



BUILDING THE FOUNDATIONS

This thematic update is part of a series developed by the United Nations in Serbia with the intention to inform our programming, share comprehensive data and complex information with the wider development community in a fast-changing context, and jointly advocate towards our national and local counterparts. The thematic updates are fact based, reflect the current state of affairs on specific issues, highlight progresses, gaps and challenges. These are not policy briefs, and they do not report on UN activities. Instead, we hope that the updates can be used as a base for further discussion between stakeholders, deepening the understanding of critical and contemporary topics, and help shape and plan evidence based sustainable solutions to critical long-term challenges in Serbia.

The focus of this update is on the Green Agenda. The UN has coined this broad issue in its Cooperation Framework with Serbia as Harnessing the Green Transformation. In this issue, we look briefly at five areas where multiple changes/progress, primarily at the legislative and policy levels, have taken place in the past year. These areas are Climate Change, Energy, Environment, Urban Development, and we have also added a specific focus on the City of Belgrade.

Climate change, pollution and environmental degradation are common global threats, with local impacts that Serbia is experiencing at a growing pace. Such multiple impacts are felt on public health, on energy, transport and other infrastructure, on urban development and agricultural production, on water availability and quality. In Serbia, notable progress has been made in climate change policy and legislative activities since the establishment of the new Government in October 2020. This was coupled with an increased ambition of reducing greenhouse gas emissions by 33.3% compared to 1990 levels, presented at the Climate Ambition Summit 2020. There is room for Serbia to consider raising its climate ambition even further and match the net zero global ambition of COP26.

Additional progress has been made in regulating energy and mining in the first half of 2021. This contributed to Serbia moving forward in its energy transition and adopting a negotiating position for EU Chapter 15 on Energy. Environmental policy represents an equally complex field. Progress is still limited. A number of strategic documents are being drafted and action plans fine-tuned especially in the areas of air, noise and waste management.

The shift away from fossil fuels-based energy system requires a large, comprehensive public investment program, coupled with strategies and programmes for local communities, reliable reskilling options for coal sector workers, building and sharing knowledge for good practice within the private sector including banking and insurance, creating and expanding new financial instruments, and last but not least, developing a set of specific tools and actions to address the needs and constraints of vulnerable and poorer households. Such a transformative agenda will require extensive information sharing and coordination between all stakeholders, around an agreed common strategy and roadmap, while the biggest efforts and changes are yet to be defined and implemented on the ground. In the months and years to come, our joint focus should be on translating the progress in strategic/legislative changes and innovations into actionable by-laws and policy instruments, designed to ramp up the energy transition and environmental protection. Strengthening existing and building new capacities to undertake this transformation, as well as raising public awareness and commitment to support it – at the national, local and individual levels – remain a prerequisite for the effective implementation of these policies.

The Green Transformation is underpinned by the four pillars of environmental sustainability, social and economic justice, peace and nonviolence, and participatory democracy. In Serbia, we are at the perfect moment to initiate and accelerate this transformation. We collectively need to tackle the challenge with a greater sense of urgency, tight cooperation and a commitment to efficiency. Let's roll!



1. CLIMATE CHANGE

1.1 Law on Climate Change

The first [Law on Climate Change](#) was adopted in March 2021.[1] This Law is the key systemic law to reduce greenhouse gas (GHG) emissions and to fulfil Serbia's obligation under the UN Framework Convention on Climate Change (UNFCCC) and harmonise with the EU Acquis. As an umbrella document for the development of strategic goals this Law mandates the adoption of a long-term low-carbon development strategy with an action plan including the programme for adaptation. The Law is expected to provide a basis for the future development of national climate policy.

This Law had been pending for several years. Its adoption suggests that climate change and environmental issues feature higher on the Government's priority list. It is the first step towards Serbia's future economic growth and development based on the reduction of GHG emissions, innovation, a green economy, the creation of green jobs and the energy transition. This type of economic growth is soon to become a sine qua non of the international market and consequently national competitiveness. This is demonstrated by the EU carbon border adjustment mechanism that will be applied to Serbia.

To achieve the goals of this Law, public bodies - in addition to the adoption of specific by-laws and ordinances – need to adopt appropriate sectoral policies and measures. Strengthening existing, and building new, capacities – at both the national and local level – also remains a challenge and is a prerequisite for the effective implementation of this Law.[2]

Under the Capacity Building Initiative for Transparency[3] a comprehensive Monitoring, Reporting and Verification (MRV) system is developed to support the operationalization of the Climate Change Law, and to allow Serbia to plan, implement and monitor more effectively climate change-related policies and measures, including those presented within the Nationally Determined Contribution (NDC). The functional domestic MRV system will increase stakeholder engagement, contribute to better quality of produced reports to the UNFCCC, and will allow the country to undertake more ambitious commitments in its NDCs over time.

1.2 Draft Low Carbon Development Strategy and Action Plan

To identify the possibility for raising Serbia's climate ambition (under the Paris Agreement), a [draft Low Carbon Development Strategy and Action Plan](#) was developed. The draft analysed different GHG scenarios. Serbia has opted for the middle scenario (of those analysed) that commits to the reduction of its GHG emissions by 33.3% compared to 1990 level by 2030 (i.e. 13.2% compared to 2010 level).[4] This represents an increased climate ambition from Serbia's first NDC in 2015, which committed to a decrease in GHG emissions by 9.8% (compared to 1990). In addition, five local low carbon development strategies have been drafted for the cities of Kragujevac, Kraljevo, Kruševac, Šabac, and Niš. These strategies and action plans are under review and the final versions will be disclosed at the end of 2021.

Serbia is preparing its first National Climate Change Adaptation Programme[5] to define sector-specific adaptation measures, set quantitative targets, determine indicators, define responsible institutions for their implementation, and methods of financing. Observed climate changes and future climate projections based on

1 In March 2021, <https://www.klimatskepromene.rs/en/recommended/serbia-adopts-its-first-law-on-climate-change/>

2 <https://ceelegalmatters.com/serbia/16624-serbia-the-new-law-on-climate-change-for-the-survival-of-the-living-world>

3 <https://www.klimatskepromene.rs/en/projects/establishing-transparency-framework-for-the-republic-of-serbia/>

4 https://www.klimatskepromene.rs/wp-content/uploads/2020/10/CCM-revised-NDCs-DRAFT-OCT-2020_.pdf

5 <https://adaptacije.klimatskepromene.rs/en/home/>

different scenarios have been developed for Serbia[6], and comprehensive vulnerability assessments are prepared for the following sectors: Agriculture, Forestry, Water Management, Energy, Infrastructure, and Public Health. An overview of priority climate change adaptation measures by sectors is presented in the draft of the revised NDC[7] and in the draft Third National Communication to the UNFCCC. Local Action Plans on Climate Change Adaptation and Resilience have been developed for Bečej, Zrenjanin, Ub and Kraljevo.[8]

The global momentum towards a net-zero transformation is picking up pace. Given the size of the country, population, and economic resilience, Serbia can consider further increasing its climate ambition for 2030 and 2050. With the expected opportunities provided under the Green Agenda for the Western Balkans, the country should commit to the more ambitious, third scenario developed within the draft strategy. This scenario aims “to reduce its GHG emissions by 45.2% compared to 1990 level”. The increased climate ambition could be announced at the 2021 United Nations Climate Change Conference (COP26) to showcase Serbia's dedication towards tangible progress. It would also place Serbia on a trajectory towards greener investments and a more prosperous future, acting as a flagship for the region.

1.3 Green Agenda for the Western Balkans

Another important new policy framework is the Sofia Declaration on the [Green Agenda for the Western Balkans](#), which Serbia signed in November 2020. The Green Agenda commits the signatories to contribute to making Europe climate neutral by 2050, to paying carbon taxes, and to aligning these taxes with the EU Emissions Trading Scheme. The Action Plan for the implementation of the Sofia Declaration on the Green Agenda for the Western Balkans is currently being prepared under the guidance of the Regional Cooperation Council.

This agenda will need to be supported by all actors including the United Nations in order to achieve a genuinely inclusive transformation. The participation of both the private and public sectors, as well as civil society, in its design and implementation will be critical for its success. It will be essential to ensure that all investments facilitate environmentally positive transitions in the region and do no harm to long-term sustainability.[9] The Green Agenda should limit the transition from coal to gas energy and instead prioritize investments and deployment of untapped local renewable sources. This will need to be matched by building capacities and partnerships across the whole society. Finally, a just implementation that abides by the core United Nations principle to Leave No One Behind (LNOB) and focuses on the most vulnerable groups and local communities in coal regions needs to be central to the energy transition and coal phaseout in the WB region.[10]

2. ENERGY



Four new laws were adopted for the mining and energy sectors in April 2021 to bring needed changes to incentivize the energy transition. By the end of 2021, Serbia is expected to draft a National Energy and Climate Plan for 2021-30 with a vision to 2050.

2.1 New Legislative Framework

The overarching **Law on Energy** has been amended to create a legal basis for the adoption of the Integrated National Energy and Climate Plan, which is the most important forward-looking strategic document for the energy transition.

6 <https://www.klimatskepromene.rs/wp-content/uploads/2021/08/Observed-Climate-Change-and-Projections.pdf>

7 <https://www.klimatskepromene.rs/wp-content/uploads/2020/10/CCA-revised-NDCs-DRAFT-OCT-2020.pdf>

8 http://civilnazastitakraljevo.rs/PDF/FinalDraft_Kraljevo_LAP.pdf

9 <https://meta.eeb.org/2020/12/23/a-green-deal-for-the-balkans/>

10 <https://balkangreenenergynews.com/platform-initiative-launched-to-help-energy-transition-of-coal-regions-in-western-balkans-ukraine/>

The Plan needs to define and integrate the national goals for energy efficiency, renewable energy, and the reduction of GHG emissions, as well as the policies and measures for their fulfilment. Serbia is the last contracting party of the Energy Community to start preparing an Integrated National Energy and Climate Plan.

The announced preparation of its draft for the 2021-2030 period, with projections until 2050 is the first step. The Law introduces new participants to the energy market and enables heat consumers to receive the status of energy vulnerable consumers (allowing subsidies to be provided to pay their bills) thus further harmonising domestic legislation with the EU Acquis.

The recently adopted **Law on the Use of Renewable Energy Sources** introduces market-based policy instruments to stimulate new investments in renewable energy sources (RES) and to increase the share of RES in total energy produced. The most important development brought by this Law is that it introduces the option for citizens and companies to produce electricity for their own consumption and become prosumers. **The success will depend on the readiness and capacities of citizens and the private sector to embrace these new opportunities.** The Law paves the way for the country to begin holding auctions that award support to renewable projects through contracts for market premiums. The Law introduces a long-awaited ban on the construction of hydropower plants of any type and capacity in protected areas, with an exception in cases where the project is of national significance. This exception and the fact that the ban is not imposed on ongoing projects requires constant, robust and transparent monitoring of its implementation. This is to avoid previous challenges that triggered the protests of a number of local communities where the small hydropower plants were built. Overall, it is expected that the adoption and implementation of this Law will attract investors, simplify procedures, reduce costs for citizens, protect the environment, fight against climate change, and accelerate the energy transition.

Serbia is advancing significantly in the transposition of the renewable energy acquis with the adoption of additional secondary legislation.

The new **Law on Energy Efficiency and Rational Use of Energy** aims to achieve greater energy savings, reduce the impact of the energy sector on the environment and climate change, and contribute to the sustainable use of natural and other resources.

The Law establishes a long-awaited Directorate for financing and encouraging energy efficiency within the Ministry of Mining and Energy (the Energy Efficiency Fund). **The novelty of this Law is the roll-out of subsidies for citizens to replace windows and doors, install wall and roof insulation, as well as to replace heating systems (stoves and boilers) with devices that are more efficient and use less polluting fuels.** The Law also introduces regulations for eco-design, including energy labels for household appliances. **Its implementation will largely depend on tailor made schemes for support of diverse groups including the most vulnerable, capacities of local self-governments and private sector to deliver on the more stringent norms and standards.**

The changes to the **Law on Mining and Geological Exploration** aim to create conditions for more efficient and sustainable management of mineral and other geological resources, as well as for increasing investments in geological exploration and mining. This Law also creates a legal basis for digitalization, simplifies and shortens permitting procedures. It establishes that geological exploration and exploitation of mineral raw materials are in public interest and if exploitation is done in a protected area or an ecological network area, public interest and significance are determined under the law regulating protection of nature. It remains to be seen how these changes will be implemented and to what extent they will contribute to sustainable management of natural resources. The alignment to the United Nations Framework Classification for Resources (UNFC) and the United Nations Resource Management System, which provides standards and guidelines for integrated and sustainable management of resources and promotes the concepts of value-addition and the progress towards a circular economy will also require more elucidation. This also has implications on a genuine and transparent implementation of existing Laws concerning Environmental Impact Assessment and Strategic Environmental Impact Assessment.

Energy poverty represents a significant impediment to the energy transition in Serbia, and further elaboration of policy mechanisms for reducing widespread energy poverty is required. A very positive step is the recent formation of the National Coalition for the Reduction of Energy Poverty. The task of this body will be to gather relevant interested parties and end energy poverty through coordinated action. The National Coalition is headed by the Minister of Mining and Energy and includes representation from civil society. It represents noteworthy ambition towards ending energy poverty and abiding by the LNOB principle.

3. ENVIRONMENT



3.1 Air Protection

An **Air Protection Program with an Action Plan** is currently being drafted and approval is planned for the third quarter of 2022. The draft Air Protection Program will define air quality goals and measures for their achievement, will provide a basis for further development and adoption of by-laws, as well as the continuation of the application of European legislation in the field of air protection. The Program is based on 3 pillars: 1. Reduction of air pollutants emissions (maximum national emissions); 2. Improvement of air quality (without exceeding limits); and 3. Reducing the impact of air pollution on citizens' health.

The current draft of the Air Protection Program includes modelling of air pollutants with existing and additional measures. The modelling exercise found that existing measures effectively applied would enable significant emission reductions for SO₂ and NO_x. However, for significant impacts on the emission reductions of PM₁₀, PM_{2.5}, and VOC emissions full implementation of EU Directives, actions on imports of second-hand vehicles, and financial measures to accelerate replacement of old solid fuel domestic appliances and old vehicles are needed. Additionally, to reduce NH₃ emissions, best practices in livestock and fertilizer spreading are required.

The success will depend on the mass replacement of inefficient devices used for domestic heating, old vehicles, coal burning in large/industrial facilities and fundamental behavioural changes. **In addition, work on strengthening the health-environment nexus, public awareness and education needs to continue.** This seems to be a massive task with limited societal capacities to undertake it. To improve the finalisation of the plan and raise the prospects for its successful implementation the Air Protection Program with Action Plan should be subject to public participation in accordance with Article 7 of the Aarhus Convention.

3.2 Nature Protection

In May 2021, the Government adopted the **Nature Protection Program** for the period from 2021 to 2023. Based on the state of biological and geological diversity and landscape diversity, the Program defines general and specific goals and measures for improving the nature protection system and biodiversity conservation. These are clearly defined, measurable, acceptable, realistic, and timed in the Action Plan for Nature Protection Program. However, there is a remaining gap in that Nature-Based Solutions – which can help address numerous challenges and provide long-term environmental, societal, and economic benefits – need to be recognized, formulated, and applied. This Program revises the Draft Nature Protection Strategy of the Republic of Serbia for the period from 2019 to 2025, in accordance with the Law on the Planning System of the Republic of Serbia and the Strategic Plan of the UN Convention on Biological Diversity for the period 2011-2020. The implementation of this Program also ensures the implementation of the goals and measures of the European Union Strategy for Biodiversity until 2030.

Recent **Amendments to the Law on Nature Protection** aim to: expand the ecological network from the existing 20% to 22% by the end of 2023; ban the construction of mini hydropower plants in protected areas; and paves the way for a Law on Noise Pollution. The changes harmonise legislation on protected areas with the recently adopted set of energy laws. This is a step forward towards better integration of energy and environmental policy objectives in the national legislative framework. Going forward it will be critical to establish a robust and transparent system for monitoring its implementation since some of the changes are open to interpretation (including but not limited to the ban on the construction of mini hydropower plants in protected areas).

3.3 Noise Protection

The Law on Environmental Noise Protection was first adopted in 2009 and last amended in 2010. A new **Draft Law on Environmental Noise Protection** was presented at

a public hearing in June 2021, with representatives of local self-governments, professional organisations and interested citizens. The Draft Law on Environmental Noise Protection was in public debate until June 23rd, 2021.

The Draft Law defines what noise is in the environment and expands the list of noise sources. It introduces changes regarding the competent authorities for the development of strategic noise maps and action plans.

The Draft Law is important for large cities throughout Serbia, especially for central cities, where the noise problem is most prominent. Notably, two articles related to noise from catering facilities were included in the Draft Law, at the proposal of the City of Belgrade. The new [Draft Law on Environmental Noise Protection](#) aims to fully harmonize this area with the EU Directive in the field of noise (2002/49/EC) that should be followed with a fully-fledged implementation plan.

3.4 Waste

Serbia is gradually improving the strategic framework to reduce its dependence on landfilling, modernise waste management infrastructure, and align the legal framework with that of the EU.[11] In particular, the Ministry of Environmental Protection published the Roadmap for the Circular Economy in Serbia in 2020, which included waste, landfill, packaging and plastics. The Roadmap contains recommendations on the sustainable use of resources, waste prevention and circular product design, as well as more specific measures for manufacturing industry, agriculture and food, plastics and packaging, and construction.[12]

At the beginning of 2020, the Ministry of Environmental Protection also announced the drafting of a new National Strategy for Waste Management (for the period of five years, 2019-2024 or 2020-2025) with a National Plan,[13] while there are also a number of regional and local plans for waste management.[14]

Currently, there is no information on when the new Strategy will be adopted. This new waste management strategy marks a notable shift away from the concept of regional sanitary landfills to a model of regional waste management centres. These regional waste management centres will include waste sorting, separation, and recycling, as well as non-recyclable waste treatment. In addition to moving to regional centres, it was announced that the principle of circular economy and waste prevention would be introduced.[15] This is critically needed given the current situation with waste management and its impact on the environment in Serbia. Finally, the Republic of Serbia approved the Draft National Sludge Management Strategy (NSMS) in June 2019. However, a review identified multiple shortcomings. These include the fact that short-term sludge management challenges and solutions were not considered, and potentially important sludge management options were not evaluated. The NSMS needs to be updated to include technical recommendations and the different available sludge management options.

All mentioned strategic and planning documents of a different scope and level should be integrated to provide more clarity on targeted interventions and investments in waste management. Furthermore, since all these drafts were prepared, the European Commission launched the European Green Deal and the new Circular Economy Action Plan as well as a consultation for the revision of the Sludge Directive. The Green Agenda for the Western Balkans was also endorsed in December 2020, which set new ambitions for the green transition. A revision of these documents is thus necessary to reflect these processes.

3.5 Horizontal Legislation

The Ministry of Environmental Protection is preparing amendments to the Law on Environmental Impact Assessments (EIA) and to the Law on Strategic Environmental Assessments (SEA), as well as to the Regulation on establishing the List of Projects Requiring

11 <https://balkangreenenergynews.com/investment-opportunities-in-upgrading-waste-management-systems-in-western-balkans/>

12 https://balkangreenenergynews.com/wp-content/uploads/2021/06/CMS-Serbia_-Fact-Sheet_final.pdf

13 The previous National Strategy for Waste Management of the Republic of Serbia was for the period 2010-2019.

14 Available on the SEPA website.

15 The Minister of Environmental Protection at the time stated that "a draft National Waste Management Strategy was drafted with the National Waste Management Plan, as well as a National Waste Prevention Program and a set of economic instruments for the implementation of European solid municipal waste regulations" also adding that "the aim is to build regional centers for waste management."

a Mandatory Impact Assessment and List of Projects that May Require an Environmental Impact Assessment ("Official Gazette of RS", no. 114/2008). Planned amendments should further harmonize this horizontal legislation with the European acquis, the directives that regulate the assessment procedure at the EU level.

4. URBAN DEVELOPMENT



The First Action Plan for the implementation of the Strategy for Sustainable Urban Development until 2030

was adopted in March 2021. The measures required for achieving the urban development goals set out in the Strategy in the period 2021-2022 have been grouped into 20 packages and described at the activity level. Under a Strategy-specific goal to achieve improved quality of environment, public health and safety in urban settlements, and a high degree of adaptation of urban areas to climate change, there are three packages of measures. These focus on: a) climate change mitigation by improving the quality of all environmental parameters, waste management systems, and energy efficiency; b) adapting to climate change and establishing a response system in risk and accident situations in urban settlements; and c) the application of environmental strategic and planning documents in both planning and achieving urban development.

In line with the six strategic priority areas of interventions in urban settlements, this Action Plan foresees the development of national urban development programs in the following two areas: 1) social inclusion and poverty reduction, and 2) settlements exposed to adverse effects of environmental pollution and climate change. However, the development of programs in other areas (including industrial and brownfield sites, urban sprawl and rural area degradation, endangered urban structures, and cultural and historic heritage sites) is planned for after 2022 only.

The Law on Disaster Risk Reduction and Emergency Management prescribe the obligation of establishing a Disaster Risk Register as a georeferenced database of natural and man-made risks. The Government of Serbia is

currently developing a Disaster Risk Register as a database of spatial data infrastructure that shall inform environmental policies, risk-informed urban planning, and investments, as defined by the EU INSPIRE Directive. The Disaster Risk Register shall become operational by mid-2022, offering the public access to the risks' exposure data on selected micro-locations, facilitating sharing of spatial information between public sector organizations, and assisting policymaking across the country.

5. THE CITY OF BELGRADE



The City of Belgrade has made progress in 2021 in adopting environmentally-friendly strategies and plans, including the final **Green City Action Plan (GCAP)**, **Sustainable Energy and Climate Action Plan (SECAP)** and the **Air Quality Plan for Belgrade**. These are both valid for ten years through 2030 and have been produced in coordination with complementary goals. In both the GCAP and SECAP, a series of 16 strategic objectives have been set out to tackle the environmental challenges identified and to meet the City's green vision. These are arranged in three core sectors: Urban Planning and Mobility; Energy and Efficiency; and Water and Waste; with two additional cross cutting objectives.

5.1 Green City Action Plan

The Green City Action Plan (GCAP) for the City of Belgrade is a strategic document which diagnoses, prioritises and detects the environmental challenges of the city, presents a "Green City" vision for 2030, and provides a financially sustainable plan to meet the City's ambition of winning the Green City Capital Award in the near future. This plan also establishes a roadmap for maximising economic, environmental, and social co-benefits.

The GCAP was developed by a team of local and international experts in close cooperation with the Belgrade

Mayor and City Administration and has been formally adopted by the City Assembly. It was developed using EBRD's Green City Action Plan Methodology, which used a combination of data driven and participatory approaches to identify key environmental challenges and to develop an Action Plan as a roadmap to achieving the Green City Vision.

5.2 Sustainable Energy and Climate Action Plan

The City of Belgrade signed the Covenant of Mayors for Climate and Energy (CoM) in October 2018, thereby making a commitment to: submitting a Sustainable Energy and Climate Action Plan (SECAP) within two years; reducing its carbon dioxide emissions by at least 40%; increasing its resilience to the impacts of climate change; and providing secured access to sustainable and affordable energy by 2030.

The SECAP adopted in June 2021 comprises: **inventories** (including a comprehensive Baseline Emissions Inventory for climate change mitigation and a Vulnerability and Risk Assessment for climate change adaptation); **actions** (featuring an overview of aggregated data on climate mitigation and adaptation and specific key and non-key actions for climate mitigation and adaptation in the municipality); **and an overview of strategy to implement the SECAP** (including targets, roles and responsibilities of authorities involved, financial capabilities, public involvement, and monitoring process).

The process of SECAP development embedded participatory approaches and stakeholder consultations. Organisations present included the City Hall, city secretariats, city public enterprises and utility companies, UN agencies, and civil society representatives. The process also involved coordination with the development of the GCAP. An overall vision, strategic objectives, as well as a long list of potential options/actions were identified. Due to the COVID-19 crisis, it was not possible to hold face-to-face discussions. Thus, the selected long-term vision, strategic objectives and short-listed options were validated at an online stakeholder workshop in July 2020. This workshop resulted in a final list of options for inclusion in the GCAP documents. The draft SECAP has been shared with stakeholders to receive feedback and it will

also undergo a Strategic Environmental Assessment (SEA).

5.3 Air Quality Plan for Belgrade

The City of Belgrade announced the Draft Air Quality Plan (valid for the next ten years) on January 15th, 2021 and invited the public to submit comments on the Draft by January 30th, 2021. The comments were included, and the new version was presented in March 2021. The UNCT has offered constructive comments and help in improving the process of developing the plan and its future implementation.

The plan gives a good overview of available data and planned abatement measures. It contains both an extensive scientific analysis of air quality data and a list of intended policy measures. The link between these two parts could be further improved. Ideally the scientific part would result in identification of the main sources of air pollution and their contribution to exceedances of air quality limit values. This could inform policy makers about the main sources that would have to be tackled first.

In the current plan the relationship between developments in emission levels and air quality is limited. The main sources for local air pollution are identified via a statistical analysis, taking into account meteorology. This is a good first step but should be further extended into source-receptor matrix that can also be used to translate projected emissions and scenarios with additional policy measures into air quality projections. The correlations in the draft plan indicate that local sources are responsible for high PM concentrations, especially in winter. This points at the importance of residential heating and probably also (old) diesel cars. High concentrations of NO₂ were found to be correlated with high traffic densities. The analysis for Belgrade shows the relative importance of coal fired power plants, gas fired heat production, waste removal and agricultural waste burning.

Emissions assessment would clarify issues such as city/area-based urban air quality problems vs. 'Hot Spots'; help prioritize and select air quality issues; magnitude of health impacts associated; urban productivity loss created by the problem; relative impact on the urban poor.

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cross cutting objectives.

Meanwhile the draft report already indicates some important sectors to tackle:

- a) Residential heating (300,000 households using solid fuels in technologically outdated devices);
- b) Heat production, electricity production;
- c) Traffic, and especially the high share of old cars;
- d) Agricultural waste burning.

All these sectors are covered, but the list of measures although impressive, do not clarify which of them would be most effective in avoiding frequent breach of air quality standards and improving health.

To assess implementation feasibility and measure progress all actions or measures should have a specific target and time span for implementation. Also, to assess the feasibility and long-term sustainability of all the actions and measures it would be good to indicate required funding and sources of funding.

To improve the process, it is recommended that regular public consultations are organized to inform the public about the roll out of measures and to gather further inputs. These public participation procedures should be organized by the responsible public authority in accordance with Article 7 of the Aarhus Convention and the [Maastricht Recommendations](#) on public participation in decision-making.

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