

## 02. AIR QUALITY

### OVERVIEW

No progress was made toward adopting air quality plans. It is urgently necessary to speed up the adoption of air quality plans for Belgrade and other cities, and to ensure transparency and public participation in the process. The draft National Emission Reduction Plan (NERP) was submitted to the Energy Community Secretariat on the 31<sup>st</sup> of December 2015. However, it has not yet been adopted and the document is not publicly available; we therefore cannot comment on the content of the NERP.

As noted in the Coalition's previous report<sup>15</sup>, the full functioning of air quality monitoring systems needs to be assured in order to provide unbiased data about air quality in the country. Serbia has a satisfactory air quality monitoring system, which received EU support for infrastructure and capacity building in previous years. However, it is critical that the responsible authorities maintain and sufficiently finance the monitoring system.

### IMPLEMENTATION

Overall, air quality in Serbia worsened compared to 2014. No progress was made in the adoption or implementation of air quality plans.

Monitoring system data availability and the quality of data is lower than in 2014. Compared to 2014, air quality in two of the eight urban agglomerations has worsened; in two urban agglomerations air quality remains the same: Highly polluted. Data is not available for three urban agglomerations.

There are continuous inconsistencies in the number of fully functioning automatic measuring units, from year to year, which is also the case for the number and type of parameters selected to be monitored. Namely, for the year 2015, PM10<sup>16</sup> were measured at only six out of forty one automatic measuring stations, which is insufficient to gain a broader picture of the exposure of the general population.

The annual update of air quality showed that four of Serbia's eight urban agglomerations fall into air quality category III, exceeding the margin of tolerance for several pollutants. For all five urban agglomerations for which data was reported, air quality worsened or remained in the same category: Over-polluted.

The Law on Air Protection<sup>17</sup> requires local government authorities to publish monthly reports on air quality based on data collected from the local network of measuring stations and measuring points. The reports should be available to the public – published in the media and on local government websites. However, our analysis of local government websites found that it is difficult to find data about air quality, due to the poor organization of information. In some cases the data were out dated, while in other cases the data were up to date but not presented as defined in the Law. According to the Law, air quality reports must contain tables, graphs and textual explanations of the data. However, reports on air quality often contain only graphical presentations of the data without explaining limit values. Limit values are legally binding concentrations of pollutants in the air that must not be exceeded. Presenting the data in only a graphical form makes it difficult for the public (non-experts) to interpret and does not clearly indicate if emissions of polluting particles are within the allowed limits. **Further, these data are published at least a month after they are recorded; as a result the public does not receive timely information about (high) levels of air pollutants when the limit values are breached.**

A large amount of air quality data collected throughout the county at a local level is not regarded as official data. The standards and rules that regulate air quality monitoring stipulate that air quality must be measured using an automatic measuring system, such as the National Network of Automatic Stations for Air Quality Monitoring, which is comprised of 37 stations. However, in many locations air quality data is measured manually by the local network of measuring stations. Although accredited manual methods are used by these measuring stations, the Law does not recognise air quality data measured in this way. As a result, in areas not covered by the automatic measuring network, official published data does not provide a realistic insight into local air quality. Of particular concern are locations where non-official measuring stations show air pollutants exceed the limit values.

Also of particular concern is the tendering process for contracting service providers (laboratories) to monitor air quality locally. As defined by the Law, the tenders are awarded to the lowest tendered offer, regardless of the quality of measuring and analysis processes, *per se*. This means that local legal entities with highly qualified staff that have invested in automatic measuring equipment, including the network of Institutes of Public Health, may not be awarded tenders, but rather to the bidder with the cheapest offer. This process is flawed and a procedure that leads to the best quality data should be established.

15 [https://rs.boell.org/sites/default/files/uploads/2016/02/coalition27\\_shadow\\_report\\_2015.pdf](https://rs.boell.org/sites/default/files/uploads/2016/02/coalition27_shadow_report_2015.pdf)  
16 PM10 is particulate matter 10 micrometers or less in diameter

17 [http://www.paragraf.rs/propisi/zakon\\_o\\_zastiti\\_vazduha.html](http://www.paragraf.rs/propisi/zakon_o_zastiti_vazduha.html)

## RECOMMENDATIONS

### *Implementation*

Responsible stakeholders for air quality monitoring should ensure that the measuring system is well maintained and that data are made available, particularly in urban agglomerations such as Belgrade.

- Intersectoral cooperation needs to improve in order to enable full implementation of the legislation already in place in the country.
- Local governments/cities should improve the quality, visibility and accessibility of air quality data.