



Strasbourg, 04 February 2026



T-PVS/Files(2026)2024-3_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting

Strasbourg, 7-11 December 2026

Bureau of the Standing Committee

7-9 April 2026,

Strasbourg

New complaint: 2024/3

**Alleged destruction of the habitat of the little cormorant
Microcarbo pygmeus on the Sava River in Belgrade (Serbia)**

- COMPLAINANT REPORT -

*Document prepared by
NGO Licej*

Additional Submission – 26 November 2025**Supplementary Submission – Complaint No. 2024/03****Serbia: Alleged destruction of the habitat of the little cormorant (*Microcarbo pygmeus*), Sava River, Belgrade****Submitted by: NGO “Licej” (Complainant)**

Dear Grazia Alessandra Siino,

Pursuant to the Bureau’s communication of 18 November 2025, and in line with the request for updated information by 31 January 2026, the complainant submits additional evidence documenting continued and irreversible degradation of the habitat in question.

New photographic material clearly demonstrates that the nesting and feeding area previously used by *Microcarbo pygmeus* has been completely removed. The natural riverbank vegetation and ecological structure have been replaced by marina infrastructure directly occupying the former habitat.

Based on all available data, the construction activities were undertaken **without a permit at the time of execution**, and according to all presently accessible official and public information, the marina **continues to operate without any valid permit**. The installation is therefore both ecologically destructive and administratively non-compliant.

An assessment was already submitted with the original complaint, including:

- documented communication with the competent authorities,
 - citizen reports from multiple locations,
 - photographic evidence from independent observers,
- all confirming progressive habitat degradation and loss of ecological conditions required for the species’ survival.

Additional critical evidence:

An **official police report** exists within the **Police Department Bežanijska Kosa**, documenting the **breach of the protective fence** that previously safeguarded the habitat (16.5.2024). Following this breach, **boat owners now pass through the area daily**, using the opening as an access route to the marina. This continuous movement has **destroyed the remaining habitat elements**, definitively eliminating the site as a viable nesting or roosting area for the little cormorant.

Due to legal restrictions, **the complainant cannot obtain this police report independently**. Access to such records is limited to competent state bodies. However, **the Bureau or the Secretariat may request this document directly from the Serbian authorities**, should they deem it necessary for the case assessment.

The present annex provides new visual evidence, confirming:

- complete physical destruction of the habitat,
- occupation of the site by marina infrastructure,
- absence of any mitigation or restoration measures,
- ongoing disturbance caused by unregulated access through the breached fence,
- continued operation of a structure that, to the best of our knowledge, lacks all required permits.

Attached evidence:

– a photograph documenting the current state of the site and visible replacement of natural habitat with marina infrastructure.

[Annexe]

This material demonstrates that the habitat has been permanently eliminated and no longer supports the ecological requirements of *Microcarbo pygmeus*. The complainant remains available for any additional clarifications or documentation required for the Bureau's review.

With respect,
Dragana Božinović

President of the Board, Licej Association
Coordinator, Green Wave Network
licejudruzenje@gmail.com | +381 61 666 6503
Belgrade, Serbia

Annex 1: Photo documenting continued and irreversible degradation of the habitat (25/11/2025)

