COMPLAINT OF ES "VREOCI" AND COUNCIL OF MZ VREOCI
IN EBRD’S PROJECT COMPLAINT MECHANISM

PARTIES

Complainants*

ES "Vreoci" – Ecological Society "Vreoci" is an association founded in 1991. The main goals of ES "Vreoci" are: the improvement of environmental protection, education of citizens, especially young people about the importance of preserving and protecting the environment, organizing activities supporting the rehabilitation of affected areas, as well as advocating for the acceptance of good practices regarding the use and preservation of natural resources and the proper treatment of waste material. The bodies of the association are the general assembly, the managing board and supervisory board. The office of ES "Vreoci" is in the Cultural Hall in Vreoci. [2]

Member of society can be anybody who accepts society's aims and statute. ES "Vreoci" finances its activities through membership fees, donations, gifts and other sources, and can obtain funds from sale of recyclable materials collected in the environment clean-up actions or from the products of educational workshops. The association has about 600 voting members. Managing board has 11 members, the chairman of the board represents the association. Chairman of the board is Gordana Kulić. [2]

The largest actions of ES "Vreoci" so far were: the blockade of railway line Vreoci–Obrenovac in 2003, demanding immediate improvement of environmental conditions in Vreoci, in which MZ Vreoci and almost all the inhabitants of the settlement Vreoci (see below) participated; protests joined by MZ Vreoci and a large number of citizens (see below) to mark the beginning of violent

* Hereafter: Numbers in angular brackets refer to source listed at the end of this Complaint.
exhumation of the local cemetery, and other protest actions. These actions were recorded by local and national printed and broadcasting media. [2]

**Council of MZ Vreoci** is the only legal representative of the settlement of Vreoci as a part of City municipality of the City of Belgrade. Mesna zajednica (MZ – Local Community) is prescribed by Law on local self-government as obligatory element of local self-government unit. Purpose of MZ is "to satisfy needs and interests of local population in villages" (Article 72). Territory of Serbia is divided to units of local self-governments, each of these units has established a number of mesna zajednica in accordance with size of its territory and number of inhabitants". [1], [2], [3]

Current Council of MZ Vreoci is elected on free elections held on December 2008 in accordance with rules prescribed for local elections. Council of MZ Vreoci has 15 members: two from Socialist party of Serbia (SPS), two are from Democratic party (DS), two are from Serbian Progressive party (SNS), one is from Democratic party of Serbia (DSS), one is from Serbian Radical party (SRS), five are from Ecological movement of Vreoci and two are independent. Mandate of Council of MZ Vreoci is four years. The elected members of Council of MZ Vreoci are performing their tasks pro bono. Work of Council of MZ Vreoci is finansed from mandatory allocation from the budget of City municipality of Lazarevac and from payments from RB Kolubara, to which the company is compelled based on performance activities on territory of MZ. President of the council of MZ Vreoci is Željko Stojković. [2], [3], [10]

**Defendent – The Client of the Bank**

EPS – Public Enterprise Electric Power Industry of Serbia (hereafter EPS) was formed by the Decision of the Government of Serbia on July 1, 2005. The basic task of the company is meeting all the electric power requirements of the economy and inhabitants of the Republic of Serbia. PE

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** Territory of the Republic of Serbia for political and administrative purpose is divided to (based on the size of the area):**
- Autonomous Provinces (two – Vojvodina and Kosovo) [16];
- Development Regions (five – Vojvodina, Šumadija and West Serbia, South and Eastern Serbia, Kosovo and City of Belgrade) [17];
- Administrative districts (29 districts including, and 24 excluding Kosovo) [18];
- City of Belgrade [16];
- Cities (23 including, and 22 excluding Kosovo) and Municipalities (150 including, and 122 excluding Kosovo), as units of local self-government [16];
  - City municipality: just Cities have right to form it for their internal purposes (at the present time they are formed only in two Cities: Belgrade and Niš) [18];
  - Local Office: any of the City/Municipality establishes provision of basic services, i.e. keeping registers, in appropriate local offices in settlements other than the central settlement of the City/Municipality (it includes one or more settlements out of the central settlement of the City/Municipality) [3];
  - Mesna zajednica (Local Community): any City/Municipality establishes appropriate number of Local Communities in accord with its size of territory, number of settlements on the territory and number of inhabitants (within the limits of construction land of the settlement which is headquarter of the City/Municipality it includes city quarters, for other settlements on territory of the City/Municipality it includes one or more cadastre municipalities; as a rule their area is smaller than area of Local Office) [3];
  - Cadastre municipality: basic unit of land division in purpose of management of real estate cadastre [16].

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EPS is a vertically integrated company that has founded 12 subsidiaries and 3 public enterprises on Kosovo. The Headquarters of EPS is in Belgrade. [4]

EPS activities are: electric power generation, electric power distribution and distribution system management, electric power trade, coal production, processing and transport, steam and hot water production in combined heating processes, water power utilization and services in river and lake traffic, wholesale trade in fuel and similar products. EPS operations are also research and development, design, construction and maintenance of energy and mining plants, design, construction and operation of telecommunication facilities and engineering. [4]

Regarding the ownership structure EPS is 100% owned by the Republic of Serbia. In 2011, EPS employed 33,851 people, as the largest company in Serbia. [4]

MB Kolubara – Mining Basin Kolubara ltd (hereafter MB Kolubara) is a company formed by EPS on November 25, 2005. The basic task of the company is to supply power plants in Serbia with lignite for production of electric power. The Headquarters of MB Kolubara is in Lazarevac. [5]

MB Kolubara activities are: excavation of lignite, surface mining of lignite, processing of lignite (washing, drying and crushing), lithotomy for construction, extraction of limestone, raw gypsum, and chalk, extraction of gravel and sand, clay, quartz sand and extraction of other ores and stone.

Regarding the ownership structure MB Kolubara is 100% owned by the Republic of Serbia. In 2011, MB Kolubara employed about 9,900 people. [5]

THE PROJECT – THE SUBJECT OF COMPLAINT

On July 26, 2011 EBRD approved a project to provide up to € 80 million in a sovereign guaranteed loan to EPS for the Environmental improvement project at Kolubara lignite basin. KfW Bank from Germany agreed to provide a parallel loan of € 60 million for the same Project. Estimated value of the Project is € 165,2 million. [11]

The Project consists of three closely interwoven and interdependent components:

1) An introduction of a coal quality management system on open cast mines in the western part of the MB Kolubara. This equipment will allow MB Kolubara to perform online analysis, control and management of lignite quality as it is excavated from various different fields in the basin and blend higher and lower qualities to ensure that the lignite supplied to the power plants is of a uniform quality and within the required parameters;

2) Procurement and erection of a spreader in the open cast mine Tamnava West Field. This will allow for the selective mining of lignite, inter-burden and overburden;
3) The acquisition of a new ECS system (excavator, conveyor and spreader) for open cast mine Field C that will allow lignite output to increase and the blending of higher calorific value lignite with lower-quality lignite – the lignite in the eastern part of the mining basin has a higher calorific value than the lignite in the western part. [11]

**CONTENT OF THE OMPLAINT**

ES "Vreoci" and the Council of MZ Vreoci hereby submits a complaint for Compliance Review to the European Bank for Reconstruction and Development (hereafter: EBRD or Bank) Project Complaint Mechanism (PCM) concerning longterm mala fide and irresponsible definition and implementation of company policy by Client of EBRD, EPS and MB Kolubara (hereafter: EPS and MB Kolubara, both referred to as Client), regarding the resettlement of Vreoci, related to the EPS/Kolubara MB Environmental improvement project at Kolubara lignite basin (the Project) in the Republic of Serbia.

Environmental improvement project at Kolubara lignite basin belongs to Category A Projects pursuant to Items 14 and 28 from Appendix 1 of EBRD's Environmental and Social Policy.

**The Complainants requests the Bank suspend the requested loan to the Client because the Client's long-term failure to meet the following Performance Requirements as they prescribed in EBRD's Environmental and Social Policy:**

1. Because Client's long-term practice contradicts Performace Requirement 4: Community Health, Safety and Security, namely:
   - it fails to comply to requirements concerning Community health and safety defined in Section Infrastructure and equipment safety, paragraph 11, in Section Hazardous materials safety, paragraph 14, and in Section Environmental and natural resource issues, paragraph 15,
   which is explained and discussed in the section 2. Environmental pollution in settlement Vreoci, in the Explanation of this complaint.

2. Because Client's long-term practice contradicts Performace Requirement 10: Information Disclosure and Stakeholder Engagement, namely:
   - it fails to comply to requirements concerning Engagement during project preparation defined in Section Meaningful consultation, paragraphs 15 and 16, and in Section Disclosure and consultation on Category A projects, paragraphs 17 and 18;
   - it fails to comply to requirements defined in Engagement during project implementation and external reporting, paragraphs 21 and 22;
   - it fails to comply to requirements defined in Grievance mechanism, paragraph 25,
which is explained and discussed in the sections 2. Environmental pollution in settlement Vreoci, and 4. Policy of MB Kolubara and the EPS regarding settlement Vreoci: Endangerment of settlement Vreoci from expansion of open pit mines, in the Explanation of this complaint.

3. Because Client's current practice contradicts Performance Requirement 5: Land Acquisition, Involuntary Resettlement and Economic Displacement, namely:
   - it fails to comply to and is performing contrary to requirements defined in Compensation and benefits for displaced persons, paragraph 30,
   which is explained and discussed in the section 4. Policy of MB Kolubara and the EPS regarding settlement Vreoci: Endangerment of settlement Vreoci from expansion of open pit mines, in the Explanation of this complaint.

4. Because the objectives of Client's planning project submitted to the Bank are opposed to Performance Requirements 1: Environmental and Social Appraisal and Management, namely:
   - it fails to comply to requirements defined in Environmental and social appraisal, para. 5,
   which is explained and discussed in the section 5. MB Kolubara and EPS policy regarding settlement Vreoci: Expansion of open pit mines as the only objective of the Project, in the Explanation of this complaint.

5. Because the objectives of Client's planning project submitted to the Bank are opposed to Performance Requirements 3: Pollution Prevention and Abatement, namely:
   - it fails to comply to requirements defined in General, paragraph 6;
   - it fails to comply to requirements defined in Pollution prevention, resource conservation and energy efficiency, paragraphs 10 and 11;
   - it fails to comply to requirements defined in Ambient considerations, paragraph 16;
   - it fails to comply to requirements defined in Greenhouse gas emissions, paras. 17 and 19,
   which is explained and discussed in the section 5. MB Kolubara and EPS policy regarding settlement Vreoci: Expansion of open pit mines as the only objective of the Project, in the Explanation of this complaint.

**EXPLANATION**

1. Kolubara mine basin and Vreoci - Topography and importance

*Kolubara lignite basin* is located 50 km southwest of Belgrade in the basin of river Kolubara. Kolubara lignite basin is part of peri-Pannonian region and is dominantly a lowland, with average elevation of 205 m, laying on mild hills and alluvial plains of river Kolubara and its tributaries.
River Kolubara is a tributary of the river Sava and belongs to medium-sized rivers in Serbia, with length of the watercourse of 123 km. Almost the entire Kolubara river is lowland river with no hydro-energetic potential. Kolubara river basin’s water regimes are characterized by extreme variation – merely 1/3 of water basin originate from river sources, while 2/3 originate of torrential flood waves, which means that most of the water passes through the basin as flood waves in spring and winter, while the water level in the vegetation period is very low. [8]

Kolubara lignite basin is cut by two strategic transportation routes along the central axis following the course of Kolubara in a north-south direction: principal road from Belgrade to Čačak and Bosnia and Herzegovina, Montenegro and Kosovo (I grade State road M 22), and railroad Belgrade–Bar, the only railroad that connects Serbia and Montenegro. Through the basin passes a
number of regional roads, of which the most important section is Stepojevac–Vreoci–Lazarevac (II grade State roads R 201 i R 203). [8]

Kolubara lignite basin has exceptional strategic importance for Serbia. In the structure of the state energy potential, nearly 99% of balance reserves is based on lignite along with a small amount of brown-lignite coal. Total geological reserves of Kolubara lignite basin are slightly over three billion tons of lignite, of which approximately 2.1 billion are balance reserves certified by the State Committee of the Ministry of Mines and Energy. The volume of coal production in the basin is at a stable level of around 29 million tons of coal annually, which amounts to 75% of coal produced yearly in Serbia without Kosovo. This production is followed by about 70 million cubic tons of overburden. Most of the lignite from Kolubara lignite basin, some 90% is supplying TPP Kolubara in Veliki Crljeni, TPP Nikola Tesla in Obrenovac and TPP Morava in Svilajnac, of total outcome of about 3,100 MW, while the remaining part is processed for industrial and consumer purposes. Although the energy value of lignite is small (on average 7500 kJ/kg, with a high percentage of water and ash), about 52% of 36 050 GWh total electricity produced in Serbia in 2011 was produced on the basis of the Kolubara mine lignite. [5], [4], [8]

**Exploitation area of Kolubara lignite basin** covers 133.9 km², of which 51.14 km² or 38.2% of the area is used for mining purposes. Exploitation area is about 25 km long and 2 to 8 km wide. It covers the territory of two municipalities, Ub and Lajkovac, belonging to the Kolubara district, and two City municipalities, Lazarevac and Obrenovac, belonging to the City of Belgrade, as a part of Metropolitan Area. The most important part of the exploitation area is located on the territory of City municipality Lazarevac. [8]

Kolubara river divides the exploitation area to the eastern and western parts. The eastern part of the area is located between the river Turija in the north, Peštan in the south and Kolubara in the west and by the activities of MB Kolubara on exploitation, this part is divided into five fields. One of these fields was closed (Field A), two are active fields (open pit mines on Field B and Field D) and two fields are designated for future exploitation (Field C and Field E). The western part of the area is located between the Kolubara river in the east and the river Tamnava and Ub in the northwest and based the activities of MB Kolubara on exploitation, this part is divided also into five fields. One of these fields was closed (Field Tamnava East), two are active fields (open pit mines Field Tamnava West and Field Veliki Crljeni), while the two fields are designated for future exploitation (Field Radljevo and South Field). [8], [5], [11]

The thickness of coal seam in the exploitation area varies between 2–10 m at the edges up to 25–45 m at the central parts of the area, and at some locations up to 100 m, which is why the depth of every pit is very different. The ratio of coal and overburden ranges from 1:1 to 1:10, depending on the depth of the coal. Coal is found at the average depth of 20–22 m, which explains usage of technology of open pit. [8], [1]
Coal mining in Kolubara mine basin has begun in 1896. Open pit mining began in 1952. End of coal mining in the Kolubara mine basin is planned after the year 2060. [5], [8]

**Center of the exploitation area of Kolubara lignite basin is in Vreoci.** Vreoci is twofold center of the area. First, Vreoci is the physical and natural center of the exploitation area, at the junction of the eastern and western part of the area. Communication of personnel and equipment between the two parts of exploitation area is possible only through Vreoci. [7], [8]

Second, in Vreoci the industrial hub of the exploitation area of Kolubara lignite basin is located. The largest industrial-transportation zone of the basin area, covering 272 hectares is located at the southern part of the settlement. About 7 km north of Vreoci in the settlement Veliki Crjeni is the second major energy-industrial zone, covering an area about 250 hectares, where TPP Kolubara and company Kolubara Universal (rubber processing and manufacturing of conveyor belts with steel cords and textiles, for the operation of equipment for open pit mines) are located. At about 7 km south of the Vreoci lays town Lazarevac, population of 30 000, where the most of
employees in the Kolubara mine basin live. To the west of the Vreoci is a railway from Belgrade to Bar and Montenegro. About 500 m further west of the railway principal road from Belgrade to Čačak (I grade State road M 22) passes, while through Vreoci the regional road Stepojevac–Vreoci–Lazarevac (II grade State roads R 201 i R 203) is passing. Kolubara river is located west of Vreoci at about 1.5 km. [8], [7]

**Industrial and transportation zone in Vreoci**, one of the largest in Serbia, covers 272 ha. It is located on the southern edge of Vreoci on the way to town Lazarevac. Construction of the zone started in 1956 by building a plant for drying lignite and the zone was continuously expanded until 1986. The zone now has around 5,500 employees, much more than population of Vreoci. The zone comprises five companies associated with the MB Kolubara: Kolubara Metal (production, repair and installation of equipment and machines for production and processing of coal, 2,800 employees); Kolubara Prerada (processing and refining of coal from surface mines, 1,800 employees); Kolubara Ugostiteljstvo (preparation of meals for 16,000 employees per day, 500 employees); Kolubara Promet (purchase and sale of coal for household consumption, 300 employees); and Xella Serbia (production of light gas concrete blocks, 100 employees). Finally, Vreoci is the key point of communication for about 8,000 employees in open pits, from a total of 10,000 employees in MB Kolubara. [2], [8]

The largest area in the zone occupies Kolubara Prerada, which has crucial importance in the production of lignite. For the excavation of coal a system of bucket wheel excavators is used. After the removal of overburden, which is deposited to dumps by tape system, excavation of layers of coal follows. Part of the coal is being conveyed by conveyor belts to the processing plants, while the most of it is loaded directly to the trains for power plants. Processing plants are in Kolubara Prerada, which has an area of 207 ha and includes facilities: dry separation (crushing and grading of raw coal in three phases); processing and refining of coal (wet separation, in which coal is washed and extracts tailings); drier and classification; heating plant, for the entire industrial zone and town of Lazarevac; and rail transport of coal for thermo power plants. For industrial and consumer use Kolubara Prerada produces around 750,000 tons of crushed raw coal and 700,000 tons of dried coal annually [5]

A railway junction, the total area of 18 ha, which is connected with the main railroad Belgrade–Bar is part of the industrial zone in Vreoci. Beside the main railroad, railway line for transportation of coal for Veliki Crljeni (TPP Kolubara) and Obrenovac (TPP Nikola Tesla) also meet in industrial zone Vreoci. Also, Vreoci is the terminal point of narrow-gauge railway Vreoci–Rudovci, which transports coal from Field B. Railway junction has eight tracks and within it, in addition to passenger and freight stations, is the marshalling yard for arranging of transport trains for coal to thermal power plants. Several additional tracks serve for the needs of crushing plant, drying and classification of coal, as well as for maintenance of all facilities and delivery of parts and equipment. [7], [8]
On the southwest side of Vreoci, between the railroad and principal road, is wastewater treatment plant (WWTP) for all wastewater from industrial zone. Around and across Vreoci several high-power facilities are passing through: two main power lines of 110 kV, and several objects, required for power distribution and operation in industrial zone, voltage of 6 kV to 110 kV. [2], [8]

Settlement Vreoci is completely enclosed on three side by the mining and industrial facilities and buildings. From the south it is closed by industrial zone and wastewater treatment plant. To the east and southeast of Vreoci is open pit mine Field D, on the very edge of the settlement. To the west are the railway and principal road and the space designated for future open pit mine South Field. Further on the west and northwest from Vreoci are the river Kolubara and open pit mine Field Veliki Crlijeni. [7], [8]

**Settlement Vreoci** is the biggest settlement in the City municipality of Lazarevac after town Lazarevac. Lazarevac is one of 17 City municipalities of City of Belgrade, part of its Metropolitan Area, area of 389 km², with population about 60,000, from which around 30,000 is in town Lazarevac. [1], [8]

The economies of both City municipality of Lazarevac and settlement Vreoci are completely dependent on mining, energetic and related activities. Traditionally, every municipality and settlement in the exploitation area of Kolubara lignite basin is undeveloped and small, with no industrial tradition, except in energy and mining, where aside from mining agriculture is the dominant economic sector. Therefore, the City municipality of Lazarevac is most closely associated with the lignite basin and with MB Kolubara. Of 33 settlements in the City municipality, nine is located in exploitation area of Kolubara lignite basin (Vreoci, Prkosava, Rudovci, Mali Crlijeni, Veliki Crlijeni, Baroševac, Zeoke, Medoševac i Cvetovac), bearing all the consequences of being located like that. [1], [8]

Area of Vreoci cadastral municipality is 1879.00 ha (approximately 19 km²), but the area remaining free of open pits is much lower, 1016 ha. Urbanized area of the settlement is about 200 ha. As a result of industrialization, settlement Vreoci has been shaped as a linear structure along the road Stepojevac–Lazarevac. The urbanization of the settlement is directly linked with the development of the industrial zone on the exit from Vreoci toward Lazarevac. [8]

Vreoci is the old settlement. The first written record of Vreoci dates from 1528, from the Turkish census of the Belgrade district. Keeping of civil registers in Vreoci was begun in 1837, and elementary school was opened in 1844. According to the census of 2002, in Vreoci 3210 residents in 1088 households lived. Most of the economically active population, 60%, is engaged on mining and industry, while only 5.4% is in agriculture. [2], [7]

Social functions present in Vreoci are local office and mesna zajednica, located in Cultural Home, together with other (sport, ecological, cultural and other) associations, then elementary school, post office and the ambulance with pharmacy. Vreoci has it´s own church and graveyard. [7]
Map 3: Social functions in settlement Vreoci and industrial zone Vreoci

Vreoci - the center of the exploitation area of Kolubara lignite basin
Area of Vreoci cadastral municipality 1,879.30 ha
Area remaining free of open pits 1,076 ha
Urbanized area of the settlement 200 ha
3,210 inhabitants in 1,088 households

Open pit
Field Veliki Crijen

Wastewater treatment plant (WWTP)

Kolubara Prerada
Processing and refining of coal from surface mine 1,830 employees

Kolubara Ugostiteljstvo
Preparation of meals for 15,000 employees per day
500 employees

Kolubara Promet
Purchase and sale of coal for household consumption 300 employees

Kolubara Metal
Production, repair and installation of coal producing equipment/machines 2,800 employees

Xella Serbia
Production of light gas concrete blocks 100 employees

Industrial and transportation zone in Vreoci
Surface 272 ha, 5,600 employees

Prepared by: Center for Regional Researches, 2012
Official assessment is that beneath the settlement of Vreoci and industrial zone Vreoci lays about 600 million tons of lignite. In order to use these reserves of coal, every valid planning document prescribes the relocation of settlement Vreoci, so that entire cadastral municipality Vreoci in future, up to 2020, would be occupied for mining, for expansion of open pit mine Field D and opening of new open pit mine South field, as well as relocation of Kolubara river. Open pit mines in the area of the cadastral municipality Vreoci, after the rearrangement, should produce between 17 and 23 million tons of lignite annually, which is 60–70% of total planned coal production in Kolubara lignite basin. [2], [6], [7], [8]

2. Environmental pollution in settlement Vreoci

**Environmental pollution in Vreoci is extremely high**, and is caused by closeness of industrial zone and open pits. Primary pollution occurs at the very sources of pollution (in industrial plants in Vreoci, at open pits and dumps of ash and slag), and under adverse weather conditions the secondary pollution occurs, caused by deposition of gases and particulate matter in a radius up to 10 km, that affects Vreoci and neigbouring areas. [7], [8]

**Technology of open pit in use in the Kolubara lignite basin** primarily changes the land radically and provokes spatial conflicts between development of open pits and the environment, by the threat of destruction of the entire environment. Another aspect of the negative impact is a strong and permanent pollution of air, water and soil, thereby endangering health of population as well as animal and plant life. The third type of negative impacts are smaller and occasional exceedings of environmental quality standards, not significant individually, but which by cumulation can give rise to significant consequences. [8]

**Coal production on open pit mine** Field D and Field Veliki Crljeni is followed by vast amounts of overburden, tailings, dust, noise and vibration. The volume of the production of overburden and tailings is much higher than lignite production and in the entire lignite basin in 2005 a total of 55.70 million m³ of overburden to 26 million tons of coal was produced. Overburden and tailings are deposited in the open pit mines that are not operational anymore. The highest emission of dust is coming from zones of open pit mines and dumps of overburden and tailings. Pollution and emissions occurs also from mining equipment and vehicles, containing hazardous gases, nitrogen oxides, carbon monoxide, sulfur dioxide and volatile organic substances. [8]

**Industrial zone in Vreoci is the largest singular source of environmental pollution.** According to observations and measurements conducted in 1992 and then from 2001 to 2007, the most polluting facilities in the zone are: facilities of Kolubara Prerada including heating plant, facilities of Kolubara Metal, facilities of Xella Srbija, coal transportation system and dumps of coal,
as well as central wastewater treatment plant. Each of these facilities is absolute source of pollution, listed on the list of facilities subject to obligation of environmental impact assessment in accord with article 30 of Law on EIA (Official Herald of Republic of Serbia No. 135/04 and 36/09). [7], [8], [30]

**Map 4: Sources of pollution and amounts of emissions in Vreoci [7], [8]**

- **Transport of coal, overburden, ash**
  - 300 tons and 20 freight trains per day
  - Flying particles of coal dust and ash noise and vibrations

- **Transport of employees**
  - 5,000 employees in the zone
  - 8,000 employees on open pit mine
  - (exhaustion gases, noise, vibration)

- **Open pit mine**
  - Field D

- **Coal production**
  - vast amounts of overburden, tailings, dust, noise and vibrations

- **Kolubara Prerada**
  - 220 m³/h wastewater, large concentration of solid particles, inorganic and organic matters

- **Dryer**
  - 410 g/gh H₂S, 168 g/gh SO₂, 23 g/gh NOx
  - 38 g/gh phenols and other gases, 1.82 kg/h of solid particles, 150 m³/h wastewater

- **Wet separation**
  - 60 m³/h wastewater, 200,000 t/year of slagings (releases large amounts of CO₂ in combustion)

- **Dry separation**
  - considerable amounts of coal dust and wastewater from washing of facilities

- **Heating plant**
  - 120,000 m³/h smoke gases (42 kg/gh CO, 280–222 kg/gh SO₂, 34–72 kg/gh NOx, and 3.25–1.379 kg/gh of solid particles. ELV exceeded in all aspects except for NO.)

- **Kolubara Metal**
  - emission of unfiltered gases (CO₂, CO, SO₂ and smoke), wastewater from the foundry (clay, sand and burnt remains of metal, smelting water)

- **Xella Srbija**
  - Air and soil pollution: solid particles, noise, vibration, solid waste

There are five spatial zones of environmental vulnerability in Vreoci based on results of monitoring of immission and receptors of pollution:

- **Zone 1**: at 250–500 m northwest from the plants of dryer and dry separation and in the immediate vicinity of the industrial railway for Obrenovac and railroad Belgrade–Bar – often exceedings of emission limit values (ELV) of suspended particles in the air, total hydrocarbons, phenols, and sediment materials (measuring point: dry separation);
- **Zone 1a**: space between facilities of Xella and Kolubara Prerada width 100–150 m – increased pollution of suspended particles, sediment materials and increased noise;
- **Zone 2**: at 100–200 m around sedimentation tank of wastewater treatment plant – often exceedings of ELV of the total hydrocarbons and phenols, and especially soot and suspended particles in the air during the winter (measuring point: waste water treatment plant);
- **Zone 2a**: around Community Hall – often exceedings of ELV of soot and suspended particles especially during the winter (measuring point: Cultural Home);
- **Zone 3**: III zona: occasional and less air pollution (northern part of settlement).

Spatial zones of vulnerability include the whole settlement Vreoci, and particularly the urbanized part of settlement. [7], [8]

**Air pollution in Vreoci is extremely high**, as demonstrated by the results of measurements and extensive testing in 2002 and 2003. The air is polluted primarily by conventional pollutants (NOx, SO2, soot, suspended particles, sediment material), and there are also pollution by specific pollutants (acrolein, phenol, formaldehyde, volatile hydrocarbons, organic nitrogen and sulfur compounds). The emissions come from the dry separation, drying plants and wastewater treatment plant. Concentrations of pollutants vary, and periodically – mostly in the winter – are exceeding the ELV by far. Air pollution is also product of suspended particles and sediment material from the transshipment of coal, dust from open pit mine, from processes in the industrial zone, from traffic. Measurements of imission values in many cases have shown exceeding of imission limit values (ILV), especially in Vreoci. Mean daily concentrations of suspended particles exceed the ILV for 14–82% at all five measuring point (the most at measuring point: Cultural Home). The concentration of soot exceeds the ILV for 3–69% on four measuring point, and the most at measuring point Cultural Home. Total sediment materials largely exceeds the ILV on measuring points at plants dry separation and Barska Street. [7], [8]

**Pollution of land is very intensive.** It is most evident around the industrial zone, due to the deposition of ash particles and other particles from gases from the air, the fertilization of arable land with sludge from filter of wastewater treatment, spillage of polluted water, etc. Periodical tests of land quality have shown increased amounts of arsenic, while levels of some heavy metals (Cu, Zn, Cr, Pb, Ni, Hg) are elevated in comparison to the natural composition of the land. The results of measurement of sediment material around Kolubara Prerada show considerable exceedings of average annual concentration, as high as two times the average value at all three measuring point (Cultural Home, plant for dry separation and wastewater treatment plant). In the
sediment materials the presence of heavy metals (Ni, Cr, Cd, Mn, Pb, etc.) was noted, while concentration of some of them (Ni, Cr and Mn) periodicaly exceeds the maximum allowable concentration (MAC). [7], [8]

**Pollution of surface waters is also high.** The results of water quality testing for the river Kolubara in 2001 before and after influx of wastewater in the area around Vreoci (profiles Slovac, Beli Brod and Draževac) show that water quality was significantly worse after influx, although the water of Kolubara does not meet the prescribed requests for Class II of water (of the five classes of water quality) even before influx: values of suspended solids often correspond to Class III or IV of water, while in periods of low water exceeds beyond classifiable condition. The percentage of oxygen saturation and the amount of bacteria occasionally exceed the values prescribed for the class. Occasionally elevated concentrations of mercury, volatile phenols, hexavalent chromium, sulfides, mineral oil and other harmful substances are occurring. Saprobiological analysis show moderate organic pollution of water stream. Violation of the prescribed requests for Class II of water occurs due to excessive number of coliform bacteria and high saprobic, and due to increased content of heavy metals (Cd, Hg, Cu, Ni), mineral oils, ammonia and phenols. Based on the tests, it can be assessed that the functioning of wastewater treatment plant is not satisfactory. The water quality of river Peštan is also monitored in Vreoci, and mainly corresponds to the Class III of water. The exceedings are most often of suspended solids and change of organoleptic properties, while occasionally an increase of dissolved oxygen and percent oxygen saturation, presence of metals (Mn, Fe) and phenols and reducing electrical conductivity occurs. Regulated watercourses of Jaruga and Stari Peštan are quite small, and since being the recipient of wastewater from plants of wet separation, they are being constant highly polluted. [7], [8]

**Pollution of groundwater is very much present.** Measurements conducted in 2007 in the area around the sedimentation tank of WWTP shown that the water samples in piezometers exceeded the allowed values of each of basic parameter of water quality: color, dissolved oxygen, COD, phenolic substances, iron, BOD5, suspended solids and the dry residue of filtered water. Groundwater used as source for supplying the settlements are highly threatened of the three parallel processes: (a) pollution of surface waters is in tight interrelation with the quality of groundwater; (b) operations in open pit mine and associated drainage systems for their protection from groundwater inflow leads to the radical overthrow of piezometeric levels in groundwater sources, and aggravates the situation of water supply systems and individual supply wells; (c) the groundwater is also pollutied by dumps of ash and slag. [7], [8]

**Condition of water supply network is very poor** in entire exploitation area of Kolubara lignite basin, especially in Vreoci. Due to drastic changes in the groundwater regime, households are unable to supply water from wells. There are serious problems in the functioning of public services, since kindergartens, schools and ambulances have no regular supply of water. In Vreoci sanitation of the settlement is also very poor due to incomplete construction of sewers in some parts, and the system has lost the characteristics of the separation system. [7], [8]
Waste management of municipal, industrial and hazardous waste in Vreoci is not satisfactory neither in terms of collection nor disposal. Organized collection of municipal solid waste is conducted only on about 30% of locations, mainly along the regional road. There are a number of illegal dumps, mostly in uninhabited areas near the open pits. Disposal of waste is conducted in the open pit mine Field D, but that dump is not adequately equipped with infrastructure to get the status of a sanitary landfill. Industrial waste is mainly sold as secondary raw material. The treatment of hazardous waste is not known. [7], [8]

Noise and vibration levels in Vreoci are extremely high, but not measured systematically. Periodical measurements performed in plants of Kolubara Prerada had shown that the noise level considerably exceeds the norm. [7], [8]

Road and rail freight traffic in Vreoci is a particularly large source of pollution of air and soil, as well as noise and vibration pollution. On routes in Vreoci pass about 300 heavy trucks per day, and on railroad there are over 20 coal-transporting freight trains passing daily. On the section Vreoci–Lazarevac, that is part of II grade State road (R 203), within the annual traffic count, during last five years traffic volumes typical for the I grade State roads was recorded, or more than 3,000 vehicles per day, and in Spatial Plan of exploitation area of the Kolubara lignite basin, traffic volume projected on that section is about 8,000 vehicles a day. [2], [7], [20], [8]

Environmental pollution in Vreoci is constantly and continuously extremely high, during at least two decades. Pollution has grown with the development of industrial zone and open pits, and with their reaching of current level during mid 80's of 20th century, which is their highest level from the formation of industrial zone and beginning of usage of the technology of open pit, pollution also reached the highest levels. The current systems for the reduction and treatment of all types of pollution are old and poorly maintained for decades, so the question is whether they have any significance for the reduction of pollution. In total, the entire area of settlement Vreoci is first-class endangered environment. [8], [30]

3. Institutional framework for addressing the problem of settlements Vreoci

The main entities in institutional framework where decision regarding Vreoci are made are:

1) MB Kolubara ie EPS;
2) City municipality Lazarevac ie City of Belgrade; and
3) ministries competent for mining, energetic, environment protection, spatial planning, agriculture, water management, transport and finance ie Government of Republic of Serbia. [8]

MB Kolubara in all documents is imprimis as responsible for addressing the problem of settlement Vreoci, primarily due to the needs and interests of its activities. [6], [7], [8]
In the past 25 years MB Kolubara substantially changed its legal status several times, and with it the authorization and licences in relation to solving the problem of Vreoci. To 1989 it had been an independent complex company named Mining-Energetic-Industrial Complex (acronym in Serbian REIK) Kolubara. Then the decision of the Parliament of Serbia established the Public Enterprise Electric Power Industry of Serbia (name still current), and REIK Kolubara, independent complex company, has become a part thereof, ceasing to exist as an independent entity. Then in 1991 the Government established the Public Enterprise Mining Basin (MB) Kolubara, reduced by several organizational units compared to the situation from 1989, but as an independent entity of equal status as EPS. After the political changes in 2000, Serbia accelerated reforms and in 2005 is adopted a new Law on Energetics and the Energy Development Strategy until 2015. These documents prescribe the separation of energy activities from other activities for each entity involved in energy production. Based on that, in 2005 decision of the Government established the current EPS, and by internal decision of EPS, MB Kolubara was founded as a subsidiary company with the legal status of a limited liability company (acronym in Serbian d.o.o.). [21], [19], [4], [5]

Notably, the legal form of limited liability is the simplest legal form for companies, which is a form suitable for and mostly used by small and medium enterprises having a small number of employees: all decisions whether strategic or daily operational level are made at level of one executive individual. This legal form is completely inappropriate for a company with about 10,000 employees, and as a consequence the company suffers of poor organization and inadequate capacities to perform all the required tasks. More importantly, all those who are in some way connected with MB Kolubara suffer from the inappropriate legal form of company, since the company is not able to make all necessary decisions in circumference, and especially not in timeframe required for effective performance. [29], [19]

The relationship between EPS and MB Kolubara is a very unequal one, based on the Decision on establishment of public enterprise for the production, distribution and trading of electricity, from 2005. Management Board of EPS has all ownership powers over MB Kolubara (Article 17, paragraph 1, item 10 of the Decision), including the authority that proprietary powers in some matters may be directly performed by authorized representatives of the EPS. The management of MB Kolubara decides just about issues up to 50 million dinars value (little less than half a million euros), while all decisions worth more than 50 million dinars are in charge of the Management Board of EPS. In this way, the only purchaser of product (lignite) completely controls the manufacturer of that product. [21], [19]

City municipality of Lazarevac is one of the 17 municipalities of City of Belgrade. In 1971 it was added to Belgrade Metropolitan Area by separation from Kolubara District. Since is 60 km away from the inner city area, for long it had the status of suburban municipality, with little more jurisdictions compared with the inner urban municipalities. Statute of the City of Belgrade from 2008, adopted subsequently to the Law on the Capital from 2007, abrogate the status of suburban municipalities and equates suburban and urban municipalities. City municipality of Lazarevac, not
being a unit of self-government, has reduced legal jurisdictions and budget compared to units of local self-government – the units being the City of Belgrade and the neighboring municipalities that are not part of the City (Lajkovac, Ub, Ljig, Aranđelovac). According to the Law on Local Self-Government, unit of local self-government has all the jurisdictions of local authorities and their own revenues for the implementation of jurisdiction. The Government is obliged to provide minimum funding for each unit of local government in case the unit is unable to collect the revenues, while unit of local self-government retains its full autonomy from the Government. Therefore, the City municipality of Lazarevac has no income by its own, but is funded by revenues from the City of Belgrade. Also, the City municipality has jurisdiction only in minuscule issues, such as eg. regarding the issuance of building permits, the municipality is deciding only for buildings up to 800 m² gross floor area, or in terms of road maintenance, is responsible for maintenance of country and dirt roads, etc. [1], [3], [22]

The relationship between the City municipality and the City of Belgrade is a clearly and strictly hierarchic one. City of Belgrade has full-scale legislative and statutory jurisdiction to direct the activities of City municipalities. The main instrument is the control over the execution of the budget of the City municipality, which is in the authority of the mayor of, who exercises his power through receiving quarterly reports of the President of the City municipality on the implementation of dedicated revenues of the City municipality (article 99 of Statute of the City of Belgrade). Furthermore, unit of local self-government, in accord to the Law on Public Enterprises and Activities of General Interest (Official Herald of Republic of Serbia No. 25/00, 25/02, 107/05, 108/05 and 123/07), has no jurisdiction over the company that was founded by the Government or by the company established by the Government. Therefore neither the City of Belgrade has no possibility to influence to the companies such as EPS or MB Kolubara. [22]

The ministries responsible for mining, energy, environment, spatial planning, agriculture, water management, transport and finance are responsible for solving the problem of Vreoci in accord to the type of work, eg. for the expansion of open pits, for preparation of planning documents, for settlements relocation, for relocation of watercourses and/or roads and for numerous other related activities. [23]

However, the key role in decision-making always belongs to the Government. Only the Government represents the Republic of Serbia as a legal entity and exercises the rights and obligations of the Republic of Serbia as a founder of public enterprises (Article 4 of the Law of the Government), and adopts its decisions by a majority vote of all members of the Government (Article 26). Minister informs the Government on all matters from the scope of his jurisdiction, submits to the Government proposals for the regulation of issues within the jurisdiction of the Government and the National Assembly and is responsible for implementation of programs and policy of the Government in scope of his competence (Article 14). Thus, on the policy and allocation of budgetary resources of each ministry is decided by the Government as a whole, and the role of ministries in decision-making is primarily technical. Also, the Government has control
and authority regarding upholding the legality and the transferring of certain budget funds over the each unit of local self-governments, including the City of Belgrade, and from it to the City municipality of Lazarevac. [24], [3]

The institutional framework for addressing problem of Vreoci indicate the existence of a considerable **gap between the jurisdictions and powers** of the key institutions. MB Kolubara, City municipality of Lazarevac and the relevant ministries have jurisdiction required to address issues related to operative activities (e.g. preparation of documentation for the expansion of open pits, the implementation of the expropriation of real estate, the determination of environmental protection measures, etc.), but the EPS, the City of Belgrade and the Government have the legal authority and financial resources for implementation of the decisions adopted by the institution of the first group. That is means that every institution from the first group, although competent to adopt decisions in area of its jurisdiction, has no power, legal and/or financial, to implement this decision in its entirety, since the institutions from second group are authorized for implementation: MB Kolubara is controlled by the EPS or EPS is superior to MB Kolubara; City municipality of Lazarevac is controlled by the City of Belgrade or the City of Belgrade is superior to City municipality of Lazarevac; finally, ministries are controlled by the Government or the Government is superior to each ministry. Thus if necessary decisions and actions of the organs and institutions of the second – controlling – group are not put into effect, decisions adopted by the organs and institutions from first – executive – group cannot be implemented. However, regarding the problem of Vreoci, only Government controls all levels of decision-making, wherefrom any action or decision in terms of solving the problem in Vreoci by any other institution except than the Government itself is only a preparatory step for the Government's decision, and only the Government's decision has real consequences. But, the Government is not bound to accept any potential preparatory steps. [21], [22], [24]

This institutional framework, that is formed and maintained as highly centralised system, particularly with regard to strategic areas that include the production of lignite and electricity, in this respect has not changed much over the past 20 years, regardless of changes of the Constitution of the Republic of Serbia from 2006. Apart from strict centralization of decision-making, this institutional framework creates a large lack of responsibility of each entity. Since the decision is not bound to the implementation, each entity of the institutional framework may adopt any decision, and then transfers responsibility to the superior entity for the lack of implementation. Only the Government has no such option, but because of that, every implementation of decision is transformed into a political issue, by which regular action of state authorities is transformed into a permanent political campaign. [25]
4. Policy of the MB Kolubara and the EPS regarding settlement Vreoci:
Endangerment of settlement Vreoci by expansion of open pit mines

For many years following 1952 and the beginning of usage of open pit technology in Kolubara lignite basin, the fact that this technology is conflicting with the environment was substantially acknowledged and respected in the business operation RB Kolubara, ie. by its legal predecessor (Mining-Energetic-Industrial Complex – REIK Kolubara). During the period of largest investment in the energy sector in Serbia and Yugoslavia, from 1965–1979, and later with somewhat decreased investment volumes (had not affected the amount of coal production) until 1989, the perpetually recurrent actions of expropriation of real estates for the expansion of open pit mines in Kolubara lignite basin was carried out within three to five years before the occupation of land and property. [8], [9]

Political change and the dissolution of Yugoslavia during the 90-ies have led to the termination of investing in the expansion of open pits. During that decade, when Serbia was under UN economic sanctions, the production of electricity was the only area of energy where Serbia was completely independent, and the production of electricity has become par excellence national-political interest. Since is more than 95% of all lignite from Kolubara lignite basin is using to generate electricity, lignite production also has become a national-political interest. Both productions, of electricity and lignite, have had a decline in the 90-ies, but in 2005 they reached the level from 1990 and since than both have a trend of slight increase. Regular works on the excavation of coal have led to the situation that the open pits in 2000 reached up to the land and houses in Vreoci that were planned for expropriation in 1995, but expropriation was not realized to this day. [8], [9]

Since 2000 The development of the open pits of the Kolubara lignite basin entered into a new phase. Two large open pits, Field D and Field Tamnava East, were at the end of service life, and the conditions for opening of new open pits have not been created (Field E, Radljevo Field and South Field). Today the Field Tamnava East is already exhausted and serves as the overburden and tailing dumps for the open pit mine Field Tamnava West. Second important change of circumstances is related to the conditions for the expansion of open pits. The expansion of open pits in the exploitation area over the past 50 years advanced from the edges toward the center of the area, and in 2000 the open pit mine Field D has reached the center of the area, Vreoci, but over more than 20 years lands and houses have not been expropriated for the expansion of open pits, nor other required actions for preparation of the ground for this purpose have been performed. [8], [11]

In the new phase of development of open pits, policy of MB Kolubara and the EPS concerning settlement Vreoci was implemented in three stages, the dynamics and quality of which, but not the objectives, were brought forth by the changes of leadership in each of members of the institutional framework (Prime Minister and the responsible ministers, directors and management of MB
Kolubara and EPS, the mayor of Belgrade and president of City municipality of Lazarevac, and political leadership of the City and City municipality). This new phase of development of open pits in general is characterized by intensifying conflict between the technology of open pits and its environment, and the continual insistence of members of the institutional framework to achieve the interests of MB Kolubara and EPS at the expense of citizens of Vreoci. [6], [7], [8], [9], [10]

**The first stage of policy of MB Kolubara and EPS regarding Vreoci,** encompassed the period from 2001 to the first half of 2004, and was initiated by complete negligence of individual and collective rights and lawful interests of citizens of Vreoci by the MB Kolubara and City municipality of Lazarevac. [9]

In mid-2001 the management of MB Kolubara for the first time in 10 years has undertook activities to spread the open pits and announced the idea of relocation of graveyard in Vreoci few hundred meters north, in order to expand the open-pit Field D. Citizens of Vreoci demanded more details about the plans in order to plan their own lives and in March 2002 the director of EPS presented the internal MB Kolubara plans on expanding open-pit Field D and of opening the open-pit Field Veliki Crljeni on the territory of cadastral municipality Vreoci. In these plans very radical solution was laid out: relocation only half of the population of settlement, reduction of the territory of the settlement to 1/3 of the current territory, the remaining part of settlement left standing on just a 500 m wide strip of land, between the two 100 m deep open pits, and other unacceptable solutions. Citizens of Vreoci held an assembly in April 2002 to discuss these radical plans of MB Kolubara and have sent request to the Government demanding the protection of their fundamental rights. Representatives of MZ of Vreoci, ES "Vreoci" and citizens of Vreoci were received in the Ministry of Mines and Energy. It was agreed upon the forming of the commission of representatives of ministries of mines and energy, environment, economy and spatial planning, with the task to propose a solution of problem of Vreoci. The commission was formed in autumn of 2000 and it had 20 months for preparation of proposal. [9]

Regardless of the deadline that the Commission of the Government had, MB Kolubara announced that it will begin relocation of graveyard in Vreoci in max 12 months. Attempts of MZ Vreoci, ES "Vreoci" and citizens to open negotiations with MB Kolubara regarding possibility of relocation of graveyard yielded no result. In January 2003, about 1,000 citizens of Vreoci, among whom were members of ES "Vreoci" and members of MZ Vreoci, blocked the regional road Stepojevac–Lazarevac, railway Belgrade–Bar and industrial railway Vreoci–Obrenovac, protesting against the relocation of the graveyard, and against the disastrous condition of the environment caused by the regular operation of MB Kolubara. The basic requirement of citizens and ES "Vreoci" was that if the graveyard is relocating, the whole settlement also must be relocated. After three days of protests, that were recorded by all national printed and broadcast media, the current Energy Minister, Kori Udovički arrived to Vreoci and issued a press release confirming the legitimacy of requests of the citizens, the need for acceptance of their interests in process of expanding of open pit Field D and
the necessity of urgent reduction of environmental pollution in Vreoci. In May, at the meeting at the Ministry of Energy, the Minister introduced to the representatives of MZ and citizens of Vreoci a decision, according to which MB Kolubara should bypass and do not relocate graveyard, and that the settlement Vreoci would not be relocated in at least 10 years. The Minister sent a personal letter to each family in the settlement where, among others, written that "the law, your demands and techno-economic analysis are forcing the RB Kolubara to bypass graveyard, at the cost of losing a lot of coal. (...) Only some ecologically endangered households will be relocated". So, the first stage was completed by the recognition of legitimacy of demands of MZ Vreoci and citizens of Vreoci and by the decision to postpone the expansion of open pits for at least a decade. [9], [13], [26]

The second stage of policy of MB Kolubara and EPS regarding Vreoci, from second half of 2004 up to the first half of 2010, begun with legal-formalistic approach of all members of the institutional framework, especially by RB Kolubara and EPS and City municipality of Lazarevac, to the citizens of Vreoci, followed by constant circumvention of acknowledgements of legitimate rights and interests of citizens. [10]

Management of RB Kolubara in fall of 2004 started again activity on the relocation of graveyard in Vreoci, despite the decision of the Minister in 2003, since the minister was changed after elections held in late 2003. This time, MZ Vreoci, ES "Vreoci", and citizens were involved in the decision making process. New position on problem of Vreoci was that open pit mines should expand immediately, and that precondition for their expansion is relocation of the whole settlement Vreoci, including the graveyard. On this basis the presently applicable documents and decisions were adopted:

1) The Management Board of EPS, on November 12, 2007 adopted the Decision on acceptance of the Programme guidelines for the relocation of settlement Vreoci, No. I-925/3, and the Government gave consent on this decision by Decision No. 310-5277/2007-3, on November 22, 2007;

2) The Assembly of the City municipality of Lazarevac, in accordance with the Programming guidelines, on December 25, 2008, enacted the General Regulation Plan for the area of the settlement Vreoci – the Programme guidelines and the results of poll of residents of Vreoci regarding relocation are integral parts of Plan;

3) The Government, on December 30, 2008, enacted the Spatial Plan of exploitation area of the Kolubara lignite basin;

4) The Government, on February 19, 2009, enacted the Decision on determining the public interest for expropriation – administrative transfer of real estate – lands and buildings on the land which by law may be subject to expropriation – the expropriation beneficiary is the EPS, and the purpose of the expropriation is expansion of the open pit Field D and opening of the open pit South Field;
5) The Assembly of the City municipality of Lazarevac, on March 30, 2009, adopted the Decision on terminating the use of the local graveyard in Vreoci (Official Gazette of the City of Belgrade No. 13/09), that prohibits the burial and building of new monuments and other memorials, and determine Lazarevac 2 Šopić as a new graveyard, and authorizing RB Kolubara to perform transfer of mortal remains and monuments and other memorials at it`s own expense;

6) The Assembly of the City municipality of Lazarevac, on the same day, March 30, 2009, enacted the Conclusion that allows the relocation of the graveyard after signing of contracts and advances to payments to owners of graves amounting to 35% of assessed value***. [6], [7], [8], [10]

The Programme guidelines for the relocation of settlement Vreoci is the basic document for solving the problem of Vreoci. It completely eliminates the problem of endangerment of Vreoci by the expansion of open pits and the problem of catastrophic environmental pollution in Vreoci, and it is also baseline for the entire legal framework for addressing the problem of Vreoci. Programme guidelines set the ground rules about relocation. It was enacted as an internal document of EPS, without any consultations, but the rules in Programme guidelines acknowledges all demands and the lawful rights and interests of MZ Vreoci and citizens of Vreoci and generally are accepted by them. [6]

The entire legal framework for the implementation of resettlement of settlement Vreoci was adopted, after the adoption of the Programme guidelines, within amazing just three months, from December 25, 2008 up March 30, 2009. [7], [8], [10]

The General Regulation Plan for the area of the settlement Vreoci, though in compliance with the content of Programmatic basis, was passed very quickly, which was possible among others, by ignoring of all suggestions the ES "Vreoci", MZ Vreoci, and of citizens of Vreoci: at the public hearing on the Plan, held at the Cultural Home of Vreoci, planning commission of City municipality of Lazarevac rejected all 37 explained and well justified objections and suggestions submitted by MZ Vreoci. Particularly controversial detail of the Plan was proposal of the location of Kusadak for collective resettlement: this proposal was rejected by the citizens of Vreoci. Although rejection of this proposal was not taken into account, this location still had not been brought to its purpose and

*** This conclusion is an example of violation of prescribed rules on expropriation of real estate, because legally binds purchasing of secondary property with purchasing of real estate of the same person. The local graveyard in Vreoci is recorded in cadastre not as a graveyard, but as ordinary parcel, where any person who is a guardian over the burial place has a stake in the property. Binding of the purchasing of ownership share of parcel of one person for the purchasing of all real estate of the same person is absolutely a violation of property rights. Moreover, the base for the advance payment is a rough estimate of real estate value prepared by the expropriation beneficiary, in this case MB Kolubara, the only customer in the process of expropriation. Because of the conflict of interests it is unacceptable that the price of real estate should be determined by MB Kolubara. A particular source of the problem is the fact that, because of the traditional avoidance of owners to register their ownership in the cadastre of the real estate, the advance payment of value of real estate was carried out to any representative of the household, usually to young persons, who often do not live in the settlement where their parents live, which is source of a large number of subsequent litigations. However, despite the apparent illegality contained in this Conclusion, about 1/3 of households envisaged for the resettlement (about 350) accepted the advance payment.
is not designated for construction land, which makes it completely inappropriate for any type of resettlement. The General Regulation Plan, from the aspect of site selection is focused on the construction of municipal infrastructure and the development of town Lazarevac, from the funds which should provide MB Kolubara and EPS, instead of focusing on relocation of settlement Vreoci. [7]

The most important parts of General Regulation Plan for the area of settlement Vreoci, in terms of addressing problem of Vreoci, are:

1) that entire area of the cadastral municipality Vreoci up to 2020 should be occupied as addition to the occupied areas for the open pits Field Tamnava East and Field D, and also for the expansion of open pit Field D, for the opening of new open pits South Field and Field Veliki Crljeni and for the relocation of the river bed Kolubara;

2) to resettle a total of 1006 from 1088 households in Vreoci in the time frame of 2008–2015 in three phases:
   a) Resettlement Phase 1, in the period 2005–2008, 85 households in the zone of open pit Field Veliki Crljeni and on the hill Vreoci in the zone of open pit Field D;
   b) Resettlement Phase 2, in the period 2008–2011, 603 households from the central part of Vreoci in the zone of open pit Field D and in the zone of the first phase of exploitation of open pit South Field;
   c) Resettlement Phase 3, in the period 2011–2015, 318 households in the zone of open pit South Field, in the zone of a new infrastructural corridor and parts of settlement that are indirectly endangered by mining operations. [7]

Weak point of the Plan is the fact that the realization of expansion of open pits is not possible without strict execution of the planned time frame for resettlement of Vreoci, because without previous resettlement the normal living conditions in Vreoci will not exist. The Plan also confirmed that the urgent relocation of Vreoci is the only solution for the threats of open pits and environmental pollution of settlement. [7], [15]

On the basis of Programme guidelines and the General Regulation Plan for the area of the settlement Vreoci, on May 12, 2009 the bodies to ensure stakeholder and public participation and transparency during the the relocation were established: Committee for monitoring of Vreoci resettlement (12 members – three representatives of EPS, MB Kolubara, City municipality of Lazarevac and MZ Vreoci) and the Committee for monitoring of graveyard Vreoci relocation (10 members – three representatives of EPS and MB Kolubara and two representatives of the City municipality Lazarevac and MZ Vreoci). Despite the fact that the office of both the Committees was designated in the Cultural Home in Vreoci, neither of these two Committees has never held a session at its headquarters. The sessions were held only in the administrative building of MB Kolubara, and only MB Kolubara determined the time of their sessions and the content of the agenda. [6], [7], [10]
As a special type of control and guarantee for the implementation of the Programme guidelines and the General Regulation Plan for the area of settlement Vreoci, the Government established a Project group for coordination of activities on relocation of settlement Vreoci by the decision No. 310-01-00525-2009-06, on August 25, 2009. The project group consists of one representative of each relevant ministry (mines and energy, finance, and environment and spatial planning), two representatives of EPS and MB Kolubara and one representative of the City municipality of Lazarevac. [6], [7], [10]
Committee for monitoring of Vreoci resettlement held 11 meetings until October 2010, approximately one session every month. This Committee includes also activities of the Committee for monitoring of graveyard Vreoci relocation in its work, for reasons of economy, because its scope covers the whole scope of the second Committee. The work of this committee was characterized by lack of implementation of committee`s decision by the MB Kolubara and City municipality of Lazarevac, open indifference of MB Kolubara and City municipality of Lazarevac to address the large number of irregularities in the implementation of resettlement activities of the settlement Vreoci (improper conduct of process of the appraisal of real estate in the process of expropriation, lack of drinking water in the settlement Vreoci which MB Kolubara should provide, not providing sufficient conditions for the normal functioning of all institutions and public services in Vreoci - ambulance, school, Cultural Hall, and others), as well as permanent rejection of suggestions of representatives of MZ Vreoci. Representatives of RB Kolubara and City municipality of Lazarevac especially ignored complaints about increasing delays in resettlement and constantly avoided to suggest locations for the collective relocation of settlement. Furthermore, between the Committee for monitoring of resettlement and the Government's Project group for coordination of activities on resettlement no communication existed, so it is unknown whether the Project group acted at all. [27]

The third stage of policy of MB Kolubara and EPS regarding Vreoci, from the mid 2010 up to today, begun by the decision of the Council of MZ Vreoci from June 28, 2010 to suspend its participation in the Committee for monitoring of Vreoci resettlement and in the Committee for monitoring of graveyard Vreoci relocation. The decision was taken at a citizens' gathering attended by hundreds of citizens and a large number of members of ES "Vreoci". With this decision, both of Committees have lost their legitimacy. This decision was the culmination of the growth of distrust of Council of MZ Vreoci and citizens of Vreoci, that was caused by the persistent legal-formalistic approach that avoids to solve the problem, and the lack of any proactive decisions or other activities of MB Kolubara and EPS and City municipality of Lazarevac. [27]

While both of the Committees have lost their legitimacy and ceased to hold meetings from end of 2010, MB Kolubara and City municipality of Lazarevac continued to conduct activities, most on the relocation of graveyard Vreoci. However, on the 10th session of the Committee for monitoring of the resettlement of settlement Vreoci held on November 17, 2010, without representatives of MZ Vreoci, the Committee unilaterally adopted a decision that the Petka shall be the location for collective resettlement, and thus accepted the proposal of ES "Vreoci" and Council of MZ Vreoci that was rejected during public hearings on the presentation of the General Regulation Plan, and simultaneously made an unilateral commitment of extending special financial support for MZ Vreoci, public services and organizations in Vreoci and employment of unemployed people from Vreoci. These unilateral commitments are not met to date, thus confirming the essential manipulative approach of MB Kolubara to problem solving in Vreoci resettlement. [27]
The dispute about the local graveyard in Vreoci between citizens and MB Kolubara got the dramatic turn in July 04, 2011 when the police and representatives of MB Kolubara occupied the graveyard without of any prior notice. Based on the above mentioned the Decision of the Assembly of the City municipality of Lazarevac on terminating the use of the local graveyard in Vreoci, which regulates the relocation of the graveyard to the new location and authorized MB Kolubara to carry out relocation, as well as Conclusion of the Government 05 No. 352-4102/2011 from May 27, 2011 and letter of Ministry of Environment, Mining and Spatial Planning No. 352-07-00004/2011-07 from June 21, 2011 addressed to the Ministry of Interior, workers sent by the MB and Kolubara and about 1,000 police officers on that day at 4 o'clock in the morning surrounded the graveyard, after which began the process of exhumation of mortal remains and graveyard relocation. The occupation of the graveyard has met by protests of citizens of Vreoci, launched by ES "Vreoci", and was recorded in all national printed and electronic media. [15]

One of the many disputable questions concerning the relocation of graveyard in Vreoci is that the MB Kolubara have had determined 4409 grave sites for relocation, although the Council of MZ Vreoci from the Archive of the City of Belgrade, as well as from the Secretariat for Administration of the City of Belgrade, has obtained data on the number of entries in the death register book for Vreoci for the period from 1837 up to 2009 that is 8906. Owners of more than 120 graves and tombstones sued MB Kolubara for the process of relocation of the graveyard, and the Court hasn`t ruled on their lawsuits yet. In consequence of the raid of the police linked to relocation of the graveyard, the official communication between the Council of MZ Vreoci and MB Kolubara and EPS is ceased. [15]

Committee for monitoring of Vreoci resettlement, after an interruption longer than one year, held 12th session on February 21, 2012, without representatives of the Council of MZ Vreoci. At that session, inter alia, stated that 1141 grave sites of a total of 4409 determined grave sites remain to be relocated to complete the relocation of Vreoci graveyard. [27]

Finally, in March 2012, on the initiative of MB Kolubara, meeting was held with participation of representatives of the Council of MZ Vreoci, citizens of Vreoci, MB Kolubara and City municipality of Lazarevac, but on the meeting again none of the proposals that could alleviate disputable issues was made – proposal for reconciliation because of the violent relocation of graveyard, proposals of locations for the construction of settlement Novi Vreoci or other proposals of measures for real improvement of condition in Vreoci and overcoming deep distrust. [27]

In the mid 2012 conditions in Vreoci regarding the endangerment of the expansion of open pits and the disastrous environmental pollution is unchanged related to before the 2008, prior to adoption of the legal framework needed for solve all these problems. Normal life of the citizens and the functioning of social services has the same problems as before the adoption of the General Regulation Plan for the area of the settlement Vreoci which establishes the responsibilities for maintaenance of social functions in the settlement until the final resettlement: local water supply
works only every two hours; pollution was unabated; volume of freight transport, road and railway, is even higher, and so on. The problem of pollution in Vreoci is even more enlarged: because of preparatory works on extension of the open pit Field D, heavy equipment is always present in the settlement, while a new transmission line of highest voltage is being implemented through settlement. Moreover, the local graveyard is still under 24 hours police guard, with strict prohibitions for visit for citizens of Vreoci. MB Kolubara treats settlement Vreoci as a mechanical sum of households, using a vast superiority in negotiations with individual households for the unfair estimation of prices of real estates – lands and objects, continues with relocation of the graveyard regardless of the attitude of citizens and owners of grave sites, and does not perform any activity aimed at the collective resettlement in order to preserve identity of settlement and at the formation of settlement Novi Vreoci. [28]

The most important fact is that the timeframe for the relocation Vreoci from Programme guidelines and the General Regulation Plan is completely abandoned: number of resettled households from Vreoci up to June 2012 is less than 100, while timeframe from the Plan prescribes that by 2011 688 households should be resettled, or more than 2/3 of the total number of households planned for resettlement, including the whole urbanized part of the settlement Vreoci. [28]

Non-implementation of the General Regulation Plan aggravated the already disastrous living conditions in Vreoci. Apart from the huge pollution caused by the proximity of open pits, the industrial zone and the transportation of coal through the settlement, and continuing violations of property rights of citizens by MB Kolubara for activities on expanding of open pits, The General Regulation Plan added special measures to ensure a fair determination of the price of real estate in the process of expropriation and to facilitate the use of land after expropriation. These special measures state the prohibition of construction in the settlement and prohibite the use of graveyard. [10], [7]

**Table: Requirements for construction, reconstruction and adaptation of the household (– prohibited, + permitted)**

<table>
<thead>
<tr>
<th>Type of construction</th>
<th>Defined time for resettlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>The formation of new lots and construction of new houses</td>
<td>–</td>
</tr>
<tr>
<td>Building a new home on an existing plot</td>
<td>–</td>
</tr>
<tr>
<td>Upgrading of the old house</td>
<td>–</td>
</tr>
<tr>
<td>The renovation of the old house</td>
<td>–</td>
</tr>
<tr>
<td>The construction of new auxiliary facilities</td>
<td>–</td>
</tr>
<tr>
<td>Upgrading or renovation of existing auxiliary facilities</td>
<td>–</td>
</tr>
<tr>
<td>Building a new fence or gate</td>
<td>–</td>
</tr>
<tr>
<td>Reconstruction of the existing fence</td>
<td>–</td>
</tr>
<tr>
<td>Construction of the existing fence</td>
<td>–</td>
</tr>
<tr>
<td>Construction of new commercial building in the housing</td>
<td>–</td>
</tr>
<tr>
<td>Renovation of existing temporary building in the housing</td>
<td>–</td>
</tr>
<tr>
<td>Construction and replacement of installation in the house</td>
<td>–</td>
</tr>
<tr>
<td>Reconstruction of existing installations in the house</td>
<td>–</td>
</tr>
<tr>
<td>Construction of septic tanks, digging wells</td>
<td>–</td>
</tr>
</tbody>
</table>
While the prohibition of use of the local graveyard shifts the cost and increases expenses of burial on the citizens of Vreoci (transportation expenses of the deceased to a more remote new graveyard), the above table shows that any serious activity in the maintenance of facilities in housing is prohibited in the vast majority of households in Vreoci: not only that construction of new houses is prohibited, but also upgrading and renovation of old houses, new construction or renovation or upgrading of existing ancillary facilities, construction of new and replacement of old installations in the home and many more can not take place. These special measures are meaningless if the timeframe for resettlement is not respected, but they could be, and in fact are a source of conflict, especially in determining the value of the property for expropriation. [7], [10]

5. Policy of MB Kolubara and EPS regarding settlement Vreoci:
Expansion of open pit mines as the only objective of the Project

The presence of the Project in planning documents as a part of the development of mining

Consistency in policy of MB Kolubara and EPS regarding Vreoci, explored in the Section 4 of this complaint, confirms that the Environmental improvement project at Kolubara mine basin, submitted by Client to the EBRD for loan, has only one objective, namely the expansion of open pits. Beside it, the Project provides additional benefits to the Client by strengthening its internal power, which is then used in relationship with local and central authorities, in the Client’s relationship with interested representatives of collective entities, such as the Council of MZ Vreoci, then councils of other mesna zajednicas from areas designated for the expansion of open pits, or to achieve lower costs in negotiations with individual households for expropriation of real estate. [28]

Though the environmental pollution in Vreoci, described in the Section 2 of this complaint is constant and continuous for over two decades, neither MB Kolubara nor EPS had conducted serious measures to reduce it. The political crisis and the disintegration of Yugoslavia during the 90-ies of the 20 century have seriously harmed production of electricity in Serbia, which has became a top national-political issue. The bombing of FR Yugoslavia by NATO in 1999 caused a particularly great damage on facilities for distribution of electricity. Therefore, the primary interest of the EPS since 2000, and since the changes in the political system in Serbia, was the restoration, rehabilitation and modernization of production facilities and distribution of electricity. In the period 2001–2005 the EPS and state has invested about 400 million euros in the reconstruction of the production system, mostly in the capital repairs of thermo power plant blocks. In the same period, 2001-2005, EPS invested only about 25 million euros in environmental issues. That means that
environmental protection by reducing pollution from the thermo power plants and other plants of EPS and related companies, as well as reducing of emissions of greenhouse gases, was not the subject of investments, especially not of large investments. [8]

Beside it, the Energy Development Strategy of Serbia for the period 2005–2015 (Official Herald of the Republic of Serbia No. 44/05) and the Decree on definition of the Implementation Programme of the Energy Development Strategy for the period 2007–2012 (Official Herald of the Republic of Serbia No. 17/07 and 73/07) puts the greatest emphasis on bringing into operation at least one new lignite-fired thermo power plant, installed capacity of 700 MW, as well as on increase of coal production by about 20%, from the current about 29 million tons to about 36 million tons annually. The energy policy of Serbia on issue of reduction of high pollution caused from Serbian thermal sector gives only declarative attitudes, without any serious measures for its real decrease. [8], [7]

It is therefore not surprising that the Environmental improvement project at Kolubara mine basin is outlined in the Spatial Plan of exploitation area of the Kolubara lignite basin and in the General Regulation Plan for the area of the settlement Vreoci, but without parts on environmental protection. [8], [7]

The Spatial Plan of exploitation area of the Kolubara lignite basin, in the second part: Concept of spatial planning and developmental policies for the use, development and protection of the area by sectors / 2.1. Mining, emphasizes "the need that equipment for excavation should be rehabilitated and modernized as preparation for work on the new open pits" and the need for "replacement of equipment of open pit Field B and overhaul of equipment of open pit Field D". [8]

The General Regulation Plan for the area of the settlement Vreoci shows the purpose of the Plan itself even clearer. The adoption of the Plan is not justified by the needs of urban regulation of the settlement or environmental protection, but by Preliminary design and Feasibility study for expansion of open pit Field D (Management board of the EPS, No. 613/11 on March 3, 2006.), by The general plan for the open pit Field Veliki Crljeni and a corresponding study of contouring open pit South Field, as well as by the auxiliary studies: "The feasibility study and preliminary design of limits of expansion of Field D" (Kolubara Projekt, 2005.), "Study of conditions for resettlement of Vreoci", with poll of households, index and evaluation of real estates (IAUS, 2005.), and "Choice of limits and the opening of open pit mine South Field in the Kolubara coal basin" (Kolubara Projekt, 2006/07). All these documents and studies were prepared or ordered by the RB, to be internal documents, with the sole purpose of expansion of open pits and of increasing the coal production. [7]

Furthermore, in the General Regulation Plan, in the section III: Development of mining activities and the impact on the environment / 1. The development of mining activities in the Kolubara basin and their impact on the environment, the following items contain very explicitly a draft of the Environmental improvement project in Kolubara mine basin:
a) "the need that existing excavation equipment revitalize and modernize for the operation on new open pits";

b) "delays in the design and procurement of additional equipment";

c) "opening of replacement capacities for the open pits where the exploitation cease by 2020 (Field B, Field Tamnava East and Field D);

d) "completion of investment program at the open pit Field Tamnava West and reaching the level of production from the current 9 million t/year up to the projected 12 million t/year, replacement of obsolete equipment on the Field B, as well as the revitalization of equipment from the Field D";

e) "reduction of annual production at open pit mine Field Tamnava West after 2020, due to large deterioration of the coal deposit conditions in the southern part of the open pit mine (stratification of coal-bearing series), demands harmonization of the amounts of low-quality coal (from open pits Field Radljevo and Field Tamnava West) with the amounts of quality coal (from open pits Field E and South Field ), since for the homogenization of coal, that will have to occur, is necessary the quantities of low-quality coal and quality coal to be in the appropriate proportion ". [7]

These quotations are to prove that the mala fide and irresponsible attitude of MB Kolubara and the EPS toward the citizens of Vreoci in the process of acquiring land for the expansion of open pit are incorporated in the key documents nominally dedicated to resettlement of Vreoci. The real purpose of spatial and urban plans during more than 10 years, as well as the Project submitted to the EBRD, actually is to hide the true objective that is just the acquiring of land for expansion of the open pits and increase production of coal without fulfilling responsibilities to the citizens of Vreoci. [7], [8]

**Potential harms caused by the Project to settlement Vreoci**

Environmental impact assessment study for the Project "Coal exploitation in the open pit mine Field C, for the capacity of 5 million tons annually, with the excavation of dump site Istočna kipa", that is part of documentation submitted by the Client to Bank, mentions settlement Vreoci several times, in context of potential direct and indirect harms that the Project might cause to the inhabitants of settlement Vreoci. [31]

**Indirect harms, that the Project may cause to the settlement Vreoci**, can be found at several places in the Study. Chapter 2: Description of the location planned for the Project implementation / 2.10. The data on the existing economic and residential facilities and infrastructure and suprastructure facilities, confirms that Vreoci is the spatial-geographic and produclional node for the transport and processing of coal, through and across which all the quantities of coal produced in the future open pit Field C is going to be transported and processed. [31]
Chapter 3. of the Study: Project Description / 3.2. Description of the object, the planned process and the technological features / 3.2.2.2. Production process and technological features, emphasises that the settlement Vreoci and the dry separation plant in Vreoci, is the point where all coal from future open pit Field C shall be brought by necessity, by five carriers with total length of 4,780 m. [31]

**Direct harm which the Project will cause to the settlement Vreoci** are in the Study in chapter 2. Description of the location planned for the Project implementation / 2.4. Water resources and water supply sources, where it is stated that:

- "Open cast coal exploitation in the central part of Kolubara basin physically destroys the interseam aquifer, a greater part of the alluvial aquifer and disturbs the floor aquifer regime";
- "Water supply system "Vreoci" provides water for a part of the population of Vreoci and the plants of Kolubara Prerada. The source consists of several drilled wells capturing water from various depths from three different hydrogeological collectors. The source capacity in the present state amounts to 60 l/s. The source of this water supply system is jeopardized by the opening of the open cast mine (Field C) in this area". [31]

Space for open pit Field C is located southwest of Vreoci, but more important is that it is upstream of Water supply system Vreoci, on the river Peštan (see Map 2: Exploitation area of Kolubara lignite basin). Quoted consequences of open pit mining are inevitable and require more serious measures to protect water sources than the measures provided for in the chapter 10 of the Study: Summary of non-technical information, especially because the source for Water supply system Medoševac, which supplies part of settlement Vreoci, also is located downstream of the future open pit Field C. [31]

Water supply in Vreoci is very poor as stated in the parts 2. and 4. of this complaint. Local water supply in the settlement Vreoci works at the alternate every two hours in best case, and by appearance the water it is not suitable for drinking, but only for technical purposes. In periods of low water levels in the Kolubara river basin, water supply in Vreoci does not deliver water to residents of the settlement Vreoci, but direct all water to the facilities of Kolubara Prerada. [28]

To avoid harms from disturbance of regimes and supply of underground water or normal water supply of the settlement Vreoci, that may be caused by future work on the open pit Field C, the only satisfactory solution is to bring fresh water from distant areas that are not threatened by open pit mining. The need for water supply from remote areas is stated in the Spatial Plan for the exploitation area of Kolubara lignite basin, but not in the quoted study. This potential direct harm to the settlement Vreoci is present throughout entire implementation of the Project. [8], [31]

Bearing in mind that development of the exploitation area of Kolubara lignite basin in the near future will tend to the full rounding of the settlement Vreoci, which is explicitly defined through the General Regulations Plan for the area of the settlement Vreoci, outlined in the section 4. of this complaint, as well as that this creates the most logical spatial connection of production and
processing of lignite, there is no excuse for delay in resettlement of Vreoci. Immediate need for resettlement is confirmed in all planning documents primarily by defining the target to increase coal production by about 20%, which is a direct increase in pollution of the settlement Vreoci. The Bank should take into account the treatment of citizens of Vreoci by MB Kolubara and EPS and regard it at it’s value as a mala fide and irresponsible behaviour, the sole purpose of which is to acquire land for the expansion of open cast pits and increase production of coal, without fulfilling commitments to the citizens of Vreoci. [7], [8]

THE FINAL STATEMENT

The Complainants expect that the Bank, in the project complaint mechanism, within a reasonable timeframe shall conduct a examination of claims and allegations from this complaint and conducts its own investigation related to the Client’s treatment of the settlement Vreoci, as well as to the quality and the goal of the Project.

The Complainants consider that the Bank should decide as set forth in the Content of this complaint.

This Complaint is signed by authorized representatives of the Complainants and their signature confirms that this complaint is a statement of their will.

In Vreoci, July 10, 2012

Ecological Society "Vreoci"
President of Managing Board

Council of Mesna zajednica Vreoci
President of the Council

______________________       ______________________
Gordana Kulić              Željko Stojković
Sources and literature

[7] General Regulation Plan for the area of the settlement Vreoci (Official Gazette of the City of Belgrade No. 54/08)
[8] Spatial Plan of exploitation area of the Kolubara lignite basin (Official Herald of the City of Belgrade No. 122/08)
[12] Environmental improvement project at Kolubara mine basin – Stakeholder Engagement Plan (From Environment Impact Assessment of the Project), February 2011
[16] Law on territorial organisation of the Republic of Serbia (Official Herald of the Republic of Serbia No. 129/07)
[17] Law on regional development (Official Herald of the Republic of Serbia No. 51/09 i 30/10)
[18] Decree on administrative districts (Official Herald of the Republic of Serbia No. 15/06)
[21] Decision on establishing of the public enterprise for the production, distribution and trading of electricity (Official Herald of the Republic of Serbia No. 12/05)
[22] Statute of the City of Belgrade (Official Gazette of the City of Belgrade No. 39/08 i 6/10)
[23] Law on ministries (Official Herald of the Republic of Serbia No. 16/11)
[26] Letter of Minister Kori Udovički to families in the settlement Vreoci, from: Vreoci 2003 – Special issue of the MZ Vreoci (see item [9])
[27] Archive of MZ Vreoci – Records of the sessions of the Committee for monitoring of Vreoci resettlement: Constitutive, the 1–12 session, from May 12, 2009 up to February 21, 2012
[29] Law on Business Companies (Official Herald of the Republic of Serbia No. 36/11 i 99/11)
[30] Study on contamination of land, plants and water in the area of Vreoci, University of Belgrade, Faculty of Agriculture, Department of phiziology of plants and agrochemistry, 1992
[31] Environmental impact assessment study for the Project "Coal exploitation in the open pit mine Field C, for the capacity of 5 million tons annually, with the excavation of dump site Istočna kipa", (From Environment Impact Assessment of the Project), 2009