

An environmental impact assessment study for a potentially environmentally hazardous mixer plant in the future tire factory “Linglong” in Zrenjanin was written with a complete lack of logic when joining this project, waste management expert Gojkan Stojinovic told VOICE. He was in a group of 70 citizens who wanted to attend the public debate on the controversial Study in Novi Sad on February 18, but it was held without the presence of the public, as the gathered citizens did not want to enter the hall because not enough was provided. places for all interested.

As in the first study, laymen refer to relevant data such as types, types and quantities of waste, for example by stating “some quantities of solid waste”, stating only “particulate pollution” without detailed analysis, or failing to identify the type and character of sludge from wastewater treatment plants, but on the other hand it handles completely irrelevant data very well, such as the percentage of Asian and European cuisine that will be prepared in the canteen (first study) or the exact number of employees in individual plants divided according to gender (new study) . “In this way, the credibility is completely destroyed and the professional capacity of the entire study and project is called into question,” says Stojinović.

“It is a consequence of the so-called salami slicing, ie splitting a single project into several smaller ones in order to avoid impact assessment, ie, in order to determine a smaller impact of the project on the environment than would be determined if the project was evaluated as a whole “, says for VOICE Hristina Vojvodić, lawyer Renewable Energy and Environmental Regulatory Institute (RERI).

According to her, the investor did not cover the entire project this time either (as instructed by the competent authority in the Decision on determining the scope and content), but focused exclusively on the mixer. “This is especially interesting since the investor in the study states in the description of previous works that the construction is planned on a location without previous activities other than agricultural. It is easy to determine that construction works are being carried out on the mentioned location, so it is not clear whether the investor indicates that this project should be viewed as unique only in a situation when it is necessary to avoid adequate determination of the project’s impact on the environment “, says Hristina Vojvodić .

### **Jackals walk the streets**

Biology professor and longtime civic activist Zorica Radisic believes that the consequences of the Chinese Linglong factory on the environment are already visible. “According to the residents of Ečka, a village near the factory, jackals were spotted walking the streets. That

was not the case before. They have already been expelled from their habitats. What will happen to the birds and other animals that live in that area? Linglong is located in a field next to corn. How will the work of the factory affect those fields and that corn? Natural and created values are what is a matter of survival. Whether someone will earn and profit is in the background. It doesn't matter if the investor comes from China or some other country. The same principle is for everyone ", warns Zorica Radisic for VOICE.

In the part of the Study that refers to the flora and fauna, it is stated that there is no protected natural asset on the plot and that "the appearance of protected specimens of flora and fauna at the subject location is not expected". The Carska bara special nature reserve, which is under a high level of international protection, is two kilometers away from the future factory. There are also 24 species of birds that are strictly protected, at the world level of protection. In order to claim that the operation of the factory will not affect the biodiversity of species and habitats of protected areas, there must be two studies: faunal (refers to protected species of birds, fish, insects and amphibians and their habitats) and floral (refers to plants). "This is a serious contingent of regulations that would have to lead to the conclusion that all of them will not be endangered by such a gigantic investment. There is a section in the Study itself in which he says that the creator is obliged to, if he could not, state the reason why he did not get all this information. Without them, the Study cannot get consent, "Radisic explained.

### **There is no assessment of the impact on human health and the environment**

Gojkan Stojinović also drew attention to the fact that the author of the study failed to respond to the requests from the Decision issued by the Provincial Secretariat for Urbanism and Environmental Protection. This Decision requires, inter alia, that the study must contain an analysis and assessment of the quality of the environment and their sensitivity in a particular area, as well as to anticipate the direct and indirect harmful effects of the project on the environment. The Study does not specify the answers to the questions of what powders and other substances will appear in the production process. The ALOHA program is also mentioned - software that calculates the level of risk. "The parameters that are inserted are not very common for our conditions, a temperature of 35 degrees or a humidity of 30 percent. Some associates found that it was not sufficiently discussed what could happen in the worst possible scenario ", says Zorica Radišić and adds that it is not specified what happens in emergency situations.

The study states that, in addition to municipal waste, packaging waste will be generated and

stored in so-called “jumbo bags” and that “in order to reduce waste that ends up in landfills, a certain amount is returned to the supplier of raw materials.” If we take into account the huge dimensions of the factory, which will cover 97 hectares, the matter is multiplying, according to the biology professor. “Do we have firefighting capacities and should we even think about what would happen in the event of such a hazard?” Now we see that the fence was not allowed to be placed there without some study. Abroad, we must know everything in advance. How many of those jumbo bags they mention will be returned? And the numbers are incredible – 108,000 tons per year (jumbo bags, plastic bags, mixed plastic packaging). So where does that happen? Are we returning two bags, and everything else remains at our landfill? I think that we do not have the capacity to process this plastic that we have, “warned Zorica Radisic.

According to Gojkan Stojinović, the fact that the cumulative influence of all broadcasters was not considered further calls into question the entire Study. “Avoiding considering the cumulative, cumulative, impact of all air pollution emitters of which there are over 20, instead of analyzing only the largest potential emitter, the study maker did not perform a detailed analysis based on available data on general population health, including trends. “Finally, by avoiding to perform a cumulative and synergistic analysis of wells drilled at the location of investors, as well as their potential impact on the environment and public health, the developer potentially misleads institutions and citizens,” said the VOICE interlocutor.  
Source: klima101.rs