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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)**

- GOVERNMENT REPORT -

*Document prepared by the
Ministry of Environmental Protection of Serbia*

Progress Report – January 2026

**Republic of Serbia
MINISTRY OF ENVIRONMENTAL
PROTECTION**

No.:004756287 2025 14850 004 000 016 012

Date: 26 January 2026
Belgrade

**Council of Europe
Directorate General of Democracy
Secretariat of the Bern Convention
F-67075 Strasbourg, France
Ms Alessandra Siino
Secretary of the Bern Convention**

**Subject: The Report on Complaint No. 2024/03: New Complaint: Serbia: Alleged
Destruction of a Nesting Site of the Pygmy Cormorant (*Microcarbo pygmaeus*)
on the Sava River in Belgrade**

Dear Ms Siino,

With regard to the request of the Bureau of the Bern Convention dated 18 November 2025, concerning Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, including the supplementary notification of the Secretary of the Bern Convention dated 20 November 2025, the Ministry of Environmental Protection, as the competent authority responsible for monitoring the implementation of the Bern Convention in the Republic of Serbia, submitted Request No. 004756287 2025 14850 004 000 016 012 of 12 January 2026 for supplementary reporting to the competent authorities and organizations: the Ministry of Construction, Transport and Infrastructure; the Institute for Nature Conservation of Serbia; and the Secretariat for Environmental Protection of the City of Belgrade.

Pursuant to the notification of the Secretariat of the Bern Convention dated 20 November 2025, stating that an error had occurred in the decision adopted by the Bureau of the Bern Convention, the Report on Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade (Ref. 002211701 2025 14850 004 007 020 092 of 24 July 2025) is hereby resubmitted for consideration as an Annex to this letter.

On the basis of the supplementary statements received from the aforementioned authorities and organizations, we hereby inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure informed that the Government of the Republic of Serbia adopted the Regulation on the Spatial Plan of the Special Purpose Area for the Development of a Part of the Riverfront in the City of Belgrade - the Area of the Sava Riverfront for the "Belgrade Waterfront" project ("Official Gazette of RS," Nos. 7/2015, 48/2022 and 86/25) (hereinafter: the Spatial Plan), in accordance with the provisions of the Law on Planning and Construction ("Official Gazette of RS," Nos. 72/2009, 81/2009 –

corr., 64/2010 – Constitutional Court decision, 24/2011, 121/2012, 42/2013 – Constitutional Court decision, 50/2013 – Constitutional Court decision, 98/2013 – Constitutional Court decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 – other law, 9/2020, 52/2021, 62/2023 and 91/25).

Within the boundaries defined by the Spatial Plan lies the protected habitat “Winter Roosts of Pygmy Cormorants” (Decision on the Designation of the Protected Habitat, “Official Gazette of the City of Belgrade,” No. 109/22), situated in the internationally important bird area (IBA) “Confluence of the Sava and Danube Rivers” (RS017), which constitutes part of the ecologically significant area of the ecological network of the Republic of Serbia.

As set out in the section of the Spatial Plan entitled “Water Management, Left Bank of the Sava River,” “Spatial Unit X (ten) of the unembanked left bank of the Sava River encompasses one of the three designated areas of the protected habitat “Winter Roosts of Pygmy Cormorants.”

This part of the Spatial Plan’s coverage represents a migration area for rare and endangered bird species, which, in accordance with established criteria, have been designated as strictly protected species. The Sava River, together with its riverbank zone in a natural and near-natural state, constitutes an ecological corridor of international importance within the ecological network of the Republic of Serbia.

In order to ensure the preservation of nature and natural processes, the Spatial Plan provides for the conservation and sustainable management of protected areas, including the designated habitat in question.

The report emphasizes that, under Article 33 of the Law on Planning and Construction, spatial and urban planning documents are to be harmonized, ensuring that any planning document of a lower hierarchical order must conform to the provisions of a planning document of a higher hierarchical order.

2. The Institute for Nature Conservation of Serbia (hereinafter: the Institute) informed that the marina will be relocated outside the boundaries of the second-degree protection regime, in accordance with the Institute’s Decision Ref. 03 No. 020-3384/4 of 22 September 2025 and the Notification of the Investor Ref. 03 No. 020-3384/5 of 31 October 2025.

At the request of the Association of Nautical Enthusiasts and Nautical Tourism “Vip Nautika” from Belgrade (Ref. 03 No. 020-3384/1 of 26 August 2025), a new location for the same marina has been designated within the III (third) degree protection regime of the protected habitat “Winter Roosts of Pygmy Cormorants,” in accordance with the Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants.”

3. The Secretariat for Environmental Protection of the City of Belgrade (hereinafter: the Secretariat) informed that the manager of the protected area, the Citizens’ Association “Green-Blue Corridors”, prepared the Management Plan for the Protected Area “Winter Roosts of Pygmy Cormorants” for the period 2023–2033 (hereinafter: the Management Plan), in accordance with the Institute’s Decision on Nature Protection Conditions Ref. 03 No. 023-1197/2 of 9 May 2023.

The Secretariat issued its approval of the Management Plan (No. V-07 No. 501-130/2023 of 19 October 2023).

Based on the Management Plan, the Annual Programme for the Management of the Protected Area “Winter Roosts of Pygmy Cormorants” for 2025 was developed and subsequently approved by the Secretariat (No. V-07 No. 501-159/2024 of 15 November 2024).

In accordance with the Management Plan, two major campaigns for monitoring the population size of the Pygmy Cormorant (*Microcarbo pygmeus*) were conducted on 30 November and 23 December 2025, with periodic checks carried out during the preceding months of the same year. On 30 November 2025, 2,418 members of the Pygmy Cormorant species (*Microcarbo pygmeus*) were recorded in flight towards the wintering site. On 29 December 2025, 3,483 members of the same species were likewise observed heading to the wintering site. Compared with the previous year, in November 2024, a similar number of members of this bird species was observed, approximately 2,500 specimens.

The Secretariat also submitted a notification from the environmental inspector of the Inspection Secretariat stating that, in the meantime, the ownership of the marina had changed and, due to technical conditions, the marina in question has not yet been relocated in accordance with the coordinates specified in the Decision of the Institute for Nature Conservation of Serbia No. 020-3384/4 of 22 September 2025.

The relocation of the marina is scheduled for March 2026, as works and activities within the protected area are strictly prohibited until 31 March 2026.

Enclosed with this report are copies of the aforementioned documents, together with their respective translations into English.

Awaiting your reply, we hereby extend our appreciation to the Bureau in advance for the thorough and highest consideration of this report.

Sincerely,

MINISTER

Sara Pavkov

Report by the Ministry of Construction, Transport and Infrastructure – January 2026



**Republic of Serbia
MINISTRY OF CONSTRUCTION, TRANSPORT
AND INFRASTRUCTURE**

No.: 000123569 2026 14810 006 000 000 001

Date: 20 January 2026

22-26 Nemanjina Street, Belgrade,
Svetlana Čeperković (S.Č.)

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada Street
11 000 Belgrade

SUBJECT: Request for Supplementary Statement regarding Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade

REFERENCE: Your letter No. 004756287 2025 14850 004 000 016 012 of 12.01.2026

To Whom It May Concern,

By your referenced letter, a request was submitted for a supplementary statement regarding Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade.

In accordance with the request, we hereby inform you that the Government of the Republic of Serbia has adopted the Regulation on the Establishment of the Spatial Plan of the Special Purpose Area for the Development of a Part of the Riverfront in the City of Belgrade - the Area of the Sava Riverfront for the “Belgrade Waterfront” project (“Official Gazette of RS”, Nos. 7/2015, 48/2022, and 86/25) (hereinafter referred to as the Spatial Plan), in accordance with the provisions of the Law on Planning and Construction (“Official Gazette of RS”, Nos. 72/2009, 81/2009 – corr., 64/2010 – Decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 – Decision of the Constitutional Court, 50/2013 – Decision of the Constitutional Court, 98/2013 – Decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 – other law, 9/2020, 52/2021, 62/23, and 91/25).

Within the boundaries defined by the Spatial Plan lies the protected habitat “Winter Roosts of Pygmy Cormorants” (Decision on the Designation of the Protected Habitat, “Official Gazette of the City of Belgrade,” No. 109/22), situated in the internationally important bird area (IBA) “Confluence of the Sava and Danube Rivers” (RS017), which

constitutes part of the ecologically significant area of the same name belonging to the ecological network of the Republic of Serbia.

As set out in the section of the Spatial Plan entitled “Water Management, Left Bank of the Sava River,” “Spatial Unit X (ten) of the unembanked left bank of the Sava River encompasses one of the three designated areas of the protected habitat “Winter Roosts of Pygmy Cormorants” (Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants”, which is situated within the ecologically significant area “Confluence of the Sava and Danube Rivers” (RS017) belonging to the ecological network of the Republic of Serbia), and which also constitutes an internationally important bird area – IBA “Confluence of the Sava and Danube Rivers” (RS017)). This part of the Spatial Plan’s coverage represents a migration area for rare and endangered bird species, which, in accordance with established criteria, have been designated as strictly protected species. The Sava River, together with its riverbank zone in a natural and near-natural state, constitutes an ecological corridor of international importance within the ecological network of the Republic of Serbia.

Chapter III. PLANNING DESIGNS, Section 3.1. PROTECTION, MANAGEMENT AND USE OF NATURAL SYSTEMS is amended and reads as follows:

Natural Assets and Green Areas

For the purpose of preserving nature and natural processes, the conservation and sustainable use of protected areas is envisaged, namely:

2) Protected Habitat “Winter Roosts of Pygmy Cormorants” (Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants”, “Official Gazette of the City of Belgrade,” No. 109/22)), situated in the internationally important bird area (IBA) “Confluence of the Sava and Danube Rivers”, which constitutes part of the ecologically significant area of the same name belonging to the ecological network of the Republic of Serbia.

The spatial and functional organization of newly planned green areas in relation to the existing ones, and their integration into a network/system at the local level, will contribute to the preservation of protected natural assets, as well as to the enhancement of natural values (habitat and species diversity) and natural processes.

In subsection 4.4.3 Water Land – Construction Rules, paragraph 4, after the words “along the newly constructed quay,” the following words are added: “it is necessary to ensure spatial and functional continuity with the existing green area on the riverbank of the right bank of the Sava River and”, while in indent 5, after words “for sitting” the following words are added: “as needed”.

In paragraph 7, the following text is added:

“Within the zone encompassing the water land on the left bank of the Sava River (Block 59), the preservation of vegetation in the inundation zone is envisaged through the construction of a riverbank reinforcement behind aforementioned Block. This measure ensures the full protection of the protected habitat “Winter Roosts of Pygmy Cormorants”, as well as the ecologically significant area “Confluence of the Sava and Danube Rivers” which constitutes a part of the ecological network of the Republic of Serbia of international importance.”

Pursuant to the Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants” (“Official Gazette of the City of Belgrade”, No. 109/22), within the area subject to the prescribed regime of II (second) degree protection, the following activities are strictly prohibited:

- 1) Cutting and removal of willow stands used by Pygmy Cormorants for roosting;
- 2) Activities and construction works that cause disturbance to the birds during the wintering

period from 1 November to 31 March, except for scientific research on the species conducted between 9:00 and 16:00 hours, and water management activities that, by their nature, do not affect the species or its habitat, provided that nature protection conditions for such activities are prescribed in accordance with Article 9 of the Law on Nature Protection;

3) Artificial lighting of willow trees during the roosting of Pygmy Cormorants in the period from 1 November to 31 March;

4) Construction of transport infrastructure (marinas and piers), except for pedestrian and bicycle paths, provided that willow stands are preserved;

5) Construction of energy, utility and other infrastructure facilities; mooring of floating structures (rafts and etc.);

6) Construction of tourist accommodation facilities, with the exception of facilities intended for the promotion and presentation of natural values;

7) Formation of agricultural and forest monocultures.

In accordance with the Decision on Designation, within the area subject to the prescribed regime of protection of the third (III) degree, all works that may have a significant negative impact on the values of the natural asset are prohibited, except for water management activities.

In Section 4.7.2. NATURE PROTECTION, item 2) is added, reading as follows: “the protected habitat “Winter Roosts of Pygmy Cormorants” (Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants” (“Official Gazette of the City of Belgrade,” No. 109/22)), which is situated within the internationally important bird area (IBA) “Confluence of the Sava and Danube Rivers”, and forms part of the ecologically significant area of the same name of the ecological network of the Republic of Serbia;

In accordance with the Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants” (“Official Gazette of the City of Belgrade,” No. 109/22), within the area subject to the prescribed regime of protection of the third (III) degree, works that may have a significant negative impact on the values of the natural asset are prohibited, except for water management activities;

Pursuant to the planning design, new public green areas shall be established, including land

-connected green surfaces (without underground structures or parts thereof) on plots of different purposes, as well as continuous tree rows within grass plots with shrub vegetation along traffic regulation corridors. The spatial and functional organization of newly planned green areas in relation to the existing ones, and their integration into a local network/system, will contribute to:

1) the establishment of Belgrade’s green infrastructure;

2) the preservation of protected natural assets, as well as the enhancement of natural values (habitat and species diversity) and natural processes.”

We also draw attention to the provisions of Article 33 of the Law on Planning and Construction (“Official Gazette of the Republic of Serbia,” Nos. 72/09, 81/09 – corrigendum, 64/10 – Decision of the Constitutional Court, 24/11, 121/12, 42/13 – Decision of the Constitutional Court, 50/13 – Decision of the Constitutional Court, 132/14, 145/14, 83/18, 31/19, 37/19 – other law, 9/20, 52/21 and 62/23; hereinafter: the Law), which stipulates that spatial and urban planning documents must be harmonized, so that a planning document of a lower hierarchical order must be consistent with a planning document of a higher hierarchical order.

Planning documents are required to be in conformity with the Spatial Plan of the Republic of Serbia.

Sincerely,

Обрађивач предмета: Светлана Чеперковић, дипл.пр.п	
Лице које врши контролу: Светлана Чеперковић, дипл.пр.п	
Лице које врши контролу: Предраг Матовић, в.д. помоћник министра	

MINISTER

Aleksandra Sofronijević

Report by the Institute for Nature Conservation of Serbia – January 2026

The Institute for Nature Conservation of Serbia

03 No. 025-2109/4

20.1.2026

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 NOVI BEOGRAD

1 Omladinskih Brigada Street

Subject: Supplementary Statement on Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade

Reference: No. 004756287 2025 14850 004 000 016 012 of 12 January 2026

By means of request Ref. 03 No. 025-2109/4 of 14 January 2026, submitted to the Institute for Nature Conservation of Serbia, you requested the submission of a supplementary statement within the scope of Institute's competence concerning "Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade," for the purpose of providing a response to the Secretariat of the Bern Convention. The request was accompanied by an electronic communication from the Secretary of the Bern Convention, informing that an error had occurred concerning the decision adopted by the Bureau of the Bern Convention, namely that the Secretariat of the Bern Convention had failed to forward to the Bureau the documentation received from the competent authority of the Republic of Serbia.

By letter Ref. 03 No. 025-2109/3 of 4 July 2025, the Institute for Nature Conservation of Serbia, with regard to specific questions contained in the guidance for completing the complaint form to the Secretariat of the Bern Convention, submitted the following responses to the Ministry of Environmental Protection:

1. That the habitat of the Pygmy Cormorant was destroyed by the construction of a marina within the protected area, thereby Article 6(b) of the Bern Convention was violated, as well as the Law on the Ratification of the Convention on the Conservation of European Wildlife and Natural Habitats ("Official Gazette of RS – International Treaties," No. 102/07);
2. That the species *Microcarbo pygmaeus* are found on five (spatially) distinct locations within the protected area "Winter Roosts of Pygmy Cormorants";
3. That the habitat of the Pygmy Cormorant was destroyed by the construction of a marina within the protected area;
4. That the protected area – Protected Habitat "Winter Roosts of Pygmy Cormorants" lies within the boundaries of the internationally important bird area (IBA) "Confluence of the Sava and Danube Rivers"; that the species is listed in Annex I of the Birds Directive, and therefore the habitats of this species represent potential Natura 2000 sites; and that the reduction in the number of members of the species has led to the species being placed on the Red List of the International Union for Conservation of Nature (IUCN) as a threatened species;
5. That the case was reported to all competent institutions, which failed to take any action, but instead permitted the unlawful relocation of the marina to the aforementioned area;

6. That instead of providing an answer to Question No. 6 – Other information (whether an Environmental Impact Assessment exists, project size, maps of the area, etc.), photographs of the site in question were submitted.

With regard to the response submitted by means of letter Ref. 03 No. 025-2109/3 of 4 July 2025, the supplementary statement specifies that the marina has been relocated outside the boundaries of the second-degree protection regime, where it had originally been planned and installed. The initial request was submitted by the Sports and Nautical Association “Vidra” from Belgrade. All documentation related to the first statement on the Complaint was submitted by means of letter Ref. 03 No. 025-2109/3 of 4 July 2025.

At the request of the Association of Nautical Enthusiasts and Nautical Tourism “Vip Nautika” from Belgrade (hereinafter: the Investor), Ref. 03 No. 020-3384/1 of 26 August 2025, a new location for the same marina was designated within the third-degree protection regime of the protected habitat “Winter Roosts of Pygmy Cormorants,” in accordance with the Decision on the Designation of the Protected Habitat “Winter Roosts of Pygmy Cormorants” (“Official Gazette of the City of Belgrade,” No. 109/22). The marina will be relocated in accordance with the Decision of the Institute for Nature Conservation of Serbia, Ref. 03 No. 020-3384/4 of 22 September 2025, and the Notification of the Investor, Ref. 03 No. 020-3384/5 of 31 October 2025. Documentation concerning the new location is enclosed with this letter, and relates to the Request of the Investor, the decision of the Institute for Nature Conservation of Serbia and the Notification of the Investor.

In accordance with your request, we hereby submit to you the supplementary statement on the Complaint for further consideration.

Acting DIRECTOR
Aleksandra Došlić

Enclosures:

- Request of the Investor Ref. 03 No. 020-3384/1 of 26.8.2025
- Decision of the Institute for Nature Conservation of Serbia Ref. 03 No. 020-3384/4 of 22.9.2025
- Notification of the Investor Ref. 03 No. 020-3384/5 of 31.10.2025

Delivered to:

- Addressee
- Records Office (2 copies)

Drafted by:

Miloš Radaković

Head of Section

Miloš Radaković

Head of Department

Nenad Sekulić, PhD

Report by the City of Belgrade – January 2026

Republic of Serbia
CITY OF BELGRADE
CITY ADMINISTRATION OF THE CITY OF BELGRADE
Secretariat for Environmental Protection
71 Karađorđeva St.
11000 Belgrade
E-mail: beoeko@beograd.gov.rs

16 January 2026
Number: V-07 No.501-73/25

MINISTRY OF ENVIRONMENTAL PROTECTION
Sector for Nature Protection

11000 Belgrade
1 Omladinskih brigada St.

Subject: Supplement to the Statement regarding Complaint No. 2024/03: New Complaint: Alleged destruction of a nesting site of the pygmy cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade

Acting upon your request, received electronically on 14 January 2026, we hereby submit a supplement to the documentation relating to the progress achieved in the relevant proceedings to date, together with the most recent information.

It is further noted that, on 22 July 2025, the Response to Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the pygmy cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, was duly submitted together with the supporting documentation.

Kindly note that the response to the complaint, with the relevant documentation, is being resubmitted once again within the framework of this communication.

Report on the encroachment and degradation of the protected habitat “Winter Roosts of Pygmy Cormorants” on the territory of the City of Belgrade

The Institute for Nature Conservation, as the professional institution competent for nature protection, prepared in 2022 a Study on Natural Asset Protection entitled “Protected Habitat – Winter Roosts of Pygmy Cormorants,” on the territory of the City of Belgrade. This Study was prepared in accordance with Article 42 of the Law on Nature Protection (“Official Gazette of the Republic of Serbia,” Nos. 36/2009, 88/2010, 91/2010, 14/2016, 95/2018 – other law, and 71/2021) and represents the fundamental document containing scientific and expert justification of the values of the natural asset, as well as the needs and measures for its protection. Furthermore, the 2022 Protection Study proposed the Association “Green and Blue Corridors” as the manager of the mentioned protected habitat.

Subsequently, the Secretariat for Environmental Protection of the City of Belgrade prepared the Draft Decision on the Proclamation of the Protected Habitat and carried out the further procedure prescribed by law. In accordance with the procedure, the City Assembly of Belgrade, upon prior consent of the Ministry of Environmental Protection of the Republic of Serbia, adopted, on 26 December 2022, the Decision on the Proclamation of the Protected Habitat “Winter Roosts of Pygmy Cormorants,” No. 501-1111/22-C, which, pursuant to the Law on Nature Protection, is classified as a Category III protected area, i.e. a protected area of local significance. Within the protected area, regimes of protection of the II (second) and III (third) degree have been established. The Association “Green and Blue Corridors” was appointed as the manager of the newly established protected area and, in accordance with the Decision on the Proclamation of the Protected Habitat and Article 53 of the Law on Nature Protection, submitted the Protected Area Management Plan for the period 2023–2033, on 30 July 2023, under No. ZP 15-23.

On 4 September 2023, the manager of the protected habitat submitted to the Institute for Nature Conservation of Serbia an official request, Ref. No. 03 No. 023-3251/1, seeking verification of full compliance with nature protection requirements. Accompanying the request was the Management Plan for the Protected Habitat “Winter Roosts of Pygmy Cormorants” for the period 2023–2033, prepared strictly in accordance with the methodology and guidelines prescribed by the Institute.

Upon examination of the submitted documentation, the Institute established that all previously defined nature protection requirements, as stipulated in Decision on Nature Protection Requirements No. 03 No. 023-1197/2 of 9 May 2023, had been fully observed and duly incorporated into the proposed Management Plan.

On 19 October 2023, the Secretariat for Environmental Protection of the City of Belgrade issued Decision Ref. No. V-07 No. 501-130/2023, thereby granting formal approval to the site manager for the Management Plan for the period 2023–2033, in strict accordance with Article 54, paragraph 4 of the Law on Nature Protection (“Official Gazette of RS”, Nos. 36/09, 88/10, 91/10 corr., 14/16, 95/18 and 71/21).

The manager of the protected habitat is under obligation to develop relevant Annual Management Programmes for the Protected Area, which constitute the operative implementation of the activities defined in the Management Plan. During the preceding period, the manager duly submitted all annual programmes within the statutory deadlines, thereby ensuring full compliance with the applicable legal framework.

The Annual Management Programme for the Protected Area “Winter Roosts of Pygmy Cormorants” for the year 2025 was duly submitted to the Secretariat for Environmental Protection on 15 November 2024 (No. V-07-501-159/2024), which issued a positive opinion and granted its approval.

We emphasize that cooperation with the manager of the protected habitat has been highly satisfactory. No objections have been raised regarding aforementioned entity’s work, and all obligations have been fulfilled in a timely manner. Communication has been adequate and constructive, while the approach has remained responsible and dedicated.

The Protected Habitat “Winter Roosts of Pygmy Cormorants” is of exceptional importance for the preservation of biological diversity, particularly as one of the rare winter roosts of this strictly protected bird species. However, several incidents have been recorded at different localities within

this area, indicating encroachment, disturbance and degradation of the habitat, thereby directly threatening its preservation and integrity.

1. First Incident – Mechanical Degradation at Locality 1

On 10 March 2024, the manager of the protected habitat informed the Secretariat for Environmental Protection electronically that mechanical intervention had been carried out at Locality 1 by the company “Elkop Projekt”, contracted by the Public Utility Company “Belgrade Waterworks and Sewerage.” The works concerned the repair of an electric cable of the Reni well, but were executed without prior issuance and approval of nature protection conditions. As a result, trees were cut and felled, and an excavation approximately three meters deep was made. These activities directly undermined the stability of the habitat and called into question the functioning of the ecosystem in that area. Furthermore, the site manager reported the expansion of a gravel depot at Locality 3, owned by the company Omega Beton.

2. Field Inspection and Initiation of Proceedings

In order to assess the situation on the ground, on 3 March 2024 representatives of the Secretariat for Environmental Protection, in cooperation with representatives of the Public Utility Company “Belgrade Waterworks and Sewerage,” carried out an inspection at Locality 1. On that occasion, they observed damage in the field, specifically felled and collapsed trees extending to the area where the excavation pit had been made. Representatives of the Public Utility Company “Belgrade Waterworks and Sewerage” provided information that Reni wells are located nearby, forming the basis of the city’s drinking water supply system and classified as first-category facilities. During exploitation, at Reni Well No. 29 situated on cadastral parcel 6801, a failure occurred in the underground power cable, causing the well to cease operation. In order to reach the point of failure, and being uninformed about the Protected Area “Winter Roosts of Pygmy Cormorants” and the procedures required for undertaking activities within a protected area, they engaged a private company equipped with the necessary machinery. Acting upon their instructions, the company carried out works on 9 March 2024, which were subsequently discovered and warned against by the protected habitat’s ranger service.

Representatives of the Secretariat for Environmental Protection presented information from the Decision on the Proclamation of the Protected Habitat “Winter Roosts of Pygmy Cormorants” regarding the manner of planning and implementation of activities that may be approved and carried out within the protected area, provided that the planned works are aligned with the concept of protection and development of the protected area, as well as with the spatial and environmental capacity of the site. This entails the limited use of natural resources in a sustainable and strictly controlled manner, with conditions to be obtained from the Institute for Nature Conservation of Serbia. On that occasion, a copy of the Decision proclaiming the Protected Habitat “Winter Roosts of Pygmy Cormorants” was formally handed over to the representatives of the Public Utility Company “Belgrade Waterworks and Sewerage.” They acknowledged receipt and confirmed that they would duly address the Institute for Nature Conservation of Serbia in accordance with the established procedures.

3. Further Encroachments at Localities 2 and 3

On 17 March 2024, the manager of the protected habitat submitted new notifications to the Secretariat for Environmental Protection, supported by photo documentation, regarding the continued expansion of the gravel depot at Locality 3, where the company “Omega Beton”,

contracted by the Public Utility Company “Srbijavode,” has been carrying out filling and enlargement works. The notification also pointed to the appearance of new floating structures at all three localities, representing a potential threat to the stability of aquatic ecosystems and possibly affecting the nesting and wintering habits of the Pygmy Cormorant.

4. Activation of Inspection Supervision

In view of the urgent character of the situation, on 18 March 2024 the Secretariat for Environmental Protection informed the Secretariat for Inspection, Oversight and Communication, submitting the complete documentation and calling upon them to act within their competences and to notify the Secretariat for Environmental Protection of the measures undertaken.

5. Examination of the Legality of Works

On 27 March 2024, the Secretariat for Environmental Protection sends a letter to the Public Utility Company “Srbijavode,” requesting information on the legal basis and conditions under which the company “Omega Beton” had been engaged to carry out works at Locality 3, which lies within the boundaries of the Protected Habitat “Winter Roosts of Pygmy Cormorants.”

6. Notification of Other Competent Authorities

On the following day, 28 March 2024, a letter was also sent to the Secretariat for Defense, Emergency Situations and Coordination, informing them of the encroachment upon aquatic surfaces and the impairment of the natural functions of the Protected Habitat.

7. On 18 April 2024, the ranger service, acting on behalf of the manager of the protected habitat – the Association “Green-Blue Corridors” – submitted a report, both by telephone and electronically, with supporting photo documentation, to the Communal Police and the Inspection Service of the City of Belgrade. The report concerned activities and construction works being carried out within the Zone of Second-Degree Protection of this Protected Area along the Sava River bank, specifically the development of infrastructure (marina and pier).

Following an on-site inspection and field work, it was established that the works were being undertaken for the purpose of installing a marina (Marina Vidra).

8. Response of the Public Utility Company “Srbijavode”

On 19 April 2024, the Public Utility Company “Srbijavode” submitted a response stating that the water land at Locality 3 had been leased to the company “Omega Beton” in accordance with applicable regulations. The same letter further indicated that the company had been instructed to carry out remediation of the damage caused and to secure the area, i.e. the water land, by installing an adequate protective fence, embankment or other construction.

9. Notification to the River Police

On 26 April 2024, the manager of the protected area, the Association “Green-Blue Corridors”, addressed the River Police Directorate, informing them that activities and construction works related to infrastructure (marina and pier) were being carried out within the zone of II (second) degree

protection of this Protected Area along the Sava River bank and calling upon them to act in accordance with their competences.

10. Request of the Sports and Nautical Association “VIDRA”

On 31 May 2024, the Sports and Nautical Association “VIDRA” submitted to the Institute for Nature Conservation of Serbia a request for the issuance of nature protection requirements for the installation of a boat mooring facility at the location with the following coordinates:

From X = 454999.80
Y = 4960781.40
To X = 455111.82
Y = 4960821.15

This site is situated within the zone of II (second) degree protection of the Protected Habitat “Winter Roosts of Pygmy Cormorants.”

The request was rejected by the Institute for Nature Conservation of Serbia on 13 September 2024.

11. Request of the Association of Nautical Enthusiasts and Nautical Tourism “VIP NAUTIKA”

On 26 August 2025, the Association of Nautical Enthusiasts and Nautical Tourism “VIP NAUTIKA” submitted to the Institute for Nature Conservation of Serbia a request, registered under No. 03-020-3384/1, for the issuance of nature protection conditions for the installation of a marina on cadastral parcel No. 6628/2, cadastral municipality New Belgrade. The part of cadastral parcel No. 6628/2, cadastral municipality New Belgrade, where the marina is planned to be installed, lies within the boundaries of the Protected Habitat “Winter Roosts of Pygmy Cormorants”, under the regime of third-degree protection, in accordance with the Decision on the Proclamation of the Protected Habitat “Winter Roosts of Pygmy Cormorants.”

On 22 September 2025, the Institute for Nature Conservation of Serbia issued Decision No. 03-020-3384/4, setting forth the nature protection conditions.

The Decision of the Institute for Nature Conservation of Serbia, No. 020-3384/4 of 22 September 2025, concerning the installation of a marina within the Protected Habitat “Winter Roosts of Pygmy Cormorants”, under the third-degree protection regime, on the left bank of the Sava River, cadastral parcel 6628/2, cadastral municipality New Belgrade, was delivered to the Environmental Protection Inspector of the Secretariat for Inspection, Supervision and Communication of the City Administration of Belgrade.

The said Decision pertains to the Association “VIP NAUTIKA”, Agostina Neta 37, Belgrade, given that in the meantime the ownership of the marina has changed.

Since the Sports and Nautical Association “VIDRA”, Savski Kej, Blok 70a, Novi Beograd, is no longer the owner of the marina, the Environmental Protection Inspectorate carried out an inspection at the site and established that the marina in question had not been relocated in accordance with the coordinates specified in the Decision of the Institute for Nature Conservation of Serbia, No. 020-3384/4 of 22 September 2025.

From the Environmental Protection Inspector of the Secretariat for Inspection, Supervision and Communication of the City Administration of Belgrade, we received information that relocation will be undertaken in March of this year, bearing in mind that all works and activities within the Protected Area are prohibited until 31 March 2026. (please find enclosed: e-mail of the Head of Department, Milica Zapletić).

We emphasize that the manager of the protected area has repeatedly addressed the competent city institutions in order to bring the issue to notice and initiate its resolution. In each communication, the reasons for intervention were clearly stated, as well as the need for urgent action in accordance with the applicable legal and planning acts.

However, despite the efforts made and the information provided, no concrete or effective steps have been taken towards resolving the issue.

The Secretariat will continue to undertake all activities within its competences, fully in accordance with the applicable legal regulations.

The manager of the Protected Habitat “Winter Roosts of Pygmy Cormorants”, the Association “Green-Blue Corridors”, concurs with the information provided and accepts its use in further proceedings or documentation.

Deputy Acting Head of the City Administration of Belgrade
Secretary of the Secretariat

Ivana Vilotijević

Report on monitoring the population size of the Pygmy Cormorant – January 2026

From: Dejan Tripkovic
Sent: Tuesday, 27 January 2026. 09:53
To: Jovana Popovic
Subject: Fw: Population Size of the Pygmy Cormorant – Winter 2025/2026

Attachments: PICTURE 150126.jpg; PICTURE 2 15026.jpg
From: Green – Blue Corridors <greenbluecorridors@gmail.com>
Sent: Tuesday, January 27, 2026 9:27:07 AM
To: Dejan Tripkovic <dejan.tripkovic@beograd.gov.rs>
Subject: Population Size of the Pygmy Cormorant – Winter 2025/2026

To Whom It May Concern,

We hereby inform you that during the winter season 2025/2026, two major campaigns for monitoring the population size of the Pygmy Cormorant (*Microcarbo pygmeus*) have been conducted, on 30 November 2025 and 29 December 2025, complemented by occasional smaller checks during the preceding months. A new major counting campaign is scheduled for the upcoming weekend.

The results are as follows:

On 30 November 2025, a total of 2,418 members of *Microcarbo pygmeus* species were observed in flight towards the wintering site.

On 29 December 2025, a total of 3,483 members of the same species were likewise observed heading to the wintering site.

In comparison with the previous year, the November 2024 count showed a similar or slightly lower number of individuals (2,500 birds observed). However, for December a significant increase was recorded, as the December 2024 count amounted to 2,000 birds.

Table of population numbers for the previous season:

Month	No. of Pygmy Cormorants
November 2024	2500
December 2024	2000
January 2025	1800
February 2025	2400

Attached are several photographs from the wintering site, taken during the night survey of the habitat on 15 January 2026.

Sincerely,

Green-Blue Corridors

E-mail by the City of Belgrade– January 2026

From: Jovana Popovic
Sent: Thursday, 15 January 2026. 12:46
To: Jovana Skoric; Aleksandra Krstic
Subject: FW:

From: Milica Zapletic <milica.zapletic@beograd.gov.rs>
Sent: Thursday, 15 January 2026. 12:45
To: Jovana Popovic
<jovana.popovic@beograd.gov.rs>
Subject:

Dear Ms Popović,

We hereby inform you that the Environmental Protection Inspector of the Secretariat for Inspection, Supervision and Communication of the City Administration of the City of Belgrade has received the submission - Decision on Nature Protection Requirements issued by the Institute for Nature Conservation of the Republic of Serbia, No. 020-3384/4 of 22 September 2025, concerning the installation of a marina within the protected habitat “Winter Roosts of Pygmy Cormorants” classified as a Category III protected area, located on the left bank of the Sava River, part of cadastral parcel 6628/2, cadastral municipality Novi Beograd.

The aforementioned Decision refers to the Association “VIP NAUTIKA”, 37 Agostina Neta St., Belgrade, having regard to the fact that the ownership of the marina has subsequently changed. Since the marina is no longer owned by the “Sports Nautical Association VIDRA,” Savski kej, Block 70a, Novi Beograd, we carried out an inspection at the site in question and established that the marina has not been relocated in accordance with the coordinates specified in the Decision of the Institute for Nature Conservation of the Republic of Serbia, No. 020-3384/4 of 22 September 2025. However, we received information that the relocation will commence in March of this year, bearing in mind that works and activities in the protected area are prohibited until 31 March 2026.

Kindest regards,

Milica Zapletić, B.Sc.
Biologist
Head of Department

CITY ADMINISTRATION OF THE CITY OF BELGRADE
Secretariat for Inspection, Supervision and Communication
Sector for Environmental Protection, Water and Tourism Inspection
Department of Environmental Protection Inspection II
Phone: 011/3309-687, 063/ 487-582
Fax: 011/3309-558
e-mail: milica.zapletic@beograd.gov.rs



Report by the Ministry of Environmental Protection - July 2025



**Republic of Serbia
MINISTRY OF ENVIRONMENTAL
PROTECTION**

No: 002211701 2025 14850 004 007 020 092

Date: 25.07.2025

Belgrade

Council of Europe
Directorate General of Democracy
Secretariat of the Bern Convention
F-67075 Strasbourg, France
Mr. Mikael POUTIERS,
Secretary of the Bern Convention

Subject: Report on Complaint No. 2024/03: New Complaint: Serbia: Alleged Destruction of a Nesting Site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade

Dear Mr Poutiers,

With reference to the request of the Secretariat of the Bern Convention dated 15 May 2025, concerning Complaint No. 2024/03: New Complaint: Serbia: Alleged Destruction of a Nesting Site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, submitted to the Secretariat by the non-governmental organization "Licej", the Ministry of Environmental Protection, as the competent authority responsible for the implementation of the Bern Convention in the Republic of Serbia, issued Request No. 002211701 2025 14850 004 007 020 092 dated 28 May 2025, addressed to the competent institutions and organizations: the Ministry of Construction, Transport and Infrastructure, the Institute for Nature Conservation of Serbia, and the Secretariat for Environmental Protection of the City of Belgrade, including the relevant sectors within the Ministry of Environmental Protection.

Based on the statements received from the aforementioned authorities and organizations regarding the complaint related to the alleged destruction of the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, we hereby inform you of the following:

1. The claims made under Question No. 1, stating that the Republic of Serbia has violated Article 6 of the Bern Convention by constructing a marina within a protected area, are inaccurate, for the following reasons:

1) The Institute for Nature Conservation of Serbia (hereinafter: the Institute) informed us that, according to the Central Register of Protected Natural Assets and the database maintained by the Institute, the protected habitat "Wintering Site of the Pygmy Cormorant" has been designated as a protected area of importance for the wintering of a significant portion of the European population of the Pygmy Cormorant on the Sava River in Belgrade, specifically in the period from 1 November to 1 April, during which time pygmy cormorants gather and roost in the willow groves within the protected area. The most significant are the willow

groves along the riverbanks where individuals roost, which are located in the area that is under the II level of protection.

The marina referenced in the complaint did not destroy the habitat of the Pygmy Cormorant, as it was constructed on the water surface of the Sava River, within an area that, along with the adjacent willow groves, falls under the Level II protection regime.

However, pursuant to Article 4, paragraph 2, item 4 of the Decision on the Designation of the Protected Habitat "Wintering Site of the Pygmy Cormorant" ("Official Gazette of the City of Belgrade", No. 109/22), the construction of marina is explicitly prohibited within areas subject to Level II protection.

The Institute also pointed out that the claim made in the complaint regarding the existence of five separate locations within the protected area is incorrect. According to the Decision on the Designation of the Protected Habitat "Wintering Site of the Pygmy Cormorant" ("Official Gazette of the City of Belgrade", No. 109/22), the protected area consists of three distinct units (localities), Localities I, II, and III (Annex: Map). The location of the marina in question is within Locality I, in the water area falling under the II degree protection regime of the "Wintering Site of the Pygmy Cormorant".

2) The Secretariat for Environmental Protection of the City of Belgrade reported that the City Assembly of Belgrade adopted the Decision on the Designation of the Protected Habitat "Wintering Site of the Pygmy Cormorant", No. 501-1111/22-C, which, in accordance with the Nature Protection Law ("Official Gazette of the RS", Nos. 36/09, 88/10, 91/10 - correction, 14/16, 95/18 - other law, and 71/21), is classified as a category III protected area - i.e., a protected area of local importance, with the prior consent of the Ministry of Environmental Protection.

Protection regimes of Level II and III have been established within the protected area.

By the same Decision, the Association of Citizens "Green-Blue Corridors" (hereinafter: the Manager) was appointed as the official manager of the protected area. The Manager prepared the Management Plan for the Protected Habitat "Wintering Site of the Pygmy Cormorant" for the period 2023–2033, in accordance with the Decision on Nature Protection Conditions issued by the Institute 03 No. 023-1197/2 of 9 May 2023).

The Secretariat for Environmental Protection of the City of Belgrade issued its consent to the Manager by Decision No. V-07 No. 501-130/2023 of 19 October 2023.

Based on the Management Plan, the Annual Management Programme for the Protected Habitat "Wintering Site of the Pygmy Cormorant" for 2025 was developed and subsequently approved by the Secretariat (Decision No. V-07-501-159/2024 dated 15 November 2024).

However, the agreement between the City of Belgrade and the Manager regarding the financing of the implementation of the Annual Programme for 2025 has not yet been signed, which prevents the implementation of protection and management measures, particularly those concerning monitoring, habitat maintenance, and the educational and promotional activities provided for in the Plan.

2.Regarding Question No. 4 - which species or habitats are affected and whether they fall under the scope of other international conventions - the Institute reported that only Localities I and III fall within the internationally important bird area (IBA) "Confluence of the Sava and Danube Rivers".

The species Pygmy Cormorant (*Microcarbo pygmaeus*) is classified as Least Concern (LC) at the European level, according to the IUCN Red List criteria (Source: <https://www.iucnredlist.org/species/22696734/166315391>), and holds the same status at the national level (Source: Red Book of Fauna of Serbia III - Birds, 2018).

3.The allegations made under Question No. 5 - that no action has been taken at the national level in relation to the proceedings concerning this complaint - are incorrect, for the following reasons:

1) The Ministry of Construction, Transport and Infrastructure informed that the Government of the Republic of Serbia adopted the Decree on the Adoption of the Spatial Plan for the Special Purpose Area of the Belgrade Riverfront - Sava Riverfront Area for the "Belgrade Waterfront" Project ("Official Gazette of RS", Nos. 7/2015 and 48/2022), in accordance with the provisions of the Law on Planning and Construction ("Official Gazette of RS", Nos. 72/2009, 81/2009 - correction, 64/2010 - CC decision, 24/2011, 121/2012, 42/2013 - CC decision, 50/2013 - CC decision, 98/2013 - CC decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021, and 62/2023). According to the Decision on the Preparation of Amendments to the Spatial Plan for the Special Purpose Area of the Belgrade Riverfront - Sava Riverfront Area for the "Belgrade Waterfront" Project and the Strategic Environmental Impact Assessment Report for

these Amendments, the procedure for amending this planning document was initiated. The Draft Plan with amendments was subject to public consultation from 21 May to 19 June 2025. Following this process, the Plan will be submitted for further adoption procedure.

The textual section of the Draft amendments specifically addresses the protected area in question:

In Chapter III - Planning Solutions, under Section 3.1 - Protection, Development, and Use of Natural Systems, a new subsection is added: "Natural Assets and Green Areas".

In Subsection 4.4.3 - Water Land, paragraph 7 includes a new provision regarding the planned conservation of vegetation in the inundation zone by constructing riverbank protection structures behind the block, which fully protects the Protected Habitat "Wintering Site of the Pygmy Cormorant" as well as the Ecologically Important Area "Confluence of the Sava and Danube Rivers", which holds international significance and forms part of the Ecological Network of the Republic of Serbia.

It was also pointed out that, according to Article 33 of the Law on Planning and Construction, spatial and urban planning documents must be harmonized, meaning that a lower-tier planning document must conform to the higher-tier one.

2) The Institute, upon request of the Sports and Nautical Association "VIDRA", b.n. Savski Kej Str, New Belgrade, issued a Nature Protection Requirements Decision 03 No. 021-2165/4 dated 13 September 2024, which prohibited the construction of a marina at the designated location. Following an appeal filed by the association "VIDRA", the Institute, acting as the first-instance authority, dismissed the appeal and forwarded the case to the second-instance authority - the Ministry of Environmental Protection - for further action, via letter 03 No. 021-2165/6 of 18 December 2024.

Additionally, the Institute conducted a field inspection on 12 June 2025 to prepare a response to this complaint. It was determined that the marina was fully installed on the water surface and remains within the boundaries of the protected area, specifically within Locality I, which constitutes a separate spatial unit. The willow groves along the land portion of the riverbank - that is, the actual habitat of the Pygmy Cormorant - have not been destroyed, but they are considered threatened by the occupation of part of the water surface falling under the II degree protection regime.

3) The Secretariat for Environmental Protection of the City of Belgrade reported that, in cooperation with the Manager, it regularly conducts field inspections in response to reported irregularities. On 18 March 2024, the Secretariat notified the City of Belgrade's Secretariat for Inspection, Oversight and Communication, submitting the complete documentation and requesting that the competent authority act within its jurisdiction and inform the Environmental Secretariat of any measures taken.

It was also reported that a response was obtained from the Public Water Management Company "Srbijavode", dated 19 April 2024, stating that the water land at Locality 3 of the protected area had been leased to the company "Omega Beton" in accordance with applicable regulations. The same letter states that the company was ordered to repair the damage caused and to secure the water land by installing an appropriate protective fence, embankment, or other structure.

4) The Manager of the Protected Area - the Citizens' Association "Green-Blue Corridors" from Belgrade - informed the Institute about illegally constructed floating structures, including the marina in question, in a letter 03 No. 025-1044/1 dated 18 March 2024. The Institute forwarded the Manager's notice to the competent authority of the City of Belgrade - the Secretariat for Inspection, Oversight and Communication and the Environmental, Water and Tourism Inspection Sector, by letter 03 No. 025-1044/2 dated 26 March 2024, for further action.

5) The Secretariat for Inspection, Oversight and Communication of the City of Belgrade reported that, acting upon a citizen's complaint, it conducted an extraordinary inspection in the protected area "Wintering Site of the Pygmy Cormorant". During the inspection, it was established that within the II degree protection zone, Locality I, on the cadastral parcel No. 6628/2, left bank of the Sava River, construction of transport infrastructure (a marina) was underway - a vessel dock approximately 100 meters long with related facilities, executed by the Sports and Nautical Association "VIDRA", New Belgrade.

In accordance with the established situation, the inspector issued Decision X-09: 501.9-280/24 of 10 June 2024, ordering the controlled entity, the Sports and Nautical Association "VIDRA", to immediately stop all ongoing work and activities related to the installation of the marina at the site of the protected area "Wintering Site of the Pygmy Cormorant", to obtain a Nature Protection Requirements Decision from the Institute for Nature Conservation of Serbia, and to inform the Manager in writing about the measures taken. The contractor complied with the inspector's decision. The procedure for obtaining nature protection

requirements in this administrative matter has not yet been completed. In the meantime, no further citizen or citizens' association complaints related to this case have been recorded.

During the same period, the Secretariat for Inspection, Oversight, and Communication of the City of Belgrade received multiple complaints against various business entities, which were promptly stopped by the environmental inspection service. A detailed inspection report is attached to this Report.

6) The Ministry of Environmental Protection reported that, in the second-instance procedure, they adopted Decision No. 001932124 2025 of 23 June 2025, rejecting as unfounded the appeal submitted by the Sports and Nautical Association "VIDRA", New Belgrade, against the Nature Protection Requirements Decision issued by the Institute for Nature Conservation of Serbia, Belgrade, 03 No. 021-2165/4 of 13 September 2024. The Ministry forwarded its decision to the Institute for further implementation.

Copies of the referenced documents with certified translations into English are attached to this Report.

We thank the Bureau in advance for its high-level consideration of this Report and look forward to your reply.

Sincerely,

MINISTER

Sara Pavkov

Report by the Ministry of Construction, Transport and Infrastructure – June 2025



**Republic of Serbia
MINISTRY OF CONSTRUCTION,
TRANSPORT
AND INFRASTRUCTURE**

No: 0024979096 2025 14810 006 000 000 001

Date: 18.06.2025

22-26 Nemanjina Str

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada Str
11000 Belgrade

SUBJECT: Request for a statement regarding Complaint No. 2024/03: New complaint: Serbia: Alleged destruction of the nesting site of the Pygmy Cormorant (*Microcarbo pygmeus*) on the Sava River in Belgrade

Dear Sir or Madam,

By your letter No. 002211701 2025 14850 004 007 020 092, the Complaint No. 2024/03 titled: New Complaint: Serbia: Alleged destruction of the nesting site of the Pygmy Cormorant (*Microcarbo pygmeus*) on the Sava River in Belgrade has been received.

The subject complaint was assessed as founded due to potential violations of the provisions of the Bern Convention concerning the Protected Area "Wintering Site of the Pygmy Cormorant" ("Official Gazette of the City of Belgrade" No. 109/22), which is identified by the Regulation on the Ecological Network under No. 22 ("Official Gazette of RS" No. 102/10) as an Internationally Important Bird Area (IBA) "Confluence of the Sava into the Danube."

We hereby inform you that the Government of the Republic of Serbia adopted the Regulation on the determination of the Spatial Plan of the special purpose area of the riverbank of the City of Belgrade for the project "Belgrade Waterfront" ("Official Gazette of RS", No. 7/2015, 48/2022) following the provisions of the Law on Planning and Construction ("Official Gazette of RS", No. 72/2009, 81/2009 - correction, 64/2010 - decision of CC, 24/2011, 121/2012, 42/2013 - decision of CC, 50/2013 - decision of CC, 98/2013 - decision of CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - decision of CC, 9/2020, 52/2021 and 62/23). By the decision to prepare amendments and supplements to the Spatial Plan of the special purpose area of the riverbank of the City of Belgrade for the "Belgrade Waterfront" project, and the Report about Strategic Impact Assessment of the amendments and supplements to the Spatial Plan of the special purpose area of the riverbank of the

City of Belgrade - the Sava River waterfront area for the “Belgrade Waterfront” project and its impact on the environment, the procedure of the amendments and supplements has begun. The Draft of the amendments and supplements is available for public inspection in the period from May 21 to June 19, 2025. After the public inspection procedure is completed, the plan will be submitted for further approval.

In the textual part of the Draft amendments and supplements to the Plan, the protected area is treated in detail as follows: In Chapter III. PLANNING SOLUTIONS, in Section 3.1. "PROTECTION, REGULATION AND USE OF NATURAL SYSTEMS," the part "Natural values and green areas" is amended to state:

Natural values and green areas:

"In the waterland, along the left bank of the Sava River (block 64), the preservation of vegetation in the floodplain is planned, with the placement of a protective belt in the block's hinterland. With this decision, the entire 3S area “Wintering Site of the Pygmy Cormorant” is protected, as well as an ecologically significant area of the “Confluence of the Sava into the Danube” ecological network of the Republic of Serbia of international importance.

In accordance with the Decision on the Declaration of a Protected Habitat “Wintering Site of the Pygmy Cormorant” (“Official Gazette of the City of Belgrade” No. 109/2022), in the area under the prescribed protection regime

In the subsection, **4.4.3 WATERLAND**, the text is amended to state:

4.4.3 WATERLAND, in paragraph 7, an additional part of the text is added which states:

"In the waterland, along the left bank of the Sava River (block 64), the preservation of vegetation in the floodplain is planned, with the placement of a protective belt in the block's hinterland. With this decision, the entire 3S area “Wintering Site of the Pygmy Cormorant” is protected, as well as an ecologically significant area of the “Confluence of the Sava into the Danube” ecological network of the Republic of Serbia of international importance.

In accordance with the Decision on the Declaration of a Protected Habitat “Wintering Site of the Pygmy Cormorant” (“Official Gazette of the City of Belgrade” No. 109/2022), in the area under the prescribed protection regime

Of the II degree, the following is prohibited:

- cutting and removal of the willow grove where the Pygmy Cormorants roost;
- activities and construction work that disturb the birds during the wintering period from November 1 to March 31, except for scientific studies of the species, in the period from 9:00 to 16:00, and the water-related activities that cannot impact the species and habitat are allowed as well under the prescribed nature protection conditions following Article 9 of the Nature Protection Law;
- artificial lighting of the willow grove during the roosting of the Pygmy Cormorants from November 1 to March 31;
- construction of transport infrastructure (marinas and docks), except for pedestrian and bicycle paths, along with observing willow grove;
- construction of energy, utility, and other infrastructure facilities (including rafts and similar);
- construction of tourist accommodation facilities, except for facilities aimed at promoting and educating about natural values;
- forming agricultural and forestry monocultures.

Following the Decision on the Declaration of a Protected Habitat with the prescribed protection regime III degree, work is prohibited on parcels that may have a significant negative impact on the preservation of natural values, except for water-related activities. All work in this block must be conducted in cooperation with the Institute for Nature Protection of Serbia.

We also point out the provisions of Article 33 of the Law on Planning and Construction ("Official Gazette of the Republic of Serbia", No. 72/09, 81/09 - correction, 64/10 - CC, 24/11, 121/12, 42/13 - CC, 50/13 - CC, 132/14, 145/14, 83/18, 31/19, 37/19 - other law, 9/20, 52/21, and 62/23; hereinafter referred to as: the Law) which stipulates that spatial and urban planning documents must be adjusted, so that a lower-ranking planning document must comply with a higher-ranking planning document.

Planning documents must comply with the Spatial Plan of the Republic of Serbia.

Sincerely,

MINISTER
Aleksandra Sofronijević

Report by the Institute for Nature Conservation of Serbia – July 2025

03 No. 025-2109/3

04.07.2025

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 Novi Beograd

1 Omladinskih brigada St

The Ministry of Environmental Protection submitted a request to the Institute for Nature Conservation of Serbia No. 002211701 2025 14850 004 007 020 092 dated 28 May 2025, registered under 03 No. 025-2109/1 dated 3 June 2025, followed by the urgency note dated 25 June 2025 and registered under 03 No. 025-2109/2 dated 3 July 2025, seeking a statement within the Institute's scope of competences concerning "Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of a nesting site of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade" for the purpose of submitting a response to the Secretariat of the Bern Convention. The Complaint, concerning potential threats to the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) along the Sava River, was submitted by the non-governmental organization "Licej" based in Belgrade.

In relation to specific questions outlined in the Complaint Form Instructions issued by the Secretariat of the Bern Convention, the complainant states the following:

1. The habitat of the Pygmy Cormorant has been destroyed by the construction of a marina within the protected area, thus violating Article 6(b) of the Bern Convention, as well as the Law on the Ratification of the Convention on the Conservation of European Wildlife and Natural Habitats ("Official Gazette RS – International Agreements", No. 102/07);
2. Within the protected area "Wintering Site of the Pygmy Cormorant" there are five distinct locations where the *Microcarbo pygmaeus* species is present;
3. The habitat of the Pygmy Cormorant was destroyed due to marina construction in the protected area;
4. The protected area "Wintering Site of the Pygmy Cormorant" is located within the boundaries of the internationally important bird area (IBA) "Confluence of the Sava and Danube Rivers"; the species is listed in Annex I of the Birds Directive, and therefore its habitats represent potential Natura 2000 network sites. Additionally, a decline in population numbers has led to the species being classified as vulnerable on the Red List of Threatened Species of the International Union for Conservation of Nature (IUCN);
5. The case was reported to all relevant institutions, which failed to take any action, and instead permitted the unlawful relocation of the marina to the aforementioned area;
6. Instead of providing a response to question no. 6 – Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc.), photographs of the location in question were submitted.

Upon reviewing submitted documentation, the central Register of Protected Natural Assets and the database maintained by the Institute for Nature Conservation of Serbia (hereinafter: the Institute), and in accordance with your request, the Institute hereby provides its statement regarding the individual allegations contained in the Complaint:

1. The protected area “Wintering Site of the Pygmy Cormorant” was designated as such due to its importance for the wintering of a significant portion of the European population of the Pygmy Cormorant along the Sava River in Belgrade, specifically during the period from 1 November to 1 April, when the birds gather and roost in the willow stands within the protected zone. The most important willow habitats are those located along the riverbank, where the birds roost, and which fall within a zone subject to the II (second) degree of protection. The marina referenced in the complaint has not physically destroyed the habitat of the Pygmy Cormorant, as it was installed on the water surface of the Sava River. However, it was placed within the area covered by the II (second) degree protection regime, which is in contradiction with Article 4, paragraph 2, item 4) of the Decision on the Designation of the Protected Habitat “Wintering Site of the Pygmy Cormorant” (“Official Gazette of the City of Belgrade”, No. 109/22). Upon request from the Sports and Nautical Association “VIDRA”, located at Savski kej bb, Novi Beograd, the Institute issued a Decision on Nature Protection Conditions 03 No. 021-2165/4 dated 13 September 2024, in which it prohibited the installation of the marina at the specified location. Following an appeal submitted by the Sports and Nautical Association “VIDRA”, the Institute, acting as the first-instance authority, issued a decision rejecting the appeal and referred the case to the second-instance authority - the Ministry of Environmental Protection - for further action, via correspondence 03 No. 021-2165/6 dated 18 December 2024.

Prior to this, the manager of the protected area - the Citizens’ Association “Green-Blue Corridors” based in Belgrade - informed the Institute about unlawfully constructed floating structures, including the marina referenced in this complaint, via correspondence 03 no. 025-1044/1 dated 18 March 2024. The Institute for Nature Conservation of Serbia forwarded the manager’s notification, accompanied by its own letter 03 no. 025-1044/2 dated 26 March 2024, to the competent authority - the Sector for Environmental, Water and Tourism Inspection, operating under the Secretariat for Inspection, Supervision and Communication of the City of Belgrade, for further action.

For the purpose of preparing a response to this complaint, the Institute conducted an expert field inspection of the location on 12 June 2025, and confirmed that the marina was installed entirely on the water surface, remaining within the boundaries of the protected area, in the separate unit known as Locality I. While willows along the riverbank, that is, the Pygmy Cormorant habitat itself has not been destroyed, it is considered threatened due to occupation of a portion of the water surface subject to the II (second) degree protection regime.

2. The claim made in the complaint that five separate locations exist within the protected area is incorrect. According to the Decision on the Designation of the Protected Habitat “Wintering Site of the Pygmy Cormorant” (“Official Gazette of the City of Belgrade”, No. 109/22), the habitat consists of a total of three distinct units (localities), namely Localities I, II, and III (Annex: Map). The marina in question is located within the boundaries of Locality I, in a section of the water surface designated under the II (second) degree protection regime of the Protected Habitat “Wintering Site of the Pygmy Cormorant.”
3. In relation to the claim made in the complaint that the habitat of the Pygmy Cormorant has been destroyed, the Institute provided responses under items 1 and 2, stating that

the habitat itself has not been destroyed. However, the marina has been constructed on the water surface, which, along with the willow stands, falls under the II (second) degree protection regime.

4. With reference to the claim that the protected habitat “Wintering Site of the Pygmy Cormorant” is located within an IBA area, it is noted that only Localities I and III fall within the boundaries of the internationally important bird area (IBA) “Confluence of the Sava and Danube Rivers.” The aforementioned localities are also situated within the proposed Special Protection Area (pSPA) “Confluence of the Sava and Danube Rivers” of the Natura 2000 ecological network, in accordance with the provisions of European Union law - Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds.

The species Pygmy Cormorant (*Microcarbo pygmaeus*) holds the lowest conservation concern status at the European level, classified as Least Concern (LC) under IUCN criteria (Source: <https://www.iucnredlist.org/species/22696734/166315391>). The same status applies at the national level (Source: The Red Book of Fauna of Serbia III – Birds, 2018).

5. Regarding the claims made in the Complaint that the case was reported to all competent institutions and that no action was taken, and further that the unauthorized relocation of the marina was permitted, the Institute maintains that the assertion concerning its own actions is incorrect, as outlined above. Considering that the species in question holds international significance, and that the complaint had not previously been addressed to either the Ministry of Environmental Protection or the Institute, it is the Institute’s view that it is necessary to organize a meeting with the Manager of the protected area, the Urban Planning Institute of the City of Belgrade and the Secretariat for Economy, City of Belgrade - the institutions responsible for the adoption of the Plan for the Placement of Floating Structures on Water Land within the Territory of the City of Belgrade (“Official Gazette of the City of Belgrade”, Nos. 37/21, 94/21 and 84/22). The installation of the marina in question is being carried out based on this Plan and further relocations of other structures currently situated on the right bank of the Sava River are also anticipated under the same framework.

Pursuant to your request, the Institute’s statement concerning the Complaint is hereby submitted for further action.

EXECUTIVE DIRECTOR

Branka Vujović

As per Decision 02 No. 012-1638/2
of 24.06.2025

Enclosed (copies):

1. Decision issued by the Institute for Nature Conservation of Serbia, 03 No. 021-2165/4 dated 13 September 2024
2. Letter of the Institute for Nature Conservation of Serbia, 03 No. 021-2165/7 dated 23 December 2024
3. Letter of the Manager of the Protected Area, 03 No. 025-1044/1 dated 18 March 2024

4. Letter of the Institute for Nature Conservation of Serbia, 03 No. 025-1044/2 dated 26 March 2024
5. Map of the Protected Habitat “Wintering Site of the Pygmy Cormorant,” showing Localities I, II and III.

Delivered to:

- Applicant
- Records Office (Archive) x 2

Report by the City of Belgrade Secretariat for Environmental Protection – July 2025

Republic of Serbia
CITY OF BELGRADE
CITY ADMINISTRATION
OF THE CITY OF BELGRADE
**SECRETARIAT FOR
ENVIRONMENTAL PROTECTION**
21.07.2025.
No. V-07 No. 501-73/25



71 Karađorđeva Str
11000 Belgrade
email: beoeko@beograd.gov.rs

MINISTRY OF ENVIRONMENTAL PROTECTION
Sector for Nature Protection

11000 Belgrade
1 Omladinskih Brigada Str

Subject: Response to Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, 2024/03

Report on the encroachment and degradation of the protected habitat “Wintering Site of the Pygmy Cormorant” in the territory of the City of Belgrade

The Institute for Nature Conservation, as the professional institution responsible for nature protection, prepared in 2022 a Study for the protection of the natural asset under the name Protected Habitat “Wintering Site of the Pygmy Cormorant” in the territory of the City of Belgrade. This study was prepared in accordance with Article 42 of the Law on Nature Protection (“Official Gazette of the RS”, Nos. 36/2009, 88/2010, 91/2010, 14/2016, 95/2018 - other law and 71/2021) and represents the basic document which contains scientific and professional justification and values of the natural asset, the necessities and measures for its protection. Furthermore, the 2022 Protection Study proposed the Association “Green Blue Corridors” as the designated manager of the aforementioned protected habitat.

Thereafter, the Secretariat for Environmental Protection of the City of Belgrade prepared the Draft Decision on Proclamation of Protection and implemented further legally prescribed procedures. In accordance with the procedure, the Assembly of the City of Belgrade, after previously obtaining the consent of the Ministry of Environmental Protection of the Republic of Serbia, on 26 December 2022, adopted the Decision on the Proclamation of the Protected Habitat “Wintering Site of the Pygmy Cormorant”, No. 501-1111/22-C, which, following the Law on Nature Protection, classifies it in the III category of protection and prescribes the regime of protection of the II and III degree.

The Association “Green Blue Corridors” was appointed as the manager of the newly formed protected habitat by the Decision on the Proclamation of the Protected Habitat, and in accordance with Article 53 of the Law on Nature Protection. The appointed manager submitted the Management Plan for the protected area for 2023-2033, on July 30, 2023, under reference number ZP 15-23.

On 04 September 2023, the manager submitted a formal request to the Institute for Nature Conservation of Serbia, under No. 03 No. 023-3251/1, to verify nature protection conditions. Alongside this request, the Management Plan for the Protected Habitat “Wintering Site of the Pygmy Cormorant” for the period 2023-2023 was submitted, which was prepared in accordance with the methodology and guidelines of the Institute.

The Institute has reviewed the submitted documentation and determined that all previously defined conditions for nature protection, issued in the Decision on Nature Protection Requirements under 03 No. 023-1197/2 dated 09 May 2023, have been fully distinguished and appropriately integrated into the proposed Management Plan.

The Secretariat for Environmental Protection of the City of Belgrade, on 19 October 2023, adopted Decision No. V-07 No. 501-130/2023, granting approval to the manager for the Management Plan for the period 2023-2033, in accordance with Article 54, paragraph 4 of the Law on Nature Protection (“Official Gazette of the RS”, Nos. 36/09, 88/10, 91/10 - correction, 14/16, 95/18, and 71/21).

Every year, the manager is also obliged to prepare Annual Management Programs for the Protected Area, which constitute the operational planning of activities defined in the Management Plan. The manager has regularly submitted these annual programs within the legally prescribed deadlines.

For the year 2025, the Annual Management Program for the protected habitat “Wintering Site of the Pygmy Cormorant” was submitted to the Secretariat for Environmental Protection (on 15 November 2024, under No. V-07-501-159/2024), and it received a positive opinion and approval from them.

However, despite meeting all plan and program obligations by the manager, in 2025, the contract between the City of Belgrade and the manager has still not been signed. The manager currently does not have secured funding sources for the implementation of activities outlined in the approved program for the current year.

Such prolongation of the contracting process may negatively affect the continuity of protection and management measures, particularly in terms of monitoring activities, habitat maintenance, as well as educational and promotional content of the management plan.

We emphasize that the cooperation with the manager has been very good, there are no objections to his work, and all obligations are fulfilled on time. Communication is correct and constructive, and the approach is professional and dedicated.

The protected habitat “Wintering Site of the Pygmy Cormorant” is of exceptional importance for the preservation of biodiversity, particularly as one of the rare wintering grounds for this strictly protected bird species. However, in the recent period, several incidents have been registered in this area, clearly indicating usurpation, habitat degradation, and activities that directly threaten its overall integrity and functionality.

1. First Incident - Mechanical Degradation at Locality 1

On 10 March 2024, the manager of the protected habitat electronically notified the Secretariat for Environmental Protection that mechanical intervention work had been carried out at Locality 1 by the company “Elkop Project”, contracted by PUC “Belgrade Water and Sewerage”. as part of a water utility project, involving the reinstallation of an electrical cable along the Sava bank. The work involved the repair of the electrical cable for the deep well (Reni well) but was carried out without prior acquisition of nature protection conditions, which resulted in the cutting and flattening of trees, as well as an excavation approximately 3 meters deep. These activities directly compromised the stability of the habitat and called into question the functioning of the ecosystem in that area. Furthermore, a report was made regarding the expansion of the gravel storage site at Locality 3, owned by the company “Omega Beton”.

2. Field Inspection and Initiation of Procedures

To assess the situation in the field, on 13 March 2024, representatives of the Secretariat for Environmental Protection, together with representatives of the PUC “Belgrade Water and Sewerage,” conducted an on-site visit to Locality 1. During the inspection, it was determined that heavy machinery had entered the site and that vegetation along the riverbank had been cleared up to the site where the pit was excavated. Representatives of PUC “Belgrade Water and Sewerage” provided information that Reni wells are located nearby, which form the basis of the city’s drinking water supply system and are classified as first-category facilities. During the exploitation at Reni well No. 29, located on cadastral parcel No. 6801, a failure occurred in the underground power cable, causing the well to cease functioning. To access the location of the malfunction and being uninformed about the protected area “Wintering Site of the Pygmy Cormorant” and the applicable procedures for undertaking activities within a protected area, they engaged a private company to carry out the necessary mechanical work. The company began work based on their instructions on 09 March 2024, which was discovered and halted by the ranger service.

Representatives of the Secretariat for Environmental Protection shared information from the Decision on the Proclamation of the Protected Habitat “Wintering Site of the Pygmy Cormorant” and the manner in which planning and implementation of activities that may be approved and conducted in the protected area must be carried out, under the condition that the planned work is aligned with the concept of protection and development of the protected area and with the site’s spatial capacity and characteristics. This includes limited and strictly controlled use of natural resources, for which prior conditions must be obtained from the Institute for Nature Conservation of Serbia. On that occasion, representatives of PUC “Belgrade Water and Sewerage” were provided with the Decision on the Proclamation of the Protected Habitat “Wintering Site of the Pygmy Cormorant,” and they confirmed they will contact the Institute for Nature Conservation of Serbia in such matters.

3. Further Encroachment on Localities 2 and 3

On March 17, 2024, the manager submitted new notifications to the Secretariat for Environmental Protection, along with attached photographic documentation, concerning the continued expansion of the gravel pit at Locality 3, where the company “Omega Beton,” contracted by PUC “Srbijavode,” continued with landfilling and expansion of the storage yard. It was also indicated that there is an emergence of new floating structures at all three localities, which poses a potential threat to the stability of aquatic ecosystems and may affect the nesting and resting habits of the Pygmy Cormorant.

4. Activation of Inspection Oversight

Considering the seriousness of the situation, on March 18, 2024, the Secretariat for Environmental Protection informed the Secretariat for Inspection, Supervision and Communication, submitting complete documentation and urging them to act within their jurisdiction and to notify the Secretariat for Environmental Protection of their further steps.

5. Legality Assessment of the Work

On March 27, 2024, the Secretariat for Environmental Protection sent an official letter to PUC “Srbijavode,” requesting submission of information regarding the legal basis and conditions

under which the company “Omega Beton” was contracted to carry out work at Locality 3, which is situated within a protected habitat zone.

6. Notification of Other Competent Authorities

The following day, March 28, 2024, a letter was also sent to the Secretariat for Defense Affairs, Emergency Situations, and Coordination, notifying them of the encroachment upon water surfaces and the disruption of the natural functions of the protected habitat.

7. On April 18, 2024, the ranger service under the manager of the Association “Green BlueCorridors” submitted, both by the phone and electronically, photographic documentation to the Municipal Police and the City of Belgrade Inspection Service, indicating that work is being conducted within the zone of the II level of protection of the protected area along the Sava River without proper notification or approvals, specifically the construction of infrastructure (marina and pier).

Through site visits and fieldwork, it was established that the work is being carried out to install a marina (Marina Vidra).

8. Response from PUC “Srbijavode”

On April 19, 2024, PUC “Srbijavode” submitted a response in which they state that they have leased the land at Locality 3 for a specified period to the company “Omega Beton” in accordance with relevant legislation. In the same letter, they also confirmed that the company is instructed to remediate the damage caused and to secure the area, i.e., the water land, by installing an adequate protective fence, embankment, or other appropriate structures.

9. On April 26, 2024, the manager of the Association “Green Blue Corridors” contacted the River Police Directorate with a notice that within the section of the Zone II protection level of this protected area along the Sava River, activities and construction work related to infrastructure (marina and pier) are being carried out. He urged the Directorate to act in accordance with their jurisdiction.

10. Request from the Sports and Nautical Association "VIDRA"

On May 31, 2024, the Sports and Nautical Association “VIDRA” submitted a request to the Institute for Nature Conservation of Serbia for the issuance of nature protection conditions for the installation of a mooring dock for boats at the locality with the following coordinates:

From X = 454999.80
Y = 4960781.40
To X = 455111.82
Y = 4960821.15

This locality lies within the Zone II (second) level of protection in the protected area "Wintering Site of the Pygmy Cormorant."

The request was **rejected on September 13, 2024, by the Institute for Nature Conservation of Serbia.**

It is important to note that the manager has repeatedly addressed the relevant city institutions to point out the issue and initiate its resolution. In every correspondence, the reasons for intervention have been clearly stated, along with the need for urgent actions in accordance with the applicable legal and planning documents.

However, despite the invested effort and the submitted information, no concrete and effective steps have been taken to resolve the problem.

The Secretariat will continue to undertake all activities within its jurisdiction, in full accordance with the applicable legal regulations.

Manager of the Protected Habitat
for
"Wintering Site of the Pygmy Cormorant"
Green Blue Corridors

Deputy Secretary of the Secretariat

Environmental Protection
Prof. Dr. Jasmina Madžgalj

Processed by: Jovana Škorić
Controlled by: Dejan Tripković

Report by the City of Belgrade Secretariat for Inspection, Supervision and Communication – July 2025

Republic of Serbia
CITY OF BELGRADE
CITY ADMINISTRATION
OF THE CITY OF BELGRADE
**Secretariat for Inspection,
Supervision and Communication**
X-09 No. 501.9-280/2024
17.07.2025.
Belgrade, 27 marta Str No. 43-45



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MINISTRY OF ENVIRONMENTAL PROTECTION

Belgrade
1 Omladinskih Brigada Str

Subject: Notification

With reference to Complaint No. 2024/03: New Complaint: Serbia: Alleged destruction of the habitat of the Pygmy Cormorant (*Microcarbo pygmaeus*) on the Sava River in Belgrade, 2024/03, and the proceeding of the Environmental Protection Inspectorate and the Communal Inspectorate of the Secretariat for Inspection, Supervision and Communication of the City Administration of the City of Belgrade, we hereby submit the following information:

Following a citizens' report, the environmental protection inspector conducted an extraordinary inspection on May 27, 2024, and on that occasion determined that the protected habitat "Wintering site of the Pygmy Cormorant" was under regime III protection, Locality I, on cadastral parcel 6628/2, on the left bank of the Sava River, where nautical infrastructure (a marina) was being constructed, with a floating dock approximately 100 meters in length and with accompanying facilities for that purpose, by the executor of the Sports Nautical Association "VIDRA", headquartered at Savski Kej, Block 70A BB, New Belgrade.

In accordance with the observed condition, the inspector issued Decision No. X-09: 501.9-280/24 on June 10, 2024, ordering the controlled entity of the Sports Nautical Association "VIDRA", to immediately cease all work and activities related to the installation of the marina at the locality of the protected habitat "Wintering site of the Pygmy Cormorant," regime III, Locality I, to obtain a decision on the conditions of nature protection from the Institute for Nature Conservation, and to provide written notification regarding the undertaken measures to the manager of the protected habitat "Wintering site of the Pygmy Cormorant", from the Association "Green Blue Corridor", and to the environmental protection inspector.

The executor of the work of the Sports Nautical Association "VIDRA" complied with the inspector's order, stopped all further activities regarding the construction of the marina, and

submitted a request to the Institute for Nature Conservation, No. 020-2165/1, which was established in the control record from the inspector dated August 08, 2024.

The environmental protection inspector has not been provided with the decision on the conditions of nature protection from the Institute for Nature Conservation, requested by the Sports Nautical Association "VIDRA," under reference No. 020-2165/1, and therefore the administrative procedure regarding this matter has not been concluded.

In the meantime, no complaints from citizens or citizens' associations have been recorded.

During the same period, this Secretariat also received a complaint against a business entities that expanded its activities in the protected habitat "Wintering Site of the Pygmy Cormorant," which was prevented by a quick intervention of the environmental protection inspection, in the case against:

1. "Omega Beton" LLC - By Decision X-09 No. 501.9-450/2024 dated May 21, 2024, the deposition and separation of sand and gravel was prohibited at Locality III, at the protected habitat "Wintering Site of the Pygmy Cormorant." The controlled entity ceased the unauthorized activities in the protected area, removed the deposited sand and gravel from the locality, and restored its original condition (fence and bridge).
2. PUC "Belgrade Waterwork and Sewerage" - It was ordered to obtain the necessary activities and planned work carried out in the protected area, and to collect conditions for nature protection from the competent authority, which was duly implemented.

Based on a citizens' report regarding the unauthorized placement of a floating facility - a boat dock, at the locality on the left bank of the Sava River, Municipality of New Belgrade, across from the Belgrade Fair, at chainage km 3+300, on July 16, 2025, an inspection was carried out and it was confirmed that the Sports Nautical Association "VIDRA," headquartered at Savski Kej, Block 70A BB, New Belgrade, at a distance of 40 m from the protected area "Wintering Site of the Pygmy Cormorant," had installed pontoons for transporting boats and a barge connected to 8 steel piles. Predrag Glišić, who is the responsible person of the Sports Nautical Association "VIDRA," was present at the locality, and he stated in the official record taken by the acting communal inspector that they do not possess the permit for the installation of the floating facility on the subject location, issued by the competent authority.

The communal inspector will continue to gather important data for conducting inspection supervision and, based on fully established facts, take measures in accordance with his legal authority.

Respectfully,

**ACTING SECRETARY OF THE SECRETARIAT FOR
INSPECTION, SUPERVISION, AND COMMUNICATION
Vlada Cvijović**

Map

