

Linglong divided the construction of the factory complex into four parts and thus managed to avoid making a study on the impact on the environment during the construction of the factory fence and accompanying facilities. Earlier, it was obliged by the competent authorities to make an impact study related to the construction of the factory, and with the latest solution, he was obliged to do the same during the construction of the mixer for the production of raw rubber.

The Regulatory Institute for Renewable Energy and the Environment (RERI) has filed a complaint with the Ministry of Environmental Protection, as a second instance decision-making body, to annul the decision of the Provincial Secretariat for Urbanism and Environmental Protection, which obliged the Chinese company Shangdong Linglong to conduct an Environmental Impact Assessment on the occasion of the construction of a mixer for the production of rubber.

As lawyer Hristina Vojvodić told the Vojvodina Research and Analytical Center (VOICE), RERI believes that the departmental secretariat was not allowed to issue a decision for a separate factory plant, but should have done so for the entire industrial complex being built in Zrenjanin. Thus, as she claims, the Provincial Secretariat slowed down the procedure. According to her, RERI, in addition to annulling the decision of the Provincial Secretariat, also requested a repetition of the entire procedure. That the decision of the relevant secretariat is unclear and not in accordance with the law, Vojvodić claims that points 1 and 3 clearly speak because they are contradictory. In the first point, the solution refers to the mixer, and in the third to the entire industrial plant.

She also warned that it is important to point out the issue of issuing an integrated permit, because it is necessary to obtain it for certain plants in the tire industry. "The law itself says that in that case, the obligation of the investor is to obtain an integrated permit and make a study on environmental impact assessment in order to minimize the harmful impact of the plant's work on the environment," said Vojvodić.

However, the Provincial Secretariat does not share the opinion of RERI, and in its decision states that the Zrenjanin factory "does not need an integrated permit because the future plant will not produce basic organic chemicals for rubber production, but these chemicals will be used for synthetic rubber production. "

The Ministry of Environmental Protection can annul the decision of the competent body in AP Vojvodina, but it cannot revoke it. If the Province does not annul its decision after the appeal, it will mean that the Chinese investor has completely succeeded in his intention to make the study only for the factory and mixer, which, according to RERI's interpretation, will reduce the scope of environmental impact assessment.

## **Contradictions in the decision of the Provincial Secretariat?**

In the decision of the Provincial Secretariat, in the first point, it is written that the study is being prepared for the project of building a mixer for the production of rubber at the Linglong factory complex with accompanying infrastructure facilities. However, point 3 states that the study must contain an analysis and assessment of the quality of environmental factors for all facilities located on the cadastral parcel 19249 KO Zrenjanin. Hristina Vojvodić pointed out this fact, claiming that the solution was unreasonable and contradictory, which is why it would have to be annulled and the Chinese company ordered to make a joint impact assessment for the entire industrial complex, which covers about a hundred hectares.

Previously, Linglong was magically released from the obligation to make an Impact Assessment Study during the construction of the factory fence, and then the accompanying facilities. Namely, the Chinese investor addressed the City Administration of Zrenjanin for the first time during the construction of auxiliary facilities, when the fence of the factory complex had already been built.

According to her, the biggest problem all the time is that the public was not provided with complete information. She believes that every citizen should have been explained how much capacity there will be, how much pollution there will be and what will be produced in the tire factory and in what way, in order to know the potential consequences of such production.

“For anyone who deals with environmental protection, the fact that the construction of the factory complex began before the study was made, be it auxiliary facilities, is simply unacceptable. An investor cannot determine the capacities and then do an impact assessment study. “If there are some limiting factors, then the installed capacity must be smaller, and therefore the auxiliary facilities do not have to be of that capacity,” said the RERI lawyer.

According to the announcement of the Chinese investor, the tire factory will be built in three phases, and the first phase should be finished in 2021. The complete completion of the works has been announced for March 2025. When the factory is fully built, it should produce 3,600 tons of final products or 13.6 million pieces of tires per year.

Linglong has six factories, and this one in Zrenjanin will be the second plant outside China (Linglong has a factory in Thailand since 2014). The factory will cover 130 hectares, and its total area will be 393,660 square meters.

The company’s website states that “new technologies such as artificial intelligence, mobile



## Chinese Linglong in Serbia must make an integrated environmental impact assessment

research, big data and industrial robots will be applied in the Zrenjanin factory”, and that the production itself will mean “excellent quality, green production and a top brand”.

Source: [voice.org.rs](http://voice.org.rs)