



Institute for Nature Conservation of Vojvodina Province, Novi Sad, Radnička 20a (hereinafter the Institute), pursuant to Articles 9 and 57 of the Law on Nature Conservation (*Official Gazette of the Republic of Serbia*, Nos. 36/2009, 88/2010, 91/2010 – correction, 14/2016, 95/2018 – other law, and 71/2021), acting on Request No. 337-00-00026/2022-04 of 7 March 2022 of the Ministry of Environmental Protection, Nemanjina 22-26, Belgrade, and received on 18 March 2022, for making a statement on the Complaint No. 2022/1 : New Complaint: Serbia: Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure construction, on 19 May 2022 under 03 No. 026-742/4, Mr. Stanko Kosovac, as per Director's Authorisation No. 04 035 4111 of 29 December 2021, hereby issues the following:

## OPINION

The Institute received your Request for the statement on Complaint No. 2022/1: New Complaint: Serbia: Alleged habitat destruction in the area of Novi Sad due to proposed infrastructure construction, submitted by the Secretariat of the Bern Convention in the Council of Europe on 8 February 2022. As indicated in the request, the respective complaint was filed on behalf of NGO "World and Danube", where the applicant mentioned that the proposed infrastructure construction in the areas of Kamenička Ada, Dunavac and Šordoš, pertaining to the territory of the City of Novi Sad, will have adverse environmental impact.

Bearing in mind the allegations in the respective document, the Institute would like to inform you of the following:

Part of the area of Kamenička Ada is identified as the habitat of strictly protected and protected wild species (NSA22b), as well as part of the Ribarsko Ostrvo (Fisher's Island) (NSA22a), in accordance with the Rulebook on declaration and protection of protected and strictly protected species of plants, animals and fungi (*Official Gazette of the Republic of Serbia*, Nos. 5/2010, 47/2011, 32/2016 and 98/2016).

The Danube with riverbank, including Ribarsko Ostrvo, is marked as ecological corridor of international importance, in accordance with the Regulation on the Ecological Network (*Official Gazette of the Republic of Serbia*, No. 102/2010).

According to the Medium-term Work Plan of the Institute for Nature Conservation of Vojvodina Province for the period 2021–2030, adopted by the competent authority, the area of Kamenička Ada, Dunavac, Šordoš and Ribarsko Ostrvo is not envisaged for the evaluation of natural values and development of a study as proposal for the protection of the area, bearing in mind that the most valuable parts have been already set-aside as the habitats of strictly protected and protected wild species, and the protection measures shall be incorporated in the planning documentation.

The Institute issued the Decision on the Conditions for Nature Conservation for the needs of development of the General Urban Plan of the City of Novi Sad until 2030, No. 03-019-2280/2 of 18 August 2021, specifying detailed measures for integral protection of the area and especially valuable spatial wholeness: Protected areas, Areas in the process of protection, Ecologically significant areas, Habitats of strictly protected and protected wild species and Ecological corridors. Nature conservation measures within the respective Decision enclosed in Attachment 1 relate to set-aside habitats of strictly protected and protected wild species in the respective area along the Danube: Part of Kamenička Ada (NSA22b) and part of Ribarsko Ostrvo (NSA22a) as well as the Danube as international ecological corridor.

The Institute issued its Opinion on Draft General Urban Plan of the City of Novi Sad until 2030, No. 03019-4092/2 of 2 March 2022, enclosed in Attachment 2.

The Institute issued the Notification related to the Initiative for the protection of natural resources as public property of Kamenička Ada, Dunavac, Šodroš and Ribarsko Poluostrvo (Fisher's Peninsula) in Novi Sad No. 03022-645/2 of 26 April 2021, enclosed in Attachment 3, submitted by several associations of citizens/organisations. In the document, the applicants were informed on all important aspects regarding the Initiative as well as on the fact that the Institute does not foresee in its Work Plan for the period 2021–2031 activities related to evaluation of natural values of the respective area for the development of an area protection study.

The Institute monitors, within its regular activities and in accordance with its professional and financial capacity, natural values in the area of the Autonomous Province of Vojvodina, including the mentioned area, i.e. defined habitats (NSA22b and NSA22a), in the territory of the City of Novi Sad and protected areas (parks and trees protected as Monuments of Nature); applies mechanisms specified by law in order to provide protection and conservation of natural values in case of all works and activities, including infrastructure projects in the territory of the City of Novi Sad, which relate to the respective area along the Danube as well. The Institute is of the opinion that the mentioned mechanisms enable conservation of basic natural landscape characteristics of the respective area, as well as its biodiversity, particularly through conservation and adequate management of the set-aside habitats of strictly protected and protected wild species.

Bearing in mind the obligation of the Parties as regards their actions, in accordance with Articles 8 and 9 of the Law, the Institute also defines, through conditions for nature conservation in spatial planning documents, the establishment of a greenery system at the City level in a functional wholeness, including green treeline corridors, parks, green surfaces in apartment blocks, as well as all types of activities taking place in the territory of the City of Novi Sad.

We would also like to point to the fact that NGO “World and Danube” did not submit to the Institute any specified data in electronic form (Excel table with detailed geo-referenced data related to the site, data, population number and habitat for each individual record of significant species), required in the letter No. 03022-645/2 of 26 April 2021, for the verification of such data by the experts of the Institute, which is the only authorised institution according to Law, in order to include these data in the database and use them for nature conservation in accordance with the Law on Nature Conservation.

Sincerely,

As per Director's Authorisation  
No. 04 035 4111 of 29 December 2021  
/s/ Stanko Kosovac

Delivered to:

- Applicant
- Archives