



Strasbourg, 15 August 2025

T-PVS/Files(2025)2022-1_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
Strasbourg, 8-12 December 2025

Bureau of the Standing Committee
16-18 September 2025
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 dated August 2025** NGO *World and Danube* Submits IV Supplementary Report to Bern Convention**

Date: 13 August 2025 **Case No.:** 2022/1 – Alleged habitat destruction in Novi Sad due to infrastructure projects

We have officially submitted the IV Supplementary Report to the Bern Convention Bureau, providing updated legal, ecological, and hydrological evidence regarding the ongoing degradation of wetland ecosystems in Novi Sad.

 What the Submission Includes:

- **Legal analysis** of violations under the Bern, Ramsar, Aarhus, and Espoo Conventions
- **Visual documentation** of habitat destruction in Šodroš, Kamenička Ada, and Dunavac
- **Hydrogeological maps** showing encroachment into Sanitary Protection Zone A1
- **Annex 1:** Analytical rebuttal of government responses
- **Annex 2:** Technical overview of drinking water well systems at Petrovaradinska Ada and Ratno Ostrvo

 Key Findings:

- Bridge V construction intersects groundwater zones supplying over 500,000 residents
- Active well systems are threatened by excavation and concrete infrastructure
- Over 160 hectares of floodplain forest and wetland are at risk of irreversible loss
- Public participation and environmental assessments remain inadequate or absent

 Our Appeal:

We call on the Bern Convention Bureau to initiate urgent monitoring and request a moratorium on all activities within Zone A1 until independent ecological and hydrological assessments are conducted.



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To: Bern Convention Secretariat

Council of Europe
Directorate of Democratic Participation F-67075 Strasbourg
Cedex France

IV Supplementary Submission

Case No. 2022/1 – Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure constructions

Submitted by: *Daniela Stojković Jovanović*

On behalf of: *NGO World and Danube*

Date: 12 August 2025

Reference: T-PVS/Files(2025)2022-01_comp

QR Code: Link to case page

✂ [Link to full documentation folder on ONE Drive](#) – includes scanned approvals, legal appeals, expert statements, and video materials.

Introductory Statement for the IV Supplementary Submission to the Bern Convention

On February 1st, 2025, the City of Novi Sad was officially awarded the prestigious title of *Ramsar Wetland City* during the 64th Standing Committee session of the Ramsar Convention. The recognition was granted based on the city's purported commitment to wetland conservation, particularly referencing the Ramsar site *Koviljsko–Petrovaradinski rit*. However, recent field documentation and legal analysis reveal a stark contradiction: nearly all wetland ecosystems within the urban territory of Novi Sad have been systematically degraded between 2014 and 2025, primarily due to infrastructure projects that violate both national legislation and international environmental obligations.

While the Ramsar site *Koviljsko–Petrovaradinski rit* remains formally intact, it lies on the periphery of the municipality and is not representative of the urban core, where the most severe destruction has occurred. In July 2021, NGO *World and the Danube* submitted a Qualified Initiative for Enhanced Protection of *Kamenička Ada*, *Dunavac*, and *Šodroš*—a flood retention zone and habitat for 253 strictly protected species. The initiative was dismissed during urban planning procedures that enabled bridge construction and large-scale urbanization. Plans now include the relocation of embankments and the development of a new urban zone spanning 175 hectares of alluvial forest and wetland ecosystems.

The construction of *Bridge V* (Ratno Ostrvo – Petrovaradinska Ada) is taking place within *Sanitary Protection Zones I–III*, as defined by the 2013 Provincial Decree, which explicitly prohibits

excavation and infrastructure within groundwater fields supplying over 500,000 residents. The bridge route intersects the *Important Bird Area (IBA) Koviljski rit* and the ecological corridor of the Ramsar site, directly undermining the ecological integrity of internationally recognized habitats.

Additional violations include:

- **NSA18 – Veliki (Pejića) rit:** Backfilled with construction materials since 2014, with intensified destruction from 2021 onward.
- **NSA19 – Veliki (Pejića) rit:** Subject to road construction, sewage infrastructure, and pond development between 2022–2025, resulting in permanent habitat loss.
- **NSA05 – “Bara at Avijatičarskog settlementa”:** Unilaterally delisted by the Institute for Nature Protection; western section permanently destroyed by 2024.
- **Danube oxbow near Avijatičarsko suburb:** A 360-meter drainage channel illegally piped and buried under landfill, now replaced by a parking lot, violating spatial plans and flood protection regulations.
- **Between Novi Sad, Veternik, and Futog:** 2.1 km of alluvial left bank illegally occupied by sand and gravel companies, backfilled and urbanized without enforcement.
- **Kamenjar suburb:** 250 meters of alluvial bank destroyed between 2024–2025, adjacent to Kamenička Ada.

These cumulative impacts represent a clear breach of Serbia’s obligations under the Bern Convention, Ramsar Convention, and national nature protection laws. The IV Supplementary Submission provides updated evidence, legal analysis, and visual documentation to support urgent international intervention.

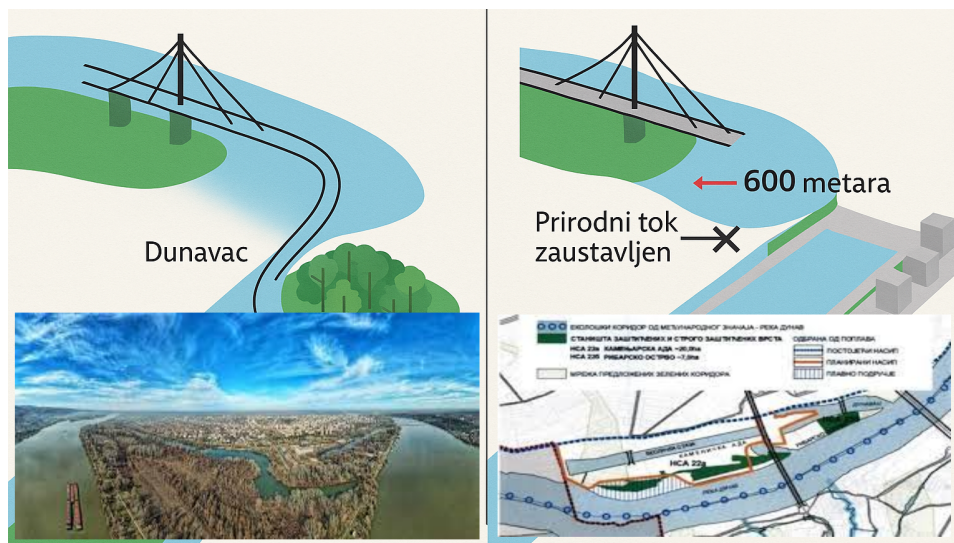
Timeline of Approvals and International Reactions

Year	Event
2020	Adoption of a Government Conclusion enabling construction of a transport facility in Kamenička Ada
2021	Rejection of the initiative to protect Dunavac, Šodroš, and Ribarsko Ireland by the Provincial Institute for Nature Protection (reason: financial constraints)
2022	Official complaint submitted to the Bern Convention by NGO “World and the Danube”
2023–2025	Regular reports submitted by both the Government and the complainant to the Bureau and Standing Committee of the Bern Convention
2025	Forth Supplementary Submission by the complainant, presenting new evidence on cumulative impacts and procedural violations

Comparison: IV Bridge vs. V Bridge – Novi Sad

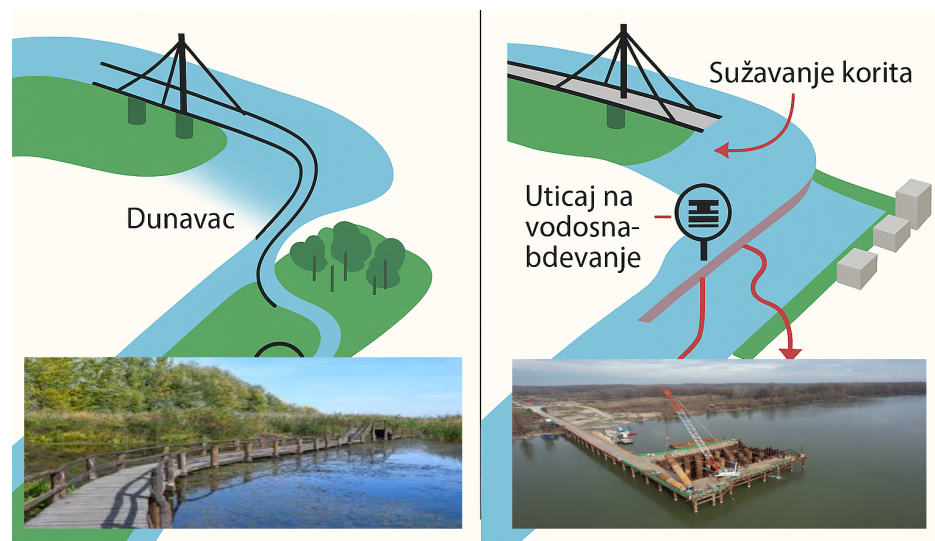
Element	IV Bridge	V Bridge
Project Client	JP "Urbanizam" Novi Sad / City of Novi Sad	JP "Urbanizam" Novi Sad / City of Novi Sad
Financier	Chinese loan with sovereign guarantees from the Republic of Serbia	Chinese loan with sovereign guarantees from the Republic of Serbia
Contractor	China Road and Bridge Corporation (CRBC)	China Road and Bridge Corporation (CRBC)
Project Conditionality	Implementation contingent on acceptance of Chinese credit and infrastructure package	Implementation contingent on acceptance of Chinese credit and infrastructure package
Environmental Impact	Narrowing of the Danube riverbed by ~600 meters; blocking the natural flow into Dunavac	Direct impact on flood retention zone; risk to water supply and Kovijsko-petrovardinskii rit forest complex
Legal Controversy	Potential violation of the Bern Convention and Serbia's Nature Protection Law	Same, with additional risks to groundwater and biodiversity

ANNEX 1 – Analytical Rebuttal of Government Response

**Bridge IV – Šodroš Zone:**

- Under construction.
- EIA created a post-construction start.
- Over 200 strictly protected species are affected.

ANNEX 2 – Drinking Water Well Systems at Ratno Ostrvo and Petrovaradinska Ada

**Bridge V – Petrovaradin Zone:**

- Part of Section 3, under construction.
- EIA expired, lacks cumulative analysis.
- Threatens Zone A1 and water sources.

Legal and International Aspects

Bern Convention Violations:

- Species: *Aythya nyroca*, *Buteo*, *Carduelis carduelis* ...
- The ecosystem of Koviljsko petrovaradinski rit is endangered.

Aarhus Convention Violations:

- Lack of public participation and transparency.

Non-compliance with Ramsar and IBA standards:

- Danube ecosystem complexity ignored.

Conclusion and Request

Conclusion: EIA for Section 3 is legally invalid, scientifically inadequate, and procedurally flawed.

NGO Request

- Immediate moratorium on activities in Zone A1 (bridge V)
- Independent ecological and hydrological assessments
- Implementation of SEA and EIA aligned with international standards
- Guaranteed civil society participation
- Sanctioning of entities responsible for violations

Attachments:

- [Statement I by JKP “Vodovod i kanalizacija” \(Ref. No. 8-20 034\)](#)
- [Statement II by JKP “Vodovodi kanalizacija”](#)
- Screenshots from T-PVS/Files(2025)2022-01_gov
- [Map of Zone A1 with infrastructure overlay](#)
- [Species list with Bern Convention status](#)
- Previous submissions from 2023 and 2024

Additionally submitted Annexes:

[Annex 1](#) – Analytical Rebuttal of Government Response

[Annex 2](#) – Drinking Water Well Systems at Ratno Ostrvo and Petrovaradinska Ada

Update Report dated January 2025

Nevladina organizacija **Svet i**

Nongovernmental organization **World and Danube**
www.svetidunav.blogspot.com



Council of Europe

Secretary of the Bern Convention

Cc: Permanent Representation of Serbia to the Council of Europe Ms.
Daniela Stojković Jovanović (complainant)

Submission of an III updated report for the attention of the Bureau 31th of
the January 2025

Subject: Complaint No. 2022/1

Complaint on stand-by

Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure constructions

In accordance with the instructions received

Dear Members of the Bern Commission,

I am writing to provide additional information and emphasize the urgency of Complaint No. 2022/1, which is being processed against the State of Serbia for alleged habitat destruction in the area of Novi Sad due to proposed infrastructure projects.

- 1. Progress of the construction of the fourth bridge:** The construction of the fourth bridge in Novi Sad is progressing, and unfortunately, we have already lost two lives during this process (We sent you details about the first case of a kayaker's death in a previous update, and the case of a Chinese worker's death took place on July 17, 2024). Currently, auxiliary bridge has been built and CRBC have started to work on the pillars of the bridge as shown on the Photo 1. For more details, please refer to this [video about the bridge](#)

Photo 1 Construction of the main bridge followed by auxiliary bridge



2. **Area devastation:** The site where auxiliary and the main bridge are in construction process has been cleared and devastated in terms of forest clearing as shown in Photo 2. A number of old Black Poplars and Willows have been removed, bank damaged and deep trenches dug up as shown on Photo 3. Additionally, because of these unregulated works illegal dumps of communal and construction wastes (Photo 4) have appeared on several places on Kamenička ada island what is direct degradation of natural values of the area proposed for protection. This small area of 3,6 hectares area has been greatly devastated which will have long-term negative effects on the Dunavac oxbow and its wildlife. But even besides that works still did not affected negatively overall biodiversity of the Kamenička ada island and Dunavac oxbow. During the whole 2024 year additional biodiversity surveys within the area brought additional discoveries of new international important, protected species of birds which increased to 160 since 2021 (139). New important discoveries (Photo 5) during 2024 were observations of Pintail (*Anas acuta*), Ferruginous Ducks (*Aythya nyroca*), Red-breasted Flycatcher (*Ficedula parva*), Glossy Ibis (*Plegadis falcinellus*), Horned Grebe (*Podiceps auritus*), Common Snipe (*Gallinago gallinago*), Red-breasted Merganser (*Mergus serrator*), Pygmy Cormorants (*Microcarbo pygmeus*), etc. Additionally, over 250 new georeferenced data on birds and invertebrates were collected (Photo 6). More people have been involved in field surveys, trainings, communal waste clearings and excursions (Photo 6) organized by various organizations - what in total additionally confirmed importance of the area for local community and biodiversity respectively.



Photo 2 Clearing of alluvial forest of old Black and White Poplars



Photo 3 Clearing of alluvial forest of old Black and White Poplars

- 3. Connection with a related company:** I would like to emphasize that the related company (the Chinese consortium CRIC&CCCC, which consists of the companies China Railway International Co. Ltd and China Communications Construction Company Ltd) was also responsible for the reconstruction of railway stations in Novi Sad. During this project, we witnessed a major tragedy when the canopy of the Novi Sad railway station collapsed, resulting in the death of 15 citizens. Since the collapse, Serbia has seen mass protests against the government for failing to disclose all details of the contracts with the Chinese company involved. Additionally, a massive general strike took place yesterday, with schools, theaters, bookstores, and many other institutions closed. The whole process of railway and bridge projects are very similar due to secretive agreements, permits and general official documents, illegal construction works and possible corruption, the same as were followed by the problematic fourth bridge scandal. For more details, please refer to these videos about the general strike and this [video](#).



Photo 4 Communal and construction waste, Kamenička ada 2024



Photo 5 Flock of Glossy Ibises on Dunavac oxbow, August 2024

- 4. Environmental Impact Study:** The Environmental Impact Study (considering the construction of the bridge) was submitted a full year after the commencement of the works. This study is utterly null and void, given the real situation on the ground. It is filled with contradictions, dry legal data from various laws, and references to cited paragraphs from international conventions and current national laws. Additionally, authors of EIA did not use any of the 2000 georeferenced data for biodiversity we have freely provided Provincial Institute for Nature Protection during this process, what could radically change the final analyses of the EIA. That was unacceptable! Also, we are concerned and think that necessary EIA study is also missing in the case of the construction of the fifth bridge (Photo 7). We have not confirmed that, but maybe Bern Convention Secretariat can ask for that document. According to national legislation projects like this (corridors of over 10km long) one should be analyzed by Strategic environmental impact assessment. The 5th bridge which is also in construction from the same agreement with CRBC is located on the border of the already designated Special protected area “Koviljsko-petrovaradinski rit”. Furthermore, the proposed urbanization and degradation of the remaining water protection area 170 ha on Kamenička Ada and Šodroš is extremely concerning (Photos 4). If these continue together with movement of the embankment it will lead to complete destruction of this natural retention zone and habitat for over 200 strictly protected species.
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Photo 6 Field excursion during Eurobirdwatch, October 2024



Photo 7 Corridor of the 5th bridge over the Danube downstream Novi Sad

5. **Ramsar Convention:** Additionally, on 24 January 2025, we learned over the media that Novi Sad has been granted the status of “Ramsar wetland city”, which a serious scandal is considering this current process over the Bern Convention and other problems with wetlands around the Novi Sad city. This bizarre news was a shock for us! Therefore, we ask the Bern Convention Secretariat (if it is possible) to check with the Ramsar Secretariat how this was possible considering all the numerous illegalities which were created by the local administration from Novi Sad during the past several years only considering the Šodroš and Dunavac area, not mentioning the others.

For these reasons, I urge the Commission to take all necessary measures to halt work on the disputed projects until the case is resolved. Thank you for your attention and willingness to address this issue.

Sincerely,

Daniela Stojkovic Jovanovic President

NGO World and Danube
