

Mini hydropower plants are presented as a development opportunity to move to sustainable energy sources. Behind this dominant narrative lies the subsidized profit of individuals, disregard of laws and regulations, with disrupting local community relationships and environmental destruction.

This year we are facing many temptations, and one of them, although we are not fully aware of this, is also the opening of Chapter 27 in pre-accession negotiations with the EU. On the other hand, we should consider this as a happy circumstance, because these negotiations will make us take into account the things and issues that mean life, that is, the environment in which we live. So far, these issues have never been on the government's list of priorities, nor have there been any economic structures.

A good introduction to the opening of Chapter 27 in 2017 was the establishment of the Ministry of Environmental Protection. The thing is, of course, in the money, because it is planned that for the realization of all the tasks that are waiting for us in this field, it will take about 10-12 billion euros ... The actual costs will certainly be much higher for various reasons.

Since so much money is in question, the new Ministry has, in its own jurisdiction, started very "gallantly" with new budget acquisitions. Foreign delegations, promised massive forest planting, promised to review projects and agree on the construction of some small and / or mini hydroelectric power plants and many other promises and good wishes, but also gave consent to the environmental impact assessment for the third block of thermal power plants Kostolac.

When we are at mHPP, the public has recently stirred up a lot of questions about the justification and well-being expected by the planned construction of a huge number of mHPP on our rivers.

The transition to renewable sources is inevitability, but there are many choices and alternatives to do it. Serbia builds its own electricity production, besides on coal and thermal power plants, on hydro-potential. Much of this potential has been built long ago and comes from large hydroelectric power plants that are capital projects for every society. It is commendable that the provision of part of the missing capacities is planned with the increase and reconstruction of the existing ones, because it is the most environmentally harmless way. The part that worries definitely are plans that include mini and micro power plants.

According to the Register of Privileged Electricity Producers, Serbia has built up mHPP on 82 locations, that is, installed power plants of about 40 MW. Since the beginning of 2017, 13 plants have been installed with total installed capacity of 6.8 MW.

In February 2019, Serbia should receive a new cadastre of small hydropower plants, and the last serious analysis of hydroelectric potential of Serbia was made in 1996 by the water management institute "Jaroslav Cherni". She relied on the "Cadastre of Small Hydropower Plants in the territory of the Republic of Serbia outside SAP" from 1987, with over 850 locations, as well as the Cadastre of Small Hydro Power Plants in the Autonomous Province of Vojvodina, which processed 13 potential locations for hydroelectric power plants. More than 50 sites with a potential over 10MW (total of about 500 MW) and more than 850 locations with a total capacity of about 450MW have been defined. These are places where it is possible to build mHPP from 100KW to 10MW, but the vast majority do not exceed 500KW. Maha's help is enormous because they belong to privileged producers who are paid a stimulating price for energy produced. The return on funds is very fast, lasting some 5 years, and the state guarantees 12 years to pay electricity at a stimulus rate (0.07-0.13E / KWh). Even after these 12 years, mHPP works very profitable, although to a lesser extent. Potential investors complain about the complicated procedure and the plethora of documentation that need to be collected for the license obtained. No matter how true or false, much has been done to formal procedures and assessments. People who give permits and approvals generally do it from their comfortable offices, not far away hundreds of miles away from the real environment. Only part of the permit depends on local governments and people who live there. When it is necessary to ensure their consent, politicians and "experts" who persuade them will appear and talk about many benefits that they will feel if they consent to the construction of HPP, the prosperity of the economy, greater employment, the ideal integration and implementation of the facility in the environment ... Called for watercourses and centuries-old use of water energy, not mentioning for a moment all those hidden, very negative effects.

The issue of water conditions, water consents and water permits is regulated by the Law on Waters. This law does not distinguish between a small hydropower plant and a hydroelectric power plant with a power exceeding 10 MW. When realistic and objective assessment was carried out, there are few projects that would satisfy all the required conditions for designing and constructing facilities. To recall the requirements are: 1) to allow the return of water to the watercourse after the use of energy; 2) does not reduce the existing volume and does not prevent the use of water for the supply of population and other users; 3) do not reduce the level of protection against harmful effects of water; 4) do not worsen the conditions of sanitary protection; 5) provides their multipurpose use. In all likelihood, it is for this reason that recently, the amendments to the Law on Planning and Construction have abolished water consents, and a water permit is no longer a condition for issuing a usage

permit.

An environmental impact assessment for HPP power below 2MW is not necessary at all, which is unprofitable because such plants are built on the most sensitive, small watercourses. For those from 2 to 10 MW, the assessment can be, but it does not have to be asked, and even if it is requested, it is always possible to obtain consent with our fidelity and acquaintances. Of course, it's far better for an investor to make an estimate at all, because he himself has to pay for it.

The Law on Environmental Protection has established that the Ministry of Environmental Protection gives prior consent to the approval for use of natural resources or goods. If it is a project implemented in a protected natural area, which is, to a great extent, very often a case, then it is necessary to obtain the first Conditions of the Institute for Nature Conservation of Serbia and submit them with the submitted request.

In the course of construction, the HPP facilities are under the jurisdiction of local government units, unless the building is built within the boundaries of the national park or within the boundaries of the protection of a protected natural good is of exceptional importance and is then under the responsibility of the Ministry of Environmental Protection or the competent authority of the autonomous province, if HPP is built on the territory of the autonomous province. In this way, the power of local powers and financiers was to be limited, but the exact opposite happened because the population living in a certain territory was deflated. All authorizations are given to the Ministry of Environmental Protection, which is in our political conditions, more interested in partnering with the Ministry of Mining and Energy, but for the benefit of the environment and the local community.

In the current regulations, there is a very large inconsistency regarding the issuance of a building permit for HPP below 1 MW. Namely, the Law on Planning and Construction stipulates that this act for energy facilities is issued in accordance with the energy permit, while the Law on Energy foresees that no energy permit is issued for these facilities.

Serbia is obliged to produce 27% of electricity from renewable sources by 2020. Transition to renewable energy sources is inevitable, but there are many choices and alternatives to do it. Not only do we have to reach 27% of the production from renewable sources, but the beginning of the construction of the third block of Kostolac power plant 350MW will additionally raise this threshold.

We forget that we did not inherit our present from our ancestors but borrowed from their descendants! What will we leave them? Will it be for the consolation that somebody else might be in power when bad estimates and decisions of the present powers come, and will come securely, for a fee? Had not we, perhaps, played too much with the future of Serbia?

However, if the goal of the society is responsibility for the relationship with future generations, it is necessary to advocate for the review of all already approved projects and given consents, but also to tighten the conditions and criteria for giving consent and permissions, not for their abolition or relief. All disregard or breach of legal and secondary regulations and other acts and norms, as well as any non-compliance with obligations assumed, must be rigorously punished. Therefore, more serious, more conscientious and rigorous inspection supervision is needed, but also the full agility of prosecutors and courts. It is of the utmost importance that society, by amending the Law in all areas related to this issue, provides mechanisms and levers to successfully counter the ever-wider destruction of the environment and those to whom personal interests and profit are merely the criterion and criterion.