



Strasbourg, 14<sup>th</sup> May 2025

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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**

45th meeting

Strasbourg, 8-12 December 2025

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**Bureau of the Standing Committee**

Autumn 2025

Strasbourg

**New complaint: 2024/3**

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

**- COMPLAINT FORM -**

*Document prepared by  
NGO Licej*

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**Convention on the Conservation of European  
Wildlife  
and Natural Habitats**



**COMPLAINT FORM INSTRUCTIONS:**

**NB:** Submitting a complaint to the Bern Convention is a serious accusation against the concerned Contracting Party(ies). Complaints must demonstrate a sufficient degree of seriousness or urgency related to species or habitats of European importance, and the complainant must demonstrate that the issue has already been raised at local and/or national level.

Complaint forms must be submitted in electronic word format, in English or French, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis. Anonymous complaints are not admissible; however the Secretariat will take measures to keep the personal details of the complainant confidential.

Please, fill in this form and send it to the attention of:

**Bern Convention Secretariat**

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

E-mail: [Bern.convention@coe.int](mailto:Bern.convention@coe.int)

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Surname(s).....Božinović.....  
On behalf of (if applicable): NGO Licej.....  
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E-mail: licejudruzenje@gmail.com.....  
Website: .www.greenwave21.org.....  
Date: 15.6.2024.

1. Please state the reason of your complaint (refer also to the Contracting Party/ies involved and the Articles of the Convention which might be violated)

Dear Sir/Madam,

After reporting to all national competent authorities, we regret to inform you that the habitat of the little cormorant *Microcarbo pygmeus* on the Sava River in Belgrade, Serbia ([https://maps.app.goo.gl/wrSXM9JW1rBrTzH89?g\\_st=av](https://maps.app.goo.gl/wrSXM9JW1rBrTzH89?g_st=av)) the area protected by the Bern Convention, has been destroyed by the installation of a marina in the protected area. Republic of Serbia is responsible for the protecting this area.

Article 6 b is violated.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention that are potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

*Microcarbo pygmeus* spends the winter in Serbia, in Belgrade, on the downstream point of Ada Ciganlija. According to official censuses from 2009, about 10 percent of the population spent the winter in a protected habitat in Belgrade. The protected habitat is located on the banks of the Sava in Belgrade near Ada Ciganlija and consists of five separate locations: Location I - vrbak on the right bank of the Sava, about 500 m downstream from the mouth of the Topčider river.

Location II - willows at the downstream end of Ada Ciganlija, located between the embankment and the main course of the Sava River

Location III - a narrow belt of willows on the left bank of the Sava near the Belgrade Shipyard. Location IV - belt of willows on the left bank of the Sava near the heating plant in New Belgrade.

Location V - this location is located next to location IV and is separated from it by a narrow space, i.e. a dock for unloading liquid fuels for the needs of the heating plant in New Belgrade.

[https://maps.app.goo.gl/wrSXM9JW1rBrTzH89?g\\_st=av](https://maps.app.goo.gl/wrSXM9JW1rBrTzH89?g_st=av) Location

Chapter II - HABITAT PROTECTION



3. What might be the negative effects for the specie/s or habitat/s concerned?

Habitat of *Microcarbo pygmeus* has been destroyed by the installation of a marina in the protected area.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald Network, UNESCO site? Are there pending procedures within another international institution?

**The wintering place of the *Microcarbo pygmeus* is located within the Internationally Important Bird Area (IBA) "Ušće Sava and Danube". The wintering of this bird in Belgrade was first recorded in the mid-nineties of the 20th century, and it was noticed that they winter in large numbers - almost 10% of the total European population of this species winters in the willows on the banks of the Sava. According to the regulations of the European Union, the little crow is on Annex I of the Birds Directive, and therefore the habitats of this species represent potential Natura 2000 areas. decreased of the number of individuals which put the species on the [International Union for Conservation of Nature](#) (IUCN) [Red List](#) as a vulnerable species.**

**There are no pending procedures within another international institution.**

5. Have you attempted to address this issue with the relevant local and national authorities? Please describe. Are there any pending procedures at national level regarding the object of your complaint?

The case was reported to all competent institutions, which did not do anything, but allowed the illegal relocation of the marina to the mentioned area.

This email is from Srbijavode, which is responsible for the protected area. Attached are the responses from the relevant institutions, as well as photographs of the destroyed habitat of this protected and European endangered species:

Subject: Notification

Reference: Your number 0198824764675/2024

Regarding the submission by the citizens' association "Joint Action Block 70 & 70a," we inform you that the environmental protection inspector of the Secretariat for Inspection, Supervision, and Communication of the City Administration of Belgrade, on May 27, 2024, conducted an extraordinary inspection of the protected habitat "Winter Habitat of the Little Cormorant" (Official Gazette of the City of Belgrade 109/22). During the inspection, it was determined that the supervised entity, "Sports Nautical Association VIDRA," Sava Quay, Block 70a, New Belgrade, had unauthorizedly commenced the construction of a marina - a docking facility for vessels, at location 1, within the regime III protected area, on the left bank of the Sava River, part of cadastral parcel 6628/2 KO New Belgrade. Considering that such activities can be planned and implemented only if the conditions for nature protection from the competent authority are obtained in advance, the environmental protection inspector, in accordance with his authority, ordered the cessation of further unauthorized activities in the protected area until the issuance of an act on the conditions for nature protection, which would determine whether these activities disturb or not the primary values of the protected area.

For other questions mentioned in the submission, related to the conditions for the construction of the marina-docking facility in the protected area, the environmental protection inspector of this Secretariat is not authorized to act.

Sincerely, Secretariat for Inspection, Supervision, and Communication This is  
from

Sincerely, Secretariat for Inspection, Supervision, and Communication And this  
is joint report from few organisations and persons:

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From: Joint Action zajednicka70akcija@gmail.com Attachments

Fri, May 10, 7:06 PM

To: inspection, Sasabozinovic70, Green, cabinet, submitreport, Government, me Dear

Sir/Madam,

In response to your email regarding the report of illegal pile driving in the area protected by the Bern Convention - the winter habitat of the little cormorant, which is under the supervision of the association "Green Blue Corridors," we inform you that at the specified location (marked on the attached map), unlawful activities of installing piles and bridges for boat storage have continued.

Nine piles have been installed, and two large pontoons for the marina have been brought in.

During this time, the habitat of the little cormorant was broken into, the fence was torn down, the sign was removed, and the forest where the habitat is located was cleared to allow workers, on the orders of the owner of the "Vidra" marina, to carry out the activities and install the bridge that will be used by them and their clients.

We remind you that the owners of the aforementioned marina have been renting out the marina space (which is still located in Block 70a) for decades without issuing fiscal receipts and without paying any fees.

We also remind you that the said marina was illegally located on the quay in Block 70a, and the owners were ordered to remove it. The City arranged the area for relocating rafts and floating objects, including the marina, investing over 700,000 euros.

Attached are disturbing pictures sent to us by our fellow citizens who identified the individuals involved in the illegal activities.

We expect your prompt response, your report on the actions taken, and strict sanctioning of such criminal behavior.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc) (for large files, please add a separate annex document, as mentioned in the above instructions)













