



# **Nature Protection**

## Overview

After Chapter 27 was opened within Cluster 4 in December 2021, the Negotiating Position, and thus the EU Common Position for Chapter 27, became available to the public. The chapter of the Common Position dealing with nature protection states that Serbia has partially harmonized national legislation with EU legislation on nature protection. The EU has asked Serbia to provide additional information on the timetable for full harmonization.

Additionally, the Common Position states that: “Serbia should submit to the Commission a list of proposed Natura 2000 sites, which sufficiently cover habitats and species in accordance with the requirements of the Birds Directive and the Habitats Directive, and demonstrate the capacity to manage the Natura 2000 network. Serbia should submit the National Action Plan on the Prevention of the Illegal Killing of Birds and start implementing a system for the enforcement of the relevant EU legal regulations, including the prevention of the criminal act of the illegal killing of birds”.

In 2021, some progress was made in the strategic and legislative framework, with the adoption of the Law on Amendments to the Law on Nature Protection, as well as the adoption of the Nature Protection Program of the Republic of Serbia for the period from 2021 to 2023.

According to civil society organizations, the procedure for adopting the Spatial Plan of the Republic of Serbia from 2021 to 2035 and the Report on the Strategic Environmental Assessment of the Spatial Plan of the Republic of Serbia from 2021 to 2035 was not implemented in accordance with the law. For this reason, civil society organization requested that the public review procedure is repeated.

As in previous years, decision-makers have failed to take a proactive approach to the implementation of regulations, both in terms of the speed at which procedures for establishing new protected areas are implemented, and in terms

of the failure to react appropriately in the absence of an effective monitoring and control system.

During the reporting period, protection procedures were initiated for ten protected areas, including two areas proposed for new national parks. These are the areas of Kučaj – Beljanica, which had not been protected until now, and Stara Planina, which has hitherto been protected as a nature park.

Although investing in nature protection and improving the protected area management system can be considered an investment in the resilience of society, the state is not sufficiently committed to enabling progress in nature protection.

# Strategic and Legislative Framework

The long-delayed procedure for compiling the Draft Law on Amendments to the Law on Nature Protection accelerated significantly at the end of March 2021, when the interested parties were informed that the Draft Amendments had been put up for public discussion. Numerous errors were identified in the drafting procedure, the public discussion, as well as the content of the amendments themselves. These were pointed out by more than 40 civil society organizations, who demanded that the Ministry declare the drafting procedure invalid and restart the entire procedure.<sup>84</sup> The Ministry of Environmental Protection did not respond to this request. On July 14, 2021, the National Assembly of the Republic of Serbia adopted the Law on Amendments to the Law on Nature Protection.<sup>85</sup> Although the Law on Nature Protection with the new amendments is legal, the process through which it was passed delegitimizes it. As a step towards creating conditions for improving the legislative framework for nature protection, a Social Dialogue was held on this topic on October 1, 2021, which was attended by representatives of relevant ministries and civil society. The Dialogue resulted in a text detailing binding procedures<sup>86</sup> that the participants had agreed to. It was agreed that a constant reconsideration of the nature protection system in the Republic of Serbia is necessary. The Ministry of Environmental Protection reaffirmed its commitment to continuing the implementation of the Law on the Planning System, which prescribes the participation of all interested parties and target groups in the process of monitoring the effects of public policies, as well as the preparation of an ex

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84 Coalition 27: Repeat the process of amending the Law on Nature Protection (<https://www.koalicija27.org/vesti/koalicija-27-ponoviti-proces-izmena-zakona-o-zastiti-prirode/>)

85 National Assembly of the Republic of Serbia (National Assembly of the Republic of Serbia | In convocation from August 3, 2020: (<http://www.parlament.gov.rs/akti/doneti-zakoni/u-sazivu-od-3-avgusta-2020.4686.html>)

86 Ministry for Human and Minority Rights and Social Dialogue (<https://minljmpdd.gov.rs/lat/jobavezujuca-postupanja.php>)

post analysis of the effects of the application of the Law and other by-laws and regulations. Civil society organizations undertook to prepare analyses of the effects of the implementation of the Law in the next year and submit them to the Ministry of Environmental Protection. Civil society organizations also agreed to participate in all processes related to drafting public documents at the invitation of the Ministry of Environmental Protection<sup>87</sup>. After this event, the dialogue on this topic was not continued until the end of 2021. The Law on Nature Protection should guarantee the protection and preservation of nature, biological, geological and landscape diversity as part of the environment. Bearing this in mind, the legislative framework can only be improved through a process that is transparent, lawful, and involves all interested parties.

A large portion of the amendments to the Law on Nature Protection in 2021 concerned the ecological network and the appropriate assessment. In spite of extensive changes and the obvious intention of the state to regulate and harmonize domestic legislation in this area with EU legislation, the details of the procedure for appropriate assessment and the competencies of various actors within the procedure remain unclear. At the public debate, representatives of the Ministry of Environmental Protection stated that the draft amendments concerning the ecological network and appropriate assessment were insufficiently developed and unclear.

Defining such a complex, new appropriate assessment procedure, which will affect all projects and activities concerning national ecological network sites and the European ecological network Natura 2000 (which, according to preliminary estimates, will cover about 25% of the territory of Serbia), certainly required a more structured discussion with a wider range of interested parties.

An additional problem in the implementation of the appropriate assessment, as the basic mechanism for the protection of the European ecological network Natura 2000, is that the Regulation on the appropriate assessment has still not been adopted, 13 years after this procedure was introduced into Serbian

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87 A Dialogue on Amendments to the Law on Nature Protection was held – Energy, Climate and Environment (<https://www.bos.rs/ekz/vesti/134/10108/odrzan-dijalog-o-izmenama-i-dopunama-zakona-o-zastitiprirode.html>)

legislation. Without a Regulation to define the procedures and competencies related to the appropriate assessment, this procedure cannot be implemented.

The lack of harmonization between domestic regulations and EU legislation is illustrated by the protection of species in accordance with the Birds Directive. The valid Rulebook on declaring a hunting ban on protected game species is not harmonized with the Birds Directive, because it allows hunting of certain species throughout the year in order to prevent damage to hunting grounds, which is in direct conflict with Article 9, paragraph 2 of the Directive. There is evident will to improve regulations in this area, demonstrated by the Amendments to the Rulebook on the ban on hunting protected wild game species, which banned the hunting of three endangered species of wild birds in Serbia, namely the turtle dove (*Streptopelia turtur*), gray partridge (*Perdix perdix*) and quail (*Coturnix coturnix*).<sup>88</sup> Additional efforts are needed to permanently protect a large number of bird species that are threatened in Serbia, which are currently considered hunting game. Among them are the bean goose (*Anser fabalis*), whose global population has declined by almost 80%, and is designated a critically endangered species (CR) on the national Red List. Permanent protection is also needed for the common pochard (*Aythya ferina*) and the garganey (*Anas querquedula*), whose numbers are globally and regionally declining, which Serbia has granted the status of endangered species (EN).<sup>89</sup> Likewise, the status of species in the Rulebook on designating and protecting strictly protected and protected species of plants, animals and fungi is not harmonized with their status within the Birds Directive and the Habitats Directive. In the reporting period, there was no progress in harmonizing these regulations with the Directives.

Although the Government Work Plan for 2020<sup>90</sup> envisaged the adoption of amendments to two laws with a significant impact on nature – the Law on Game and Hunting and the Law on the Protection and Sustainable Use of

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88 Rulebook on declaring a hunting ban on protected game species – Ministry of Agriculture, Forestry and Water Management (<http://www.minpolj.gov.rs/download/pravilnik-o-izmenamapравilnika-o-proglasavanju-lovostajem-zasticenih-vrsta-divljaci/>)

89 An important step towards the protection of endangered migratory birds – Society for the Protection and Study of Birds of Serbia (<https://pticesrbije.rs/vazan-korak-ka-zastiti-ugrozenih-ptica-selica/>)

90 [https://www.srbija.gov.rs/extfile/sr/370541/plan-rada-vlade-srbije-za-2020\\_cyr.pdf](https://www.srbija.gov.rs/extfile/sr/370541/plan-rada-vlade-srbije-za-2020_cyr.pdf)

Fish Stocks – there were no activities relating to amending these regulations during the reporting period.

During 2021, the procedure of harmonizing domestic regulations with the EU Regulation on the trade in wild species was not initiated<sup>91</sup>, which should be done by drafting the Law on Cross-Border Traffic and Trade in Wild Species of Plants and Animals.

A good example of dialogue between civil society and the Ministry of Environmental Protection was the prescription of the obligation to establish stakeholder councils in all protected areas in the Republic of Serbia through the Law on Nature Protection.

On May 20, 2021, the Government of the Republic of Serbia adopted the Nature Protection Program of the Republic of Serbia for the period from 2021 to 2023. The Program was adopted without a public discussion. Technically, the Program was significantly improved compared to previous public policies in the field of nature protection, as it contains clearly defined measures and activities, competent institutions, deadlines and financial resources. This will allow for monitoring the implementation of this document more objectively and transparently. The deadline for the preparation of the first report on the implementation of the Program is 120 days after the end of the first calendar year, i.e. April 2022. The adoption of this Program has still not remedied the lack of a long-term strategic document in the field of nature protection. The integral Environmental Protection Strategy, the preparation of which has been announced, will likely serve as such a document.

Nature protection and preservation of biodiversity is one of the five pillars to which the Government of the Republic of Serbia committed itself by signing the Sofia Declaration on the Green Agenda for the Western Balkans.<sup>92</sup> The European Union has published the Economic and Investment Plan and guidelines for the implementation of the Green Agenda for the Western Balkans. According to this plan, 30 billion euros will be allocated for the region in the next seven

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91 <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A31997R0338>

92 Negotiation group for Chapter 27 (<https://www.pregovarackagrupa27.gov.rs/wp-content/uploads/2021/06/Deklaracija-iz-Sofije-o-Zelenoj-agendi-za-Zapadni-Balkan-SRP.pdf>)

years. €9 billion will be distributed as grants, while the rest of the funds will be invested using the new Western Balkans Guarantee Facility.<sup>93</sup>

The procedure for adopting the Spatial Plan of the Republic of Serbia from 2021 to 2035 and the Report on the Strategic Environmental Assessment of the Spatial Plan of the Republic of Serbia from 2021 to 2035, one of the most important documents of the planning system of the Republic of Serbia, was not implemented in accordance with the law, according to civil society organizations. For this reason, civil society organization requested that the public review procedure is repeated. The explanation of this request, which was sent to the Ministry of Construction, Transport and Infrastructure on June 26, 2021, states that during the public inspection procedure, several violations of the positive regulations of the Republic of Serbia were committed, and critical deficiencies were observed in the documents in question regarding non-compliance with key international agreements that Serbia is party to.<sup>94</sup> In October 2021, the Ministry of Construction, Transport and Infrastructure published the Report on the public review Procedure, completely ignoring the request to repeat the procedure.<sup>95</sup> Due to the importance of the Spatial Plan and its impact on nature protection, the process must be implemented in accordance with the law and with the involvement of all interested parties.

In the previous period, protection procedures were initiated for 11 protected areas. Among them are two areas proposed for new national parks. These are the areas of Kučaj – Beljanica, which was not protected until now, and Stara Planina, which has to date been protected as a nature park. The establishment of these national parks was neither formally announced through strategic and planning documents nor informally by competent institutions. As a result, there was a lack of social dialogue about how to protect these two areas. These are certainly significant initiatives. New national parks have not been established in Serbia since the 1980s. However, to implement these processes appropriately

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93 The Action Plan for the Green Agenda for the Western Balkans was adopted Energy Portal of Serbia (<https://www.energetskiportal.rs/usvojen-akcioni-plan-za-zelenu-agendu-za-zapadni-balkan/>)

94 <http://www.reri.org.rs>

95 Report on the public review PPRS 1 10.pdf (<https://www.mgsi.gov.rs/sites/default/files/Izvestaj%20o%20obavljenom%20javnom%20uvidu%20PPRS%201%2010.pdf>)



and purposefully, public discussions must be held at the local and national levels, in order to enable the participation of a wide spectrum of interested parties.

In addition to the abovementioned national parks, protection procedures have been initiated for nine other protected areas, the largest of which are the Area of Outstanding Characteristics of the Foreland of the Left Bank of the Danube near Belgrade and the Area of Outstanding Characteristics of Donja Mostonga. If these protected areas are declared as proposed, the total area under protection will increase by about 57,000 hectares.

# The Implementation of Regulations

During the reporting period, the process for protecting five more areas was completed. Of these, four are new areas (Areas of outstanding characteristics Maljen and Ada and sections near Slankamen, and Nature Monuments Kalemegdanski rt and Kovačevića pećina). A review of the previous protection of Area of outstanding characteristics Ovčarsko-Kablarska Gorge was also undertaken. The total area under protection has been increased by about 13,000 ha, increasing the total area of Serbia under protection to 7.81%. The new Nature Protection Program also set new goals for increasing the area under protection. The target value for 2021 was 8%, which was not reached.

In September 2021, the cross-border Mura-Drava-Danube biosphere reserve was declared the first pentilateral UNESCO MAB reserve in the world.<sup>96</sup> The reserve encompasses the territories of five countries – Austria, Hungary, Croatia, Slovenia and Serbia– and covers an area of almost one million hectares. In Serbia, the reserve includes the wider area of Upper Danube, the territories of the municipalities of Apatin, Sombor, Bač, Bačka Palanka and Odžaci. The establishment of such a protected area is of great importance for the improvement of nature protection in Serbia through the development of new models and practices of managing protected areas. The current Law on Nature Protection does not define the category of biosphere reserve, which will certainly complicate the management of the declared reserve.

Activities to establish the European ecological network Natura 2000 continued in 2021, mostly through the project “EU for Natura 2000 in Serbia”. This project was started in May 2019 and was completed in November 2021. The most important results of the project are the identification of 277 sites of

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96 [https://wwf.panda.org/wwf\\_news/?3677441/Worlds-first-5-country-biosphere-reserve-will-benefit-people-and-nature-in-the-Amazon-of-Europe](https://wwf.panda.org/wwf_news/?3677441/Worlds-first-5-country-biosphere-reserve-will-benefit-people-and-nature-in-the-Amazon-of-Europe)

potential interest to the community (pSCI) and 85 special areas for protection (SPA). Digital maps of the proposed sites are available on the website of the implementing party (DAPHNE)<sup>97</sup>, but they are still not available on the official website for Natura 2000 in Serbia.<sup>98</sup> During the project, an information system for collecting and analyzing data about habitats and species was established and improved. This project breaks the long-term stalemate in the development of the Natura 2000 network in Serbia. It is now extremely important to secure financial resources through the national budget or from international donors for the continuation of activities and completing the process of identifying Natura 2000 sites in Serbia.

Ineffective prevention and failure to remove illegally constructed facilities remains a significant problem in many protected areas. The illegal building in the Kopaonik National Park, which attracted the attention of all relevant institutions and the public, has still not been demolished.<sup>99</sup> The increased interest of domestic tourists in visiting natural areas in Serbia has also caused a large increase in the construction of residential and tourist facilities. Very intense construction, mostly outside the legal framework, is evident in the Tara National Park<sup>100</sup>, where dozens of illegal buildings have been recorded.

In accordance with the Law on Nature Protection<sup>101</sup>, the implementation of the amended Article 9 of the Law, which prescribes the jurisdiction and procedure for issuing nature protection conditions, began on January 1, 2022. For civil society organizations – particularly citizens' associations – that implement protection measures in protected areas, often in cooperation with protected area managers, such a centralized procedure is problematic, because waiting times for being issued a decision are too long, and the fees are too high for associations relying on project funding.

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97 <https://daphne.sk/Natura2000Serbia/>

98 <http://www.natura2000.gov.rs/>

99 <https://www.euronews.rs/biznis/biznis-vesti/25832/nelegalni-ski-bife-na-pancicevom-vrhu-ipak-opstao-ministar-momirovic-tvrdi-da-je-sruseno-dve-trecine-objekta/vest>

100 <https://www.danas.rs/vesti/drustvo/nastavlja-se-nelegalna-gradnja-u-nacionalnom-parku-tara/>

101 "Official Gazette of RS", no. 36/2009, 88/2010, 91/2010 – amendment, 14/2016, 95/2018 – other law and 71/2021

In August 2021, the State Audit Institution published an audit report on the Public Enterprise Fruška Gora National Park<sup>102</sup> that identifies numerous irregularities, mainly related to public procurement procedures, but also related to the management and use of natural resources. Deviations of more than 10% of planned and contracted volume of felling were found in 27 reports reviewed by the auditors. This means that over two years (2019 and 2020) 4400 m<sup>3</sup> more wood was cut on Fruška Gora than planned. The report also stated that the public enterprise does not have established procedures for charging fees for the use of protected areas, which should be one of the key items in the sustainable financing of protected areas.

In December 2021, the State Audit Agency also published the Report on Auditing Business Expediency: Management of National Parks in Serbia<sup>103</sup>, which included all national parks in Serbia. The report pointed to shortcomings in the work of ranger services and competent inspectorates, as well as the lack of coordination and cooperation among competent entities. In addition, it was noted that planning documents relevant for national parks are not adopted regularly, public companies that manage national parks often do not have control over all activities on the territory of national parks, and that the volume of wood cutting often exceeds the planned volume. The report also highlighted the problem of the spread of illegal construction in national parks, which occurs due to the inactivity of the competent entities and weak cooperation between them.

In 2021, the Environmental Protection Inspectorate, Department for Nature, conducted 665 inspections<sup>104</sup>, 143 (about 18%) more than in 2020.<sup>105</sup> The largest portion (334) of these were special inspections. It is impossible to identify the purpose of these inspections (for example, of protected areas, control of the use of species, etc.) based on the Report on the Work of the Environmental Protection Inspectorate. In 2021, the Inspectorate filed 32 misdemeanor charges and one criminal charge, which is roughly the same as the previous year, 2020.

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102 <http://www.dri.rs/php/document/download/3950/2>

103 <http://www.dri.rs/php/document/download/4358/2>

104 <https://www.ekologija.gov.rs/sites/default/files/inline-files/Inspekcija%20za%20zastitu%20zivotne%20sredine%20godisnji%20izvestaj%202021.pdf>

105 <https://www.ekologija.gov.rs/sites/default/files/inline-files/GODISNJI%20IZVESTAJ%20INSPEKCIJE%20ZA%20ZZS%20ZA%202020.pdf>

# Financing

According to the Report on the execution of the budget of the Ministry of Environmental Protection for the period January 1, 2021 to December 31 2021<sup>106</sup>, RSD 617,002,000 was earmarked for nature protection, of which 97.7%, or RSD 602,771,640.13 was spent.

Compared to 2020, when funds spent for nature protection amounted to RSD 425,537,182.00, there is a noticeable increase in funds spent in 2021, in the amount of RSD 177,237,458.13.

In 2021, RSD 269.8 million was allocated for the management of national parks and protected areas<sup>107</sup>. An amount of RSD 229 million was set aside for the same needs in 2020<sup>108</sup>, which indicates that financial support to protected areas increased by 18% in the reporting period.

This increase in allocated and spent funds for nature protection represents significant progress compared to previous years. However, given the numerous problems requiring extensive investment, as well as the fact that only 5.9% of the total spent budget of the Ministry of Environmental Protection in 2021 was spent on nature protection, the allocated funds remain insufficient to achieve systemic progress in this area. The available budgetary funds for the management of protected areas are still insufficient to achieve sustainable management. Most of the protected areas, especially national parks, nature parks and special nature reserves, are still primarily financed from the exploitation of natural resources, i.e. wood.

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106 <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/informator-o-radu>

107 Regulation on amending the regulation on the allocation and use of funds for subsidizing protected natural assets of national interest in 2021 ("Official Gazette of the RS", no. 117/2021)

108 Regulation on amending the regulation on the allocation and use of funds for subsidizing protected natural assets of national interest in 2022 ("Official Gazette of the RS", no. 98/2020)

The Law on Amendments to the Law on Nature Protection<sup>109</sup> (adopted in July 2021) amended Article 9, which regulates the procedure for requesting nature protection conditions in the process of developing plans, programs, projects, works and activities defined in Article 8 of this Law.

Nature Protection Conditions for National Parks and Category I and II Protected Areas established by the Government, are issued by the Ministry responsible for environmental protection, based on expertise previously obtained from the competent institute. In accordance with the Rulebook on the amount, method of calculation and collection of fees for the issuance of nature protection conditions<sup>110</sup>, applicants are obliged to pay a fee for the issuance of decisions on nature protection conditions, which is paid into the Budget of the Republic of Serbia. The explanation published by the Ministry of Environmental Protection on its website, related to the implementation of Article 9 of the Law on Nature Protection from January 1, 2022, does not state what purpose the collected funds will be used for. The fees are assumed to generate a significant income. It is therefore necessary to monitor whether the collected funds will be used for nature protection.

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109 [https://www.paragraf.rs/izmene\\_i\\_dopune/150721-zakon-o-izmenama-i-dopunama-zakona-o-zastiti-prirode.html](https://www.paragraf.rs/izmene_i_dopune/150721-zakon-o-izmenama-i-dopunama-zakona-o-zastiti-prirode.html)

110 "Official Gazette of RS" no. 73/2011 and 106/2013

# Recommendations



## Strategic and Legislative Framework

- 1.** Draft and adopt a new Law on Nature Protection in accordance with EU legislation, ratified international agreements, good practice in this area, and the needs of nature protection in Serbia, through a transparent and inclusive process.
- 2.** Regulate the appropriate assessment procedure for the ecological network through the Law on Nature Protection and the Regulation on appropriate assessment.
- 3.** Create and adopt the Environmental Protection Strategy of the Republic of Serbia, covering nature protection, in accordance with the Global Strategic Plan for Biodiversity, the EU Biodiversity Strategy and the Green Agenda for the Western Balkans.
- 4.** Amend the Rulebook on Designating and Protecting Strictly Protected and Protected Species of Plants, Animals and Fungi and the Rulebook on Designating Protected Wild Game Species so that the provisions of the Habitats Directive and the Birds Directive related to hunting are fully transposed.
- 5.** Create and adopt a protocol to precisely determine the sequence and manner of action by the competent authorities in cases of poisoning, as well as other cases of illegal actions against wild species.
- 6.** Form an inter-ministerial working group for protected areas and the ecological network to coordinate work on the development of planning documents, feasibility studies for protected areas, management plans and area protection acts.

- 7.** Establish mechanisms in the Ministry of Environmental Protection for improving the participation of civil society organizations in the processes of drafting and monitoring the application of regulations, plans and other relevant documents in the field of nature protection in accordance with the Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents, and the Guidelines for Involvement of Civil Society Organizations in the Adoption of Regulations of the Government of the Republic of Serbia.
- 8.** Define the biosphere reserve as a type of protected area in the Law on Nature Protection, and prescribe the competencies and basic measures for managing those areas.



## The Implementation of Regulations

- 9.** Ensure a transparent and inclusive process of amending the Negotiating Position for Chapter 27 as well as assessments on the fulfillment of criteria in the field of nature protection by organizing regular consultations with civil society and other interested parties.
- 10.** Improve the capacities of the Ministry of Environmental Protection in the field of nature protection; increase the number of employees in the sector as a matter of priority.
- 11.** Improve the capacities of nature protection institutes (provincial and Republic-level) by increasing the number of professional staff and procurement of technical equipment.
- 12.** Continue building the capacities of the police, inspectorate, prosecution and judiciary for the implementation of regulations related to protecting species and habitats, in cooperation with professional civil society organizations.



- 13.** Improve the planning and implementation of inspection supervision over protected areas, i.e. ecological network sites.
- 14.** Provide free access to the online database of decisions on nature protection conditions issued by the Ministry of Environmental Protection of the Republic of Serbia and the Institute for Nature Protection for all interested parties.
- 15.** Improve cooperation with interested parties in the implementation of international agreements in the field of nature protection through regular information exchange and consultations.
- 16.** Form the National Council for the ecological network Natura 2000 and ensure intersectoral cooperation and continuous institutional support.
- 17.** Compile an effectiveness assessment of the management of protected areas, establish mechanisms for monitoring management effectiveness and ensure the availability of reports to the public.
- 18.** Establish a mechanism for the regular involvement of civil society in the planning and implementation of the Green Agenda (5<sup>th</sup> pillar – biodiversity: ecosystem protection and restoration).



## Financing

- 19.** Continue regular financing of activities for establishing the ecological network of the Republic of Serbia and Natura 2000, with full and regular reporting on the activities carried out and the funds spent.
- 20.** Provide greater financial resources for the management of protected areas, as well as for the protection of species and habitats at the national and local level.