

## 05. NATURE PROTECTION

### OVERVIEW

It seems that, despite certain advances in this area, nature conservation in Serbia remains low on the list of national priorities, which can be concluded by numerous problems that repeat from year to year. The causes should be sought in: the non-compliance of sectoral policies, the lack of capacities and resources for planning and implementation of activities, inconsistent implementation of the law, lack of adequate control and monitoring, ineffective processing of acts of violation of laws etc. Solving these problems has to be systematically addressed, with the mutual cooperation of different sectors and increased investments in this area.

Although the third revision of the National Programme for the Adoption of the Acquis states that partial transposition of the directives on wild birds and habitats has been carried out<sup>99</sup>, the progress in resolving recognized problems in transposition and implementation into national legislation has proven to be limited.

Although it seemed that by establishing a new Ministry of Environmental Protection, the process of Euro integration in this area, as well as nature conservation itself, would be significantly improved, this is however not the case. It is particularly obvious that activities in the nature protection sector have stagnated, or are being performed inconsistently and non-transparently. It is clear that without the better organization of work, allocation of more financial resources, better planned activities, greater devotion and cooperation with other sectors (in particular the Ministry of Agriculture, Forestry and Water Management), no progress can be expected in the protection of nature nor adequate implementation of the process of accession to the European Union.

In the previous year, cooperation between the institutions, the negotiating group for Chapter 27 and CSOs in the preparation of the negotiating position for the field of nature protection has been realized and can now be considered successful, but it is necessary for it to be continued, with special emphasis on the need to exchange information on the preparation of the negotiating position and timely consultations on its content.

### LEGISLATIVE FRAMEWORK

To date, the Republic of Serbia has failed, although it was obliged as a signatory to the Convention on Biological Diversity, to implement changes to the legislative framework of the Aichi goals set by the UN Convention on Biological Diversity for the period 2011-2020.<sup>100</sup> Although these objectives were supposed to be an integral part of the Nature Conservation Strategy of the Republic of Serbia, the drafting of this document is a controversial process that, despite numerous inconsistencies and lack of transparency, has been carried out at a varied pace since 2014, and remains incom-

99 [http://www.mei.gov.rs/upload/documents/nacionalna\\_dokumenta/npaa/npaa\\_2018\\_2021.pdf](http://www.mei.gov.rs/upload/documents/nacionalna_dokumenta/npaa/npaa_2018_2021.pdf)

100 <https://www.cbd.int/sp/targets/>

plete. Consultations of the working group for the drafting of the Nature Conservation Strategy of the Republic of Serbia for the period from 2016 to 2026 were carried out in 2014, but in November 2016, the competent Ministry announced a public review of the draft document,<sup>101</sup> and the public were offered the right to comment. Although the Ministry has a legal obligation to publish a report on the public review, it has not yet been published. The Government Work Plan for 2018 envisaged that this document would be adopted in August 2018.<sup>102</sup> However, the process was again prolonged due to harmonization of the draft text of the Strategy with the Law on the Planning System.<sup>103</sup> In the meantime, the timeframe of the document has been changed from 2019 to 2025, and in 2018 a new working group was formed without informing the public about this process. The amended document was published on the Ministry's website without announcing a public review.<sup>104</sup> In addition, according to the latest available information, in order to comply with the aforementioned Law on the Planning System, the Nature Conservation Strategy will become the Nature Conservation Program, despite the fact that the Law on Nature Protection<sup>105</sup> envisages the existence of the Strategy. Such inefficiencies in the system throws into doubt not only compliance with international agreements ratified by Serbia, but also the compliance with its own laws, as well as harmonization of sectoral policies.

In 2018, the Ministry of Environmental Protection initiated changes to the Law on Nature protection. The main reasons for these changes was the initiative to ban the construction of small hydropower plants in protected areas. and the issuance of conditions for the protection of nature. CSOs are included in the working group on amendments to the Law, and amendments are expected as early as 2019.

Although the the Government Work Plan for 2018 envisaged that the regulation on appropriate assessment should be considered and adopted in June, this process has not been completed to date. The existence of this Regulation, which is the basic mechanism for the protection of the European Natura 2000 ecological network, is envisaged by the Law on Nature conservation, although the National program for the adoption of Acquis claims that this document has been prepared, however the process of its development is not transparent and lasts for several years already. The Regulation on the Appropriate Assessment is one of the key regulations for the transposition and implementation of Article 6 of the EU Habitats Directive.

The Rulebook on Protection of Strictly Protected Wild Species of Plants, Animals and Fungi from 2016<sup>106</sup>, which allows deviations from the EU Birds Directive (2009/147/EC) according to its Article 9, the killing of non-hunttable species for the purpose of preventing damage to hunting grounds and in accordance with the annual

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101 <http://www.ekologija.gov.rs/javni-uvvid-o-predlogu-strategije-o-zastiti-prirode/>

102 <http://www.civilnodrustvo.gov.rs/upload/documents/zakoni/Plan%20Rada%20Vlade%202018.PDF>

103 "Official Gazette of the Republic of Serbia", No. 30/2018

104 <http://www.ekologija.gov.rs/predlog-strategije-zastite-prirode-za-period-od-2019-do-2025-godine/>

105 Rulebook on declaring closed hunting season of the protected wild game species - "Official Gazette of the Republic of Serbia", No. 36/2009, 88/2010, 91/2010-correction, 14/2016 and 95/2018 – state law

106 "Official Gazette of the Republic of Serbia", No. 9/2012, 31/2013, 55/2015, 67/2015, 75/2016

management plans for hunting grounds, remains in place. It is not known whether the authorities in charge of environmental protection issues have had their say in the adoption of annual plans, or whether during the adoption of these plans the principles of European practices became the basis of which culling of the mentioned species are approved, are applied. The aforementioned rulebook, as a measure of protection and regulation of population numbers, foresees the hunting season of the turtle dove (*Streptopelia turtur*) to be closed from October the 1<sup>st</sup>, 2015 to March 31<sup>st</sup>, 2018, which in the meantime has expired, although the causes for which the same measure has been adopted are still not well known, and they are certainly not removed.<sup>107</sup> At the same time, the rulebook does not specify the dates for the start and end of the hunting season of this species, and it remains unclear whether and what legal protection it currently enjoys.

According to the Minister of Agriculture, Forestry and Water Management, a working group was formed to make amendments to the Law on Game Animal and Hunting,<sup>108</sup> which was supposed to submit the draft proposal by September 2018.<sup>109</sup> The public had no opportunity to see its members nor its results, even after trying to obtain information based on the availability of information of public importance, and according to available data there are no representatives of civil society organizations other than hunting organizations on the working group.<sup>110</sup> However, unofficial versions of the proposals bring extremely controversial proposals which by changing the definition of hunting try to enable the use of electronic lures before the start of shooting, which is in direct contradiction with the principles and provisions of international documents adopted by the Republic of Serbia, including the EU Birds Directive (Annex IV).

Progress in the protection of wild birds was achieved through the adoption of the Law on the Confirmation of African-Eurasian Migratory Waterbird Agreement.<sup>111</sup> This international agreement, which derives from the Convention on the Conservation of Migratory Species of Wild Animals<sup>112</sup>, prescribes the protection of 255 species of birds that are dependent on aquatic habitats, almost half of which are in Serbia, and 119 of which are protected or strictly protected by domestic regulations.<sup>113</sup>

Improvement of the legislative framework in the area of protection of wild species and their habitats was also achieved by the adoption of the Law on the Confirmation of Agreements on the Conservation of Bats in Europe,<sup>114</sup> which was also derived from

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107 Stanojević, N. and Ružić, M. 2018 *Streptopelia turtur*. In: Radišić, D. Vasić, V., Puzović, S., Ružić, M., Šćiban, M., Grubač, B., Vujić, A. eds. Red Book of Fauna of Serbia III - Birds. Belgrade: Institute for Nature Protection of Serbia, University of Novi Sad, Faculty of Science, Department of Biology and Ecology and Society for the Protection and Study of Birds of Serbia. pp 331-334

108 "Official Gazette of the Republic of Serbia", No. 18/2010 and 95/2018 – state law

109 [http://www.ekolss.com/poseta\\_ministra\\_poljoprivrede\\_iss.htm](http://www.ekolss.com/poseta_ministra_poljoprivrede_iss.htm)

110 <https://lorist.co.rs/beograd-formirana-radna-grupa-za-izradu-naacrta-zakona-o-divljaci-i-hovstvu/>

111 <http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/mu/skupstina/zakon/2018/13/2/reg>

112 <http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/viewdoc?regactid=413546&doctype=reg&findpd-furl=true>

113 <http://www.ekologija.gov.rs/skupstina-usvojila-izmene-i-dopune-zakona-o-zastiti-zivotne-sredine-i-set-ekoloskih-zakona/>

114 <http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/mu/skupstina/zakon/2018/13/4/reg>

the International Convention on the Conservation of Migratory Species of Wild Animals.

Although activities towards the preparation of the text of the Protocol on the Treatment and Cooperation of Bodies and Organizations in the Fight Against Illegal Killing, Trapping and Trade in Wild Animals have been intensified during 2017, the purpose of which is to determine jurisdiction to act in cases of destruction of nature, this text has not been completed to date. At the beginning of 2018, the Ministry of Environmental Protection announced unofficially that the document will be adopted in the short term, but it has not been included in the official Government Work Plan for 2018.

According to information on the initiation of the protection procedure and public debates published on the website of the Ministry, 17 natural goods were found during the reporting period in the procedure of protection. The total area proposed for protection has been increased by about 50 thousand hectares (50,178.14 ha).<sup>115,116</sup> In the same period, the protection of almost 27 thousand hectares (26,969.73 ha) was officially declared within the three protected areas, which is a concerning.<sup>117</sup> Although the process of providing legislated protection of an area is mostly long-lasting, both due to the nature of the procedure itself and because of the lack of capacity of the Institute for Nature Conservation during the development of the protection study, it is not clear why the public has had to wait such a long time to notice the initiation of the protection procedure by the Ministry of Environmental Protection, i.e. the decision on the proclamation by the competent authorities. This practice has proven to be a key obstacle to the effective protection of nature according to the standards prescribed by EU legislation and other international instruments. Although areas proposed for protection are officially considered protected until the end of the procedure, the mechanisms for their protection are not entirely clear, which is why these areas are vulnerable to adverse effects. Thus, the City of Belgrade Development Strategy, until 2021<sup>118</sup>, foresees the construction of a port in Beljarica, an area for which the protection procedure has already been initiated, and which has the status of an Important Bird Area (IBA the confluence of the Sava into the Danube)<sup>119</sup>, which makes it part of the Ecological Network of the Republic of Serbia and the potential Natura 2000 area.

By amending the Order on Measures for Conservation and Protection of Fish Stocks<sup>120</sup>, the Ministry of Environmental Protection imposed a ban on catching the sterlet (*Acipenser ruthenus*). The initiative for banning the catch of the sterlet was initiated by CSOs with the support of professional and scientific institutions. The reason for launching the initiative has been massive overfishing on the territory of Serbia in the past few years. It has been announced that the budget for 2019 will allocate funds

115 <http://www.ekologija.gov.rs/category/saopstenja/saopstenja-zastite-prirode-i-klimatskih-promena/>

116 <http://www.ekologija.gov.rs/category/obavestjenja/zastita-prirode/>

117 <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije.html>

118 [http://www.beograd.rs/images/file/8482b593767213b8926a3fc6988eca50\\_1021365819.pdf](http://www.beograd.rs/images/file/8482b593767213b8926a3fc6988eca50_1021365819.pdf)

119 <http://datazone.birdlife.org/site/factsheet/usce-save-u-dunav-iba-serbia>

120 "Official Gazette of the Republic of Serbia", No. 56/2015 and 94/2018

for sterlet population research<sup>121</sup> in order to determine whether the species should remain permanently protected, i.e. have the status of a strictly protected species, or whether there will be fishing allowed once the population is recovered.

Another important bylaw passed by the Ministry in 2018 is the Rulebook on the Procedure for Proposing and Appointing Members of the National Park System Advisory Board.<sup>122</sup> This is an important mechanism for strengthening the involvement of local stakeholders in the management of national parks, which is certainly a positive step towards the increased transparency of the work of national parks and the improvement of their management.

At the end of 2018, the Ministry, introducing the Third Draft Negotiation Position for Chapter 27, introduced amendments to the Technical Adaptation of the Birds and Habitats Directives, in which some of the proposals of the professional public presented at a public hearing in March 2018 were adopted. It remains to be seen how and in what time the proposed solutions will be incorporated into national legislation.

## THE IMPLEMENTATION OF LEGISLATION

Inadequate and inconsistent implementation of the laws and regulations of the Republic of Serbia was so frequent that it could be considered as the rule rather than an exception. The main reason for this is the lack of capacities (both in numbers, as well as in training and equipment for work) of institutions of executive power, prosecution and the judiciary, as well as strong political pressure on members of these institutions. Last year, no significant progress was made in the implementation of the law.

Protected area management plans, which are often inconsistent with the principles of nature protection, lead to the loss of biodiversity in areas which are extremely important to nature conservation in Serbia. There is a continuation of the negative practice of destroying natural habitats by illegal construction of tourist and other facilities in protected areas, as well as the implementation of intensive logging in certain areas. Clear-cutting, especially that which has been carried out in protected areas, sometimes even within the strictest protection areas, is particularly dangerous for nature. Particularly concerning is the fact that the documents on the reasons and scope of tree cutting is most often inaccessible to the public; contrary to the Law on Free Access to Information of Public Importance<sup>123</sup> and the Aarhus Convention. Those who manage protected areas, mostly public companies, do not have sufficient capacity to implement protection measures; they lack not only adequate financial support for satisfactory functioning but also adequate control over the work performed by competent authorities, and often carry out illegal activities on their own. Contrary to logic, the management of protected areas mainly generates revenues by using the natural resources of the area whose protection it should provide. This applies in particular to the permitted exploitation of forests and hunting in protected areas of the highest importance, such as national parks.

121 <http://www.ekologija.gov.rs/za-unapredjenje-zastite-i-ocuvanja-jesetarskih-vrsta/>

122 "Official Gazette of the Republic of Serbia", No. 46/2018

123 "Official Gazette of the Republic of Serbia", No. 120/2004, 54/2007, 104/2009 and 36/2010

The biggest problem in conservation of important habitats and species is non-transparent and inadequate **planning of small hydroelectric power plants** and other facilities in protected areas, whose construction often does not meet biological minimum standards and disturbs the natural balance of already disturbed natural ecosystems. The main cause of this problem is poor planning documents, inadequate implementation of the Strategic Environmental Assessment Process and Environmental Impact Assessment, as well as ubiquitous corruption and political pressure. The cumulative impact of these projects being carried out poses a particular danger to nature which, in the impact assessment studies of these projects, is stated in principle and not assessed in practice.

In the autumn of 2018 the **burning of stubble** in fields was a mass occurrence, which led to the complete destruction of numerous habitats throughout Serbia. These illegal activities also affected Carska bara, and the other protected areas of IBA and Ramsar in which the vegetation was completely destroyed by burning.<sup>124</sup> Burning of stubble is a primitive agrotechnical measure of removing harvest residues, which is legally prohibited, but still used. It puts the survival the wild flora and fauna of the Republic of Serbia at risk, and it is necessary to prevent it in the future by the adequate application of the law.

After several years of inactivity of the authorities responsible for the establishment of the Ecological network Natura 2000 in September 2018, funds were allocated to this purpose for projects with a duration of one year.<sup>125</sup> To date there is no official information on whether the future funds will be continuously allocated to this purpose, which is necessary for the quality preparation of Natura 2000 in the process of Euro integration. Although, since 2017, the implementation of the new IPA project to deal with the establishment of Natura 2000 has been planned, it is still not certain when it will actually begin. Public tender for the selection of the contractor was published in February 2018, but it has not yet been completed.

Illegal hunting of wild animals, especially birds (most often by prohibited means such as electronic lures), has been recognized as a major problem in Serbia, which repeats itself year after year<sup>126,127</sup>. The reason for this is the inconsistency of the law, ignorance and disregard of the law, insufficient control of hunting by the competent institutions, lack of capacities in police and inspection services, as well as the absence of punishment for perpetrators of committed crimes. The growing problem of the poisoning of wild birds, predominantly birds of prey and other wild animals is also evident as a result of unregulated use of pesticides and the use of substances prohibited by law. Inadequate control over the traffic, use of these substances and the absence of the adequate punishments for perpetrators of such illegal acts contribute to the development of the aforementioned problem in the protection of nature.

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124 <http://www.ekologija.gov.rs/paljenje-carske-bare-je-zlocin-prema-prirodi-i-zivotnoj-sredini/>

125 <https://www.nabavke.com/javne-nabavke-tenderi-srbija/>

126 Report on illegal killing, poisoning, capture, keeping and trade in wild birds in the Republic of Serbia for the period 2000-2017 can be found at: <http://pticesrbije.rs/wp-content/uploads/2017/10/Serbia-bird-crime-report.pdf>

127 <http://pticesrbije.rs/2018/09/30/nezakonito-unistavanje-ptica-u-srbiji-se-nastavlja/>

In 2018, there was no report of the Republic of Serbia on the activities undertaken by the state to combat illegal hunting, capture and trade in wild birds, previously requested by the Secretariat of the Convention on the Conservation of European Wildlife and Natural Habitats.<sup>128</sup>

Last year, progress had been made in the cooperation of the Sector for Monitoring and Precaution (Inspection) concerning the environment through the inclusion of CSOs into the capacity-building program of environmental inspectors, which opened the possibility for more intensive involvement of CSOs in environmental control and precautionary issues.

## **FINANCING**<sup>129, 130</sup>

According to the Law on Budget of the Republic of Serbia for 2018,<sup>131</sup> only RSD 5 million were allocated to activities on the establishment of the Natura 2000 network, which were not spent for this purpose<sup>132</sup>. In addition, according to information received from the Ministry of Environmental Protection, the financing of projects for the establishment of the Ecological Network in the amount of RSD 17 million and the establishment of the Natura 2000 network in the amount of RSD 11 million was provided through subsidies to the Institute for Nature Conservation. It is planned that these activities would be financed through the work of the Institute in 2019, and a total of RSD 14 million are intended for these two items.

The budget for 2018 envisaged RSD 248 million for subsidies granted to managers of protected natural resources of national interest, and allocated RSD 245.5 million, which is an alarmingly small allocation of funds for the conservation of nature in Serbia, while the same amount is planned for 2019. Given that most of these funds are spent on employee salaries, maintenance of facilities, purchase of equipment etc. only a small part of the fund remains for the necessary investment in practical protection and improvement of the state of nature in protected areas through revitalization and maintenance of habitats and the recovery of species.

In accordance with the strategic goals of the Ministry to increase forestation, the budget for 2019 allocated RSD 63 million in order to protect and preserve the landscape diversity, which is 30 million less than the previous year. This activity is financed from the Green Fund, and according to available information RSD 40.5 million was spent for its realization.

**Non-transparent allocation of budget funds and lack of reporting on their spending are still the biggest problems affecting the success of nature conservation in Serbia.** For example, for years, funds have been allocated to the activity entitled “Pro-

128 <https://www.coe.int/en/web/bern-convention/-/38th-standing-committee-meeting?desktop=false>

129 All the data on the financial resources for 2018 were taken from the RS Budget Law for 2018 <http://www.mfin.gov.rs/UserFiles/File/zakoni/2017/Zakon%20o%20budzetu%202018.pdf>

130 [http://www.parlament.gov.rs/upload/archive/files/cir/pdf/predlozi\\_zakona/2018/Budzet2019.pdf](http://www.parlament.gov.rs/upload/archive/files/cir/pdf/predlozi_zakona/2018/Budzet2019.pdf)

131 “Official Gazette of the Republic of Serbia”, No. 95/2018

132 [http://www.ekologija.gov.rs/wp-content/uploads/informator/IZVR%C5%A0ENJE\\_BUD%C5%BDETA.pdf](http://www.ekologija.gov.rs/wp-content/uploads/informator/IZVR%C5%A0ENJE_BUD%C5%BDETA.pdf)

tection and Conservation of Strictly Protected Species of Polecat Populations and Migratory Species” (2018 – RSD 6.6 million, 2019 – RSD 5.4 million), while reporting on the implementation of these activities does not exist. The situation is similar when it comes to other budget lines.

## RECOMMENDATIONS

### *Legislative framework*

- Completion of the drafting of the Protocol on the Actions and Cooperation of Authorities and Organizations in Combating Illegal Killing, Trapping and Trade in Wild Animals by the Ministry of Environmental Protection with the final consultation of the professional and scientific public, as well as the adoption of the Protocol by the Government of the Republic of Serbia.
- Revise the Law on National Parks. Make National Park Service Law revision a process that will enable the active participation of experts and interested public in developing the legislative framework for the management of protected areas; especially legal provisions relating to the mechanism of protected areas management, categorization of protected areas, establishment and implementation of regimes and protection measures.
- Within the process that will enable the active participation of experts and interested public, complete the drafting of the Nature Conservation Strategy of Serbia and enable the enforcement of all prepared regulations whose enforcement has been postponed (e.g., the Regulation Acceptance Testing).
- Harmonize regulations in the field of nature conservation not only with each other but also with other laws and areas concerning nature conservation.
- Fully transpose the provisions of the EU Birds Directive and Habitats Directive into national legislation. Implement the announced amendment of the Law on Nature Protection.
- Improve cooperation in the processes of adopting strategies, laws and by-laws between the sectors of nature conservation, energy, spatial and urban planning and construction, as well as cooperation between said sectors when it comes to enforcement, especially in the Environmental Impact Assessment and Strategic Impact Assessment.
- Improve cooperation between state institutions and civil society organizations in the field of nature conservation during the preparation of strategic documents and regulations, work on data collection and nature conservation. Achieve full participation of civil society organizations in the processes by considering and appreciating attitudes and expert opinions.
- Continue active information and involvement of civil society organizations in the preparation of a negotiating position for Chapter 27 in the field of nature conservation.

## ***Implementation of regulations***

- Strengthen cooperation among all stakeholders in order to prevent corruption in the nature conservation sector (especially those related to the illegal use of forests, water resources and hunting).
- Improve cooperation and increase the capacities of state institutions in charge of nature conservation (increase the number and professional capabilities of employees and technical capacities), and establish a better organization of work. Allow full implementation of the systematization of job positions within the Ministry of Environmental Protection.
- In 2019, strengthen the inspection of protected areas in order to combat illegal construction, logging and other activities that lead to destruction of habitats.
- Ensure more active work of the competent Ministry in solving problems and preventing violations of the provisions of the International Convention on the Conservation of European Wild Flora and Fauna and Natural Habitats in Serbia.
- Continue the continuous capacity building of the police, the inspectorate, the prosecution and judiciary for the implementation of regulations related to the protection of species and habitats, in cooperation with professional organizations of civil society.
- Ensure regular and adequate reporting under the international conventions in the field of nature conservation as ratified by Serbia (in particular according to the Convention on the Conservation of European Wild Flora and Fauna and Natural Habitats, the Convention on the Conservation of Migratory Species of Wild Animals and the CITES Convention).
- Ensure better cooperation and open flow of information between different sectors within the Ministry of Environmental Protection, as well as between state institutions whose work influences or concerns nature protection.

## ***Financing***

- Allocate public funds for strengthening the capacity for the implementation of legal regulations at both the local and national level.
- Ensure the spending of funds from the Republic of Serbia budget allocated to activities to establish the Ecological network and Natura 2000 network in 2019 and define the budget for these purposes for the year 2020.
- Ensure adequate and purposeful financing of nature conservation from the Green Fund in accordance with the needs of nature conservation (identify priorities and criteria for allocation of funds).
- Ensure transparent and adequate allocation of resources in the nature conservation budget and reporting on their spending; allocate more funds for practical protection of species and habitats.

# KILLING OF COMMON QUAILS IN ILLEGAL HUNTING IN SERBIA (2000 – 2018):

**448** is the number of recorded cases of illegal hunting of Common Quail

**681** is the number of electronic devices for game calling (“lures”) used in Common Quail hunting

\*in 100% of recorded cases of illegal hunting lures were used\*

**1.65 million**

is the estimated number of Common Quails that are killed during illegal hunting in the Mediterranean every year

**60.000**

is the estimated number of Common Quails that are killed during illegal hunting in Serbia annually

The prohibition of use of lures during hunting in the Republic of Serbia is prescribed by the Law on the Ratification of Convention on the Conservation of European Wildlife and Natural Habitats, the Law on Nature Protection and the Law on Game and Hunting. In the European Union, this prohibition is prescribed by the Birds Directive.

Terminological non-compliance of the Criminal Code of Republic of Serbia with regulations in the areas of nature protection and game and hunting, and poor application of the law in general contribute to persistence of this problem.

# The number of recorded cases of illegal hunting of Common Quail by districts

