

Comments to (the Romanian language version of) the Spatial Plan of the Republic of Serbia 2021-2035 and to the “Developers’ position on the comments of the neighbouring states”

We appreciate that the Serbian authorities have provided the Romanian interested public a translated version of the Spatial Plan of the Republic of Serbia 2021-2035, thus ensuring equal opportunities for public participation, albeit not at the same time as the public in the country of origin, and despite the SEA report staying in English.

Overall, it should be highlighted that Serbia, Romania, and all neighbouring countries, EU members or not, are jointly and mutually responsible for meeting the continent’s stated and assumed decarbonisation goals and protecting the health and well-being of their citizens, the natural heritage and its diversity. In the current economic and geo-political reality, in which fossil fuels are driving energy prices to levels never seen before, and are being used to fund wars - which, in turn, will only exacerbate the climate emergency - planning a country’s development on coal and gas seems reckless to say the least.

Therefore, we call on the Serbian Government to review this Spatial Plan - whose implementation is anyway delayed - in view of a genuine decarbonisation, with clear indicators and milestones, develop a green scenario, which is currently not even taken into consideration, and remove all new fossil fuels capacities, such as TENT B3, TE Novi Kovin, TE Kolubara B, TE Štavalj etc. It is not credible that a “gradual decarbonisation” will take place in Serbia, when this Spatial Plan envisages over 4GW of additional lignite and fossil gas installed capacity. Nor can its transboundary impact be neglected, especially in light of coal phase out commitments of nearly all of Serbia’s neighbours. The Spatial Plan, at this moment in time, should also complement and be consistent with the National Energy and Climate Plan, currently under preparation.

With regards to the [response](#) of the Developers of the SEA Report to our comments from June 2021, a few observations are still due, as we consider some of the answers do not address the issues raised.

1. The answers provided to our comments regarding decarbonisation asserts that the *“SPRS concept is based on gradual decarbonisation. It is assumed that this process will be significantly faster as time goes on. In SPRS considerable attention has been paid to energy transition and dynamic increase of the renewable energy sources share in energy production.”*

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Serbia had an obligation to reach 27% of renewable energy in the final gross energy consumption by 2020, a goal clearly missed, considering what the Energy Community most recent Implementation Report [mentions](#): “With 21,44% of renewable energy sources, Serbia was still far from its overall indicative trajectory of 25,6% in 2019. None of the indicative sectoral targets have been reached in 2019.”

This reality check raises the question “**How is this gradual decarbonisation actually reflected and taken into consideration in the SPRS?**” The maximum total installed capacity for projects listed in the SPRS that is based on wind power is half of that based on fossil fuels - **2GW (in new wind capacity) versus 4GW (in new lignite and fossil gas). No mention of new capacity in solar energy projects.** Energy efficiency is merely noted as a means to reduce consumption and emissions, without any concrete projects or estimations of reduction. This disbalance between the level of detail between fossil fuels based projects on the one hand, and renewable based ones and energy efficiency on the other, serves as an indication for the direction in which energy planning will really go, which is in the opposite direction of decarbonisation, with long-term effects not just on Serbia’s economy and environments, but on those of the neighbouring countries too.

2. The SEA Report developer has not provided evidence that it is possible to exclude transboundary impacts regarding the spatial distribution of electricity facilities, or to conclude that these impacts are uncertain and cannot be determined at this planning stage. It is technically and scientifically possible to determine the transboundary impacts of these plants and there are already numerous reports and studies showing that thermal power plants, which do not necessarily have to be in the transboundary zone, have a significant transboundary impact. *The Kovin lignite power plant, particularly, is in a transboundary area, so its environmental impact cannot be excluded in this phase of spatial planning.
3. We consider that the SEA Report developers could not only predict whether certain projects in this planning stage will have transboundary impacts, but that they have an obligation to inform all neighbouring countries on their possible transboundary environmental effects.
4. The answer to our comment concerning dropping some of the harmful activities identified and listed in the SEA report asserts that *“In order for Developers of SEA Report to recommend giving up certain planning solutions, there should be another – alternative solution [...] In concrete case, state institutions in the SPRS development process have not provided alternative solutions, which is the reason why the potential of the SEA Report was limited”*

If no alternative solution was provided to harmful activities, does it mean that both documents - the Spatial Plan and the SEA report - are incomplete and should be redone?

5. It is mentioned that the “SEA Report will be amended with key NERP results”.

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When is a new version of the SEA Report going to be released and will it be subject to transboundary consultations again?

6. Regarding our comment that heavy metal contamination of soil and water should be assessed for its potential transboundary impacts, the answer was *“Monitoring water quality in the territory of the Republic of Serbia is subject matter of the National monitoring programme, and not SPRS and SEA, in whose development only data from the national measurements station grid are used”*.

We consider that this answer ignores the problem raised. We have provided you with sufficient evidence that there is a potential transboundary contamination problem. This is official data that one state institution should be able to access from another state institution. If the SEA Report does not assess the potential transboundary pollution from existing and planned coal capacities - who and when will?

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