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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

22-24 September 2026

Strasbourg

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)

- GOVERNMENT REPORT -

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



Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION
No.: 003384537 2026 14850 004 000 020 092
Date: 14 August 2026
Belgrade

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

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

Dear Ms Siino,

With regard to the request from the Secretariat of the Bern Convention dated 15 July 2026 concerning Complaint No. 2025/01: New Complaint (Pending): Alleged threat to habitat and protected species by the construction of Gradina S4 hydropower plant on the Studenica River, the Ministry of Environmental Protection, in its capacity as the competent authority monitoring the implementation of the Bern Convention for the Republic of Serbia, submitted Request No. 003384537 2026 14850 004 000 020 092 dated 17 July 2026 for a statement to the competent authorities and organizations, namely: the Ministry of Construction, Transport and Infrastructure, the Ministry of Agriculture, Forestry and Water Management - the Republic Water Directorate, the Agency for Spatial and Urban Planning of the Republic of Serbia, the Institute for Nature Conservation of Serbia, including the relevant sectors of the Ministry of Environmental Protection.

Based on the statements received from the aforementioned authorities and organizations regarding the Complaint concerning the alleged threat to the habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River, we hereby inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure stated that, within the scope of its competence in the field of spatial planning, no new information is available.

2. The Ministry of Agriculture, Forestry and Water Management – the Republic Water Directorate stated that it has not issued any water acts for the construction of the “Studenica S4 – Gradina” small hydropower plant on the Studenica River.

3. The Agency for Spatial and Urban Planning of the Republic of Serbia stated that it does not have insight into the subsequent process for issuing approvals for the construction of the referenced small hydropower plant.

With regard to the graphic data, these were submitted solely in DWG format for the purpose of confirming the Urban Planning Project for the construction of the “STUDENICA S4 – GRADINA” SMALL HYDROPOWER PLANT (SHP) on the Studenica River, and are available at the following link:

https://razmena.appurs.gov.rs/uploads/2026/04/36_UP_MHE_Studenica.zip

4. The Institute for Nature Conservation of Serbia (hereinafter: the Institute) reported that it has no information as to whether the competent authority for this project has determined the requirement for an environmental impact assessment procedure or a screening procedure.

At the request of the Bureau, the Institute provides data on the planned hydropower project in SHP format (shape-file), as well as data on protected areas in the Republic of Serbia also in SHP format, including those holding international protection status.

The Institute further reports that a Decision on Nature Protection Requirements, Ref. 03 No. 021-4391/2 of 6 February 2026, was issued, by which the request of the Ministry of Construction, Transport and Infrastructure for the issuance of nature protection requirements for the preparation of location conditions for the construction of the small hydropower plant “Studenica S4- Gradina” was rejected. The Applicant submitted an appeal against the aforementioned decision to the Institute for Nature Conservation of Serbia, Ref. 03 No. 021-3589/8 of 24 February 2026, within the statutory deadline, and the complaint is currently under consideration.

With regard to the clarification of discrepancies between the list of species indicated in the Standard Data Form (SDF) for the Emerald site Golija and the list submitted by the Complainant, the Institute reports that the area planned for the construction of the small hydropower plant “Studenica S4- Gradina” is not located within the Emerald site “Golija”. The Institute for Nature Conservation of Serbia has no information on the list of species submitted by the Complainant.

5. The Ministry of Environmental Protection stated that, the project developer has not submitted a request to decide on the need for an environmental impact assessment for the construction project of the small hydroelectric power plant "Gradina S4" on the Studenica River.

Please find enclosed copies of the aforementioned documents translated into English.

We look forward to your response, and we thank the Bureau in advance for its highest consideration of this report.

Sincerely,

STATE SECRETARY

Dragana Ostojic

Annex I

Republic of Serbia

INSTITUTE FOR NATURE CONSERVATION OF SERBIA

Novi Beograd, 35 Japanska Street

Phone: +381 11/2093-802; 2093-803

Pursuant to Articles 9,74 and 130 of the Law on Nature Protection ("Official Gazette of the Republic of Serbia", Nos. 36/09, 88/10, 91/10 - corrigendum, 14/16, 95/18 - other law and 71/21), Standalone Article 36 of the Law on Amendments to the Law on Nature Protection ("Official Gazette of the Republic of Serbia", No. 71/21), and Article 136 of the Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia", Nos. 18/16, 95/18 – authentic interpretation, and 2/23 – CC), and acting upon the request of the Ministry of Construction, Transport and Infrastructure of the Republic of Serbia, 22-26 Nemanjina Street, Belgrade (ROP-MSGI-31797-LOCH-2-HPAP-8/2025), for the issuance of nature protection conditions required for the preparation of the location conditions for the construction of the "Studenica S4 – Gradina" small hydropower plant (SHP) – a dam and a powerhouse, the Institute for Nature Conservation of Serbia, on 6 February 2026, under reference number 03 No. 021-4391/2, hereby issues the following

DECISION

1. The request of the Ministry of Construction, Transport and Infrastructure, no. 22-26 Nemanjina Street, City of Belgrade, for the issuance of nature protection conditions required for the development of location conditions for the construction of the "Studenica S4 – Gradina" small hydropower plant – a dam and a powerhouse IS HEREBY REJECTED.
2. The fee for issuing the expert opinion for the issuance of an act on nature protection conditions, in the amount of RSD 34,210.00, has been determined in accordance with the Law on Republic Administrative Fees ("Official Gazette of the Republic of Serbia", Nos. 43/03, 51/03 – corrigendum, 61/05, 101/05 – other law, 5/09, 54/09, 50/11, 93/12, 65/13 – other law, 83/15, 112/15, 113/17, 3/18 – corrigendum, 95/18, 86/19, 90/19 – corrigendum, 144/20, 138/22, 92/23 and 94/24), and the Harmonized Dinar Amounts of the Republic Administrative Fee Tariff ("Official Gazette of the Republic of Serbia", 55/25) - Tariff item 186a; paragraph 2, item 3), sub-item (1).

Statement of Reasons

The competent authority - the Ministry of Construction, Transport and Infrastructure - submitted the request Ref. 03 No. 021-4391/1 of 12 November 2025 to the Institute for Nature Conservation of Serbia for the issuance of nature protection conditions required for the development of location conditions for the construction of the "Studenica S4 – Gradina" small hydropower plant. The request for the issuance of location conditions for the aforementioned construction project was submitted to the Ministry of Construction, Transport and Infrastructure by "Hiro-Min" Ltd, 21b Nikole Tesle Street, 32000 Čačak.

The “Studenica S4 – Gradina” Conceptual Design no. IDR-02/25-0, Volume-0, Main Volume, developed in August 2025 by the designer Zoran Bogdanović, BSc in Civil Engineering, license no. 314 601 07, was submitted together with the request.

Following a review of the submitted request and the accompanying documentation provided by the applicant, it was established that the Conceptual Design envisages the construction of the “Studenica S4 – Gradina” small hydropower plant (SHP) on the Studenica River, in the wider area of Ušće residential area, City of Kraljevo. The dam is planned to be located at barrier site S4, with a maximum structural height of 28 metres, and is envisaged to consist of the spillway section of the dam (spillway crest and stilling basin), the powerhouse, the right non-overflow section of the dam with a fish pass, and the left non-overflow section of the dam. At mean water levels, the reservoir would extend to a length of 1,400 meters. The hydropower plant is of the dam type. The powerhouse is planned to be situated along the left river bank.

To enable fish fauna migration in both directions, a fish pass is planned consisting of 90 chambers of identical interior size, measuring 1.20×1.50 m. The specified number of chambers is required to overcome the elevation difference of approximately 18 m between the upstream and downstream water levels. Structurally, the fish pass forms an integral part of the right non-overflow dam section, and is planned to be constructed as a box-type recess filled with stone. The chambers would be separated by partitions incorporating submerged bottom openings measuring 25×25 cm. The longitudinal slope of each chamber is 12.5%. The minimum water depth in each chamber is 0.60 m. For inspection, cleaning and maintenance purposes during operation, a manually operated slide gate is planned at the entrance section of the fish pass.

Upon review of the Central Register of Protected Natural Assets and the documentation of the Nature Conservation Institute of Serbia, and in accordance with the regulations governing nature protection, it has been established that the location proposed for construction is not situated within a protected area for which protection proceedings has been conducted or initiated, nor does it fall within the boundaries of an ecologically significant area of the Ecological Network of the Republic of Serbia, as defined by the Decree on the Ecological Network (“Official Gazette of the RS”, no. 102/10). However, the Studenica River has a direct functional connection to the protected area of the “Golija” Nature Park, pursuant to the Decree on the Designation of the “Golija” Nature Park (“Official Gazette of the Republic of Serbia”, no. 88/24), and forms part of the wider area internationally recognized as the UNESCO MAB “Golija–Studenica” Biosphere Reserve.

Although a small hydropower plant has already been constructed on the Studenica River, the watercourse has largely been preserved in a natural and semi-natural state, particularly in its lower reaches. For this reason, the Studenica River, together with its riparian zone and surrounding landscape elements, has been recognized as an ecological corridor of local importance in accordance with Article 4, paragraph 4 of the Decree on the Ecological Network (“Official Gazette of the RS”, No. 102/10).

The Studenica River is home to strictly protected wild fish species: European bullhead (*Cottus gobio*) and Balkan spined/golden loach (*Sabanejewia balcanica*), as well

as to protected wild fish species: Danube gudgeon (*Gobio obtusirostris*), schneider (*Alburnoides bipunctatus*), chub (*Squalius cephalus*), Danube barbel (*Barbus balcanicus*), and brown trout (*Salmo trutta*), in accordance with Annexes 1 and 2 to the Rulebook on Declaration and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi ("Official Gazette of the Republic of Serbia", Nos. 5/10, 47/11, 32/16 and 98/16).

The construction of the "Studenica S4 – Gradina" small hydropower plant would significantly alter the hydromorphological features of the Studenica River over a wide area by slowing the water flow and substantially changing water depth. This would deteriorate the river's physical, chemical, and hydrodynamic parameters, leading to permanent disruptions to all aquatic habitats. Furthermore, disrupting the natural alternation of fast and slow flows, as well as shallow and deep sections, would permanently destroy the environments of fish and other aquatic organisms. Ultimately, this would cause irreversible changes to the ecosystems of animal species specifically adapted to river sections with lower water temperatures and higher oxygen concentrations.

Within the area concerned, four species of strictly protected wild amphibians have been recorded: the fire salamander (*Salamandra salamandra*), Greek frog (*Rana graeca*), yellow-bellied toad (*Bombina variegata*), and two reptile species: the grass snake (*Natrix natrix*) and the Caspian whipsnake (*Dolichophis caspius*), as well as one protected wild species: marsh frog (*Pelophylax ridibundus*), in accordance with Annexes 1 and 2 to the Rulebook on Declaration and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi. The recorded reptile species – the European green lizard (*Lacerta viridis*) and the wall lizard (*Podarcis muralis*) are of international significance.

The construction of small hydropower plants has adverse effects on wild amphibian and reptile species that spend their entire life cycle in the local aquatic environment (such as the Greek frog), as well as on terrestrial species to which flowing-water habitats or proximity to such hilly and mountainous aquatic habitats are essential for survival, reproduction and offspring development. The destruction of sites where amphibians and reptiles reproduce and develop, as well as sites that serve as sources of their food, would result in reduction in the size of local populations. As a result of the loss of individuals, populations would become more vulnerable to the adverse effects of fluctuations in environmental factors (temperature, humidity and other), which would further exacerbate the decline in population abundance and consequently lead to the local extinction of species. The amphibian species recorded in the field: the fire salamander, Greek frog and yellow-bellied toad lay their eggs in slower-flowing sections of the river. In addition, the survival of reptile species associated with aquatic habitats requires a certain degree of humidity, which is maintained by spraying flowing water.

A significant number of the species listed are covered by Resolution No. 6 of the Bern Convention (Law on the Ratification of the Convention on the Conservation of European Wildlife and Natural Habitats ("Official Gazette of the Federal Republic of Yugoslavia, International Treaties", no. 11/01)), and/or by Annexes II and IV to the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and

Flora), thereby requiring a strict precautionary approach and avoidance of interventions that may result in permanent deterioration of habitats or populations.

The area concerned is located within the proposed Site of Community Importance (pSCI) "Studenica" of the Natura 2000 ecological network, in accordance with European Union legislation - the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. This area has been identified in accordance with the obligations of the Republic of Serbia in the European Union accession process, and it makes a significant contribution to the maintenance or restoration of the favourable conservation status of natural habitat types and/or species, as well as to the coherence of the European Natura 2000 ecological network. The area has been designated due to the presence of nationally and internationally protected species: the European copper skink (*Ablepharus kitaibelii*), Danube barbel (*Barbus balcanicus*), Caspian whipsnake (*Dolichophis caspius*), and viper's bugloss (*Echium russicum*).

The planned interventions entail the construction of hydraulic structures (water intake, powerhouse and access and service roads), which would introduce anthropogenic, technical and industrial elements into a naturally preserved and spatially sensitive area that are incompatible with the existing morphology and natural structure of the landscape. The construction of a small hydropower plant on the watercourse concerned would result in the fragmentation of the natural landscape unit, disruption of the spatial integrity and visual connectivity of the area, as well as degradation of riparian vegetation, thereby further diminishing the natural character and authenticity of the landscape. Given that the area concerned forms part of a naturally preserved and valuable landscape, and taking into account the high degree of sensitivity of such areas to interventions, the construction of the proposed small hydropower plant would result in the permanent degradation of the landscape structure.

The 2025 Natural Assets Conservation Plan of the Nature Conservation Institute of Serbia envisages the completion of multi-year studies aimed at assessing the value of the areas of the Troglav and Čemerno mountains with a view to placing them under protection. The planned and proposed boundaries of the future protected area directly adjoin the neighbouring protected area, the "Golija" Nature Park, i.e. the "Golija-Studenica" Biosphere Reserve. In this respect, the Studenica River course and its drainage basin also constitute, to a considerable extent, a natural boundary between these areas. At the same time, they constitute a distinctive landscape element that permeates the area and, in physiognomic and functional terms, provides a link between these protected areas and the extensive landscape units. The river basin also serves as a movement corridor for various faunal elements, both along the river course (aquatic organisms) and transversely, from one riverbank to the other. The functionality and maintenance of these corridors largely depend on the preservation of the existing physical-geographical structure of the Studenica River course. As the gorge valley of the Studenica is also one of the finest examples of a river valley incised into a distinctive serpentine geological substrate, characterised by morphologically distinctive micro-units, any disturbance of such a geomorphological and landscape entity would further impair the natural values of both the existing and the future protected area.

Based on all of the above, it was decided as set out in the operative part of this Decision.

Legal Remedy: An appeal against this Decision may be lodged with the Ministry of Environmental Protection within 15 days from the date of receipt of the Decision. The appeal shall be submitted to the Nature Conservation Institute of Serbia, together with proof of payment of the Republic Administrative Fee in the amount of RSD 610.00 to current account no. 840-0000031395845-78, reference number 7401379251, using payment model 97.

ACTING DIRECTOR
Aleksandra Došlić

Annex II

Ref: 03 No. 025-2922/2

Date: 28 July 2026

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 Novi Beograd

1 Omladinskih brigada St.

Your Reference: No. 003384537 2026 14850 004 000 020 092 of 17 July 2026

In accordance with the request of the Ministry of Environmental Protection, Ref. 03 No. 025-2922/1 of 21 July 2026, for the submission of a progress report regarding Complaint No. 2025/1, New (pending), Serbia: Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River, pursuant to the decision of the Bureau of the Standing Committee of the Bern Convention, submitted to the Ministry of Environmental Protection by the Secretariat of the Bern Convention on 15 July 2026, specifically the Directorate General Human Rights and Rule of Law (DGI), Directorate of Social Rights, Health and Environment, the Institute for Nature Conservation of Serbia, within the scope of its competences, hereby informs you as follows:

Inquiry by the Bureau of the Standing Committee of the Bern Convention:

The Bureau: Noted that, in accordance with the Law of Environmental Impact Assessment of Serbia, the planned 2.1 MW hydro power plant does not require an immediate initiation of EIA procedure, but the project holder submitting a request to the competent authority to determine necessity of the EIA. Asked whether the competent authority required EIA or Screening procedure for the project.

The Institute for Nature Conservation of Serbia has no information as to whether the competent authority has required the conduct of an Environmental Impact Assessment or a screening procedure for this project.

Inquiry by the Bureau of the Standing Committee of the Bern Convention:

The Bureau: Asked the Government to provide the shape files of the planned HPP project and shape files of protected sites in Serbia, including international recognitions.

The Institute for Nature Conservation of Serbia, as an attachment to this document, provides data on the planned hydropower project in SHP format (shapefile), as well as data on protected areas in the Republic of Serbia, also in SHP format, including those with international protection status (i.e., international recognitions).

Inquiry by the Bureau of the Standing Committee of the Bern Convention:

The Bureau: Requested the Government to clarify the specific purpose of the planned project, if any, and to respond to the Complainant's allegations of false legal basis for obtaining a building permit.

The Institute for Nature Conservation of Serbia has no information regarding the specific purpose of the planned project. It should be noted that the Institute issued a Decision on Nature Protection Conditions, Ref. 03 No. 021- 4391/2 dated 6 February 2026, rejecting the request of the Ministry of Construction, Transport and Infrastructure for the issuance of nature protection conditions for the purpose of preparation of location conditions for the construction of the small hydropower plant "Gradina S4". The Institute has no information concerning the status of the procedure for issuing the building permit.

Inquiry by the Bureau of the Standing Committee of the Bern Convention:

The Bureau: Asked for clarifications on discrepancies on species list mentioned in Golija Emerald Site SDF and those provided by the complainant.

The area planned for the construction of the small hydropower plant "Gradina S4" is located outside the Emerald site "Golija". The Institute for Nature Conservation of Serbia has no information regarding the list of species submitted by the Complainant.

The aforementioned attachments are enclosed herewith:

- Decision on Nature Protection Conditions, Ref. 03 No. 021- 4391/2 of 6 February 2026
- SHP data (shapefiles) for the planned hydropower project and protected areas in Serbia

Annex III



Republic of Serbia
MINISTRY OF AGRICULTURE,
FORESTRY AND WATER MANAGEMENT
- Republic Water Directorate -
No.: 003452995 2026 14843 001 000 051 001
Date: 21 July 2026
B e l g r a d e

MINISTRY OF ENVIRONMENTAL PROTECTION

BELGRADE, Omladinskih brigada 1

SUBJECT: Request for progress report on 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

To Whom It May Concern,

With reference to your request submitted to the Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, by letter No. 003384537 2026 14850 004 000 020 092 of 17 July 2026, we hereby inform you that the Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia has not issued any water acts for the construction of the Gradina S4 hydropower plant on the Studenica River.

The Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia does not possess information regarding the planned construction of the Gradina S4 hydropower plant on the Studenica River, nor does it hold data on protected areas in the Republic of Serbia.

Sincerely,

Acting Director
/s/ Maja Grbić, BA LLB



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

No.: 004705527 2025 14850 004 000 016 012

Date: 21 April 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: Progress Report on Complaint No. 2025/01: New Complaint (Pending):
Alleged threat to habitat and protected species by the construction of the
Gradina S4 hydropower plant on the Studenica River**

Dear Ms Siino,

With regard to the request from the Secretariat of the Bern Convention dated 11 November 2025 concerning Complaint No. 2025/01: New Complaint (Pending): Alleged threat to habitat and protected species by the construction of Gradina S4 hydropower plant on the Studenica River, the Ministry of Environmental Protection, in its capacity as the competent authority monitoring the implementation of the Bern Convention for the Republic of Serbia, submitted Request No. 004705527 2025 14850 004 000 016 012 dated 2 March 2026 for a statement to the competent authorities and organizations, namely: the Ministry of Construction, Transport and Infrastructure, the Ministry of Mining and Energy, the Ministry of Agriculture, Forestry and Water Management - the Republic Water Directorate, the Agency for Spatial and Urban Planning of the Republic of Serbia, the Institute for Nature Conservation of Serbia and the City Assembly of Kraljevo, including the relevant sectors of the Ministry of Environmental Protection.

Based on the statements received from the aforementioned authorities and organizations regarding the Complaint concerning the alleged threat to the habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River, we would hereby like to inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure informed that the request for location conditions for the construction of the small hydropower plant (SHPP) „Studenica-S4 Gradina” on the Studenica River, with an installed capacity of 1.9 MW, was submitted to the Department for Construction affairs, Implementation of Consolidated Procedures and Legalisation. In the procedure of issuing location conditions, requirements of competent authorities were requested, including those of the Institute for Nature Conservation of Serbia. The location conditions contain all urban planning, technical and other requirements

and data necessary for the preparation of the conceptual design, i.e., the project for the construction permit and the project for execution, as well as information on whether, in connection with the construction of the facility or the execution of works in accordance with the issued location conditions, it is necessary to initiate the procedure of obtaining consent for the Environmental Impact Assessment Study, or a decision that such a study is not required, which the competent authority obtains through the integrated procedure from the ministry responsible for environmental affairs.

2. The Ministry of Mining and Energy informed that no additional information is available regarding the handling of this complaint concerning the construction of the „Studenica-S4 Gradina” hydropower plant on the Studenica River, with a capacity of 2,160 kW.

3. The Ministry of Agriculture, Forestry and Water Management - the Republic Water Directorate informed that no water permits have been issued for the construction of the „Studenica-S4 Gradina” hydropower plant on the Studenica River.

4. The Agency for Spatial and Urban Planning of the Republic of Serbia (hereinafter referred to as the Agency informed as follows:

- In accordance with Article 166d of the Law on Planning and Construction („Official Gazette of the Republic of Serbia”, Nos. 72/2009, 81/2009 - correction, 64/2010 - Decision of the CC, 24/2011, 121/2012, 42/2013 - Decision of the CC, 50/2013 - Decision of the CC, 98/2013 - Decision of the CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023) (hereinafter referred to as the Law), an Urbanistic Project has been determined for the construction of the small „Studenica-S4 Gradina” hydropower plant (SHPP) on the Studenica River, City of Kraljevo (Confirmation No. 863/2024-06 dated 28 March 2025), following the procedure conducted in accordance with the mentioned Law and regulations arising from it. (All information is available on the official website of the Agency www.appurs.gov.rs in the Urbanistic Projects/Confirmed Urbanistic Projects Section, under number 36);

- In the procedure of expert control and confirmation of the aforementioned Urbanistic Project, in addition to other documentation obtained in accordance with the Law and regulations adopted pursuant to the said Law, a positive opinion regarding the fulfilment of conditions in terms of nature protection (03 No. 020-3589/5 of 10 July 2023) was attached, as well as a positive opinion regarding the fulfilment of conditions in terms of cultural monument protection (No. 46/2 of 29 January 2025), which we would like to list as special documentation of significance for the respective case;

- According to the mentioned Urbanistic Project, a run-of-river small hydropower plant with a dam is planned with a water surface length of about 1400 m, and a water surface area of about 7.5 ha. The total height of the dam is < 30.00 m, and the total length of the dam crest is about 100.00 m. In terms of capacity, the total planned installed power is 2160 kW.;

- In addition to the above, and taking into account the regulations governing this area, it is noted that the Report on the Strategic Environmental Impact Assessment, or the Environmental Impact Assessment Study, are not prepared in the procedure related to the preparation, expert control, and confirmation of the Urbanistic Project.

- It is specifically noted that in the further procedure of obtaining the relevant acts for construction, after the confirmation of the Urbanistic Project, in accordance with the Law and regulations pursuant to the aforementioned Law, obtaining location conditions, and then building permits, for which the authority in accordance with the Law, in the given case, lies with the Ministry of Construction, Transport and Infrastructure, follows. In this regard, the Agency does not possess detailed information about the timeframe for the implementation of the said project.

5. The Institute for Nature Conservation of Serbia (hereinafter referred to as the Institute) stated as follows:

1) Clarification of the status of the specific area 'Studenica', which has been identified as a potential area of the European ecological network Natura 2000 in the territory of the Republic of Serbia (pSCI):

The area of pSCI 'Studenica' has been identified as a potential Proposed Site of Community Importance (pSCI) under the name 'Studenica' and is the result of the international project: 'EU for Serbia - Continued support to implementation of Chapter 27 in the area of nature protection (Natura 2000)' in the Republic of Serbia, funded by the European Union. The area is recognized as a habitat for internationally and nationally significant wild species: Danube barbel (*Barbus balcanicus*), Viper's Bugloss or False Pink Liatris (*Echium russicum*), Caspian whipsnake (*Dolichophis caspius*), and European copper skink (*Ablepharus kitaibelii*). pSCI 'Studenica' is not recognized under national legislation, but the area is protected as a habitat for the aforementioned and other present strictly protected and protected wild species according to Annexes 1 and 2 of the Regulation on the Declaration and Protection of Strictly Protected and Protected Wild Species of Plants, Animals, and Fungi („Official Gazette of the Republic of Serbia”, Nos. 5/10, 47/11, 32/16 and 98/16).

Based on the above, and at the new request of the investor, the Institute issued a new Decision on Nature Protection Conditions (03 No. 021-4391/2 of 6 February 2026) for the preparation of location conditions for the construction of the „Studenica-S4 Gradina” hydropower plant on the Studenica River, in which it refused the request for the construction of the aforementioned SHPP.

The Institute has issued a new decision on nature protection conditions based on new data and facts aimed at protecting nature, species habitats, and strictly protected species (aquatic ecosystems), which are specified in the respective decision.

It is also noted that it is necessary for the competent authority: the Ministry of Construction, Transport, and Infrastructure, which addressed the Institute in 2025 with a request for the issuance of nature protection conditions for the preparation of location conditions for the construction of the „Studenica-S4 Gradina” hydropower plant on the Studenica River, to also contact other holders of public powers to review the changes that have occurred in the meantime, since the issuance of the previous nature protection conditions; for this reason, the Institute is not competent to inform other institutions in the procedure in question.

2) Regarding clarification on the capacity of the small hydropower plant and information about the regulations established by the competent local authority, Kraljevo, in connection with the construction of small hydropower plants (SHHPs):

The capacity of the small hydropower plant is 2.16 MW. The construction of the respective SHPP is foreseen by the Spatial Plan of the City of Kraljevo („Official Gazette of the City of Kraljevo”, No. 7/11).

3) Detailed information on the timeframe for the implementation of the small hydropower plant project:

The Institute does not have data on the timeframe for the implementation of the project of the respective SHPP.

4) Clarification regarding the procedure of the Environmental Impact Assessment (EIA) Study and whether it is mandatory in the case of small hydropower plants on the Studenica River:

The procedure for assessing the impact of a project on the environment is carried out by the competent authority (local self-government or the Ministry of Environmental Protection)

in accordance with the provisions of the Law on Environmental Impact Assessment („Official Gazette of the Republic of Serbia”, No. 94/24), before issuing approval for project execution by the authority competent for project approval.

According to Articles 4, 5, and 10 of the aforementioned Law, the subject of impact assessment are projects that may have a significant impact on the environment, taking into account, in particular, their size, characteristics, or location of execution, and which are determined in accordance with Article 5(1) of the Law.

The subject of impact assessment also includes projects which, alone or together with other executed, approved, or planned projects, may have a significant impact on the environment, particularly considering their size, characteristics, or location of execution.

The subject of impact assessment are also projects which, alone or together with other projects, works, or activities, may have a significant impact on the conservation and integrity of areas of the ecological network in accordance with the Law and the regulations governing nature protection.

The subject of impact assessment also includes strategic energy projects which are designated as strategic in accordance with the regulations governing the energy sector.

The impact assessment procedure consists of the following stages:

- 1) deciding on the need for an impact assessment for projects referred to in Article 5(1) point 2) of the Law;
- 2) determining the scope and content of the project Environmental Impact Assessment Study;
- 3) deciding on giving consent to the Environmental Impact Assessment Study of the project.

The respective power plant is listed in List II - Projects for which it is obligatory to submit the request for deciding about the need for an environmental impact assessment, in accordance with the Regulation on the List of Projects for which an environmental impact assessment is mandatory, the List of Projects for which it is obligatory to submit the request for deciding about the need for an environmental impact assessment, and the criteria for deciding about the need for an environmental impact assessment („Official Gazette of the Republic of Serbia”, No. 106/25).

6. The Ministry of Environmental Protection informed that, concerning the request submitted by the project holder “HIDRO-MIN” LLC, Nikole Tesle 21b, 32000 Čačak, Serbia, it is required to initiate the procedure for determining whether it is mandatory to prepare an Environmental Impact Assessment pertaining to the construction of SHPP “Studenica-S4 Gradina.” This procedure must be initiated before the competent authority by submitting a request for a decision on the need for an Environmental Impact Assessment, in accordance with Article 12 of the Law on Environmental Impact Assessment.

7. The City Assembly of Kraljevo informed that it has not received a request to decide on the need to prepare an Environmental Impact Assessment Study for the „Studenica-S4 Gradina” hydropower plant on the Studenica River.

Please find attached copies of the mentioned documents with 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,

STATE SECRETARY
Dragana Ostojic
Dragana Ostojic



Annex I

Republic of Serbia
MINISTRY OF CONSTRUCTION,
TRANSPORT AND INFRASTRUCTURE
No.:001060959 2026 14810 006 000 051 001

Date: 18 March 2026
22-26 Nemanjna St.
S. Č. (Svetlana Čeperković)

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada St.
11 000 Belgrade

SUBJECT: Request for progress report on Complaint No. 2025/01: New complaint (Pending):
Serbia: Alleged threat to habitat and protected species due to the construction of
the “Studenica - Gradina S4” hydropower plant on the Studenica River

To Whom It May Concern,

You addressed the Ministry of Construction, Transport and Infrastructure with request No. 004705527 2025 14850 004 000 016 012, seeking a progress report on Complaint No. 2025/01: New complaint: (Pending): Alleged threat to habitat and protected species due to the construction of the “Studenica - Gradina S4” hydropower plant on the Studenica River, in relation to the request submitted to the Ministry of Environmental Protection by the Secretariat of the Bern Convention on 18 November 2025.

The Ministry of Construction, Transport and Infrastructure received a request for additional clarifications regarding the capacity of the small hydropower plant and detailed information on the timeframe for project implementation, as well as clarifications concerning the Environmental Impact Assessment procedure and whether it is mandatory in the case of small hydropower plants (SHPP) on the Studenica River.

Further to the above, we hereby inform you that the request for location conditions for the construction of SHPP “Studenica S4” on the Studenica River, with an installed capacity of 1.9 MW, was submitted to the Department for Construction Affairs, Implementation of Consolidated Procedures and Legalization. In the process of issuing location conditions, the competent authorities were requested to issue conditions pertaining to their respective jurisdictions, including the conditions of the Institute for Nature Conservation of Serbia. The location conditions contain all urban planning, technical and other requirements and data necessary for the preparation of the conceptual design, construction permit project and

execution project, as well as information on whether, in connection with the construction of the facility or execution of works in accordance with the issued location conditions, it is necessary to initiate the procedure for obtaining consent to the Environmental Impact Assessment Study, or a decision that such a study is not required, which the competent authority obtains through the unified procedure from the ministry responsible for environmental protection.

Sincerely,

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

MINISTER

Aleksandra Sofronijević

Annex II

Administration for Joint Services
of the Republic Bodies
REGISTRY & RECORDS
MANAGEMENT OFFICE – 1088
Received on: 11.03.2026

Republic of Serbia
MINISTRY OF AGRICULTURE,
FORESTRY AND WATER
MANAGEMENT
-Republic Water Directorate-
Number: 001003856 2026 14843 001 000
051 001
Date: 05
March 2026
B e l g r a d e

MINISTRY OF ENVIRONMENTAL PROTECTION
BELGRADE, 1 Omladinskih brigada St.

SUBJECT: Request for a progress report on Complaint No. 2025/01: New complaint
(pending): Alleged threat to habitat and protected species by the construction of
the Gradina S4 hydropower plant on the Studenica River

To Whom It May Concern,

In accordance with the request submitted to the Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, by letter No. 3047055 27 2025 14850 004 000 016 012 dated 2 March 2026, we hereby inform you of the following:

The Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia has not issued any water acts relating the construction of the Gradina S4 hydropower plant on the Studenica River.

Sincerely,

ACTING DIRECTOR
Maja Grbić, LL.B.

Annex III



Republic of Serbia

**AGENCY FOR SPATIAL AND URBAN
PLANNING OF THE REPUBLIC OF SERBIA**

Number: 2025/2026-06

Date: 11 March 2026

10a Kralja Milutina Street,
Belgrade

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 Novi Beograd
2 Mihajla Pupina Blvd

To Whom It May Concern,

Acting in accordance with your letter No. 004705527 2025 14850 004 000 016 012 dated 2 March 2026 (received at the Records Management Office of the Agency for Spatial and Urban Planning of the Republic of Serbia on 5 March 2026), and in connection with the request for a report within the scope of the Agency's jurisdiction on the progress regarding Complaint No. 2025/01 concerning the construction of small hydropower plant (SHPP) "Studenica S4 - Gradina" on the Studenica River, we hereby inform you of the following:

- The Agency for Spatial and Urban Planning of the Republic of Serbia, in accordance with the competencies stipulated in Article 166 g of the Law on Planning and Construction ("Official Gazette of the Republic of Serbia", Nos. 72/2009, 81/2009 – corrigendum, 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, 62/2023 and 91/2025, hereinafter: the Law), on 28 March 2025 confirmed the *Urban Project for the Construction of the Small Hydropower Plant (SHP) "Studenica S4 — Gradina" on the Studenica River, City of Kraljevo* (Certificate No. 863/2024-06 of 28 March 2025), following the procedure conducted in accordance with the Law and regulations adopted on the basis of the Law (available on the official website of the Agency www.appurs.gov.rs in the section *Urban Projects/Confirmed Urban Projects*, under No. 36);
- In the course of the procedure pertaining to the expert review and confirmation of the aforementioned Urban Project, in addition to other documentation obtained in accordance with the Law and regulations adopted on the basis of the Law, a *positive opinion regarding the fulfilment of prescribed nature protection conditions* was submitted (Institute for Nature Conservation of Serbia, 35 Japanska Street, Novi Beograd, Ref. 03 No. 020-3589/5

of 10 July 2023), as well as a *positive opinion regarding the fulfilment of conditions in terms of cultural heritage protection* (Institute for the Protection of Cultural Monuments Kraljevo, 24 Cara Lazara Street, Kraljevo, No. 46/2 of 29 January 2025), which we cite as documents of particular relevance to this case;

According to the aforementioned *Urban Project*, a diversion run-of-river small hydropower plant (SHPP) is planned, with a reservoir surface length of approximately 1,400 meters and a reservoir surface area of about 7.5 hectares. The total height of the dam is ≤ 30.00 meters, while the total crest length of the dam is 100.00 meters. In terms of capacity, the total planned installed capacity is 2160 kW.

In addition to the foregoing, and having regard to the regulations governing this field, please note that the *Strategic Environmental Impact Assessment Report*, as well as the *Environmental Impact Assessment Study of the project*, are not prepared within the procedure relating to the preparation, expert review and confirmation of the Urban Project.

We particularly emphasize that, in the subsequent procedure of obtaining the relevant acts required for construction of the SHPP, following the confirmation of the Urban Project, in accordance with the Law and regulations adopted on the basis of the Law, the next step is the issuance of *location conditions*, followed by the *building permit*, for which competence, pursuant to the Law, in the present case lies with the Ministry of Construction, Transport and Infrastructure. In this respect, the Agency does not possess the requested detailed information regarding the timeframe for the implementation of the project in question.

Sincerely,

INTERIM DIRECTOR

Đorđe Milić, MSc Spatial Planning

Delivered to:

- Addressee – 4 copies
- Records Office – 4 copies

Annex IV

03 No. 025-860/2
27.3.2026

ЗАВОД ЗА ЗАШТИТУ ПРИРОДЕ СРБИЈЕ
INSTITUTE FOR NATURE CONSERVATION OF SERBIA
Јапанска 35, 11070 Нови Београд тел: 011 2093 801, факс: 011 2093 867
www.zzps.rs ПИБ 108844280, Матични број 17798561



MINISTRY OF ENVIRONMENTAL PROTECTION
11070 Novi Beograd
1 Omladinskih brigada St.

Your reference: No. 004705527 2025 14850 004 000 016 012 of 02.03.2026

You addressed the Institute for Nature Conservation of Serbia, with a Request filed under reference 03 No. 025-860/1 of 5 February 2026, seeking a submission of a progress report concerning “Complaint No. 2025/01: New complaint (pending): Alleged threat to habitat and protected species by the construction of the Gradina S4 hydropower plant on the Studenica River”, as concerns the scope of competence of the Institute for Nature Conservation of Serbia.

Based on the review of the Nature Protection Information System maintained by the Institute for Nature Conservation of Serbia, as well as on the relevant legal framework, and acting in accordance with your request, the Institute hereby informs you as follows:

Decision: Bureau:

In relation to the specific area identified as “Studenica”, clarification of its status as a proposed Site of Community Importance (pSCI) within the Natura 2000 ecological network was requested.

The proposed Site of Community Importance (pSCI) “Studenica” has been identified under that name as a potential area of community importance, resulting from the international project “EU for Serbia – Continued support to implementation of Chapter 27 in the area of nature protection (NATURA 2000)” in the Republic of Serbia, financed by the European Union. The area has been recognized as a habitat of internationally and nationally significant wild species: Danube barbel (*Barbus balcanicus*), Russian bugloss (*Echium russicum*), Caspian whipsnake (*Dolichophis caspius*) and European snake-eyed skink (*Ablepharus kitaibelii*). The pSCI “Studenica” has not been designated under national legislation; however, the area is protected as a habitat of the above-mentioned and other strictly protected and protected wild species, in accordance with Annexes 1 and 2 of the Rulebook on the Proclamation and Protection of Strictly Protected and Protected Wild Species of Plants, Animals and Fungi (“Official Gazette of RS,” Nos. 5/10, 47/11, 32/16 and 98/16).

Having regard to the foregoing, the Institute for Nature Conservation of Serbia issued Decision Ref. 03 No. 021-4391/2 of 6 February 2026, rejecting the request for construction of the small hydropower plant “Gradina S4.”

Clarifications regarding the capacity of the small hydropower plant (SHPP) and information on the rules established by the competent local authority, Kraljevo, concerning the construction of small hydropower plants (SHPPs) were requested.

The capacity of the small hydropower plant is 2.16 MW. The construction of the aforementioned small hydropower plant is envisaged under the Spatial Plan of the City of Kraljevo (“Official Gazette of the City of Kraljevo,” No. 7/11).

Detailed information on the timeframe for implementation of the small hydropower plant project was requested.

The Institute for Nature Conservation of Serbia has no data on the timeframe for implementation of the small hydropower plant project.

Clarifications regarding the procedure of the Environmental Impact Assessment (EIA) and its mandatory application in the case of small hydropower plants (SHPP) on the Studenica River were requested.

The procedure for assessing the environmental impact of a project is carried out by the competent authority (local self-government or the Ministry of Environmental Protection) in accordance with the provisions of the Law on Environmental Impact Assessment ("Official Gazette of RS," No. 94/24), prior to the issuance of the approval for project implementation by the authority competent for the project approval.

Pursuant to Articles 4, 5 and 10 of the aforementioned Law, projects that may have a significant impact on the environment, particularly in view of their size, characteristics or location, and which are determined in accordance with Article 5, paragraph 1 of this Law, are subject to environmental impact assessment.

Projects which, either individually or in combination with other executed, approved or planned projects, may have a significant impact on the environment, particularly in view of their size, characteristics or location, are subject to environmental impact assessment.

Projects which, either individually or in combination with other projects, works or activities, may have a significant impact on the conservation and integrity of areas within the ecological network, in accordance with this Law and the regulations governing nature protection, are also subject to environmental impact assessment.

Strategic energy projects determined as strategic in accordance with the regulations governing the field of energy are also subject to environmental impact assessment.

The environmental impact assessment procedure consists of the following phases:

- 1) Deciding on the need for environmental impact assessment for projects referred to in Article 5, paragraph 1, item 2 of the Law on Environmental Impact Assessment;
- 2) Determining the scope and content of the environmental impact study of the project;
- 3) Deciding on granting consent to the environmental impact study of the project.

The hydropower plant concerned is classified under List II – Projects for which submission of a request for a decision on the need for environmental impact assessment is mandatory, in accordance with the Regulation on the List of projects for which environmental impact assessment is mandatory, the List of projects for which submission of a request for a decision on the need for environmental impact assessment is mandatory, and the criteria for deciding on the need for environmental impact assessment ("Official Gazette of RS," No. 106/25).

ACTING DIRECTOR

Aleksandra

Došlić

Delivered to:

- Addressee
- Records Office – 2 copies

Prepared by:

Saša Branković _____

Igor Lepojević _____

Vladan Bjedov _____

Marko Divac _____

Head of Division: Miloš Radaković _____

Head of Department: dr Nenad Sekulić _____

Annex V

Republic of Serbia
INSTITUTE FOR NATURE CONSERVATION OF SERBIA
Novi Beograd, Japanska no. 35
Telephone: 381 11 2093-802; 2093-803

Pursuant to the Articles nos. 9, 74 and 130 of the Law on the Nature Protection (*Official Gazette of the Republic of Serbia*, Nos. 36/09, 88/10, 91/10 - as amended, 14/16, 95/18 - state law and 71/21), in accordance with the separate Article 36 of the Law on Amendments to the Law on the Nature Protection (*Official Gazette of the Republic of Serbia*, No. 71/21) and Article 136 of the Law on General Administrative Procedure (*Official Gazette of the Republic of Serbia*, nos. 18/16, 95/18 - authentic construing and 2/23-Constitutional Court), acting upon the request submitted by the Ministry of Construction, Transport and Infrastructure, Nemanjina Street 22–26, Belgrade (ROP-MSGI-31797-LOCII-2-IIPAP-8/2025) for the issuance of nature protection conditions for the preparation of location conditions for construction of a small hydropower plant (SHP) “Studenica S4 – Gradina,” a dam with a powerhouse, the Institute for Nature Conservation of Serbia, on 6 February 2026, 3 ref. no. 021-4391/2, has adopted the following:

DECISION

1. **The request of the Ministry of Construction, Transport and Infrastructure, Nemanjina Street 22–26, Belgrade, for the issuance of nature protection conditions for the preparation of location conditions for construction of a small hydropower plant (SHP) “Studenica S4 – Gradina,” a dam with a powerhouse, HAS BEEN REJECTED.**
2. The fee for issuing the technical basis for the issuance of the act on nature protection conditions in the amount of 34,210.00 dinars has been determined in accordance with the Law on Republic Administrative Fees (*Official Gazette of the Republic of Serbia*, Nos. 43/03, 51/03-as amended, 61/05, 101/05-state law, 5/09, 54/09, 50/11, 93/12, 65/13-state law, 83/15, 112/15, 113/17, 3/18-as amended, 95/18, 86/19, 90/19-as amended, 144/20, 138/22, 92/23, 94/24 and harmonized dinar amounts from the Tariff of Republic Administrative Fees 55/25) - Tariff no. 186a; paragraph 2 item 3), subitem (1).

Explanation

The competent authority – Ministry of Construction, Transport and Infrastructure – submitted a request to the Institute for Nature Conservation of Serbia 03 ref. no. No. 021-4391/1 dated 12 November 2025, for the issuance of nature protection conditions for the preparation of location conditions for the construction of a small hydropower plant (SHP) “Studenica S4 – Gradina.” The request for issuing location conditions for the subject construction was submitted to the Ministry of Construction, Transport and Infrastructure by the company “Hiro-Min” d.o.o., Nikola Tesla 21b, 32000 Čačak.

Enclosed to the request, a Conceptual Design “Studenica S4 – Gradina”, No. PŽ-02/25-0

Main volume, was submitted, prepared in August 2025, the designer: Zoran Bogdanović, BSc in Civil Engineering, license number: 314 601 07.

Based on the submitted request and the appurtenant documentation of the submitter, it has been established that the conceptual design plans the construction of a small hydropower plant (SHP) “Studenica S4 – Gradina” on the Studenica River, in the wider area of the settlement of Ušće, City of Kraljevo. The dam is planned at a diversion point S4, with a maximum construction height of 28 m. It is designed to consist of an overflow dam section (overflow trench and absorption basin), a powerhouse, a right non-overflow section of the dam with a fish pass, and a left non-overflow section of the dam. The reservoir would be approximately 1,400 m long at average water levels. The power plant is of the storage type. Powerhouse is planned along the left bank.

For the migration of ichthyofauna in both directions, a fish pass is planned, consisting of 90 chambers with identical internal dimensions of 1.20×1.50 m. The specified number of chambers is required in order to overcome a head difference of approximately 18 m between the upstream and downstream water levels. Structurally speaking, the fish pass is an integral part of the right non-overflow dam bay, and it is planned to be constructed as a box-shaped cross-section filled with stone. The chambers would be separated by partitions within which submerged bottom openings of dimensions 25 × 25 cm have been envisaged. The longitudinal slope of the chamber is 12.5%. The minimum water depth in the chamber is 0.60 m. For the purposes of inspection, cleaning, and repairs during the exploitation, a plate valve with manual drive is envisaged at the inlet of the fish pass.

Based on the review of the Central Register of Protected Natural Assets and the documentation of the Institute for Nature Conservation of Serbia, and in accordance with regulations governing nature protection, it has been determined that the location where construction is planned is not situated within a protected area for which protection procedure has been implemented or initiated, nor within the boundaries of an ecologically significant area of the ecological network of the Republic of Serbia, in accordance with the Regulation on the Ecological Network (*Official Gazette of the Republic of Serbia*, No. 102/10). However, the Studenica River is in a direct functional contact with the protected area of the “Golija” Nature Park, in accordance with the Regulation on the proclamation of the “Golija” Nature Park (*Official Gazette of the Republic of Serbia*, No. 88/24) and lies within a broader area internationally recognized as the “Golija–Studenica” UNESCO MAB biosphere reserve.

Although one small hydropower plant has already been constructed on the Studenica River, the watercourse has largely been preserved in its natural and semi-natural state, especially in the lower course. For this reason, the Studenica River, together with its riverbanks and surrounding landscape elements, has been identified as an ecological corridor of local importance, in accordance with Article 4, paragraph 4 of the Regulation on the Ecological Network (the *Official Gazette of the Republic of Serbia*, No. 102/10).

The Studenica River is inhabited by strictly protected wild fish species: the bullhead (*Cottus gobio*) and the Balkan loach (*Sabanejewia balcanica*), as well as protected wild fish species: gudgeon (*Gobio obtusirostris*), spirlin (*Alburnoides bipunctatus*), common chub (*Squalius cephalus*), Balkan barbel (*Barbus balcanicus*), and brown trout (*Salmo trutta*), in accordance with Annexes 1 and 2. of the Regulation on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (the *Official Gazette of the Republic of Serbia* nos. 5/10, 47/11, 32/16 and 98/16).

The construction of the small hydropower plant “Studenica S4 – Gradina” would lead to changes in the hydromorphological characteristics of the Studenica River course over a wider area and to a greater extent, in the sense that it would slow down and significantly change the depths of the water. This would result in the disturbance of the physical, chemical, and hydrodynamic parameters of the river and cause irreversible changes to the habitat of all aquatic organisms. Changes to the natural alternation of fast- and slow-flowing, shallow and deep water permanently destroy the habitats of fish and all aquatic organisms. In addition, irreversible changes would occur in the habitats of animal species that are narrowly adapted to life in the river sections with lower water temperatures and higher levels of oxygen.

Within the subject area, four species of strictly protected wild amphibian species have been recorded: fire salamander (*Salamandra salamandra*), Greek frog (*Rana graeca*), yellow-bellied toad (*Bombina variegata*), as well as two reptile species: grass snake (*Natrix natrix*) and Caspian whipsnake (*Dolichophis caspius*), and one protected wild species: marsh frog (*Pelophylax ridibundus*), in accordance with Annexes 1 and 2 of the Regulation on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi. The recorded reptiles, green lizard (*Lacerta viridis*) and common wall lizard (*Podarcis muralis*), are species of international importance.

The construction of small hydropower plants negatively affects wild species of amphibians and reptiles that spend their entire lives in the local aquatic environment (such as the Greek frog), as well as dry terrestrial species for which flowing aquatic habitats or the proximity of such hill and mountain water habitats are essential for survival, reproduction, and development of offspring. The destruction of sites where the development of amphibian and reptile offspring takes place, as well as areas that serve as sources of their food, would lead to a reduction in the size of local populations. As a result of the loss of individuals, populations would also become more sensitive to the negative effects of fluctuations in environmental factors (temperature, humidity, etc.), which would further increase the decline in population numbers and, consequentially, lead to the extinction of species. The amphibian species recorded in the field: fire salamander, greek frog, and yellow-bellied toad, lay their eggs in calmer sections of the river. In addition, for the survival of reptile species associated with aquatic habitats, a certain level of humidity is necessary, which is provided through the dispersion of flowing water.

Most of the listed species are included in Resolution 6 of the Bern Convention (Law on Ratification of Convention on the Conservation of European Wildlife and Natural Habitats, *Official Gazette of the FRY – International Treaties*, No. 11/01), and/or in Annexes II/IV of the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora), which impose a strict preventive regime and the avoidance of interventions that may lead to the permanent deterioration of habitat conditions or populations.

The subject area is located within the proposed Site of Community Importance (pSCI) “Studenica” of the Natura 2000 ecological network, in accordance with the regulations of the European Union – the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. This area has been identified in line with the obligations of the Republic of Serbia in the EU accession process and significantly contributes to maintaining or restoring the natural habitat types and/or species to a favourable conservation status and contributes to the coherence of the European Natura 2000 ecological network. The area has been designated due to the presence of nationally and internationally protected species: the European copper skink (*Ablepharus kitaibelii*), Balkan barbel (*Barbus balcanicus*), caspian whipsnake (*Dolichophis caspius*), and echium (*Echium russicum*).

Planned interventions include the construction of hydraulic engineering structures (water intake, powerhouse, access and service roads), which would introduce into a naturally preserved and spatially sensitive area the anthropogenic, technical and industrial elements that are not in harmony with the existing morphology and natural structure of the landscape. The construction of small hydropower plants on the subject watercourse would lead to fragmentation of the natural landscape unit, disruption of spatial compactness and visual connectivity, as well as degradation of riparian vegetation, further reducing the natural character and authenticity of the landscape. Considering that the subject area is part of a naturally preserved and valuable landscape and given that such areas are characterized by a high degree of sensitivity to interventions, the construction of the proposed small hydropower plant would lead to permanent degradation of the landscape structure.

The Nature Protection Plan of the Institute for Nature Conservation of Serbia for 2025 foresees the completion of multi-annual research on the valorisation of the Troglav and Čemerno mountain areas for the purpose of their placement under protection. The planned and proposed boundaries of the future asset directly adjoin the neighbouring asset – Nature Park “Golija”, i.e. the “Golija–Studenica” Biosphere Reserve. At the same time, the course and basin of the Studenica River themselves largely represent a natural boundary between these areas. They also constitute a unique connecting landscape element that, in both physiognomic and functional terms, forms a link between these protected assets and wider landscape units. The river basin also serves as a communication corridor for various faunal elements, both along the river course (aquatic organisms) and in transverse directions, from one bank to the other. The functionality and maintenance of these corridors largely depend on the preservation of the existing physical-geographical structure of the Studenica River course. As the canyon valley of the Studenica river is one of the finest examples of river valley incision into a specific serpentinite geological substrate, with morphologically distinctive micro-units, any disturbance of such geomorphological and landscape entity would further degrade the natural values of both the existing and future protected area.

Based on all of the above, it was decided as in the operative part of this Decision.

Instructions on legal remedy: A complaint may be filed against this Decision to the Ministry of Environmental Protection within 15 days from the date of receipt of the Decision. The complaint shall be submitted to the Institute for Nature Conservation of Serbia, with the enclosed evidence of payment of the Republic administrative fee to the amount of 610.00 dinars to the current account no. 840-0000031395845-78, reference to 7401379251 following the model 97.

Acting director

Aleksandra Došlić

/signed by hand, illegible/

/affixed official round seal with the coat of arms in the centre/