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AND NATURAL HABITATS

Standing Committee

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Bureau of the Standing Committee

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New (pending) Complaint: 2025/01

**Alleged threat to habitat and protected species by the
construction of the Gradina S4 hydropower plant on the
Studenica River
(Serbia)**

- COMPLAINANT REPORT -

*Document prepared by NGO Polekol and
Informal citizens' group Save Studenica, Ušće*

Bern Convention Secretariat

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

Complainants: NGO Polekol, Svetogorska St. No. 37/2, Belgrade, Serbia and Informal citizens' group Save Studenica, Ušće

Subject: Complaint No. 2025/01, New (pending), Serbia: Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River

Progress report regarding the Decision of 15 July to the Bureau of the Standing Committee to the Bern Convention

Abstract:

The proceedings for the issuance of Location Conditions are currently pending.

Since Studenica S4 Gradina SHPP is a private, commercial project. conservation objectives and the prevention of adverse impacts of the proposed project on the integrity of the ecologically significant area of the Golija Nature Park, as well as of lower Studenica - the proposed Site of Community Importance (pSCI) Studenica, must prevail.

New scientific paper (Two perspectives, one river: what macroinvertebrates and fish reveal about mountain river ecosystem) underscores high conservation value and the importance of maintaining ecological integrity of Studenica.

The preparation of the new Draft Spatial Plan for the Special-Purpose Area of the Golija Nature Park is currently under way, presenting an opportunity to protect the Studenica River along its entire length by expressly prohibiting the construction of reservoirs and micro, mini and small hydropower plants throughout the planning area.

I

The Location Conditions proceedings are ongoing but should be discontinued ex officio Upon review of the Central Register of Unified Procedures, in relation to the investor's application for the issuance of Location Conditions dated 9 November 2025, the proceedings are still pending. The Complainant submits that the proceedings should be discontinued ex officio by the Ministry of Construction, Transport and Infrastructure (MGSI), given that Location Conditions for the site in question cannot lawfully be issued.

This is because the applicable Spatial Plan for the Special-Purpose Area of the Studenica Monastery provides, in respect of the plots on which the disputed Studenica S4 Gradina Small Hydropower Plant (SHPP) project is proposed to be developed, that those plots are situated within an area classified as an area of very high environmental quality.

This category comprises areas where the environmental characteristics have remained almost entirely unaltered, including protected natural areas (areas subject to protection regimes of the first and second degrees), areas protected under international conventions (the UNESCO MAB Biosphere Reserves list, the Ramsar List, and the list of sites of importance for the conservation of European wild flora and fauna under the NATURA 2000 network), mountain peaks and areas of difficult access, as well as Class I watercourses. For areas falling within this category, planning solutions are to be designed so as to maintain the existing level of environmental quality.¹

Lower course of the Studenica River has been identified:

- as a future NATURA 2000 site,
- as an area of difficult access, which has contributed to the preservation of its landscape and biodiversity; that along its course, the river shapes breathtaking landscapes, where steep gorges, clear waters and unspoiled mountain scenery create an environment of rare beauty and uniqueness. Its inaccessibility has helped preserve diverse fauna and rich relict and endemic Tertiary flora, thereby enhancing the landscape value of the Golija Biosphere Reserve;
- as a Class I watercourse under the applicable legislation of the Republic of Serbia, pursuant to the Regulation on the Categorisation of Watercourses, List of Watercourses, West Morava River Basin, item 41: Studenica: from the source to its confluence with the Ibar – Class I;²

In addition to the absence of an adequate planning basis for the project concerned, as explained in detail in the previous submission and supported by the attached expert opinion, the findings concerning the species and habitats identified and described in the Report of the Institute for Biological Research “Siniša Stanković” and Faculty of Biology, University of Belgrade, demonstrate that the legal requirements for the issuance of the Location Conditions, and consequently for the issuance of a construction permit, have not been met under the applicable legislation due to provisions of article 4,

6. And 7. of the Rulebook on the Declaration and Protection of Strictly Protected and Protected Wild Plant, Animal and Fungi Species.³

In view of all of the above, the proceedings concerning the issuance of Location Conditions for the construction of the Studenica S4 Gradina SHPP should be discontinued ex officio.

II

Nature conservation objectives must prevail

The Studenica S4 Gradina SHPP is a private, commercial project. No public interest, nor any overriding public interest within the meaning of Article 10 of the Nature Protection Act⁴, has been established in relation to the construction of the Studenica S4 Gradina SHPP.

Accordingly, the conservation objectives and the prevention of adverse impacts of the proposed project on the integrity of the ecologically significant area of the Golija Nature Park, as well as of the proposed Site of Community Importance (pSCI) Studenica, must prevail.

According to data published by the Energy Agency of the Republic of Serbia, total electricity generation delivered into the grid 0.73% of total electricity generation and 2.36% of electricity generated from renewable energy sources.⁵

¹ <https://www.mgsi.gov.rs/sites/default/files/SPU%20PPPPPN%20Studenica-tekst.pdf>

² https://srda.rs/wp-content/uploads/eko-pravo/VAZDUH_VODA_I_ZEMLJISTE/ZAKON_O_VODAMA/UREDBA_O_KATEGORIZACIJI_VODOTOKA.pdf

³ http://demo.paragraf.rs/demo/combined/Old/t/t2016_12/t12_0180.htm

⁴ https://www.paragraf.rs/propisi/zakon_o_zastiti_prirode.html

⁵ <https://oie.rs/wp-content/uploads/2025/02/ENERGETSKI-BILANS-REPUBLIKE-SRBIJE-ZA-2025-002.pdf>

III

New scientific paper

(Two perspectives, one river: what macroinvertebrates and fish reveal about mountain river ecosystem)

The lower Studenica River represents an ecologically valuable section connecting the Golija Nature Reserve and the Ibar Gorge, further emphasising the importance of maintaining its ecological integrity.

In addition to its assessed good ecological status, this river section possesses a high conservation value. The wider region in which the Studenica is situated, encompassing the eastern Carpathians, the Balkan Peninsula and the eastern Alps, is recognised as a biodiversity hotspot characterised by a high level of endemism. The presence of regionally characteristic and Balkan endemic taxa, including the crustacean *Gammarus balcanicus*, the leech *Dina dinarica*, and the fish species *Barbus balcanicus* and *Sabanejewia balcanica*, highlights the biogeographical significance of the area and supports the conclusion that its lotic habitats remain well preserved.

Furthermore, all recorded fish species are native, and six are legally protected under the national legislation of the Republic of Serbia, further underscoring the conservation importance of this river.

Taken together, the fish- and macroinvertebrate-based assessment indicates favourable ecological conditions in the investigated river reach. These findings are consistent with the objectives of the Water Framework Directive, namely to prevent deterioration and improve the status of aquatic ecosystems and to achieve at least “good ecological status” for all surface waters by 2027.

At the national level, policy frameworks such as the Programme for Adaptation to Changed Climate Conditions with Action Plan (2023–2030) emphasise the importance of enhancing the connectivity of priority habitats through the protection of ecological corridors and ecological restoration projects, applying the concept of Nature-based Solutions. This is consistent with the Strategy for Environmental Protection – Green Agenda of the Republic of Serbia 2024–2033.⁶

IV

New Spatial Plan for the Special-Purpose Area of the Golija Nature Park

The Complainant considers it particularly important to emphasise that the preparation of the Draft new Spatial Plan for the Special-Purpose Area of the Golija Nature Park is currently under way.⁷

The Spatial Planning and Urbanism Agency of the Republic of Serbia conducted an early public review procedure from 5 to 19 May 2026, with the purpose of informing the public about the general objectives

⁶ <https://www.tandfonline.com/doi/full/10.1080/02705060.2026.2715563#abstract>

⁷ <https://www.appurs.gov.rs/%d1%80%d0%b0%d0%bd%d0%b8-%d1%98%d0%b0%d0%b2%d0%bd%d0%b8-%d1%83%d0%b2%d0%b8%d0%b4-%d0%b8-%d1%98%d0%b0%d0%b2%d0%bd%d0%b8-%d1%83%d0%b2%d0%b8%d0%b4/>

and purpose of the preparation of the plan, possible development options for the spatial area concerned, the anticipated effects of the planning process, and other relevant matters.

The Complainant expresses serious concern that the materials made available for public review contain planning solutions envisaging the construction of a ski resort within the Golija Nature Park, including a reservoir for artificial snowmaking on the uppermost reach of the Studenica River. A high dam with the Preprana reservoir is planned on the middle course of the Studenica. Additional reservoirs are also envisaged at other locations.

The Complainant welcomes the recognition in the planning material that:

“A potential factor threatening the environment is represented by the planned small hydropower plants, whose locations were determined on the basis of the potential cadastre of small hydropower plants at a time when the protection regimes had not yet been established (1987, Complainant’s note), and during which a large number of springs and streams have, to date, either dried up or been displaced as a result of natural tectonic and hydrological processes. The proposed locations of the small hydropower plants are situated in environmentally pristine areas, on unpolluted rivers and watercourses, with numerous recorded strictly protected species. The impoundment and diversion of water for the purposes of small hydropower plants constitutes an invasive and direct impact on biodiversity and results in the degradation of the Golija ecosystem as a whole.”

The planning material further identifies among the principal conflicts:

“the conflict between the protection of nature and natural and cultural values and the utilisation of the hydropower potential of the Studenica River, including the potential construction of the multipurpose ‘Preprana’ reservoir, as well as the potential construction of small hydropower plants on other rivers.”

Having regard to the value and significance of the Golija Nature Park and the lower course of the Studenica River, as demonstrated by the studies conducted by the Faculty of Biology of the University of Belgrade and the Institute for Biological Research “Siniša Stanković” in Belgrade, the conflict between the protection of nature and natural and cultural values, on the one hand, and the utilisation of the hydropower potential of the Studenica River, including the potential construction of small hydropower plants and reservoirs, on the other, should be resolved in favour of the protection of nature and natural and cultural values.

Accordingly, the new Spatial Plan should provide for an explicit prohibition on the construction of reservoirs and micro, mini and small hydropower plants throughout the entire planning area.

Having regard to the factual situation on the ground, national public policies concerning climate change adaptation and environmental protection, the applicable legislation of the Republic of Serbia, the international agreements to which the Republic of Serbia is a Party, the EU environmental acquis, and the relevant provisions and standards arising from the Bern Convention on the Conservation of European Wildlife and Natural Habitats, the Complainant is of the view that the Studenica S4 Gradina SHPP, together with all other micro, mini and small hydropower plants and reservoirs, be removed from the Spatial Plan and that their construction be expressly prohibited, on the grounds that their adverse cumulative effects are incompatible with the conservation objectives of the candidate Emerald

Network site and lower Studenica as an area of significant ecological and landscape value deserving formal and effective protection.

V

In light of the beforementioned developments, we respectfully urge the Bureau to:

- 1) upgrade the status of this case to a "Possible File" under the Bern Convention;
- 2) place the complaint on the agenda of the next Standing Committee meeting;
- 3) engage in coordination with UNESCO and IUCN to explore possibilities for the protection of lower Studenica watercourse and gorge, World Heritage Property (C389) and potential extension of the Golija Nature Park and Golija - Studenica Biosphere Reserve MAB;
- 4) conduct an independent expert assessment within on-the-spot appraisal (fact-finding mission);
- 5) recommend to the State to halt all the activities regarding the project, implement measures for the protection of habitats and species, implement appropriate conservation measures to prevent damage to protected species and habitats of lower Studenica and integrity of Golija Nature Park and Golija - Studenica Biosphere Reserve MAB;
- 6) Remove the projects concerned from the Spatial Plan and expressly prohibit the construction of SHPPs and reservoirs within the Studenica River basin.
- 7) ensure compliance with the Bern Convention and related instruments.

In Belgrade,
15.8.2026.

Legal representative:

Žaklina Živković m.p.

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Bern Convention Secretariat
Directorate of Democratic
Participation Council of Europe F-
67075 Strasbourg, Cedex

Complainants: NGO Polekol, Svetogorska St. No. 37/2, Belgrade, Serbia and Informal citizens' group Save Studenica, Ušće

Report in response to the Decision regarding Complaint No. 2025/01: New file(pending): Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River, from November 17th 2025.

Abstract:

Since Complainants first submitted the complaint, several critical developments have taken place at the national and international level. Significant new data have been collected, confirming the ecological value and importance of preserving the concerned site, and reinforcing concerns about the potential threat posed by the planned hydropower construction.

Ministry of Construction, Transport and Infrastructure initially rejected the investor's application for Location Conditions (first step in obtaining construction permit) due to formal deficiencies, a revised request remains pending.

The procedure of confirmation of the Urban Planning Project for SHPP Studenica S4 Gradina by the competent planning authority is based on the misapplication of the Spatial Plan of the City of Kraljevo instead of the Spatial Plan for the Special-Purpose Area of the Studenica Monastery, thereby circumventing mandatory requirements for a Detailed Regulation Plan and Strategic Environmental Assessment. Additional irregularities include the unlawful supplementation of documentation and the exclusion of the public from the decision-making process.

The project area lies within the proposed Site of Community Importance (pSCI) Studenica, identified under Serbia's obligations in the EU accession process and forming part of the future Natura 2000 ecological network - the conservation status of which must be preserved and enhanced in the future period.

Independent scientific research, including Study conducted by the Institute for Biological Research "Siniša Stanković," and Birdlife Serbia demonstrates a substantially different and more ecologically significant state than reported by authorities.

More than 200 scientists have publicly called for the suspension of the project and the protection of the entire Studenica River and its gorge.

Local communities oppose the project and call for the protection of the Studenica River, including the suspension of all project-related activities, the removal of all SHPP locations from spatial planning documents, and the full protection of all watercourses within the administrative territory of the City of Kraljevo.

First step toward construction permit and circumvention of mandatory Strategic Environmental Assessment (SEA)

The investor "HIDRO-MIN" LLC, Čačak, has submitted to the Ministry of Construction, Transport and Infrastructure an application for the issuance of Location Conditions for the construction of the small hydropower plant (SHPP) "Studenica S4 – Gradina."

The Ministry adopted a conclusion rejecting the application (due to formal deficiencies), No. 004053631 2025 14810 005 000 000 001, ROP-MSGI-31797-LOC-1/2025, dated 13 October 2025.¹

Informal citizens' group Save Studenica, Ušće reacted with open letter.²

On 9 November 2025, the investor submitted to the Ministry a request for the issuance of Location Conditions based on a harmonized (amended) application. Upon review of the Central Registry of Integrated Procedures for the Issuance of Construction Permits (CEOP), it was established that the procedure is still pending.³

This is because the Agency for Spatial Planning and Urbanism of the Republic of Serbia, by confirming the Urban Planning Project, created for the investor a false legal and planning basis for obtaining Location Conditions and, consequently, a building permit, by applying the Spatial Plan of the City of Kraljevo instead of the Spatial Plan for the Special-Purpose Area of the Studenica Monastery, which requires elaboration through a Detailed Regulation Plan and, accordingly, a mandatory Strategic Environmental Assessment (SEA) — requirements that were circumvented through the preparation and unlawful confirmation of the Urban Planning Project with the ultimate goal of expediting the construction of the SHPP Gradina S4.

Through a procedure unrecognized by Law, the developer was permitted to supplement the documentation; this included obtaining new conditions from public utility companies and amending the core content of the UPP - actions which legally necessitated its rejection. The final confirmation of the UPP was issued only after an additional three months, during which time the public was entirely excluded from the procedure. Consequently, the final content of the UPP was disclosed over a year after the conclusion of the public presentation.

Regarding the procedural non-compliance and exclusion of the public, procedural and environmental implications of the misapplication of the planning framework and erroneous establishment of the planning basis for considering requests for the construction of small hydropower plant on the Studenica River, [Complainants submit expert opinion on this matter](#).⁴

¹ https://drive.google.com/file/d/1LTh3L30xZ6calKfXaaxVZOAUApdIQtx6/view?usp=drive_link

² <https://www.krug.rs/studenica-ponovo-na-meti-mestani-i-ekolozi-traze-obustavu-izdavanja-lokacijskih-uslova/>

³ <https://ceop.apr.gov.rs/ceopweb/sr-cyrl/home>

⁴ https://drive.google.com/drive/folders/16si9aYq1_jhH0xz6t8yiJk1E7BuDM_z2?usp=drive_link

II

Status as pSCI under Natura 2000 and national regulations

Location of SHPP is within the borders of proposed Site of Community importance, pSCI Studenica. This area has been identified in accordance with the obligations of the Republic of Serbia in the process of accession to the European Union, and it makes a significant contribution to maintaining or restoring the favourable conservation status of natural habitat types and species, as well as to the coherence of the European ecological network Natura 2000.

Even regardless of that, the lower course of the Studenica River, constitute particularly valuable watercourse which, together with its' riparian zone and gorge, must be safeguarded/protected in accordance with Articles 4, 6, and 7 of the [Rulebook on the Declaration and Protection of Strictly Protected and Protected Wild Species of Plants, Animals, and Fungi](#) in particular in light of the findings made available to the Complainant on the basis of independent scientific research, including the study conducted by the Institute for Biological Research "Siniša Stanković" and data provided by BirdLife Serbia.

III

Scientific Research and Recent Findings on Biodiversity of lower Studenica and it's gorge

Polekol contracted the Institute for Biological Research "Siniša Stanković" – National Institute for the Republic of Serbia, University of Belgrade (IBISS), for a [study of plant and animal species diversity in the lower course of the Studenica River](#). The research includes a review of available literature and preliminary field investigations.

Contrary to the statements of the Institute for Nature Conservation of Serbia, as set out in the Report of the Ministry of Environmental Protection, No. 002211897 2025 14850 004 007 020 092 of 25 July 2025. regarding potentially endangered species and habitats, scientific data obtained by the Complainants provides evidence of a substantially different factual situation on the ground.

BIRDS:

The Birdlife Serbia database contains extensive records on the bird fauna of the lower Studenica. To date, 102 species have been documented along the river and within a 500-meter radius. Most of these are strictly protected or protected species, predominantly forest birds and those inhabiting mosaic open habitats.

The area concerned encompasses habitats of the strictly protected bird species *Cinclus cinclus* and *Motacilla cinerea*, whose conservation status, in accordance with the provisions of the Birds Directive, must be maintained and further improved in the future period.

The most significant bird species in this ecosystem is the White-throated dipper (*Cinclus cinclus*). Their presence, particularly in large numbers, identifies the Studenica as an aquatic ecosystem of extraordinary importance. Along with the Lopatnica River to the north, the Studenica is one of the last unpolluted and free - flowing waterways in the Ibar basin where Dippers still breed. Studenica currently represents the final refugium for the White-throated Dipper in this region of Serbia.

During winter, White-throated Dippers from the entire Studenica basin congregate in the river's lower course, where foraging is more accessible. Data from winter waterbird censuses conducted in 2020, 2021 and 2026 underscore the vital importance of this river section. The population of the entire Studenica river basin characterized with exceptionally high abundance and figures undocumented elsewhere in Serbian ornithological literature. This makes the Studenica uniquely significant, as it supports over 5% of the national population.⁵

FISH:

The Studenica River rises in south-west Serbia at 1,600 m on Golija Mountain, flows through a gorge with canyon elements, and joins the Ibar River at 340 m. In its upper reaches, fish communities are dominated by *Salmo trutta*, accompanied by *Cottus gobio*, whereas downstream the habitat gradually shifts towards cyprinid waters.

The fish community of the researched stretch reflects a transition between the cold, fast-flowing upper reaches and the warmer, slower-flowing Ibar River. Predominant species are *Barbus balcanicus* and *Alburnoides bipunctatus*, along with *Squalius cephalus*, *Salmo trutta*, *Sabanejewia balcanica* and less numerous *Barbatula barbatula*, *Gobio gobio*, and *Cottus gobio*, indicating high habitat heterogeneity with benthic and pelagic niches. All species recorded are native. According to national legislation, *C. gobio* and *S. balcanica* are strictly protected fish species, while *B. balcanicus*, *A. bipunctatus*, *S. cephalus*, and *S. trutta* are protected. *S. balcanica* and *B. barbatula* were detected for the first time in this sparsely studied area of the Studenica River. Diversity indices indicated a relatively rich and balanced community structure, suggesting stable interactions and favorable habitat conditions. Although, last surveys over the years recorded the decline of the *Salmo trutta* abundance.

The dam would disrupt the natural hydrological regime, fragment habitats, and diminish water quality, resulting in the loss of ecological features characteristic of salmonid waters. Such impacts pose a particular threat to the already declining *Salmo trutta* populations, as well as to other protected aquatic species.⁶

The majority of the recorded species within the Studenica fish community are subject to various levels of protection under the applicable national by-law. The strictly protected species *Cottus gobio* (bullhead) and *Sabanejewia balcanica* (Balkan loach) are listed under the Bern Convention and the Habitats Directive, and require specific habitat conservation measures as well as the designation of specially protected areas.

Barbus balcanicus (stream barbel) is included in Appendix III of the Bern Convention, as well as under the Habitats Directive as a species of Community interest, whose disturbance, disruption of reproduction and migration cycles, taking from the wild, and exploitation entail criminal liability. *Alburnoides bipunctatus* (spirlin) is likewise listed in Appendix III of the Bern Convention as a protected fauna species.

Protected species such as *Salmo trutta* (brown trout), *Squalius cephalus* (chub), and

⁵ https://drive.google.com/file/d/1IEcD-ShvOYJ6rRfz4UzTbMIiKItY7DmP/view?usp=drive_link

⁶ https://drive.google.com/file/d/1vs13p_bi6dJo522fqNCCWzdWMzpGW-Ei/view?usp=drive_link

Barbus balcanicus (stream barbel) have their protection status and regulatory regime governed by legislation in the field of fisheries.

The planned dam, although located outside the designated protection zone, would have a significant impact on the Studenica River, both upstream and downstream of the barrier. Of particular concern is the fact that four-fifths of the Studenica's course is already under protection, while the lower stretch—approximately the final 10 km before its confluence with the Ibar—remains unprotected. The results of the research indicate a justified need for this section of the river to be included within protection measures as well.

Under the applicable national regulations, Studenica River is classified along its entire course as a natural water body of Type IV, i.e. a natural mountain river at elevations above 500 meters, characterized by a coarse rocky substrate. The construction of a dam and the formation of a reservoir would alter the characteristics and values on the basis of which it has been designated for protection, and its status would necessarily have to be reclassified as a heavily modified water body, giving rise to numerous ecological, hydromorphological, and management challenges.⁷

AMPHIBIANS AND REPTILES:

In the studied area of the lower course of the Studenica River during spring of 2026 (despite adverse weather conditions), reptile diversity surveys confirmed the presence of as many as seven reptile species. All six species (the Common Wall Lizard, Balkan Wall Lizard, European Green Lizard, Caspian Whipsnake, Aesculapian Snake, and Horned Viper) are listed in Appendix II of the Bern Convention, meaning they represent a conservation priority for signatory countries, including Serbia. The lower Studenica region is rich in species that constitute key ecosystem elements, and any disruption of their survival could jeopardize the overall functionality of these sensitive ecosystems.

MAMMALS:

There is literature evidence confirming that the area around the lower course of the Studenica River is a part of the home range of both *Canis lupus* and *Ursus arctos*, and that these species actively move through this area. Large carnivore distribution maps for Europe (2017–2022/23) were published by Kaczensky et al. (2024); the associated shapefiles are available and the data can be verified.⁸

Regarding the marbled polecat (*Vormela peregusna*), although this species is primarily associated with open habitats – which are only sparsely represented in the study area – it can also inhabit dry forests, which are present within the studied area. Notably, one specimen of *Vormela peregusna* was recorded near the Studenica Monastery, only a few kilometres from the study site. Unfortunately, we were unable to obtain the photograph on the time.

Regarding bats, they are generally an insufficiently studied group of mammals in Serbia, and species lists are therefore often compiled based on existing data on their known

⁷ <https://polekol.org/en/2025/12/16/dr-canak-atlagic-studenica-is-a-river-of-indigenous-and-protected-species-urgent-protection-of-its-entire-course-is-needed/>

⁸ <https://datadryad.org/dataset/doi:10.5061/dryad.3xsj3txrc#readme>

distribution in Serbia and known habitat preferences. The study area is one of the regions where bat fauna remains poorly studied; consequently, the species list has been prepared using available literature sources.

All the listed species have also been identified by the Institute for Nature Conservation of Serbia in its 2020 Proposal for the protection of Golija Nature Park as species recorded in the wider area of the park. Among these, *Rhinolophus euryale* is most strongly associated with karst habitats. Species such as *Rhinolophus ferrumequinum*, *Myotis emarginatus*, and *Myotis myotis* have also been recorded in Vojvodina, a predominantly lowland region, indicating their broad ecological tolerance and habitat flexibility (Paunović et al., 2020). Individuals of *Rhinolophus hipposideros* are often found in abandoned houses, which are common in the study area. It should be mentioned that the area around the Studenica River also includes several small speleological features, some of which were historically adapted as hermitages for monks. These structures may provide suitable roosting sites for bats.⁹

IV

Scientists call for halting the SHPP project and the protection of the entire course of the Studenica River and its gorge

More than 200 scientists¹⁰, has addressed an open letter and appeal to the competent institutions of Republic of Serbia and City of Kraljevo in which they expressed profound concern and strong opposition to the planned construction of the small hydropower plant (SHPP) "Studenica S4 – Gradina" on the Studenica River, in the City of Kraljevo, and full support to the demands of citizens and their associations—particularly the residents of Ušće—for the suspension of all activities related to the construction of the said SHPP, a prohibition of such construction, and the protection of the entire course of the Studenica River and its gorge.

Studenica, along its course, shapes breathtaking landscapes, where steep gorges, clear waters, and unspoiled mountain scenery create an environment of rare beauty and uniqueness. Its inaccessibility preserved diverse fauna and rich relict and endemic tertiary flora.

The damming of the river and the inundation of part of the Studenica Gorge would cause permanent and irreversible adverse impacts on the Golija Nature Park, Emerald site and UNESCO Biosphere Reserve as well as on lower Studenica - on the overall ecosystems, including a large number of rare, relict, protected, strictly protected, and endemic species of flora and fauna, thereby constituting a unique refuge of global importance.

V

Local communities in action

Citizens of the Studenica region demand the preservation of the Studenica and all watercourses within the administrative territory of the City of Kraljevo

⁹ https://drive.google.com/drive/folders/1wQY2F2sYo0mFQf11A5Di-JIAJ5C4tDSy?usp=drive_link

¹⁰ <https://polekol.org/en/2025/03/27/the-scientific-communitys-appeal-for-the-preservation-of-the-studenica-river-was-supported-by-more-than-200-scientists/>

On 13 April 2025, a citizens' assembly (zbor građana)¹¹ entitled "People's Assembly for the Protection of the Studenica River" was held at the "Studenica" Cultural Centre in Ušće, attended by 215 citizens residing in the territory of the Local Community Ušće, as well as property owners within its area.¹²

The Assembly unanimously adopted the requests and proposals:

1. To delete from the Spatial Plan of the City of Kraljevo all locations designated for small hydropower plants (SHPPs) within the Cultural Landscape of the Studenica River Basin;
2. To URGENTLY suspend all activities related to the construction of the SHPP "Studenica S4 – Gradina";
3. The Assembly of Citizens of the Local Community Ušće supports the Petition for a complete ban on SHPPs within the territory of the City of Kraljevo, submitted in 2021 to the City Assembly and other municipal authorities;

Requests and proposals of the citizens' assembly (zbor građana) were submitted to the City Assembly, city administration - its bodies and departments and to the Ministry of the construction, transport and infrastructure with request that they consider these requests and proposals of the citizens, adopt a position thereon, and make appropriate decisions, and to inform the citizens accordingly.¹³

VI

UNESCO World Heritage site under threat

Polekol, Informal citizens' group Spasimo Studenicu (Save Studenica) Ušće and [Europa Nostra Serbia](#), have submitted [Letter of concern about a threat to a World Heritage site Threats to Studenica World Heritage Property \(C389\)](#) in which we expressed our grave concern regarding the current state and the increasing threats to the natural and cultural heritage of the Studenica River Basin, recognized as a cultural landscape and part of the natural setting of the Monastery of Studenica - a World Heritage property inscribed on the UNESCO World Heritage List in 1986. In which we requested from UNESCO to call upon the Republic of Serbia to ensure the protection and integrity of the cultural landscape of the Studenica River Basin and integrity of the natural heritage, in accordance with the World Heritage Convention, the Statutory Framework of the World Heritage Convention, the Operational Guidelines for the Implementation of the World Heritage Convention, the Convention on Biological Diversity, the Technical Guidelines for Biosphere Reserves, and relevant best practices;

VII

In light of the beforementioned developments, we respectfully urge the Bureau to:

¹¹ Article 67. and 69. Of Law on the local selfgovernment (Official Gazette of the Republic of Serbia, Nos. 129/2007, 83/2014 – as amended by other law, 101/2016 – as amended by other law, 47/2018 and 111/2021 – as amended by other law)

¹² <https://www.krug.rs/odjeci-jednog-zbora-sta-su-sve-porucili-mestani-usca-video/>

¹³ https://drive.google.com/file/d/1zJIG2Y5K9qkukN6fstd5wJFkyF4UJjgq/view?usp=drive_link

- 1) upgrade the status of this case to a "Possible File" under the Bern Convention;
- 2) place the complaint on the agenda of the next Standing Committee meeting;
- 3) engage in coordination with UNESCO and IUCN to explore possibilities for the protection of lower Studenica watercourse, gorge, World Heritage Property (C389) and potential extension of the Golija Nature Park and Golija - Studenica Biosphere Reserve MAB;
- 4) conduct an independent expert assessment within on-the-spot appraisal (fact-finding mission);
- 5) recommend to the State to suspend the project, implement measures for the protection of habitats and species, implement appropriate conservation measures to prevent damage to protected species and habitats and integrity of Golija Nature Park and Golija - Studenica Biosphere Reserve MAB;
- 6) ensure compliance with the Bern Convention and related instruments.

In Belgrade,

30.4.2026.

Legal representative:

Željko Željko



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

Complainants: NGO Polekol, Svetogorska Street No. 37/2, Belgrade, Serbia, and the informal citizens' group "Save Studenica", Ušće

Request for Admission of Additional Evidence After Expiry of Reporting Deadline

Re: Complaint No. 2025/01 – New File (Pending): Alleged Threat to Habitat and Protected Species by the Construction of the Gradina S4 Hydropower Plant on the Studenica River

We respectfully submit this request for the admission of additional evidence after the expiry of the reporting deadline in relation to Complaint No. 2025/01 – New File (Pending): Alleged Threat to Habitat and Protected Species by the Construction of the Gradina S4 Hydropower Plant on the Studenica River.

The enclosed material was obtained only after the expiration of the procedural deadline established for 30 April 2026 in these proceedings pursuant to the Bureau's Decision of 17 November 2025.

The evidence could not reasonably have been submitted earlier because the Complainants received the Report on the State of Biodiversity in Areas of Species and Habitat Conservation Importance in the Lower Course of the Studenica River, issued by the Faculty of Biology, University of Belgrade, only on 19 May 2026, and subsequently required several days to obtain a certified English translation by a sworn court translator.

The newly obtained evidence is directly relevant to the issues currently under examination by the Bureau and materially affects the factual assessment of compliance with obligations arising under the Bern Convention.

In the area for which the data were collected (the lower course of the Studenica River outside the boundaries of the protected area of Golija Nature Park and within the boundaries of the potential Natura 2000 site (pSCI) SRBPEZ146 Studenica), a total of 164 protected taxa under international and national protection regimes, as well as 41 taxa classified as endemic, relict, or rare within the Republic of Serbia, have been recorded.

In addition, the analysed area has been found to contain 22 Natura 2000 habitat types, all of which may, to varying degrees, be exposed to adverse impacts resulting from the construction and operation of the planned SHPP Studenica S4 Gradina, as well as potentially two additional downstream hydropower plants.

These data were obtained through a review of the Database on the Distribution of Species of Conservation Importance maintained by the Biodiversity Information Centre of the Faculty of Biology, University of Belgrade, as well as the database maintained by the Bird Protection and

Study Society of Serbia (BirdLife Serbia).

A detailed presentation of all recorded taxa, classified by taxonomic groups and applicable protection lists, is provided in the enclosed material.

The Complainants respectfully submit that the admission of this evidence is justified by the principles of effectiveness, procedural fairness, and sound administration underpinning the Convention's monitoring mechanism. The evidence is materially relevant and concerns facts central to the assessment of threats to protected habitats and species, thereby bearing directly on the substantive issues already before the Bureau.

Furthermore, the delay was not caused by negligence or procedural abuse, but by circumstances outside the Complainants' control. Consideration of this evidence will assist the Bureau in reaching a complete and accurate assessment of ongoing and potential breaches of the Convention.

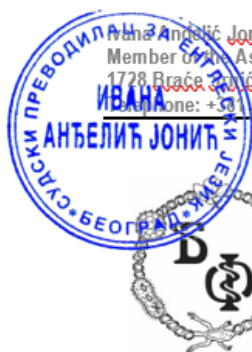
The Complainants further note that the precautionary and preventive objectives of the Bern Convention favour a substantive assessment of newly available environmental information, particularly where such information concerns possible continuing environmental harm or irreversible impacts on protected habitats or species.

Accordingly, the Complainants respectfully request that the Bureau:

1. admit the enclosed evidence into the case-file documentation; and
2. take the enclosed evidence into account during the further examination of the Complaint.

Enclosure:

– Report on the State of Biodiversity in Areas of Species and Habitat Conservation Importance in the Lower Course of the Studenica River, issued by the Faculty of Biology, University of Belgrade, dated 19 May 2026.



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Civil Association Polekol
 Belgrade

Report on the State of Biodiversity in Areas for Which Data on Species and Habitats of Conservation Importance Have Been Requested: Lower Course of the Studenica River

In the area for which the data were requested, a total of 164 protected taxa according to international and national criteria, as well as 41 taxa classified as endemic, relict, or rare within the Republic of Serbia have been recorded. In addition, the analysed area has been found to host 22 Natura 2000 habitat types, which will to some extent be exposed to adverse impacts of the planned activities.

These data were obtained through review of the *Database on the Distribution of Species of Conservation Importance* maintained by the Biodiversity Information Centre of the Faculty of Biology, University of Belgrade, as well as of the database of the Bird Protection and Study Society of Serbia (Birdlife Serbia).

A detailed presentation of all the registered taxa by groups and protection lists is provided below.

(an asterisk (*) in parentheses next to a name indicates taxa whose scientific names have since been changed)

The Habitats Directive

(The Habitats Directive, Council Directive 92/43/EEC) (53)

Mosses: *Buxbaumia viridis*, *Dicranum viride*, *Hamatocaulis vernicosus*, *Sphagnum fallax*, *Sphagnum girgensohnii*, *Sphagnum palustre*, *Sphagnum squarrosum*, *Sphagnum subsecundum*, *Sphagnum teres* **Plants:** *Galanthus nivalis*, *Gentiana lutea* subsp. *symphyandra*, *Lycopodium clavatum* subsp. *clavatum* **Fishes:** *Barbus balcanicus* (**Barbus* spp), *Cottus gobio*

Amphibians: *Bombina variegata*, *Hyla arborea*, *Rana graeca*

Reptiles: *Ablepharus kitaibelii*, *Dolichophis caspius*, *Lacerta viridis*, *Natrix tessellata*, *Podarcis muralis*, *Podarcis tauricus*, *Testudo hermanni*, *Vipera ammodytes*

Mammals: *Canis lupus*, *Ursus arctos*, *Vormela peregusna*

Bats: *Eptesicus serotinus*, *Hypsugo savii*, *Myotis bechsteinii*, *Myotis capaccinii*, *Myotis daubentonii*, *Myotis mystacinus*, *Nyctalus leisleri*, *Nyctalus noctula*, *Pipistrellus nathusii*,

Pipistrellus pipistrellus, *Pipistrellus pygmaeus*

Butterflies and moths: *Euphydryas aurinia* (**Euphydryas* (*Eurodryas*, *Hypodryas*) *aurinia* *), *Euphydryas maturna* (**Hypodryas maturna* **Euphydryas maturna*), *Euplagia quadripunctaria* (**Callimorpha* (*Euplagia*, *Panaxia*) *quadripunctaria* *), *Lycaena dispar*, *Nymphalis vaualbum*, *Polyommatus eros eroides* (**Polyommatus eroides* **Polyommatus eroides*)

Coleoptera: *Lucanus cervus cervus*, *Morimus funereus*, *Rosalia alpina alpina* **Orthoptera:** *Paracaloptenus caloptenoides*, *Pholidoptera transsylvanica* **Crustaceans:** *Astacus astacus*, *Austropotamobius torrentium*



Birds (131)

Bird Directive Anex I – 31

(The Bird Directive, Council Directive 79/409/EEC)

Bern Convention Appendix II – 100

(Bern Convention, Convention on the Conservation of European Wildlife and Natural Habitats)

***Strictly protected species - 118**

***Protected species - 13**

(*Regulation on the Designation and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi (Official Gazette of the Republic of Serbia, Nos. 5/2010, 47/2011, 32/2016 and 98/2016))

Accipiter gentilis, *Accipiter nisus*, *Actitis hypoleucos*, *Aegithalos caudatus*, *Aegolius funereus*, *Aegypius monachus*, *Alauda arvensis*, *Alcedo atthis*, *Alectoris graeca*, *Anthus campestris*, *Anthus pratensis*, *Anthus spinoletta*, *Anthus trivialis*, *Apus apus*, *Aquila chrysaetos*, *Asio otus*, *Bonasa bonasia*, *Buteo buteo*, *Buteo rufinus*, *Caprimulgus europaeus*, *Carduelis cannabina*, *Carduelis carduelis*, *Carduelis spinus*, *Certhia brachydactyla*, *Certhia familiaris*, *Chloris chloris*, *Ciconia ciconia*, *Ciconia nigra*, *Cinclus cinclus*, *Circus gallicus*, *Circus aeruginosus*, *Circus macrourus*, *Coccothraustes coccothraustes*, *Columba oenas*, *Columba palumbus*, *Corvus corax*, *Corvus cornix*, *Crex crex*, *Cuculus canorus*, *Delichon urbica*, *Dendrocopos leucotos*, *Dendrocopos major*, *Dendrocopos medius*, *Dendrocopos minor*, *Dryocopus martius*, *Emberiza calandra*, *Emberiza cia*, *Emberiza cirrus*, *Emberiza citrinella*, *Emberiza hortulana*, *Emberiza melanocephala*, *Eremophila alpestris*, *Erithacus rubecula*, *Falco peregrinus*, *Falco subbuteo*, *Falco tinnunculus*, *Ficedula albicollis*, *Fringilla coelebs*, *Galerida cristata*, *Garrulus glandarius*, *Gyps fulvus*, *Haliaeetus albicilla*, *Hieraaetus pennatus*, *Hirundo daurica*, *Hirundo rustica*, *Jynx torquilla*, *Lanius collurio*, *Lanius excubitor*, *Loxia curvirostra*, *Lullula arborea*, *Luscinia megarhynchos*, *Mergus merganser*, *Merops apiaster*, *Monticola saxatilis*, *Motacilla alba*, *Motacilla cinerea*, *Motacilla flava*, *Muscicapa striata*, *Neophron percnopterus*, *Nucifraga caryocatactes*, *Nycticorax nycticorax*, *Oenanthe oenanthe*, *Oriolus oriolus*, *Otus scops*, *Parus ater*, *Parus caeruleus*, *Parus cristatus*, *Parus lugubris*, *Parus major*, *Parus montanus*, *Parus palustris*, *Passer domesticus*, *Passer montanus*, *Perdix perdix*, *Pernis apivorus*, *Phoenicurus ochruros*, *Phoenicurus phoenicurus*, *Phylloscopus collybita*, *Phylloscopus*

sibilatrix, Pica pica, Picus canus, Picus viridis, Prunella modularis, Ptyonoprogne rupestris, Pyrrhula pyrrhula, Regulus ignicapillus, Regulus regulus, Riparia riparia, Saxicola rubetra, Saxicola rubicola, Scolopax rusticola, Serinus serinus, Sitta europaea, Streptopelia decaocto, Streptopelia turtur, Strix aluco, Strix uralensis, Sturnus vulgaris, Sylvia atricapilla, Sylvia communis, Sylvia curruca, Tachybaptus ruficollis, Tichodroma muraria, Troglodytes troglodytes, Turdus merula, Turdus philomelos, Turdus pilaris, Turdus torquatus, Turdus viscivorus, Upupa epops.

Bern Convention

(Bern Convention, Convention on the Conservation of European Wildlife and Natural Habitats) (51)

Mosses: *Buxbaumia viridis, Dicranum viride, Hamatocaulis vernicosus*

Fishes: *Alburnoides bipunctatus, Barbus balcanicus (*Barbus meridionalis), Chondrostoma nasus, Cottus gobio*

Amphibians: *Bombina variegata, Bufo bufo, Hyla arborea, Rana graeca, Salamandra salamandra* **Reptiles:** *Ablepharus kitaibelii, Anguis fragilis, Dolichophis caspius, Lacerta viridis, Natrix natrix, Natrix tessellata, Podarcis muralis, Podarcis tauricus, Testudo hermanni, Vipera ammodytes*

Mammals: *Canis lupus, Meles meles, Ursus arctos, Vormela peregusna*



Bats: *Eptesicus serotinus, Hypsugo savii, Myotis bechsteinii, Myotis capaccinii, Myotis daubentonii, Myotis mystacinus, Nyctalus leisleri, Nyctalus noctula, Pipistrellus nathusii, Pipistrellus pipistrellus, Pipistrellus pygmaeus*

Butterflies and moths: *Euphydryas aurinia (*Euphydryas (Eurodryas, Hypodryas) aurinia *), Euphydryas maturna (*Hypodryas maturna *Euphydryas maturna), Euplagia quadripunctaria (* Callimorpha (Euplagia, Panaxia) quadripunctaria *), Lycaena dispar, Nymphalis vaualbum, Polyommatus eros eroides (*Polyommatus eroides * Polyommatus eroides)*

Coleoptera: *Lucanus cervus cervus, Morimus funereus, Rosalia alpina alpina* **Orthoptera:** *Paracaloptenus caloptenoides, Pholidoptera transsylvanica* **Crustaceans:** *Astacus astacus, Austropotamobius torrentium*

Regulation on the Designation and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi (Official Gazette of the Republic of Serbia, Nos. 5/2010, 47/2011, 32/2016 and 98/2016)

Strictly protected species

(Annex 1.) (53) Mosses:

Buxbaumia viridis

Plants: *Gentiana acaulis, Phegopteris connectilis*

Fishes: *Cottus gobio*

Amphibians: *Bombina variegata, Bufo bufo, Hyla arborea, Rana graeca, Rana dalmatina, Salamandra salamandra*

Reptiles: *Ablepharus kitaibelii*, *Dolichophis caspius*, *Natrix natrix*, *Natrix tessellata*, *Podarcis tauricus*

Mammals: *Canis lupus*, *Ursus arctos*, *Vormela peregusna*

Bats: *Eptesicus serotinus*, *Hypsugo savii*, *Myotis bechsteinii*, *Myotis capaccinii*, *Myotis daubentonii*, *Myotis mystacinus*, *Nyctalus leisleri*, *Nyctalus noctula*, *Pipistrellus nathusii*, *Pipistrellus pipistrellus*, *Pipistrellus pygmaeus*

Other invertebrates: *Lithax niger*, *Protonemura praecox*, *Taeniopteryx nebulosa*, *Thremma anomalum* **Butterflies and moths:** *Apatura iris*, *Argynnis pandora* (**Argynnis (Pandoriana) pandora*), *Boloria titania* (**Boloria (Clossiana) titania*), *Coenonympha orientalis* (**Coenonympha gardetta*), *Euphydryas maturna* (**Hypodryas maturna* **Euphydryas maturna*), *Lycaena dispar*, *Nymphalis vaualbum*, *Papilio machaon*, *Plebejus argyrognomon* (**Plebeius (Plebeius) argyrognomon*), *Polyommatus eros eroides* (**Polyommatus eroides* * *Polyommatus eroides*), *Satyrium acaciae*, *Satyrus ferula*

Coleoptera: *Carabus curtulus*, *Carabus ulrichii pernix*, *Carabus violaceus scordiscus*, *Lucanus cervus cervus*, *Morimus funereus*, *Rosalia alpina alpina*

Orthoptera: *Pholidoptera transsylvanica*

Crustaceans: *Astacus astacus*, *Austropotamobius torrentium*

Regulation on the Designation and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi (Official Gazette of the Republic of Serbia, Nos. 5/2010, 47/2011, 32/2016 and 98/2016)

Protected species (Annex 2.) (35)

Plants: *Asarum europaeum* subsp. *europaeum*, *Athyrium filix-femina*, *Cephalanthera damasonium*, *Colchicum autumnale*, *Daphne blagayana*, *Galanthus nivalis*, *Gentiana asclepiadea*, *Helleborus serbicus*, *Lilium martagon*, *Orchis simia* subsp. *simia*, *Orchis tridentata*, *Primula veris* subsp. *veris*, *Pulmonaria officinalis*, *Teucrium chamaedrys* subsp. *chamaedrys*, *Vaccinium myrtillus*

Fishes: *Alburnoides bipunctatus*, *Barbus balcanicus* (**Barbus meridionalis*, **Barbus peloponnesius*), *Chondrostoma nasus*, *Salmo trutta*, *Squalius cephalus*

Reptiles: *Testudo hermanni*, *Vipera ammodytes*

Mammals: *Canis lupus*, *Meles meles*, *Vulpes vulpes*

Other invertebrates: *Amphinemura sulcicollis*, *Brachyptera seticornis*, *Cheilosia grisella*, *Perlodes microcephalus*

Coleoptera: *Monochamus saltuarius*, *Xylosteus*

spinolae rufiventris **Orthoptera:** *Pholidoptera*

aptera karnyi, *Saga campbelli campbelli*

Odonata: *Leucorrhinia dubia*

Endemic, relict and rare species not subject to protection and not listed internationally, but of exceptional importance for the survival of species within the territory of the Republic of Serbia (41)

Mosses: *Cynodontium polycarpon*, *Dicranum viride*, *Hamatocaulis vernicosus*, *Straminergon stramineum*

Plants: *Carex humilis*

Bats: *Pipistrellus pygmaeus*



Other invertebrata: *Cheilosia grisella*, *Platycheirus melanopsis*, *Propappus volki*
Butterflies and moths: *Boloria titania* (**Boloria (Clossiana) titania*),
Coenonympha orientalis (**Coenonympha gardetta*), *Polyommatus dorylas*,
Polyommatus eros eroides (**Polyommatus eroides* * *Polyommatus eroides*)
Coleoptera: *Carabus convexus gracilior*, *Carabus coriaceus hopffgarteni*, *Carabus curtulus*, *Carabus ulrichii pernix*, *Carabus violaceus scordiscus*, *Molorchus minor minor*, *Monochamus saltuarius*, *Necydalis major*, *Obrium brunneum*, *Pidonia lurida*,
Purpuricenus globulicollis globulicollis
Orthoptera: *Paracaloptenus caloptenoides*, *Pholidoptera aptera karnyi*,
Pholidoptera transsylvanica, *Poecilimon pseudornatus*, *Saga campbelli campbelli*
Odonata: *Aeshna juncea*, *Coenagrion hastulatum*, *Coenagrion scitulum*, *Leucorrhinia dubia*

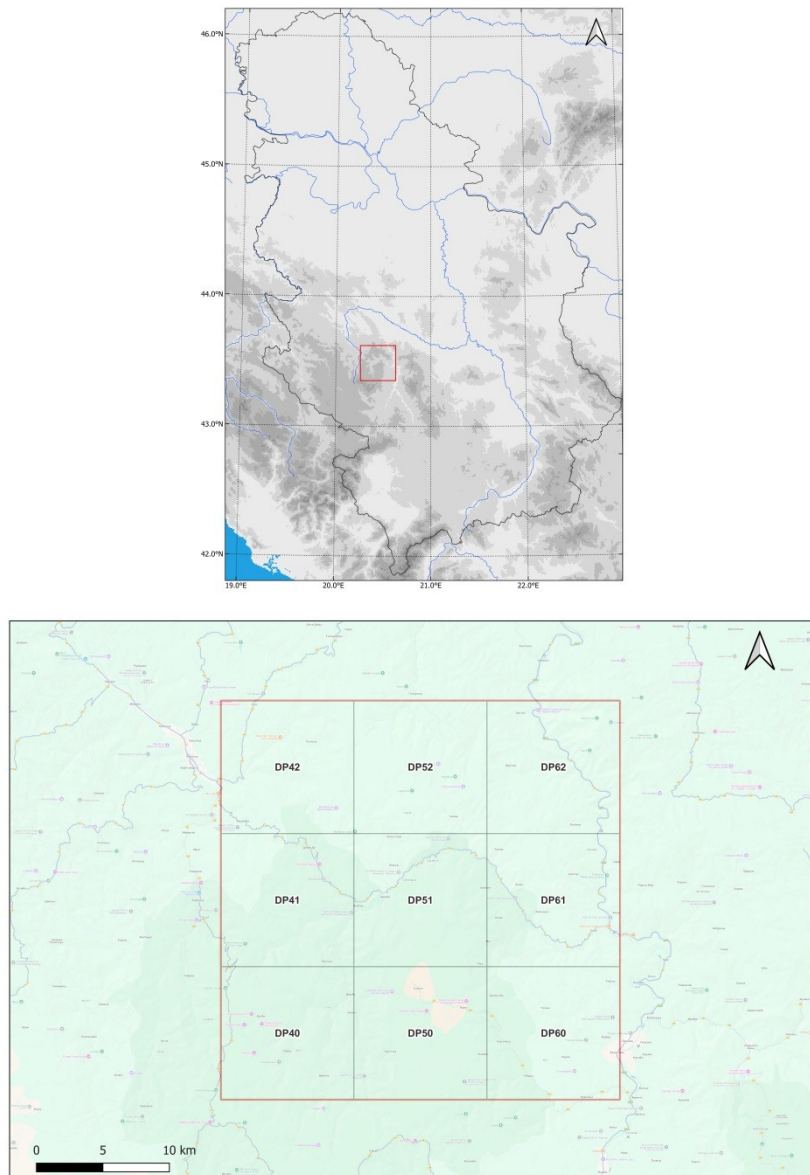
The Habitats Directive (Natura 2000) – Overview of Habitat Types (international legislation)

4060 Alpine and Boreal heaths
 6170 Alpine and subalpine calcareous grasslands
 62A0 Eastern sub-Mediterranean dry grasslands (*Scorzoneratalia villosae*)
 62F0 Dry Balkan steppe-like serpentine rocky grasslands (*Halacsyetalia sendtneri*)
 *6210 Semi-natural dry calcareous grasslands and scrubland facies (*Festuco-Brometalia*)
 (*important orchid sites)
 *6230 Species-rich *Nardus* grasslands (*Nardus stricta*) on siliceous substrates of mountain areas (and submontane areas of continental Europe)
 6510 Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*) 6520 Mountain hay meadows
 7140 Transition mires and quaking bogs
 7220 Petrifying springs with tufa formation
 (Cratoneurion) 7230 Alkaline fens
 8140 Eastern Mediterranean screes
 *8160 Medio-European calcareous scree of hill and montane levels 8310 Caves not open to the public
 9110 Luzulo-Fagetum beech forests
 *9180 *Tilio-Acerion* forests of slopes, screes and ravines
 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)
 91L0 Illyrian oak-hornbeam forests (*Quercus petraea*, *Carpinus betulus*) 91M0 Pannonian-Balkan oak forests (*Quercus cerris*, *Quercus petraea*) 91W0 Moesian beech forests
 9410 Acidophilous *Picea* forests of the montane to alpine levels (*Vaccinio-Piceetea*)
 *9530 (Sub-)Mediterranean pine forests of endemic black pines

Annex 1

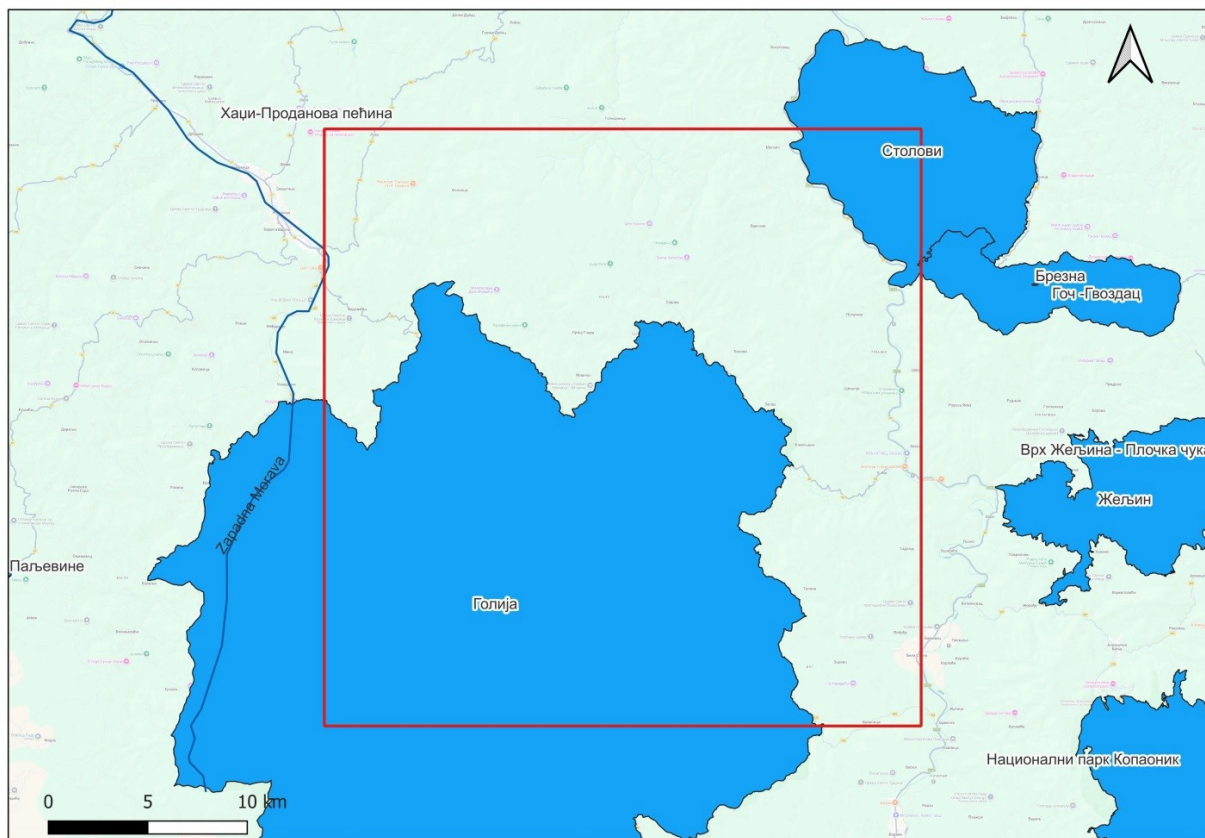
The report has been prepared for an area covering 9 MGRS (UTM) grid squares of 10 × 10 km (DP40-DP4269- DP60-DP6210).



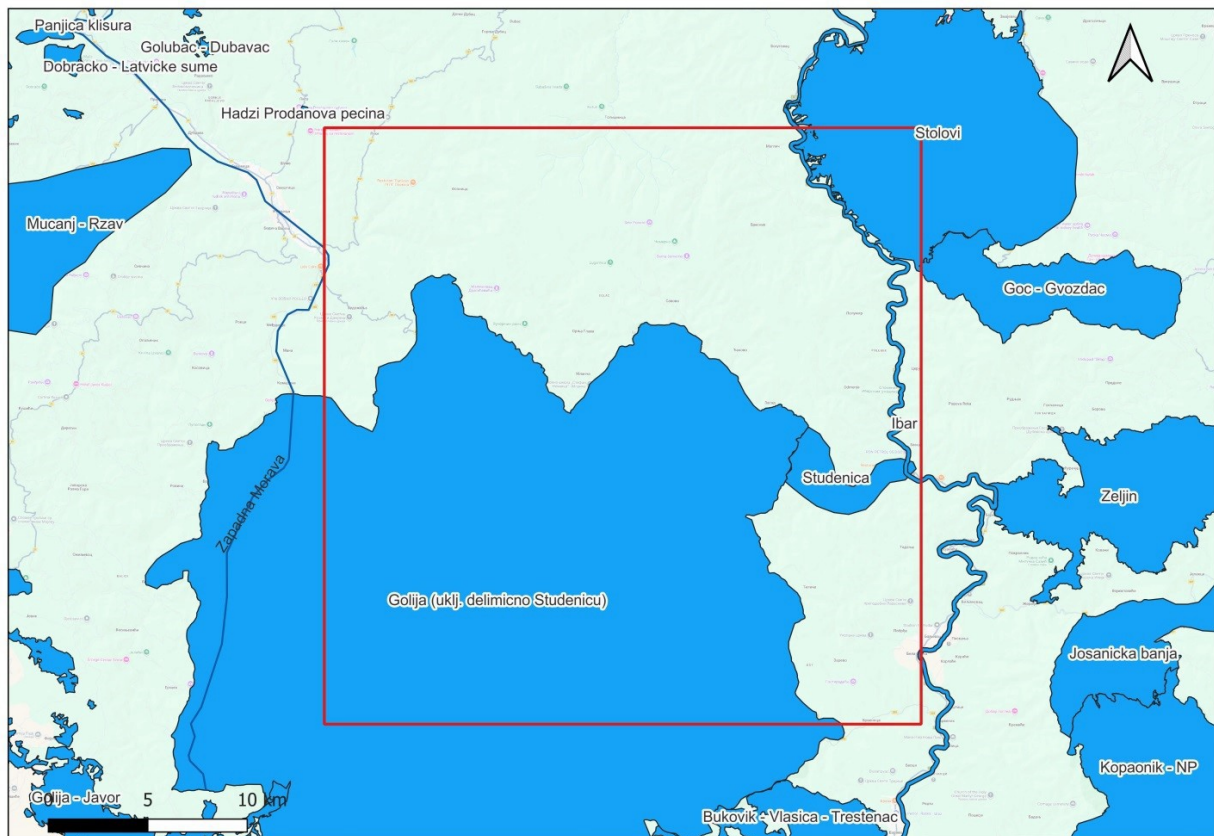


The boundaries of the area concerned of 9 MGRS (UTM) grid squares of 10×10 km (DP40- DP4269-DP60-DP6210), to which the report on data concerning registered species of conservation importance refers, are indicated by the red rectangular frame.

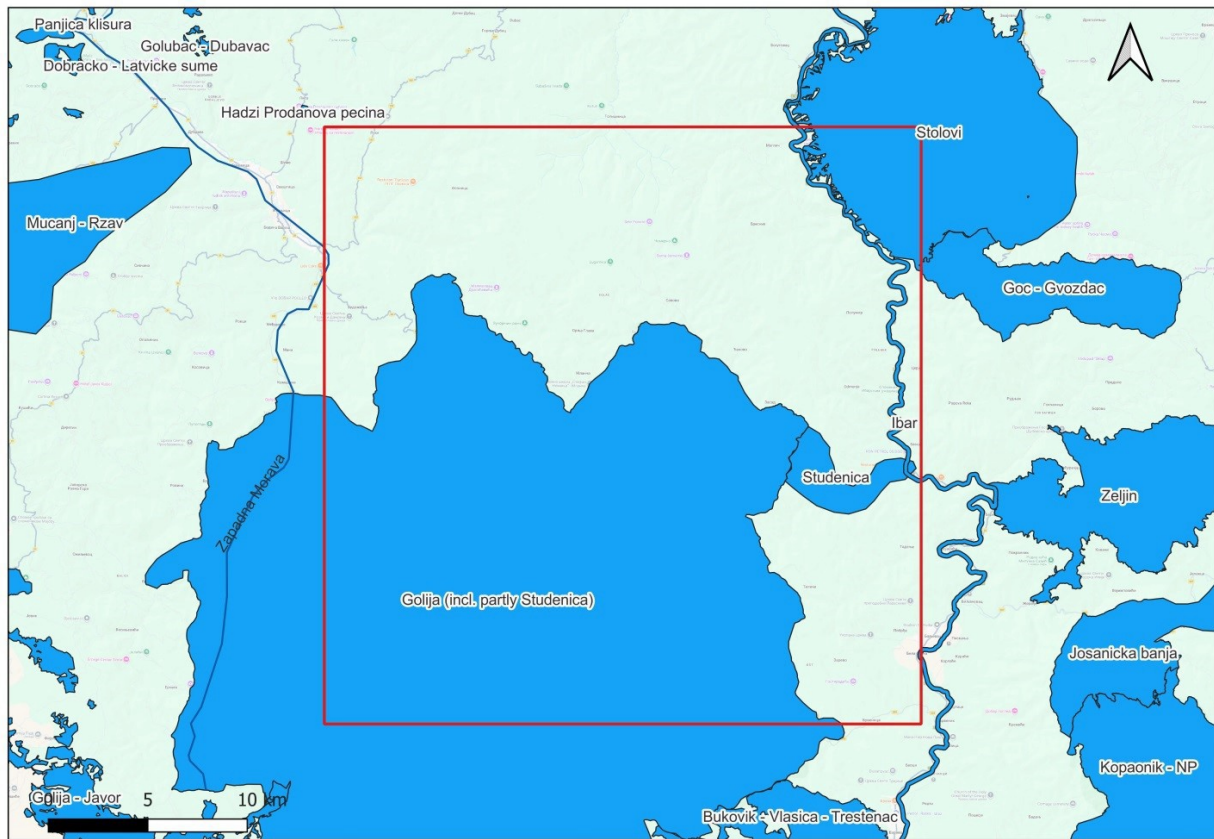
Annex 2. Boundaries of protected sites. The following protected sites are located within the boundaries of the area concerned: Golija Nature Park, Stolovi Area of Outstanding Natural Beauty.



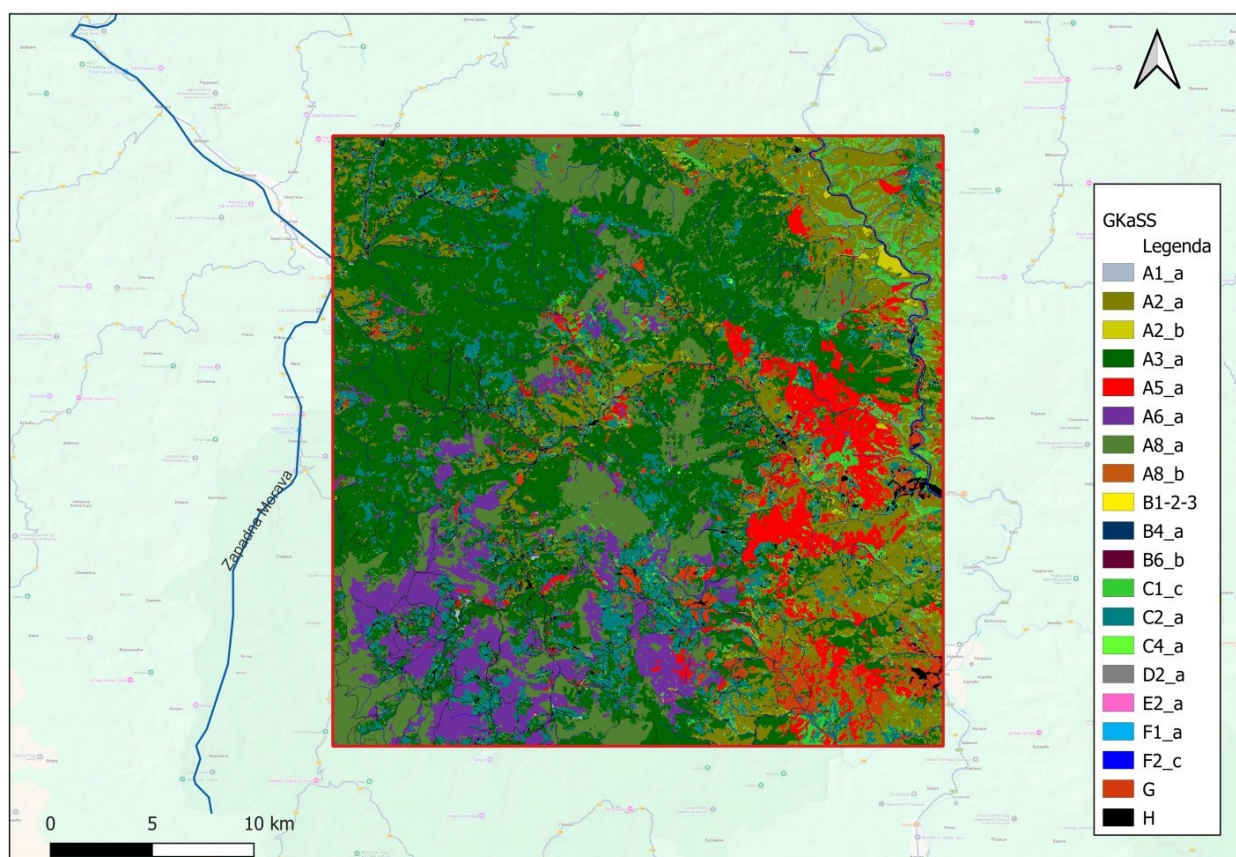
Annex 3. Boundaries of the Indicative Ecological Network of Serbia (IEMS-2023). SRBPEZ031 Goč - Gvozdac, SRBPEZ032 Golija, SRBPEZ186 Ibar, SRBPEZ144 Stolovi, SRBPEZ146 Studenica.



Annex 4. Boundaries of the Potential Natura 2000 Sites (pSCI). The following sites are located within the boundaries of the area concerned: SRBPEZ073 Goč - Gvozdac, SRBPEZ078 Golija (incl. partly Studenica), SRBPEZ092 Ibar, SRBPEZ267 Stolovi, SRBPEZ269 Studenica.

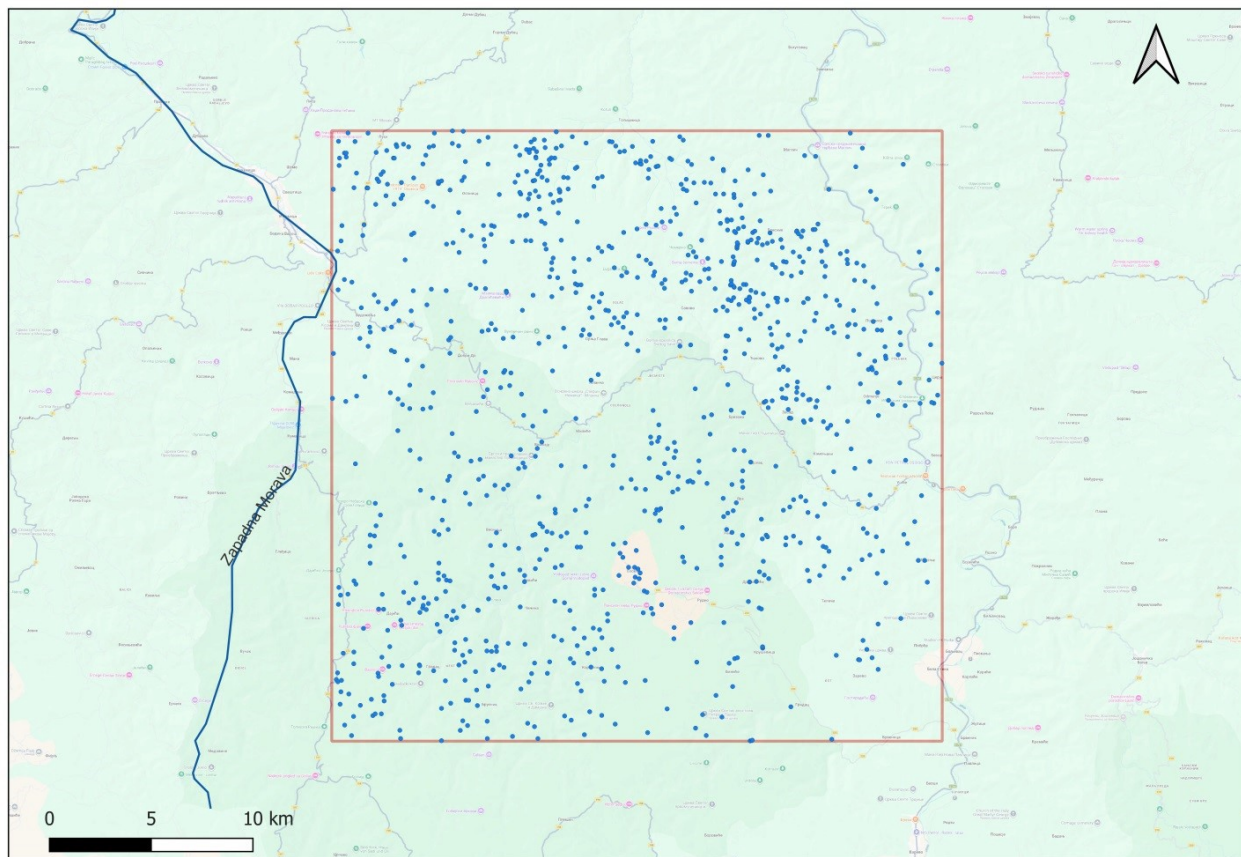


Annex 5. Map of main habitat types within the boundaries of the area concerned (source: Lakušić, D., Kuzmanović, N., Kovačević, J., 2021. Generalized habitat map of Serbia (GKaSS-02) [Generalizovana karta staništa Srbije] - Map legend, Version 2. Biodiversity Information Centre, University of Belgrade, Faculty of Biology, Geomatics Company MapSoft d.o.o. Belgrade)

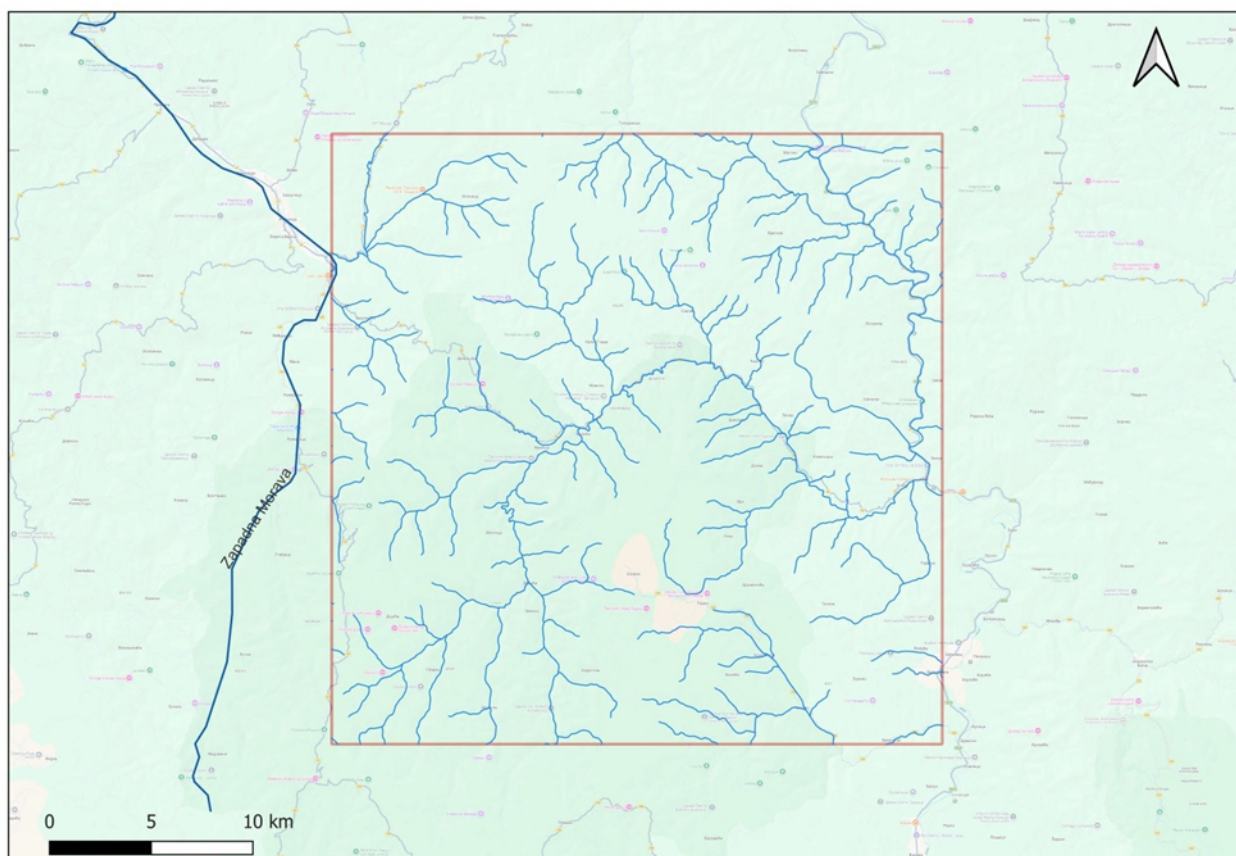


Legend: A1_a Riparian Willow and Poplar Forests (49.24 ha), A2_a Xerophilous Oak Forests (14355.36 ha), A2_b Xerophilous Hornbeam Forests (*Ostrya carpinifolia* and *Carpinus orientalis*) (230.96 ha), A3_a Mesophilous Beech Forests (33045.36 ha), A5_a Thermophilous Coniferous Forests (5262.36 ha), A6_a Cold- Adapted Coniferous Forests (6905.36 ha), A8_a Mixed Deciduous Forests with Spruce and Fir (11631.24 ha), A8_b Mixed Deciduous Forests with Pine (9.04 ha), B1-2-3 Broadleaf Hygrophilous, Xerophilous and Mesophilous Shrubs (886.56 ha), B4_a Alpine Heaths (1.12 ha), B6_b Creeping Juniper Scrubs (0.44 ha), C1_c Central Balkan Rocky Grasslands (2530.32 ha), C2_a Mesic To Wet Grasslands (8963.2 ha), C4_a Alpine and Sub-Alpine Grasslands (10.48 ha), D2_a Rocks and Scree (587.72 ha), E2_a Mires (0.28 ha), F1_a Inland Surface Standing Waters (4.92 ha), F2_c Inland Surface Running Waters (1062.44 ha), G Agricultural Habitats (2231.96 ha), H Constructed, Industrial and Other Artificial Habitats (2171.32 ha)

Annex 6. Map of spring habitats (F2_a) within the boundaries of the area concerned 70 x 50 km (source: Lakušić, D., Kuzmanović, N., Kovačević, J., 2021. Generalized habitat map of Serbia (GKaSS-02) [Generalizovana karta staništa Srbije] – Map legend, Version 2. Biodiversity Information Centre, University of Belgrade, Faculty of Biology, Geomatics Company MapSoft d.o.o. Belgrade)



Annex 7. Map of running water habitats (F2_c) within the boundaries of the area concerned 70 x 50 km (izvor: EU-Hydro River Network Database, European Environment Agency (EEA); “Hydrography of Europe”, Downloaded from <http://tapiquen-sig.jimdo.com>, Based on shapes from Environmental Systems Research Institute (ESRI), free distribution)



Cartographic annexes prepared by: Dr Dmtar Lakušić, Professor, University of Belgrade - Faculty of Biology and **Dr Nevena Kuzmanović**, Research Adviser, University of Belgrade - Faculty of Biology

In Belgrade, 19 May 2026

Coordinator:

(Signed)

Dr Imre Krizmanić

University of Belgrade - Faculty of Biology

Contributors:

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University of Belgrade - Faculty of Biology

Dr Nevena Kuzmanović, Research Adviser

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University of Belgrade - Faculty of Biology

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University of Belgrade - Faculty of Biology



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