 kilometara, protiče kroz deset zemalja i utiče na život više od 80 miliona ljudi. Reka i priobalna područja imaju mnogo uloga: koriste se za poljoprivrednu proizvodnju, služe za transport, proizvodnju električne energije, rekreaciju **i zaštitu od poplava, rezervoari su vode za piće,** staništa su za biljke i životinje. Mnoge od ovih i drugih uloga i zadataka su ekosistemske usluge i sve ili utiču ili su pod uticajem kvaliteta vode Dunava. Postoji snažna veza ekosistemskih usluga i života ljudi, biljaka i životinja u slivu.



Polazeći od nacionalnih zakona, zakonskih akata, pravilnika, međunarodnih deklaracija i konvencija, EU zakona, protokola i drugih zakonskih

The Fourth Bridge – Threat to Biodiversity

Location: Ribarsko Island, Kamenička Ada, Dunavac, Šodroš

Problem: The planned construction of the bridge encroaches upon legally protected habitats of wild species

Implication: Destruction of ecosystems and violation of international obligations (Bern Convention, Danube Convention, Ramsar, Aarhus)



Protection of the Floodplain Area

From its source to its mouth in the Black Sea, the Danube flows for more than 2,800 kilometers, crossing ten countries and affecting the lives of over 80 million people. The river and its floodplain areas serve many roles: they are used for agricultural production, transport, energy generation, recreation, and flood protection; they act as reservoirs of drinking water and habitats for plants and animals. Many of these functions are ecosystem services, all of which influence or are influenced by the quality of the Danube's waters. There is a strong link between ecosystem services and the lives of people, plants, and animals in the basin.

Based on national laws, legal acts, regulations, international declarations and conventions, EU legislation, protocols, and other regulatory frameworks

regulativa kao i ovlašćenja stanovništva, koja proističu iz aktuelnog zakona o Zaštiti životne sredine, 2021. godine grupa eksperata, strukovnih i nevladinih organizacija pripremila je **Inicijativu o zaštiti značajnog prirodnog javnog dobra i jedinstvenog prirodnog ekosistema Ribarskog ostrva, KAMENIČKE ADE, DUNAVCA I ŠODROŠA**

Neformalna građanska inicijativa Dunavac Šodroš u ime sastavljača Inicijative tada zahteva od Pokrajinskog zavoda za zaštitu prirode da pristupi kategorizaciji javnog prirodnog dobra Kameničke ade, Dunavca i Šodroša i da se navedenom predelu omogući adekvatna zaštita. Potrebno je izvršiti stručni monitoring na području Ribarskog ostrva na osnovu utvrđivanja verodostojnosti stručne studije Republičkog zavoda za zaštitu prirode: " Spomenik prirode Ribarsko ostrvo" , kao i pristupiti izradi studije o stepenu zaštite na širem području Kameničke ade, Dunavca I Šodroša i time potvrditi ili demantovati navode građana, institucija, udruženja i stanovništva. Arhiviranje posrednih i neposrednih dokaza o prisustvu strogo zaštićenih i zaštićenih vrsta (163 strogo zaštićenih i zaštićenih vrsta, Januar 2026) kao i o posebnim odlikama celovitog prostora ekosistema Dunavac, Šodroš i Kamenička ada u vidu krucijalnog predela u zaštiti grada Novog Sada od poplava ima aktivističku, pravnu i društvenu odgovornost.

Pokrajinski zavod za zaštitu prirode nakon nekoliko meseci odgovara da monitoring ne može uraditi jer ne poseduje finansijska sredstva za te namene!

as well as the rights of citizens arising from the current Law on Environmental Protection, in 2021 a group of experts, professional associations, and NGOs prepared an Initiative to protect the significant public natural asset and unique ecosystem of Ribarsko Island, Kamenička Ada, Dunavac, and Šodroš.



The informal civic initiative Dunavac Šodroš, on behalf of the authors of the Initiative, requested the Provincial Institute for Nature Protection to categorize Kamenička Ada, Dunavac, and Šodroš as public natural assets and to provide adequate protection for the area. It was necessary to conduct expert monitoring of Ribarsko Island to verify the validity of the study prepared by the Republic Institute for Nature Protection: "Natural Monument Ribarsko Island". In addition, a study was needed to determine the level of protection for the wider area of Kamenička Ada, Dunavac, Šodroš, and the Ribarsko Peninsula. Such a study would confirm or refute the claims of citizens, institutions, associations, and residents, supported by direct and indirect evidence of the presence of strictly protected and protected species, as well as the unique features of the ecosystem of Dunavac, Šodroš, and Kamenička Ada as a crucial area for protecting the city of Novi Sad from floods.

After several months, the Provincial Institute for Nature Protection responded that monitoring could not be carried out because it lacked the financial resources for such activities.

Pet godina borbe za Šodroš i Dunav

Od februara 2021. pa sve do kasnog leta 2023. godine odvijala se jedna od najupornijih građanskih borbi u Novom Sadu – borba za očuvanje Kameničke Ade, Dunavca, Šodroša i Ribarskog ostrva.



Prvi dokumentarni film o ovom području, prikazan 25. februara 2021, otvorio je javnu raspravu o planiranoj izgradnji četvrtog mosta. Već u martu iste godine, građani su pokrenuli peticiju i prikupili preko 18.000 potpisa, uprkos zabrani Skupštine grada da se potpisi prikupljaju uživo zbog pandemije. Inicijativa za zaštitu prirodnog dobra podneta je 4. marta, a prvi protest održan 20. Juna 2022



Five Years of Struggle for Šodroš and the Danube



From February 2021 until late summer 2023, one of the most persistent civic struggles in Novi Sad unfolded – the fight to preserve Kamenička Ada, Dunavac, Šodroš, and Ribarsko Island.



The first documentary film about this area, screened on February 25, 2021, opened a public debate on the planned construction of the Fourth Bridge. Already in March of the same year, citizens launched a petition and collected more than 18,000 signatures, despite the City Assembly's ban on in-person signature collection due to the pandemic. The Initiative for the protection of the natural asset was submitted on March 4, and the first protest was held on June 2022.

8

U julu 2021. nevladina organizacija „Svet i Dunav" podnela je ustavnu žalbu i inicijativu za ocenu ustavnosti, ali Ustavni sud do danas nije doneo odluku. Paralelno, projekat edukacije dece u osnovnim školama prekinut je nakon političkih pritisaka. Krajem iste godine, organizacija je podnela žalbu Birou Bernske konvencije, koji je u januaru 2022. proglasio žalbu validnom čime je otpočeo višegodišnji proces u Savetu Evrope.

Uprkos tome, vlasti su nastavile sa radovima. Protesti su se nizali, a incidenti – poput automobila koji je uleteo među demonstrante u februaru 2022. godine– dodatno su pojačali tenzije. Organizacija nosilac Žalbenih i tužbenih procesa izložena je finansijskim kaznama i kontinuiranim blokadama računa.

Kulminacija je usledila u julu 2022, kada su privatne bezbednosne snage nasilno privele demonstrante, a režimski mediji ih nazivali „putujućim cirkusom". U oktobru iste godine, predsednica organizacije Daniela Stojković Jovanović bila je uhapšena tokom protesta na Šodrošu, dok su međunarodni mediji poput Al Jazeere i BBC-a izveštavali o slučaju.

Nakon destruktivnih radova na području Šodroša od jeseni 2022. Godine, tokom jula 2023. godine, pod pritiskom Biroa Bernske konvencije objavljena je i usvojena **Studija uticaja na životnu sredinu na okolnost izgradnje IV mosta u Novom Sadu,** ali godinu dana nakon što su stabla već posečena i predeo potpuno degradiran,. Stručnjaci su ukazali na ozbiljne nedostatke Studije – izostavljanje preko 150 strogo zaštićenih vrsta i ignorisanje postojećih statusa zaštite.

Na poslednjoj javnoj raspravi u julu 2023, Stojković je upozorila da borba za očuvanje prirode prerasta u ličnu borbu protiv uzurpacije vodnog zemljišta, ugrožavanja zdravlja, bezbednosti ljudi, grada i zaštićenog staništa divljih vrsta, i na kraju protiv političkog progona uzbunjivača

In July 2021, the NGO *World and the Danube* filed a constitutional complaint and an initiative for a review of constitutionality, but the Constitutional Court has not issued a decision to this day. In parallel, a project for educating children in elementary schools was discontinued following political pressure. At the end of the same year, the organization submitted a complaint to the Bureau of the Bern Convention, which in January 2022 declared the complaint valid, thereby initiating a multi-year process within the Council of Europe.

Despite this, the authorities continued with construction works. Protests followed one after another, and incidents – such as a car driving into demonstrators in February 2022 – further heightened tensions. The organization leading the appeals and legal proceedings was subjected to financial penalties and continuous account blockages.

The culmination came in July 2022, when private security forces violently detained demonstrators, while regime-controlled media labeled them a "traveling circus." In October of the same year, the organization's president, Daniela Stojković Jovanović, was arrested during protests at Šodroš, while international media outlets such as Al Jazeera and BBC reported on the case.

Following destructive works in the Šodroš area in autumn 2022, under pressure from the Bureau of the Bern Convention, an Environmental Impact Assessment Study on the construction of the Fourth Bridge in Novi Sad was published and adopted in July 2023 – but a full year after the trees had already been cut down and the area completely degraded. Experts pointed out serious shortcomings in the Study – the omission of more than 150 strictly protected species and the disregard of existing protection statuses.

At the final public hearing in July 2023, Stojković warned that the struggle to preserve nature was evolving into a personal struggle against usurpation of water land, the endangerment of health, the safety of people, the city, and the protected habitats of wild species, and ultimately against the political persecution of whistleblowers.

U septembru 2025. godine Biro Stalnog komiteta Bernske konvencije ponovo je razmatrao žalbu u vezi sa uništavanjem staništa u Novom Sadu. U svojoj odluci Biro je izrazio *ozbiljnu zabrinutost* zbog nesklada između težine navoda koje je podneo podnosilac žalbe i izveštaja vlasti, posebno zbog nepostojanja procene kumulativnih uticaja na plavne i močvarne ekosisteme, kao i na podzemne vode.

Biro je pozvao vlasti da **obustave izgradnju** mostova u Novom Sadu dok se ne sprovedu nezavisne ekološke i hidrološke procene, da spreče ilegalne aktivnosti koje nanose štetu lokalnim ekosistemima i da obezbede transparentnost i učešće javnosti. Takođe je zatražena koordinacija sa RAMSAR Sekretarijatom, uz najavu da će, imajući u vidu rizik od nepovratne štete, na prolećnom zasedanju 2026. razmotriti mogućnost podizanja statusa žalbe.

In September 2025, the Bureau of the Standing Committee to the Bern Convention re-examined the complaint regarding the destruction of habitats in Novi Sad. In its decision, the Bureau expressed *strong concern* about the discrepancy between the seriousness of the allegations signalled by the complainant and the reports submitted by the authorities, noting the lack of assessment of cumulative impacts on floodplain and wetland habitats, as well as on groundwater provisions.

The Bureau called upon the authorities to **halt construction** until independent ecological and hydrological assessments are completed, urged them to prevent illegal activities causing harm to local ecosystems, and emphasized the need for transparency and public participation. Furthermore, the Bureau requested coordination with the RAMSAR Secretariat and announced that, in view of the risk of irreversible damage, it will consider raising the status of the complaint at its Spring 2026 meeting.

CONVENTION DE BERNE
BERN CONVENTION

V most – ugrožavanje sanitarnih zona

Lokacije: Ratno ostrvo i Petrovaradinska ada

Problem: saobraćajna infrastruktura u zonama sanitarne zaštite izvorišta pijaće vode

Implikacija: direktan rizik po javno zdravlje – izvorišta obezbeđuju najveći deo pijaće vode za Novi Sad

U srcu Novog Sada, ispod korita Dunava i pored vodoplavnih šuma Koviljskog rita i Petrovaradinske ade, nalazi se ono što ne vidimo — **pitka voda koja svakodnevno snabdeva oko 500 000 stanovnika Novog Sada i okoline**.

Danas, uz izgradnju V mosta, ona je pod višestrukim infrastrukturnim i ekološkim rizikom.



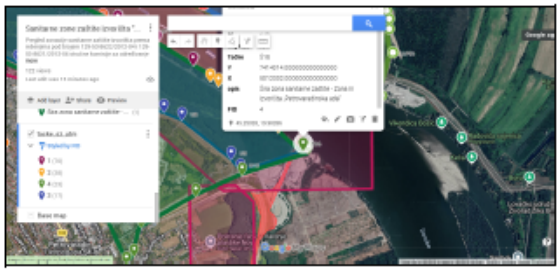
Nakon pregleda stručnih dokumenata Instituta za vode "Jaroslav Černi" iz 2010. godine — dva Elaborata o zonama sanitarne zaštite — postaje jasno: **izvorišta Novog Sada nisu samo ranjiva, već decenijama izložena sistemskom ignorisanju rizika**.

The Fifth Bridge – Threat to Sanitary Zones

Locations: Ratno Ostrvo and Petrovaradinska Ada

Problem: Traffic infrastructure within the sanitary protection zones of drinking water sources

Implication: Direct risk to public health – these sources provide the majority of drinking water for Novi Sad



In the heart of Novi Sad, beneath the bed of the Danube and alongside the floodplain forests of Kovilj Rit and Petrovaradinska Ada, lies what cannot be seen — drinking water that supplies around 500,000 residents of Novi Sad and its surroundings every day.

Today, with the construction of the Fifth Bridge, this vital resource is exposed to multiple infrastructural and ecological risks. After reviewing the expert documents of the Jaroslav Černi Institute for Water from 2010 — two Studies on sanitary protection zones — it becomes clear that Novi Sad's water sources are not only vulnerable, but have for decades been exposed to systemic neglect of risks.

Tehnički zahvati u zoni izvorišta

Most prelazi **preko ruba rezervata prirode** „Koviljsko-petrovaradinski rit“ i međunarodno značajnog područja za ptice (IBA Koviljski rit)



Prilazne konstrukcije i vijadukt prostiru se **iznad zone aktivnih bunara**, bez jasne procene uticaja na podzemne tokove
Topla voda od hlađenja turbina i kolektori već ugrožavaju izvorište — a most dodatno komplikuje hidrauličku konfiguraciju. Ništa manju opasnost ne predstavlja činjenica da gradnja mosta zahvata nasip koji štiti od poplava, čime se povećava rizik za ugrožavanje izvorišta.

Ugrožavanje aktivnih bunara

Prilikom izgradnje V mosta, deo stubova i konstrukcije **završava u neposrednoj blizini aktivnih bušotina**
To nije samo prostorno preklapanje — to je **direktna interferencija sa podzemnim vodnim tokovima**
Elaborat za Ratno ostrvo jasno propisuje zabranu fizičkog zahvata unutar **uže zone sanitarne zaštite** — što je ovde prekršeno

Zanemarivanje sanitarne zaštite

Teška mehanizacija, betoniranje, vibracije i razlivanje građevinskih materijala mogu dovesti do:

- poremećaja u **hidrauličkoj stabilnosti podzemnih voda**
- potencijalnog **prodiranja kontaminanata kroz pukotine**
- gubitka prirodnih **filtera tla i šljunka**

Technical Interventions in the Source Zone

The bridge crosses the edge of the *Koviljsko-Petrovaradinski Rit* nature reserve and the internationally significant bird area (IBA Koviljski Rit).

The approach structures and viaduct extend above the zone of active wells, without a clear assessment of the impact on underground water flows. Warm water from turbine cooling and collectors already threatens the source — and the bridge further complicates the hydraulic configuration. No less dangerous is the fact that the construction of the bridge encroaches upon the embankment that protects against floods, thereby increasing the risk of endangering the water source.

Endangerment of Active Wells

During the construction of the Fifth Bridge, part of the pillars and structures are located in the immediate vicinity of active boreholes. This is not merely spatial overlap — it is direct interference with underground water flows. The study for *Ratno Ostrvo* explicitly prescribes a ban on physical interventions within the inner sanitary protection zone — a prohibition that has been violated here.

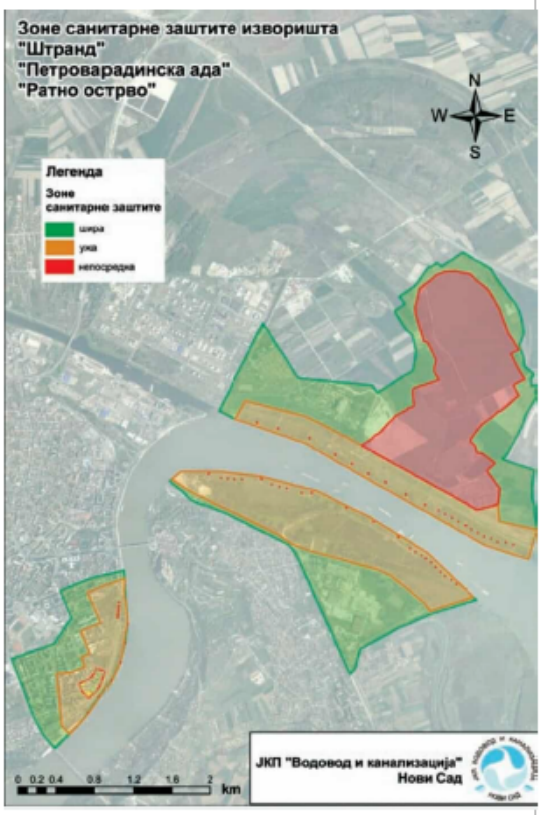
Neglect of Sanitary Protection

Heavy machinery, concreting, vibrations, and the spillage of construction materials can lead to:

- disturbances in the hydraulic stability of groundwater,
- potential penetration of contaminants through cracks,
- degradation and loss of natural soil and gravel filtration systems

Dokazi i elaborati

1. JKP „Vodovod i kanalizacija“



- Vlasnički status bunara nije rešen → pravna nesigurnost

Iz odgovora JKP „Vodovod i kanalizacija“ (21. јул 2025 *„…Napominjemo da su imovinsko-pravni odnosi na parcelama na kojima leže bunari ova dva izvorišta najvećim delom nerešeni, te je stoga preduzimanje konkretnijih mera od strane našeg preduzeća nemoguće.“*

- Institucija priznaje postojanje naselja i deponija, ali nema kapacitet da ih ukloni
- Studije o uticaju na životnu sredinu su manjkave jer nisu konsultovane nadležne vodne institucije i javna preduzeža, kao ni Institut za vode Jaroslav Černi (Direkcija za vode,

Evidence and Expert Studies

1. Public Utility “Watercompany and Sewerage”

- Unresolved ownership status of wells → legal uncertainty
- From the response of JKP “Waterworks and Sewerage” (July 21, 2025):
- “…We note that the property-legal relations concerning the parcels on which the wells of these two sources are located remain largely unresolved, and therefore the undertaking of more concrete measures by our company is impossible.”
- The institution acknowledges the existence of settlements and landfills but lacks the capacity to remove them.
- Environmental Impact Assessment studies are deficient because the relevant water institutions and public enterprises were not consulted, nor was the Jaroslav Černi Institute for Water (Water Directorate, Ministry of Energy, JKP Waterworks and Sewerage, JKP Vode Vojvodine, etc.).



Ključni citati iz odgovora JKP „Vodovod i kanalizacija“ (2025)

O važećim rešenjima:

„...13.03.2013. godine Pokrajinski sekretar za zdravstvo, socijalnu politiku i demografiju usvojio je Rešenja o određivanju Zona sanitarne zaštite za izvorišta ‘Ratno ostrvo’ i ‘Petrovaradinska ada’.

O obavezama Vodovoda:

„Elaboratima o zonama sanitarne zaštite su definisane obaveze JKP ‘Vodovod i kanalizacija’. Izvorišta su obezbeđena ljudskom posadom tokom cele godine, bunari se zaključavaju, postoji sistem video nadzora. Postavljene su table sa informacijama o zonama sanitarne zaštite i zabranama. Vrši se kontinualni monitoring kvaliteta i kvantiteta podzemnih voda.“

O problemima u zonama zaštite:

„Ukazuje se na probleme zagađenja... divlja naselja i septičke jame koje direktno ugrožavaju izvorišta vode (naselje Dunavac na izvorištu Petrovaradinska ada i novoformirano naselje na Ratnom ostrvu), formiranje divljih deponija u zonama sanitarne zaštite...“

Zaključak

JKP potvrđuje da su Rešenja o zonama sanitarne zaštite iz 2013. godine i dalje na snazi. Obaveze su jasno definisane – fizičko obezbeđenje, video nadzor, table sa zabranama, kontinuirani monitoring.

Uprkos tome, sami priznaju postojanje divljih naselja, septičkih jama i divljih deponija unutar zona zaštite, što direktno ugrožava izvorišta.

Ignorišu se radovi prilikom izgradnje V mosta!

Key Quotes from the Response of JKP “Waterworks and Sewerage” (2025)

On existing decisions:

“...On March 13, 2013, the Provincial Secretary for Health, Social Policy, and Demography adopted Decisions on the designation of Sanitary Protection Zones for the water sources ‘Ratno Ostrvo’ and ‘Petrovaradinska Ada’.”

On the obligations of Waterworks:

“The elaborates on sanitary protection zones define the obligations of JKP ‘Waterworks and Sewerage.’ The sources are secured by human personnel throughout the year, wells are locked, and a video surveillance system is in place. Signs have been installed with information on sanitary protection zones and prohibitions. Continuous monitoring of the quality and quantity of groundwater is carried out.”

On problems within the protection zones:

“Attention is drawn to pollution problems... informal settlements and septic tanks that directly threaten the water sources (the Dunavac settlement at the Petrovaradinska Ada source and the newly formed settlement at Ratno Ostrvo), as well as the formation of illegal landfills within the sanitary protection zones...”

Conclusion

JKP confirms that the Decisions on sanitary protection zones from 2013 remain in force. The obligations are clearly defined – physical security, video surveillance, prohibition signs, and continuous monitoring.

Nevertheless, the institution itself acknowledges the existence of informal settlements, septic tanks, and illegal landfills within the protection zones, which directly endanger the water sources. At the same time, construction works related to the Fifth Bridge are being ignored.

Uporedni pregled Odgovora nadležnih institucija

Pokrajinski sekretarijat za zdravstvo (30.09.2025 / 27.10.2025)

Potvrđuje da su rešenja o zonama zaštite („Ratno ostrvo“ br. 129-53-8622/2012-04 i „Petrovaradinska ada“ br. 129-53-8621/2012-04) i dalje važeća.

Izričito navodi da *njihovo mišljenje nije traženo u postupku procene uticaja na životnu sredinu za V most*.

Sekretarijat nije bio obavešten o početku radova.

Republička direkcija za vode (30.09.2025 / 26.11.2025 / 01.12.2025)

RDV *nije bila uključena u postupak procene uticaja na životnu sredinu za V most*.

Nije izdala nikakva mišljenja ili saglasnosti, jer je nadležnost preneta na AP Vojvodinu.

Potvrđuje da *nije izdata nikakva dozvola za eksploataciju pijaće vode CRBC-u*.

JVP „Vode Vojvodine“ (29.05.2019 / 15.12.2025)

Izdao je samo *Mišljenje u postupku izdavanja vodnih uslova* (br. II-620/5-19, 29.05.2019), koje se odnosi na tehničke aspekte trase.

Nije učestvovao u reviziji projekata zahvata u vodnom režimu za V most.

Potvrđuje da *nema evidenciju o vodnim aktima u zonama sanitarne zaštite*.

Ključni citati iz dokumenata „Vode Vojvodine“

Mišljenje u postupku izdavanja vodnih uslova (29.05.2019, br. II-620/5-19):

Comparative Review of Responses from Competent Institutions

Provincial Secretariat for Health (30.09.2025 / 27.10.2025)

Confirms that the decisions on sanitary protection zones (“Ratno Ostrvo” No. 129-53-8622/2012-04 and “Petrovaradinska Ada” No. 129-53-8621/2012-04) remain valid.

Explicitly states that its opinion was not requested in the Environmental Impact Assessment procedure for the Fifth Bridge.

The Secretariat was not informed about the commencement of construction works.

Republic Water Directorate (30.09.2025 / 26.11.2025 / 01.12.2025)

Declares that it was not involved in the Environmental Impact Assessment procedure for the Fifth Bridge.

Did not issue any opinions or approvals, as jurisdiction had been transferred to the Autonomous Province of Vojvodina.

Confirms that no permit for the exploitation of drinking water was issued to CRBC.

Public Water Management Company “Vode Vojvodine” (29.05.2019 / 15.12.2025)

Issued only an Opinion in the procedure for establishing water conditions (No. II-620/5-19, 29.05.2019), which referred to technical aspects of the route.

Did not participate in the revision of projects involving interventions in the water regime for the Fifth Bridge.

Confirms that it has no record of water-related acts within the sanitary protection zones.

Key Quotes from “Vode Vojvodine” Documents

Opinion in the procedure for establishing water conditions (29.05.2019, No. II-620/5-19):

„DP 21 prelazi preko dva izvorišta sanitarne vode, odnosno njihovih zona sanitarne zaštite. U pitanju su izvorište vode 'Petrovaradinska ada' i 'Ratno ostrvo'. Svi radovi koji se izvode u zonama sanitarne zaštite izvorišta moraju biti u skladu sa Pravilnikom o načinu određivanja i održavanja zona sanitarne zaštite izvorišta vodosnabdevanja ('Sl. glasnik RS', br. 92/08)."

Odgovor na zahtev (15.12.2025, br. VI-89/94):

„JVP 'Vode Vojvodine' je izdalo Mišljenje u postupku izdavanja vodnih uslova br. II-620/5-19... Procena uticaja na vodni režim i izvorišta pijaće vode nije u nadležnosti JVP 'Vode Vojvodine'. JVP 'Vode Vojvodine' nije učestvovalo u reviziji projekta zahvata u vodnom režimu, jer nije u nadležnosti ovog javnog preduzeća."

Zajednički odgovor (15.12.2025, br. VIII-89/93):

„Nije nam poznato jer izdavanje takvih dozvola nije u nadležnosti JVP 'Vode Vojvodine'... JVP 'Vode Vojvodine' nije nadležno."

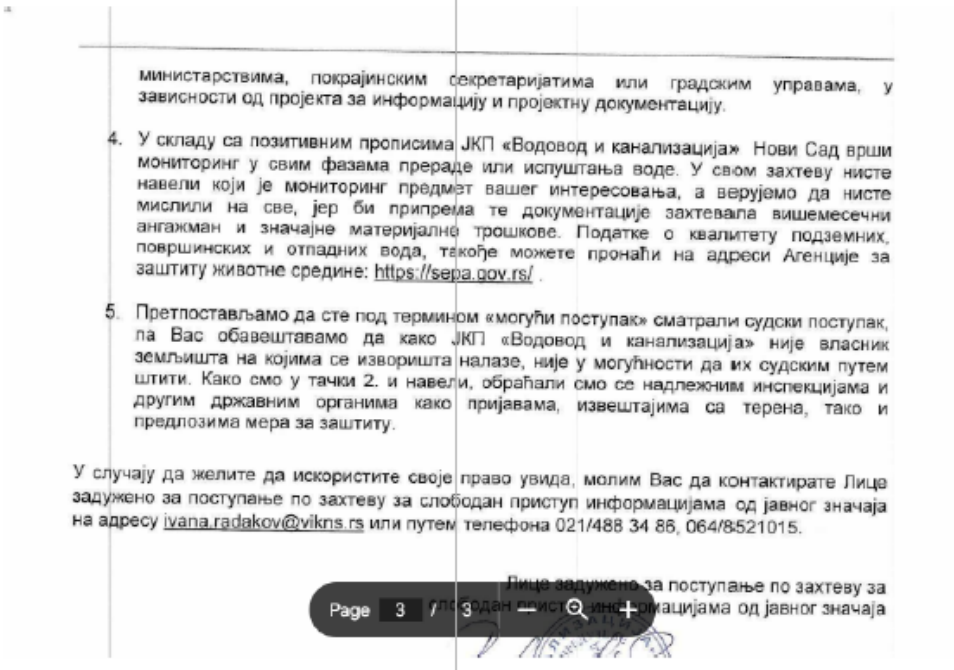
"DP 21 crosses two drinking water sources, i.e., their sanitary protection zones. These are the water sources 'Petrovaradinska Ada' and 'Ratno Ostrvo.' All works carried out within the sanitary protection zones of the sources must comply with the Rulebook on the Method of Determining and Maintaining Sanitary Protection Zones of Water Supply Sources ('Official Gazette of RS,' No. 92/08)."

Response to request (15.12.2025, No. VI-89/94):

"Public Water Management Company 'Vode Vojvodine' issued an Opinion in the procedure for establishing water conditions No. II-620/5-19... The assessment of the impact on the water regime and drinking water sources is not within the competence of JVP 'Vode Vojvodine.' JVP 'Vode Vojvodine' did not participate in the revision of the project involving interventions in the water regime, as this is not within the competence of this public enterprise."

Joint response (15.12.2025, No. VIII-89/93):

"We are not informed, as the issuance of such permits is not within the competence of JVP 'Vode Vojvodine'... JVP 'Vode Vojvodine' is not competent."



министарствима, покрајинским секретаријатима или градским управама, у зависности од пројекта за информацију и пројектну документацију.

4. У складу са позитивним прописима ЈКП «Водовод и канализација» Нови Сад врши мониторинг у свим фазама прераде или испуштања воде. У свом захтеву нисте навели који је мониторинг предмет вашег интересовања, а верујемо да нисте мислили на све, јер би припрема те документације захтевала вишемесечни ангажман и значајне материјалне трошкове. Податке о квалитету подземних, површинских и отпадних вода, такође можете пронаћи на адреси Агенције за заштиту животне средине: https://sepa.gov.rs/ .

5. Претпостављамо да сте под термином «могући поступак» сматрали судски поступак, па Вас обавештавамо да како ЈКП «Водовод и канализација» није власник земљишта на којима се изворишта налазе, није у могућности да их судским путем штити. Како смо у тачки 2. и навели, обраћали смо се надлежним инспекцијама и другим државним органима како пријавама, извештајима са терена, тако и предлозима мера за заштиту.

У случају да желите да искористите своје право увида, молим Вас да контактирате Лице задужено за поступање по захтеву за слободан приступ информацијама од јавног значаја на адресу ivana.radakov@vikns.rs или путем телефона 021/488 34 86, 064/8521015.

Лице задужено за поступање по захтеву за слободан приступ информацијама од јавног значаја

Page 3 / 3

Elaborat „Petrovaradinska ada“ (Institut J. Černi, 2010)

Rizici: kanalizacioni kolektor, saobraćajnice, naselje „Dunavac“, deponije, neuređena plaža

Zaključak: izvorišta već pod pritiskom, potrebne hitne mere

Elaborat „Ratno ostrvo“ (Institut J. Černi, 2010)

Rizici: industrija (NIS, TE-TO), kolektori otpadnih voda, poljoprivreda, transport opasnih materija

Zaključak: izvorište sistemski ugroženo kombinacijom industrije, kanalizacije i poljoprivrede

Rešenja o zonama sanitarne zaštite (2013)

Izvorište „Ratno ostrvo“:

Pokrajinski sekretarijat za zdravstvo, socijalnu politiku i demografiju doneo je **Rešenje broj 129-53-8622/2012-04 od 29. januara 2013. godine**, kojim su utvrđene zone sanitarne zaštite izvorišta „Ratno ostrvo“ u Novom Sadu. Rešenjem su definisane **Zona I (neposredna), Zona II (uža) i Zona III (šira)**, sa preciznim koordinatama, na osnovu elaborata koji je izradio Institut „Jaroslav Černi“. Ovo izvorište obezbeđuje oko **60% potreba za pijaćom vodom Novog Sada i okolnih naselja**.

Izvorište „Petrovaradinska ada“:

Pokrajinski sekretarijat za zdravstvo, socijalnu politiku i demografiju doneo je **Rešenje broj 129-53-8621/2012-04 od 29. januara 2013. godine**, kojim su utvrđene zone sanitarne zaštite izvorišta „Petrovaradinska ada“. I ovde su definisane **Zona I, Zona II i Zona III**, sa koordinatama i opisom postojećih i planiranih bunara. Izvorište „Petrovaradinska ada“ je drugo

Study „Petrovaradinska ada“ (Institut J. Černi, 2010)

Risks: sewage collector, traffic infrastructure, the “Dunavac” settlement, landfills, unmanaged beach

Conclusion: the water source is already under pressure, urgent measures are required

Study “Ratno Ostrvo” (Jaroslav Černi Institute, 2010)

Risks: industry (NIS, TE-TO), wastewater collectors, agriculture, transport of hazardous materials

Conclusion: the water source is systematically endangered by a combination of industry, sewage, and agriculture

Decisions on Sanitary Protection Zones (2013)

Water Source “Ratno Ostrvo”:

On January 29, 2013, the Provincial Secretariat for Health, Social Policy, and Demography issued Decision No. 129-53-8622/2012-04, establishing the sanitary protection zones of the “Ratno Ostrvo” water source in Novi Sad. The Decision defined Zone I (immediate), Zone II (inner), and Zone III (outer), with precise coordinates, based on the study prepared by the Jaroslav Černi Institute. This source provides about 60% of the drinking water needs of Novi Sad and surrounding settlements.

Water Source “Petrovaradinska Ada”:

On January 29, 2013, the Provincial Secretariat for Health, Social Policy, and Demography issued Decision No. 129-53-8621/2012-04, establishing the sanitary protection zones of the “Petrovaradinska Ada” water source. Here too, Zone I, Zone II, and Zone III were Located directly along the Danube, downstream from Roka Stream – the recipient of municipal wastewater.

Study “Petrovaradinska Ada” (Jaroslav Černi Institute, 2010)

po veličini u sistemu Novog Sada, sa prosečnom eksploatacijom od **300–400 l/s**, i nalazi se neposredno uz Dunav, nizvodno od Roka potoka – recipijenta komunalnih otpadnih voda.

Zaključak

Pozivanjem na ova dva rešenja (129-53-8622/2012-04 i 129-53-8621/2012-04, oba od 29. januara 2013) jasno se pokazuje da su **zone sanitarne zaštite izvorišta pijaće vode u Novom Sadu zakonski utvrđene i obavezne**. Svaka intervencija u tim zonama – uključujući izgradnju V mosta i prateće saobraćajnice – direktno je u sukobu sa važećim režimom zaštite i predstavlja ozbiljno kršenje zakona o vodama i javnom zdravlju.

Citat iz odgovora Pokrajinskog sekretarijata za zdravstvo (27. oktobar 2025) kojim se potvrđuju navedena Rešenja kao pravosnažna:

„Za navedena izvorišta Opština Novi Sad ishodovala je od Pokrajinskog sekretarijata za zdravstvo, socijalnu politiku i demografiju **Rešenja o određivanju zona sanitarne zaštite:**

– ŠTRAND br 129-53-8620/2012-04 od 29.01.2013.

– PETROVARADINSKA ADA br 129-53-8621/2012-04 od 29.01.2013.

– RATNO OSTRVO br 129-53-8622/2012-04 od 29.01.2013.

sa obavezom da se UNESU u plan upravljanja vodama, prostorne i urbanističke planove u skladu sa članom 77. stav 8. Zakona o vodama.“

Conclusion

By referring to these two decisions (129-53-8622/2012-04 and 129-53-8621/2012-04, both dated January 29, 2013), it is clearly demonstrated that the sanitary protection zones of Novi Sad's drinking water sources are legally established and mandatory. Any intervention within these zones – including the construction of the Fifth Bridge and accompanying traffic infrastructure – is in direct conflict with the existing protection regime and represents a serious violation of water law and public health regulations.

> Quote from the Response of the Provincial Secretariat for Health (27 October 2025)
>
> "For the mentioned water sources, the Municipality of Novi Sad obtained from the Provincial Secretariat for Health, Social Policy, and Demography Decisions on the designation of sanitary protection zones:
>
> – Štrand No. 129-53-8620/2012-04 of 29.01.2013
>
> – Petrovaradinska Ada No. 129-53-8621/2012-04 of 29.01.2013
>
> – Ratno Ostrvo No. 129-53-8622/2012-04 of 29.01.2013
>
> with the obligation to be INCLUDED in the water management plan, spatial and urban plans, in accordance with Article 77, paragraph 8 of the Water Law."

Studija o proceni uticaja na životnu sredinu 10215-ST2-IDP-nije ažurirana

Zakonski okvir: Član 28. Zakona o proceni uticaja na životnu sredinu → obavezno ažuriranje studije ako radovi ne počnu u roku od 2 godine. **Činjenice:** Saglasnost izdata 5. februara 2021; radovi nisu počeli do februara 2023; studija nije ažurirana. **Implikacija:** Radovi 2025. se odvijaju na osnovu nevažeće studije → postupak nezakonit i osporiv

Ključni nalazi iz studije (Deonica 3, Kać–Petrovaradin)

Studija o proceni uticaja na životnu sredinu za deonicu 3 (Kać–Petrovaradin) sama priznaje da se radovi odvijaju u neposrednoj blizini izvorišta pijaće vode „Ratno ostrvo“ i „Petrovaradinska ada“.

Poglavlje 5.3 – Zemljište, voda i vazduh: navodi da se atmosferske i otpadne vode iz urbanih zona („Sever IV“ i „Rokov potok“) direktno ispuštaju u Dunav, *neposredno nizvodno od izvorišta pijaće vode*. Studija konstatuje da se otpadne vode upuštaju „bez prethodnog tretmana“, što predstavlja **sanitarni problem**.

Poglavlje 10.8 – Praćenje uticaja: predviđa uzorkovanje podzemnih voda pomoću piezometara, čime se potvrđuje da je trasa u zoni koja direktno utiče na podzemne izvore. Monitoring je definisan za površinske i podzemne vode, što znači da se priznaje rizik po sanitarne zone.

Poglavlje 11.0 – Nedostaci studije: u studija se otvoreno navodi da *„nisu vršena namenska merenja“* i da će se *„postojeće stanje životne sredine utvrditi neposredno pred početak radova“*. Dakle, odluka o saglasnosti doneta je na osnovu nepotpunih i zastarelih podataka.

Poglavlje 13.0 – Prilozi (karte i situacioni planovi): grafički prilozi pokazuju da trasa prelazi preko Dunava i ulazi u zone koje se nalaze u neposrednoj blizini izvorišta, potvrđujući

Environmental Impact Assessment Study 10215-ST2-IDP – Not Updated

Legal framework: Article 28 of the Law on Environmental Impact Assessment → mandatory updating of the study if works do not commence within two years. **Facts:** Approval issued on February 5, 2021; works did not begin by February 2023; the study was not updated. **Implication:** Works in 2025 are being carried out on the basis of an invalid study → the procedure is unlawful and contestable.

Key Findings from the Study (Section 3, Kać–Petrovaradin)

The Environmental Impact Assessment Study for Section 3 (Kać–Petrovaradin) itself acknowledges that works are taking place in the immediate vicinity of the drinking water sources “Ratno Ostrvo” and “Petrovaradinska Ada.”

Chapter 5.3 – Soil, Water, and Air:
Notes that stormwater and wastewater from urban zones (“Sever IV” and “Roka Stream”) are discharged directly into the Danube, immediately downstream from the drinking water sources. The study states that wastewater is released *“without prior treatment”*, which constitutes a sanitary problem.

Chapter 10.8 – Monitoring of Impacts:
Provides for sampling of groundwater using piezometers, thereby confirming that the route lies within a zone that directly affects underground sources. Monitoring is defined for both surface and groundwater, which means that the risk to sanitary zones is acknowledged.

Chapter 11.0 – Deficiencies of the Study:
The study openly states that *“no targeted measurements were carried out”* and that *“the existing state of the environment will be determined immediately before the start of works.”* Thus, the approval decision was made on the basis of incomplete and outdated data.

Chapter 13.0 – Annexes (maps and situational plans):
Graphic annexes show that the route crosses the Danube and enters zones located in the immediate vicinity of the water sources, thereby confirming the risks.

da je prostorni obuhvat radova u dodiru sa vodenim telima i ekološkim koridorima.

Javna rasprava o Studiji održana je 22. decembra 2020. godine i trajala je svega 15 minuta. Na njoj nisu prisustvovali predstavnici nosioca projekta, obrađivača studije, niti ključne institucije poput vodnih preduzeća i Direkcije za vode. Time je procedura javnog uvida svedena na formalnost, bez stvarne rasprave o sanitarnoj zaštiti izvorišta pijaće vode, što ozbiljno dovodi u pitanje legitimitet same studije.

Zaključak

Na osnovu proučenih poglavlja studije jasno je:

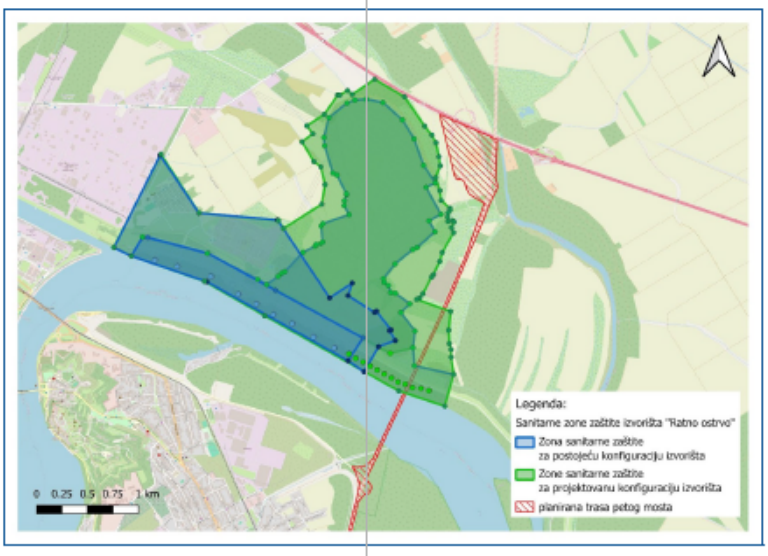
1. **Sanitarne zone su direktno ugrožene** – jer se otpadne i atmosferske vode ispuštaju u Dunav nizvodno od izvorišta.
2. **Studija je manjkava i zastarela** – sastavljači priznaju da se nije sproveo namenski monitoring i da se stanje tek treba utvrditi.
3. **Radovi se odvijaju protivno zakonu** – jer se zasnivaju na nevažećoj studiji (saglasnost iz 2021. istekla je u februaru 2023).

The public hearing on the Environmental Impact Assessment Study was held on December 22, 2020, and lasted only 15 minutes. Representatives of the project proponent, the study's authors, and key institutions such as water companies and the Water Directorate were not present. As a result, the procedure of public review was reduced to a mere formality, without genuine discussion on the sanitary protection of drinking water sources, which seriously calls into question the legitimacy of the study itself.

Conclusion

Based on the reviewed chapters of the study, it is clear that:

1. Sanitary zones are directly endangered – because wastewater and stormwater are discharged into the Danube downstream from the sources.
2. The study is deficient and outdated – the authors themselves admit that no targeted monitoring was carried out and that the state of the environment was to be determined only immediately before the start of work.
3. The works are being carried out unlawfully – because they are based on an invalid study (the approval issued in 2021 expired in February 2023).



Dozvola za istraživanje podzemnih voda u zoni sanitarne zaštite

Istraživanje = Eksploatacija

Dokument: Rešenje Pokrajinskog sekretarijata za energetiku, građevinarstvo i saobraćaj (2022)

Lokacija: Kamp Petrovaradin i Kamp Kać – u sanitarnoj zoni izvorišta

Problem: Istraživanje podzemnih voda u zoni I = faktička eksploatacija pijaće vode

Implikacija: Dozvola je protivzakonita jer se zahvat odvija u zoni gde je to zabranjeno

Dokument Pokrajinskog sekretarijata za energetiku, građevinarstvo i saobraćaj (br. 004571046 od 16.12.2025) značajan je jer pokazuje da je CRBC dobio odobrenje za geološka istraživanja, ali ne i za eksploataciju podzemnih voda.

Ključni citat

„...utvrđeno je da privrednom subjektu China Road and Bridge Corporation Srbija Gradevinarstvo d.o.o. Beograd

nije izdato odobrenje za istraživanje podzemnih voda niti se navedeni subjekt organu obraćao sa zahtevom za izdavanje odobrenja za izvođenje primenjenih geoloških istraživanja podzemnih voda.



Permit for Groundwater Exploration in the Sanitary Protection Zone

Exploration = Exploitation

Document: Decision of the Provincial Secretariat for Energy, Construction, and Transport (2022)

Location: Petrovaradin Camp and Kać Camp – within the sanitary protection zone of the water sources

Problem: Groundwater exploration in Zone I = de facto exploitation of drinking water

Implication: The permit is unlawful because the intervention takes place in a zone where such activities are strictly prohibited.

The document of the Provincial Secretariat for Energy, Construction, and Transport (No. 004571046 of December 16, 2025) is significant because it shows that CRBC received approval for geological exploration, but not for the exploitation of groundwater.



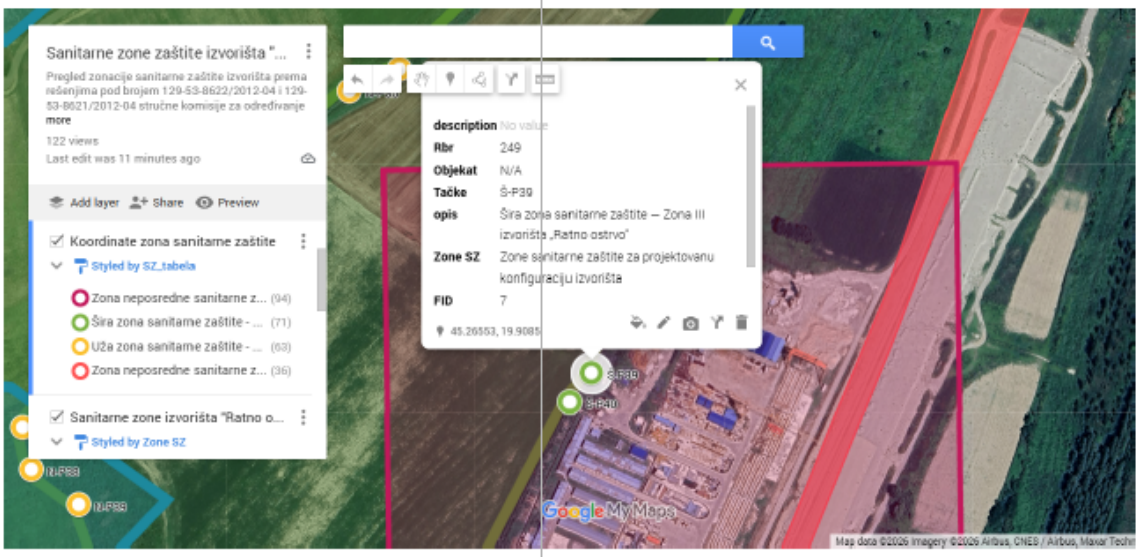
Key Quote:

"...it was established that the economic entity China Road and Bridge Corporation Serbia Construction d.o.o. Belgrade was not issued approval for groundwater exploration, nor did the said entity address the authority with a request for the issuance of approval for conducting applied geological exploration of groundwater."

21

Nadalje, … rešenjem organa broj: 143-310-337/2022-03 od 8. septembra 2022. godine bilo je odobreno izvođenje primenjenih geoloških istraživanja podzemnih voda za potrebe vodosnabdevanja izvorišta privremenih kampova u Petrovaradinu i Kaću… **Rok važenja predmetnog rešenja bio je do 31.08.2024. godine.**“

“Furthermore, by Decision No. 143-310-337/2022-03 of September 8, 2022, approval was granted for the performance of applied geological exploration of groundwater for the purpose of supplying temporary camps in Petrovaradin and Kać… The validity period of the said Decision was until August 31, 2024.”





Предмет: Информација око режима санитарне заштите у зони изградње 5 моста.

Поштована госпођо Стојковић Јованović,

У вези вашег дописа нашем органу информишемо Вас о следећем:

1. На снази су издата решења о зонама санитарне заштите изворишта за: „Ратно одстрво" под бројем 129-53-8622/2012-04 од дана 29.01.1013 године, и „Петроварадинска ада" под бројем 129-53-8621/2012-04 од дана 29.01.2023. године.
2. Мишљење о процени утицаја на животну средину за пројекат 5 моста, није тражено од нашег органа.
3. Секретаријат није био обавештен о почетку радова на локацији за изградњу новог 5 моста.

Овим путем Вас упућујемо да се обратите Граду Нови Сад, Градској управи за урбанизам и грађевинске послове и Градској управи за комуналне послове, како би сте добили у потпуности тражене информације.

Срдачан поздрав,

ПОКРАЈИНСКИ СЕКРЕТАР
ЗА ЗДРАВСТВО
Др Попов Милан

Zakonske direktive i regulativa

Nacionalni okvir:

Zakon o zaštiti životne sredine (Sl. glasnik RS, br. 135/2004, 36/2009, 72/2009, 43/2011, 14/2016, 76/2018, 95/2018, 101/2020, 44/2021, 95/2021, 101/2022)

Utvrđuje opšte principe zaštite životne sredine, uključujući obavezu zaštite izvorišta pijaće vode i sanitarnih zona.

Zakon o vodama (Sl. glasnik RS, br. 30/2010, 93/2012, 101/2016, 95/2018, 157/2020, 129/2021, 10/2023)

Definiše upravljanje vodama, zaštitu izvorišta i stroge zabrane zahvata u zonama sanitarne zaštite.

Zakon o proceni uticaja na životnu sredinu (Sl. glasnik RS, br. 135/2004, 36/2009, 72/2009, 43/2011, 14/2016, 95/2018, 101/2020, 44/2021, 95/2021, 101/2022)

Član 28 propisuje obavezno ažuriranje studije ukoliko radovi ne počnu u roku od dve godine od izdavanja saglasnosti.

Međunarodni okvir:

Bernska konvencija (1979) – zaštita staništa i vrsta.

Dunavska konvencija (1994) – integrisano upravljanje slivom reke Dunav.

Ramsarska konvencija (1971) – zaštita močvara od međunarodnog značaja.

Arhuska konvencija (1998) – pravo na pristup informacijama, učešće javnosti i pristup pravdi u pitanjima životne sredine.

EU Okvirna direktiva o vodama (2000/60/EC) – uspostavlja okvir za zaštitu površinskih i podzemnih voda, prelaznih i obalnih voda.

Legal Directives and Regulations

National Framework:

Law on Environmental Protection (Official Gazette RS, No. 135/2004, 36/2009, 36/2009 – other law, 72/2009 – other law, 43/2011 – decision of the Constitutional Court, 14/2016, 76/2018, 95/2018 – other law, 101/2020, 44/2021, 95/2021, 101/2022)

Establishes the general principles of environmental protection, including the obligation to safeguard drinking water sources and sanitary zones.

Law on Waters (Official Gazette RS, No. 30/2010, 93/2012, 101/2016, 95/2018, 157/2020, 129/2021, 10/2023)

Defines water management, protection of water sources, and strict prohibitions on interventions within sanitary protection zones.

Law on Environmental Impact Assessment (Official Gazette RS, No. 135/2004, 36/2009, 72/2009, 43/2011, 14/2016, 95/2018, 101/2020, 44/2021, 95/2021, 101/2022)

Article 28 requires updating of studies if works do not commence within two years of approval.

International Framework:

Bern Convention (1979) – protection of habitats and species.

Danube Convention (1994) – integrated river basin management.

Ramsar Convention (1971) – protection of wetlands of international importance.

Aarhus Convention (1998) – access to information, public participation, and access to justice in environmental matters.

EU Water Framework Directive (2000/60/EC) – establishes a framework for the protection of inland surface waters, groundwater, transitional waters, and coastal waters.

Zaključak

Institucije same potvrđuju postojanje sanitarnih zona i obaveze njihove zaštite, ali istovremeno priznaju da se u njima odvijaju zabranjene aktivnosti. Najveći propust predstavlja izdavanje dozvole kompaniji CRBC i ignorisanje obaveze ažuriranja studije uticaja na životnu sredinu. Time je direktno dokazano da se pijaća voda koristi za potrebe gradilišta, što je protivzakonito i predstavlja ozbiljan rizik po javno zdravlje.

U odbrani zaštićenog sanitarnog područja **Ratno ostrvo – Petrovaradinska ada** do sada smo preduzeli sledeće korake:

- Zahtev za vanredni inspekcijski nadzor
- Ponovljeni Zahtev (dva puta)
- Tužba Upravnom sudu zbog nezakonitih akata izdatih od strane Pokrajinske zdravstvene sanitarne inspekcije
- Dopuna Žalbe Br2022-1 Birou Bernske konvencije
- Žalba Aarhuskoj konvenciji
- Žalba i zahtev za preispitivanje Odluke u vezi sa Poveljom Ramsar

Ovi postupci pokazuju da borba za očuvanje izvorišta nije samo lokalna inicijativa, već deo šireg međunarodnog pravnog i društvenog procesa. Ona zahteva istrajnost, doslednost i odlučnost, jer ovakvi procesi traju godinama, ponekad i duže od jedne decenije. Upravo ta istrajnost je dokaz da se pravo na vodu ne može pregovarati niti kompromitovati – ono je osnovno ljudsko pravo i temelj života.

Conclusion

Institutions themselves confirm the existence of sanitary protection zones and the obligations to safeguard them, yet at the same time they acknowledge that prohibited activities are taking place within these zones. The most serious failure is the issuance of a permit to CRBC and the neglect of the obligation to update the environmental impact study. This is direct evidence that drinking water is being used for construction purposes, which is unlawful.

In defense of the protected sanitary area **Ratno Ostrvo – Petrovaradinska Ada**, the following steps have been undertaken so far:

- Request for extraordinary inspection supervision
- Repeated Request (twice)
- Lawsuit before the Administrative Court against unlawful acts issued by the Provincial Health Sanitary Inspectorate
- Supplement to Complaint Br2022-1 to the Bureau of the Bern Convention
- Complaint to the Aarhus Convention
- Complaint and request for reconsideration of the Decision related to the Ramsar Charter

These actions demonstrate that the struggle to protect water sources is not merely a local initiative, but part of a broader international legal and social process. It requires persistence, consistency, and determination, as such proceedings often last for many years, sometimes more than a decade. This very perseverance proves that the right to water cannot be negotiated or compromised – it is a fundamental human right and the foundation of life.

Borba za prirodu i pravo na vodu nije sprint, već maraton. Međunarodni procesi pred Savetom Evrope, uključujući žalbe u okviru Bernske konvencije, često traju duže od jedne decenije. Samo istrajnost, doslednost i odlučnost građana i organizacija mogu održati pritisak i obezbediti da se glas zajednice čuje. Ovi procesi zahtevaju neprekidno dokumentovanje, pravnu argumentaciju i javnu podršku, ali upravo ta dugotrajna posvećenost pokazuje snagu civilnog društva. Bez istrajnosti, nijedna pravda ne bi bila moguća.

Uputstvo za podnošenje žalbe Bernskoj konvenciji

Pravni osnov:

Žalbe se podnose u okviru *Bernske konvencije o očuvanju evropskih divljih vrsta i prirodnih staništa* (1979), kojom upravlja Savet Evrope.

Ko može podneti žalbu:

- ❖ Nevladine organizacije, građanske inicijative i pojedinci.
- ❖ Žalba mora biti zasnovana na konkretnom slučaju kršenja obaveza države potpisnice.

Šta žalba mora da sadrži:

- ☐ Kratak opis problema (lokacija, vrsta ugroženosti).
- ☐ Dokaze: stručni elaborati, fotografije, odluke institucija.
- ☐ Pravnu argumentaciju: pozivanje na Bernsku konvenciju, nacionalne zakone, EU direktive.
- ☐ Jasno traženje da Savet Evrope pokrene postupak protiv države.

Forma i jezik:

Žalba se podnosi na engleskom ili francuskom jeziku. Mora biti potpisana od strane ovlašćenog predstavnika.

The struggle for nature and the right to water is not a sprint, but a marathon. International processes before the Council of Europe, including complaints under the Bern Convention, often last longer than a decade. Only the persistence, consistency, and determination of citizens and organizations can maintain pressure and ensure that the voice of the community is heard. These processes require continuous documentation, legal argumentation, and public support, but it is precisely this long-term commitment that demonstrates the strength of civil society. Without perseverance, no justice would be possible.

Guidance for Submitting a Complaint to the Bern Convention

Legal Basis:

Complaints are submitted within the framework of the *Bern Convention on the Conservation of European Wildlife and Natural Habitats* (1979), administered by the Council of Europe.

Who Can Submit a Complaint:

- ★ Non-governmental organizations, civic initiatives, and individuals.
- ★ The complaint must be based on a concrete case of a state's failure to comply with its obligations.

What the Complaint Must Contain:

- ☐ A brief description of the problem (location, type of threat).
- ☐ Evidence: expert studies, photographs, institutional decisions.
- ☐ Legal argumentation: references to the Bern Convention, national laws, EU directives.
- ☐ A clear request that the Council of Europe initiate proceedings against the state.

Form and Language:

Complaints must be submitted in English or French. They must be signed by an authorized representative.

Adresa za slanje žalbi:

Council of Europe – Bern Convention Bureau

Directorate of Democratic Participation

F-67075 Strasbourg Cedex, France

Elektronska adresa (web):

https://www.coe.int/en/web/bern-convention/complaints

Način podnošenja:

Elektronski putem zvaničnog formulara na sajtu Saveta Evrope.

Poštom na gore navedenu adresu.

Ishod i postupak:

Ako je žalba validna, Bureau otvara slučaj i traži izjašnjenje države.

Proces traje više godina, ponekad i duže od jedne decenije, ali omogućava međunarodni pritisak i monitoring.

Address for Submitting Complaints:

Council of Europe – Bern Convention Bureau

Directorate of Democratic Participation

F-67075 Strasbourg Cedex, France

Electronic Address (web):

https://www.coe.int/en/web/bern-convention/complaints

Submission Method:

Electronically via the official form on the Council of Europe website.

By post to the above address.

Outcome and Procedure:

If the complaint is valid, the Bureau opens a case and requests the state's response.

The process may last for many years, sometimes more than a decade, but it enables international pressure and monitoring.

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 (Carudelis 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).

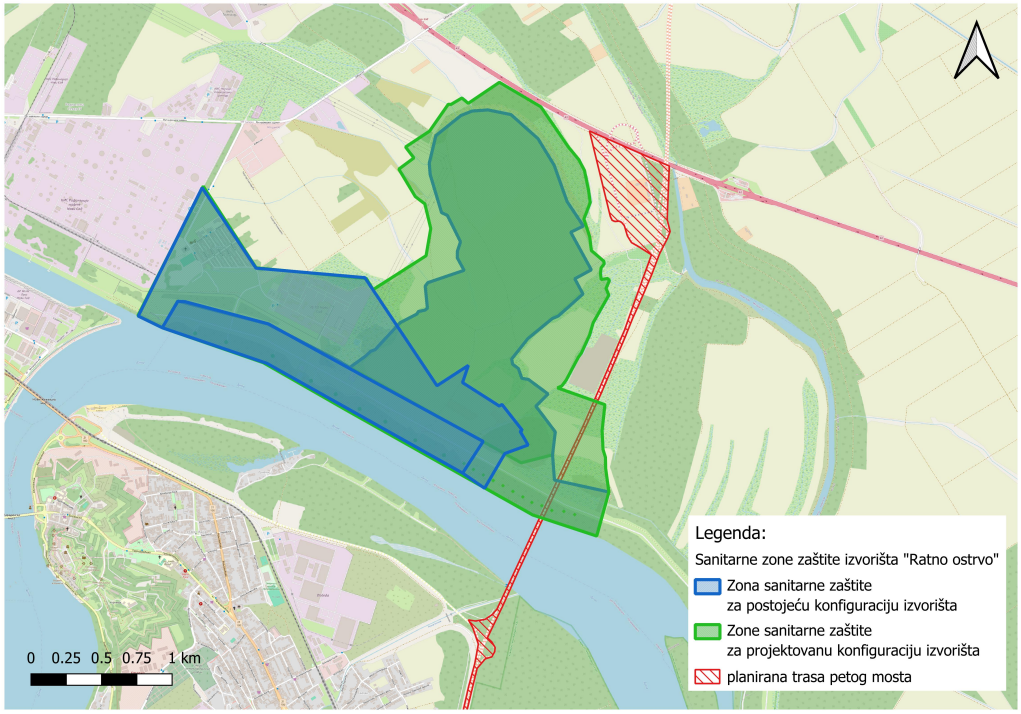
II. Sanitary Zones and Drinking Water Sources

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	Administrative Lawsuit filed before Administrative Court in Novi Sad by Daniela Stojković Jovanović against Provincial Sanitary Inspection.	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.