

A draft of the new Detailed Urban Development Plan (DUP) for 'Archaeological site - Lepenski vir', situated in the Đerdap National Park (NP) along the Danube's Iron Gates, was presented by the Majdanpek Municipality on 15th October 2020.

A number of environmental NGOs in Serbia, led by WWF Adria-Serbia, are deeply concerned regarding the potential threat to the Đerdap National Park.

The Plan is seriously threatening a number of natural and cultural values of the region, as well as opportunities for sustainable development of the local area. Namely, the Plan is looking to build a new docking station on the river, with accompanying touristic objects, close to the archaeological site Lepenski vir, despite an existing and functional docking station in the riverside town of Donji Milanovac, Serbia, situated only 16km from the archaeological site. Development of such a project would directly impact on the Danube river and its shore, as well as adjacent habitats which are under 1st and 2nd zone of protection within the Đerdap National Park. This would threaten the existence of a number of local animal and plant habitats, some of which have been proclaimed as natural values of national importance by the Law on National Parks of the Republic of Serbia, as well as the "Rulebook on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi".

This locality is one of the most important sites in Đerdap NP from the viewpoint of scientific research and nature protection. It is additionally worrying that the zone of the planned development complex includes relict and rare communities of nettles and walnuts, which were originally found in this area. Furthermore, the Đerdap National Park has been recognised as an internationally highly significant area, which is why it has been inscribed as UNESCO Global Geopark, Important Bird Area (IBA), Important Plant Area (IPA) and Prime Butterfly Area (PBA). It is also part of the EMERALD network of protected areas, and it represents a potential Natura 2000 area of the European ecological network. In addition, Đerdap National Park is protected by the Carpathian Convention, which Serbia has ratified, as well as the Protocol on Sustainable Forest Management within the mentioned convention, with the goal to protect the most valuable forest complexes in Europe. The protocol also aims to maintain or increase the area under forests, as well as to improve the protective functions of forests, such as flood prevention, landslides and the regulation of watercourses in general, which are important measures for adapting to climate change.

Only a few days ago, Đerdap was added to the list of the wetlands of international importance, as the 11th and largest Ramsar Site in Serbia. The area is exceptionally important for migrating and wintering birds due to its geographic location and the fact that large water bodies in the Site rarely freeze. Up to 150,000 birds are present during the

winter, the majority of them ducks, geese and swans. The Site is also a breeding ground for a number of protected species such as the common tern (*Sterna hirundo*) and the black tern (*Chlidonias niger*) both listed in Annex I of the EU Birds Directive. Nevertheless, during the public hearing procedure that was open from 26th September until 26th October 2020, the presented Plan did not consider the recommendations on the protection of cultural landscapes promoted by the European Landscape Convention, ratified by the Serbian Parliament in 2011.

On 26th October, WWF Adria - Serbia, Renewables and Environmental Regulatory Institute (RERI), Europa Nostra and the Center for Cultural Decontamination submitted comments to the Majdanpek Municipality, demanding the suspension of the procedure due to the procedural violation. We requested for a new procedure to be initiated in accordance with the legal regulations of the Republic of Serbia. To this date, the Municipality has not acknowledged this procedural failure and will continue with the adoption of the plan. The illegality in the preparation of this Plan is reflected in the fact that the Municipality of Majdanpek, as the holder of the Plan, grossly violated the public inspection procedure by omitting the Draft Report on the Strategic Environmental Assessment of the DUP. The obligation to submit this Report is prescribed by the Rulebook that regulates content, manner and procedure of drafting spatial and urban planning documents. In this way, interested parties are prevented from gaining insight into the complete documentation for public consultation and reacting in a timely manner, which makes the whole procedure irregular.

Our concerns have been additionally raised due to the recently announced Special Purpose Area Spatial Plan for Đerdap National Park (SPSP), a hierarchically higher plan developed under the responsibility of the Ministry of Construction, Transport and Infrastructure. The early draft was open for consultations during November 2020 and it is clear that it supports similar provisions as those from the DUP, including intensive tourism and nautical infrastructure development within the protected zones of the National Park. The draft plan is even proposing changes in the zonation of the Park which is in direct collision with the Law on National Parks. On December 3rd WWF and RERI submitted comments on this plan, indicating several legal inconsistencies and unsustainable approaches with regards to the future development of the area.

Source: wwfadria.org