
Water
Quality

Overview

The previous year did not bring any significant progress in the strategic and legislative framework of the water sector. The Water Management Plan, as one of the key documents for further progress in this area and harmonization with EU practices, has still not been published. The Plan was developed through an EU twinning project. The publication of the draft was announced for the end of 2020; however, this has still not taken place. One positive step was the drafting of an action plan for the implementation of the Water Management Strategy, but this has also not yet been adopted by the Government of the Republic of Serbia.

It is obvious that in the previous period, the Government has concretized and consolidated activities on reducing surface water pollution, i.e., building capacities for wastewater treatment. Progress is evident in the preparation of investment projects, which should lead to more efficient and faster construction of the wastewater treatment plants themselves.

There has been no significant progress in mitigating and eliminating hydro-morphological pressures, such as the construction of small hydropower plants and intense exploitation of river sediments. The fact that construction projects that significantly endanger water resources and run contrary to the principles of integrated and sustainable management have continued to appear and receive support is discouraging.

There has been no change to the financing and administrative capacity in the water sector compared to the previous period.

Strategic and Legislative Framework

In the previous period, no new legislation has been drafted, adopted or significantly amended in the water sector.

During 2020, the development of the Water Management Plan for the Republic of Serbia 2021–2027 continued according to the previously prepared Work Program and the plan for the development of the Water Management Plan for the Republic of Serbia 2021–2027. The plan is being developed as part of the EU twinning project Support to Policy Planning in the Water Management Sector. Its development and adoption are essential for the appropriate implementation of European legislation in the field of water in Serbia.

In September 2020, the second conference within the Plan development process was held, followed by the final conference at which the programme of measures for the future Plan were presented. Civil society participation was facilitated during the development of the Plan through participation in the conferences and submission of written comments. The publication of the Draft Plan was announced for the end of 2020, but had not been published at the time of writing. According to the aforementioned Work Program and the plan for the development of the Plan, the Draft Plan should have been published in December 2020.

At the end of 2020, a public debate was held on the Proposed Action Plan for the implementation of the Water Management Strategy for the Republic of Serbia from 2021 to 2023. The public debate was completed and the draft of this plan, together with the report on the Strategic Environmental Impact Assessment, is available to the public (MAFWM, 2020), but has not yet been adopted by the Government of the Republic of Serbia. The plan provides an overview of the activities for the implementation of the Strategy with defined responsible parties, deadlines, financial resources and indicators for monitoring implementation. The adoption of this plan would create the conditions for the effective implementation of the Strategy.

The Implementation of Regulations

Based on the events of the previous year, it can be said that wastewater treatment is finally starting to be recognized as one of the priorities in the field of environmental protection. In 2020, the Ministry of Environmental Protection announced that technical documentation has been prepared for the construction of 29 wastewater treatment plants (WWTPs). The Review of Projects and Project Activities in Waste and Wastewater Management (MEP, 2020) states that WWTP construction projects have been completed, or are in the final phase of construction, in Leskovac, Raška, and Subotica, as well as the joint project for Kula and Vrbas. In addition, the Review lists another 34 projects that are in the preparatory stages with the participation of the Ministry of Environmental Protection or other competent institutions and bodies.

In 2020, the Framework Loan Agreement LD 2026 (2019) was ratified between the Council of Europe Development Bank and the Republic of Serbia for the programme loan – Water Supply and Wastewater Treatment Plants (NARS, 2020). This loan will provide €200 million, mostly for the construction of wastewater treatment plants in Serbia.

In January 2020, the Ministry of Construction, Transport and Infrastructure of Serbia signed two agreements with the Chinese company CMEC (China Machinery Engineering Corporation) for the collection and treatment of wastewater from the central sewage system of the City of Belgrade. The contract for the first phase of construction is worth €271 million, and the value of the total investment is estimated at up to €771 million. No public procurement procedure was conducted for contracting of this work. The basis for signing the contract is the Agreement on Economic and Technical Cooperation in the Field of Infrastructure between the Government of the Republic of Serbia and the Government of the People's Republic of China, signed in 2009 (CPES,

2021). The details of the contract are not known, nor have they at any point been presented to the public. It is a positive development that the treatment of wastewater in Belgrade has finally started to be resolved, but it is worrying that it is being done in a non-transparent manner and while ignoring the legal order of the Republic of Serbia.

Individual projects that were active in 2020:

- The Ministry of Finance (Sector for Contracting and Financing Programs from European Union Funds) announced that a tender would be issued for the construction of a WWTP in Niš in September 2020, but it had not yet been issued by the end of 2020. The estimated value of the project is €43 million.
- In August 2020, the WWTP in Kruševac was put into operation. The plant was built with a loan from the German Development bank KfW.

Significant progress in practice, i.e., in the percentage of wastewater that is treated, is still not evident. According to data from the Statistical Office of the Republic of Serbia, the percentage of the population connected to urban wastewater treatment with at least secondary treatment in 2019 was 13.1%, which is not significantly different from previous years (SORS, 2020). While progress in the preparation of projects for WWTPs is certainly visible, we hope that the construction and operation of WWTPs will be significantly accelerated in the near future.

The Environmental Protection Agency has continued regular monitoring of surface waters. In 2020, the results of surface and groundwater quality testing in 2019 were published. The monitoring covered 70 profiles in 49 watercourses, seven profiles in the canal network, one reservoir and 53 groundwater stations (SEPA, 2020). The scope of monitoring, i.e., the number of analysed water bodies, has changed slightly in the past few years. Taking into account the number of water bodies, which according to the current Rulebook on the Identification of Surface and Groundwater Bodies amounts to 493 watercourses, five lakes and 153 groundwater bodies (MAFWM, 2010), it is clear that monitoring coverage is far from adequate and that such monitoring does not

meet the requirements of the Water Framework Directive. It should be noted that the new typology of water bodies, which has been announced and is being developed, will significantly increase the number of water bodies, which will further increase the requirements for water quality monitoring. The current capacities of the Environmental Protection Agency are modest and should be significantly strengthened in order to raise water quality monitoring to a level that will meet obligations under European water policies.

The issue of the construction of small hydropower plants, which has attracted a lot of public attention in the past few years, and which has been identified as one of the most significant factors endangering watercourses in Serbia, has not yet begun to be resolved in a systematic way. On the contrary, in December 2020, the Ministry of Mining and Energy increased the incentives for privileged electricity producers, blowing wind into the sails of investors for the further construction of small hydro plants. The adopted Regulation on the Amount of Special Fee for Incentivizing Privileged Electricity Producers in 2021 (VRS, 2020) (Official Gazette of the Republic of Serbia, No. 152/2020), increases the incentives from 0.093 dinars per kWh consumed to 0.437 dinars per kWh. Several local governments have recognized the danger posed by the spontaneous construction of small hydro plants and, within their competencies, have initiated appropriate procedures to better regulate the sector. Last year, the municipalities of Užice, Požega, Bor, Svrljig, Vlasotince, Arilje and Paraćin suspended the issuance of permits for the construction of small hydro plants until the spatial plans were changed.

Uncontrolled and excessive extraction of river sediments remains a serious threat to the preservation of watercourses in Serbia. No significant progress has been made in controlling river sediment exploitation. The capacities of the competent inspectorate are still insufficient to properly respond to these pressures, which dramatically endanger Serbia's rivers. During the previous year, civil society organizations also registered specific examples of violations of regulations and illegal use of river sediments. The situation on the lower course of the Drina river is especially problematic, as reported by the Center for Investigative Journalism (CINS, 2020), where the situation is further aggravated by the unresolved delineation of the border between Bosnia and Herzegovina and the Republic of Serbia.

The principle of integrated water management, although formally introduced through the Law on Waters, is still difficult to implement in practice. This is perhaps best illustrated by cases of controversial projects that have attracted public attention in the past year, such as the planned construction in the area of the water protection zone at Makiš (Belgrade) and the announced project to build a residential and business complex at an unprotected part of the Danube near Novi Sad. In the first case, construction is planned in the immediate vicinity of Makiško polje, the largest water source for Belgrade, which would expose it to pollution. In the case of Novi Sad Waterfront, it is planned to move the embankment in the direction of the river in order to create a construction area. This solution is extremely problematic in light of modern principles of river conservation and management, as well as international agreements, such as the Convention on Cooperation for the Protection and Sustainable Use of the Danube River (FAFRY, 2003), which Serbia has signed, and which unequivocally obliges Serbia to use water and watercourses sustainably.

In accordance with Article 142 of the Law on Waters (NARS, 2010), at the end of 2020 the Ministry of Agriculture, Forestry and Water Management began the formation and election of members of the National Water Conference, a body that should ensure public participation in water management. The National Conference should have 14 members, including representatives of citizens' associations. The Conference is formally established, and its members appointed, by the Government of the Republic of Serbia, however at the time of writing, this process has not been completed.

In 2020, a study of the situation in the field of wastewater management was prepared through the project Public-Private Dialogue for Development, implemented by NALED, the Association 3E and the Network of Inspectors of Serbia (Krstović et al, 2020). The study, in addition to state bodies, included the business sector in considering and assessing the wastewater situation. In addition to highlighting specific problems in the implementation of obligations and control of businesses that discharge industrial wastewater (inadequate capacities, unclear legal provisions), the study showed that stronger and better structured involvement of business is necessary in order to effectively solve wastewater problems, from policy development to implementation.

Financing

According to the Regulation on Determining the Water Management Program in 2020 (GRS, 2020a), RSD 3.68 billion was allocated from the Budget Fund for Water for the regulation and use of water, protection of water from pollution, regulation of watercourses and protection against the harmful effects of water, and planning and international cooperation in the field of water. In 2019, RSD 3.73 billion was earmarked for the same purposes. The distribution of funds in relation to the planned work has remained the same as previously, with most of the funds, in the amount of about RSD 2.9 billion (about 80% of the total budget), continuing to be directed to the regulation of watercourses and protection from the harmful effects of water (floods and torrents). In the last few years, the water management budget has stagnated.

Other funds are also directed to water management and protection. In 2020, the Ministry of Environmental Protection provided RSD 270,000,000 for the construction of a WWTP in Leskovac, and the Ministry of Construction, Transport and Infrastructure provided RSD 60,000,000 for the construction of a WWTP in Kikinda. Local governments also invested in the water sector, primarily water protection and the construction of wastewater treatment plants.

The total budget expenditure for water management is difficult to monitor, as it is spread across several budget lines (capital investments, co-financing of international projects, etc.) as well as local government budgets. However, expenditure is nonetheless clearly insufficient, given the scope of necessary investment.

Recommendations

Strategic and Legislative Framework

1. Integrate nature directives (Birds Directive and Habitats Directive) into the field of water management. Better coordination is needed between the water management sector and the environmental sector regarding the implementation of EU directives.

2. Develop a concrete plan and set of measures for the improvement of water quality monitoring in accordance with the requirements of the Water Framework Directive.

3. Develop specific strategies to improve investment in wastewater treatment facilities. Initiate the development of models and strategies for knowledge transfer in the field of wastewater treatment in order to reduce costs and mobilize domestic capacities.

4. Adopt strategic and planning documents in accordance with the obligations arising from the Water Framework Directive (Water Management Plan, Flood Risk Management Plan).

The Implementation of Regulations

5. Develop capacities and improve the organization of public institutions responsible for water management, especially at the local level – the complexity of water management issues requires stronger personnel and technical capacities. The competent institutions must conduct an analysis of the existing capacities as soon as possible and develop a plan for their improvement. To achieve this, professional institutions and CSOs need to advocate for greater political and financial support for the water management sector.

6. Develop structured cooperation with other relevant sectors: environmental protection, energy, agriculture and spatial planning. This requires constant communication and exchange of information between sectors to be established.

7. Further improve public participation in policy development in the water management sector. Public consultations should provide more opportunities than the legal minimum. Stakeholder involvement should begin in the early stages of policy development.

8. Integrate nature-based solutions into water management practices and more seriously consider ecosystem services. Specific capacities for these needs should be developed in the competent institutions.

9. Improve control and mitigation of key dangers: poorly planned small hydropower plants, gravel extraction, pollution, uncontrolled use of groundwater, and illegal construction on river banks – river habitats, wetlands, and water resources in general are very endangered in Serbia. Urgent action is needed at the national level.

10. Develop a single database on planning and constructing WWTPs that is available to the interested public, enabling more efficient and systematic planning and monitoring of project implementation throughout Serbia.

11. Adopt key strategic and planning documents for alignment with EU water management legislation and practice.

Financing

12. Gradually increase water prices and fees for wastewater drainage and treatment services, in order to provide for the construction of the necessary facilities for water drainage and treatment and their normal operation.

13. Permanently increase budget funds for financing water management activities and water protection.

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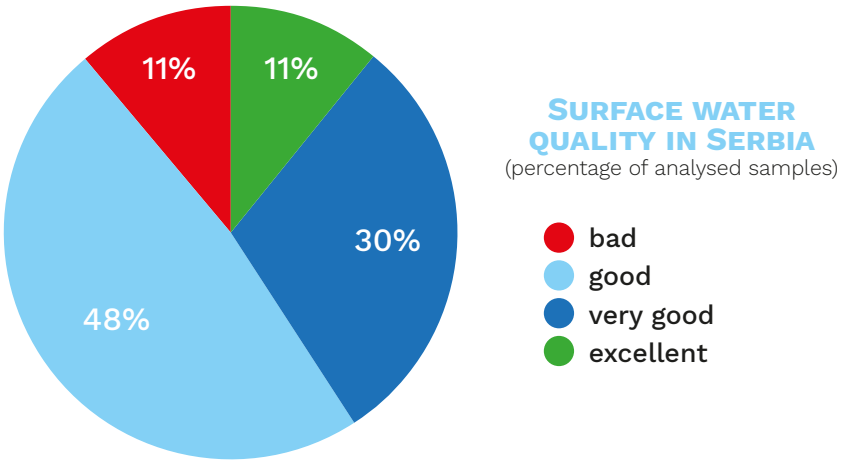
WATER QUALITY

SURFACE WATER QUALITY

78% OF WATER COURSES where the quality is measured are rated as being of good or excellent quality



*** Source:** Environmental Protection Agency
http://indicator.sepa.gov.rs/pretraga/indikatori/svefind/6f14b40186514ca6b35fa3a628337e9a

Most communal and industrial waste water is **NOT TREATED**, but directly dumped into water courses (recipients) – the question therefore arises:

DOES WATER QUALITY MONITRING PROVIDE A REALISTIC PICTURE OF THE STATE OF OUR WATER COURSES?

DO NATURAL ECOSYSTEMS STILL HAVE THE CAPACITY TO RESIST OUR NEGLIGENCE TOWARDS RIVERS?