

DELAYING DECARBONIZATION

Report on the Implementation of the Actions of the
Green Agenda for the Western Balkans in Serbia

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Abbreviations

BOS	Belgrade Open School
CBAM	Carbon Border Adjustment Mechanism
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	Corporate Sustainability Reporting Directive
CO₂	Carbon dioxide
CO₂eq	Carbon dioxide equivalent
EBRD	European Bank for Reconstruction and Development
EU	European Union
EU ETS	EU Emission Trading System
EC	Energy Community
GAWB	Green Agenda for the Western Balkans
GHG	Greenhouse gases
INECP	Integrated National Energy and Climate Plan
IPA	Instrument for Pre-Accession Assistance
LTS	long-term strategies
MoE	Ministry of Environmental Protection of the Republic of Serbia
MMR	Monitoring Mechanism Regulation
NDC	Nationally Determined Contributions
NGO	non-governmental organization
NO_x	Nitrogen oxides
NPAA	National Programme for the Adoption of the Acquis
CSOs	Civil society organizations
RES	Renewable energy sources
PFR_x	Perfluorocarbons
RERI	Renewables and Environmental Regulatory Institute
RS	Republic of Serbia
SORS	Statistical Office of the Republic of Serbia

MRV System	<i>Monitoring, Reporting and Verification (MRV) System for Greenhouse Gas Emissions</i>
TPP	<i>Thermal power plant</i>
UNFCCC	<i>The United Nations Framework Convention on Climate Change</i>

Introduction

The Green Agenda for the Western Balkans is a regional development strategy adopted at the Sofia Summit in November 2020.¹ It follows the principles of the European Green Deal of the European Commission from 2019, which set the goal for Europe to become the first climate-neutral continent by the middle of the 21st century.² The Green Agenda reflects this ambition onto the economies of the Western Balkans, with the aim of enabling the region's economic growth to take place independently of carbon dioxide emissions.

It is based on five key pillars:

- ➔ **Climate, energy, and mobility (decarbonization)** transition to clean energy sources and climate protection measures;
- ➔ **Circular economy** sustainable production and consumption;
- ➔ **Depollution** protection of air, water, and soil;
- ➔ **Sustainable food systems & rural areas;**
- ➔ **Biodiversity** protection and restoration of ecosystems.³

In October 2020, the European Commission presented the Economic and Investment Plan for the Western Balkans, which offers the region the opportunity to attract €30 billion (including €9 billion in non-repayable financial assistance) to fund key projects and initiatives in transport, energy, green and digital transition, and rural development.⁴ To implement the goals of the Green Agenda, an Action Plan was adopted at the Brdo pri Kranju Summit in October 2021. The plan contains 58 concrete actions, organized under five pillars and seven thematic “roadmaps.”

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- 1 Sofia Declaration on the Green Agenda for the Western Balkans, accessed on 23.07.2025, https://www.mei.gov.rs/upload/documents/eu_dokumenta/2020/deklaracija-iz-sofije-o-zelenoj-agendi-za-zapadni-balkan-srp.pdf.
 - 2 European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The European Green Deal, COM (2019) 640 final.
 - 3 Sofia Declaration on the Green Agenda for the Western Balkans, in Serbian, accessed on 23.07.2025, https://www.mei.gov.rs/upload/documents/eu_dokumenta/2020/deklaracija-iz-sofije-o-zelenoj-agendi-za-zapadni-balkan-srp.pdf.
 - 4 European Commission, Communication from the European Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Economic and Investment Plan for the Western Balkans, COM (2020) 641 final, accessed on 10. 05. 2025, https://enlargement.ec.europa.eu/document/download/30108255-efa8-4274-962a-c24faee32734_en?filename=communication_on_wb_economic_and_investment_plan_october_2020_en.pdf.

To achieve the goals of the Green Agenda for the Western Balkans, significant policy changes are necessary in the countries of the Western Balkans, whose economies are almost all carbon-intensive and based on the exploitation of fossil fuels.

Delaying Decarbonization

The report *Delaying Decarbonization* provides a comprehensive overview of the current progress in preparing and implementing national legislation, the state of institutional structures and administrative capacities, stakeholder involvement, financing, and other relevant aspects related to the implementation of the Action Plan for the Sofia Declaration on the Green Agenda for the Western Balkans. The analysis focuses on four measures from the Action Plan rather than the entire decarbonization area, due to limited capacity to analyze all measures envisaged by the Green Agenda for the Western Balkans. The analysis covers the period from the signing of the Sofia Declaration on the Green Agenda for the Western Balkans up to June 2025.

The starting point for the analysis is the set of recommendations from the Joint NGO Proposal from October 2024,⁵ in which a group of civil society organizations, including partners of the Green Agenda Navigator project, presented joint proposals for improving the Action Plan, both in terms of specific measures and in terms of governance mechanisms.

⁵ CEE Bankwatch Network and partner organizations, *Joint CSO Proposals for the Action Plan for the Implementation of the Green Agenda for the Western Balkans Parts 1 and 2 (September 2024)*, accessed on 10. 06. 2025, https://bankwatch.org/wp-content/uploads/2024/09/2024_10_Joint-NGO-proposals-on-the-GAWB-Action-Plan_Parts-1-and-2.pdf.

Action no.	Names of existing measures from the Action Plan for the Implementation of the Green Agenda for the Western Balkans ⁶	Names of measures from the Joint NGO Proposal from October 2024
Action no. 1	Align with the EU Climate Law with a vision of achieving climate neutrality by 2050	Adopt or update national climate laws to align with the EU Climate Law
Action no. 3	Develop and implement Integrated Energy and Climate Plans	Implement National Energy and Climate Plans and long-term strategies (LTS) and where necessary, update them to integrate clear plans for fossil fuel phaseout and just transition.
Action no. 5	Align with the EU Emissions Trading System and/or introduce other carbon pricing instruments	Without proposed changes
Action no. 15	Ensure participation in the Coal Regions in Transition initiative for the Western Balkans.	Draw up equivalents to Territorial Just Transition Plans for carbon-intensive regions

Table 1. Comparative overview of the names of measures from the Action Plan for the implementation of the Green Agenda for the Western Balkans and the measures from the Joint NGO Proposal.

The data for the report were collected through a review of available public policy documents and laws relevant to each of the measures, as well as reports on the processes of drafting and adopting public policy documents, and by submitting requests for access to information of public importance. In addition to the analysis, the report includes conclusions and recommendations for each of the actions considered.

The development of the report Delaying Decarbonization is part of the activities of the regional project Green Agenda Navigator Empowering Civil Society to Support the Development of Climate-Neutral, Resilient, Resource efficient and Competitive

6 Regional Cooperation Council. *Green Agenda for the Western Balkans 2021-2030* (2020). Accessed 10.06.2025. <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.rcc.int/files/user/docs/d6b170df3ed1b06973f02675e474d661.pdf>

Economies in the Western Balkans, implemented by the Belgrade Open School in cooperation with six regional partners: the organization Eco-team from Montenegro, the Aarhus Center Association in Bosnia and Herzegovina, the organization Eco-Z from Kosovo*, the Center for Environmental Research and Information Eko-Svest from North Macedonia, the organization Protection and Preservation of Natural Environment from Albania, as well as the CEE Bankwatch Network. The project is co-funded by the European Union.

The project aims to contribute to inclusive democratization and participatory implementation of reforms in the EU accession process of the Western Balkans' through enhancing cooperation, understanding, and the impact of civil society organizations on the implementation of the Green Agenda.⁷

The Working Group That (Doesn't) Work

With the task of monitoring, analyzing, and addressing the most important issues in the implementation of the Sofia Declaration on the Green Agenda for the Western Balkans, as well as the regional Action Plan, the Government of the Republic of Serbia initially established the Working Group for the Implementation of the Sofia Declaration on the Green Agenda for the Western Balkans in March 2023.⁸ However, in January 2025, a new decision was made to establish a revised Working Group.⁹ The new decision differs from the previous one primarily in its expanded composition, as it includes a greater number of members from various ministries, agencies, and institutions, aiming to strengthen the intersectoral approach. The possibility of forming subgroups based on the pillars of the Green Agenda was introduced, along with the option of involving additional institutions in the group's work. Reporting

* This designation does not prejudice the status of Kosovo and is in accordance with United Nations Security Council Resolution 1244, as well as the International Court of Justice's opinion on the Kosovo declaration of independence.

7 Green Agenda Navigator Empowering Civil Society to Support the Development of Climate-Neutral, Resilient, Resource efficient and Competitive Economies in the Western Balkans, Belgrade Open School, accessed on 16.07.2025, <https://www.bos.rs/rs/aktuelni-projekti/18/2030/navigators-zelene-agende-osnazivanje-civilnog-drustva-za-podrsku-razvoju-klimatski-neutralnih-i-otpornijih-ekonomija-na-zapadnom-balkanu.html>.

8 Government of the Republic of Serbia, *Decision on the Establishment of the Working Group for the Implementation of the Goals of the Sofia Declaration on the Green Agenda for the Western Balkans*, Official Gazette of the Republic of Serbia, No. 23/2023 (24.03.2023).

9 Government of the Republic of Serbia, *Decision on the Establishment of the Working Group for Monitoring the Implementation of Measures and Activities Foreseen by the Personal Data Protection Strategy for the Period from 2023 to 2030 and Other Related Issues*, Official Gazette of the Republic of Serbia, No. 8/2025 (24. januar 2025), accessed on 16.06.2025, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/odluka/2025/8/3>.

deadlines were also clearly defined: every 90 days to the Government and every 60 days to the competent committee. Additionally, the Ministry of Environmental Protection (MoE) was explicitly designated to provide technical and administrative support to the Working Group. In the meantime, a new government was formed in April 2025; however, no changes were made to the composition of the Working Group. As a result, under the existing decision, the chairperson remains the former Minister of Environmental Protection.

Although the decision foresees that the chair of the Working Group may invite representatives of other institutions to participate in its work, and that the Working Group will actively cooperate with representatives of all competent authorities and organizations, representatives of civil society organizations have still not been included in the work of the Working Group.

There is limited information available about the work of this Working Group, with only one meeting publicly documented—held on April 9, 2024, and chaired by the then Minister of Environmental Protection.¹⁰ The lack of information on concrete activities and results, as well as the absence of public reports on its work, not only points to insufficient transparency but also raises doubts about the effectiveness of the Group's operations and calls into question the genuine commitment to implementing the measures outlined in the Green Agenda for the Western Balkans.

Green Agenda for the Republic of Serbia

Although it represents a regional framework, the success of the Green Agenda largely depends on the implementation of reforms at the national level. These reforms are also a prerequisite for the progress of Western Balkan countries toward EU membership under the new methodology for conducting accession negotiations.

Probably the most significant step in aligning national policies with the Green Agenda for the Western Balkans was taken during the drafting of the Environmental

¹⁰ Vujović chaired the meeting of the Working Group for the Implementation of the Green Agenda goals, [ekologija.gov.rs](https://www.ekologija.gov.rs) (9.04.2024), accessed on 17.07.2025, <https://www.ekologija.gov.rs/lat/saopstenja/vesti/vujovic-predsedavala-sastankom-radne-grupe-za-implementaciju-ciljeva-zelene-agende>.

Protection Strategy Green Agenda for the Republic of Serbia for the period 2024–2033, which serves as the overarching sectoral document for the field of environmental protection and climate change in Serbia. The Working Group for drafting the Environmental Protection Strategy began its work at the beginning of 2023.

In November 2022, the Ministry for Human and Minority Rights and Social Dialogue, in cooperation with the Ministry of Environmental Protection, issued a public call for civil society organizations to join the Working Group for drafting the Environmental Protection Strategy with an Action Plan. Only seven civil society organizations responded to the Ministry's call, which is a relatively low number considering that the Belgrade Open School, through a parallel process of broad consultations, engaged at least 35 different civil society organizations. This significantly contributed to greater transparency in the process and improved representation of civil society in the development of the Strategy.¹¹

In addition to the five areas covered by the GAWB (decarbonization, circular economy, pollution reduction, sustainable agriculture, and biodiversity), the Strategy includes a sixth pillar that addresses cross-cutting issues such as administrative and institutional capacities and financing. Although the adoption of the Strategy was initially planned for the end of 2023, due to the complexity of the process and extensive inter-ministerial coordination, the draft document was subjected to public consultation from December 4 to December 24, 2024. The report from the public consultation was published in January 2025¹², but the document has still not been adopted.

Alongside the Strategy, an Action Plan for the period 2024–2028 was also developed. However, since the document has not yet been adopted, the timeframe for implementing the planned measures has already been shortened in advance, raising doubts about whether the proposed timeline remains realistic. Although the adoption of the

11 Mirjana Jovanović and Sanja Žarković, *The Public's Move: A Model of Broad Parallel Consultations for Effective Public Participation in Environmental Decision-Making* (Belgrade Open School, 2025), 20, accessed on 11.07.2025, https://www.bos.rs/rs/uploaded/Javnost%20na%20potezu_Model%20%C5%A1irokeh%20paralelnih%20konsultacija.pdf.

12 Ministry of Environmental Protection of the Republic of Serbia, *Report on the Participation of Relevant Authorities, Organizations, and the Public in the Process of Drafting the Strategic Environmental Impact Assessment Report for the Environmental Protection Strategy Green Agenda for Serbia with the Action Plan* (2024), accessed on 15.06.2025, <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/javne-rasprave/javni-poziv-za-ucescje-javnosti-u-procesu-konsultacija-u-vezi-sa-izradom-strategije-zastite-zivotne-sredine-zelena-agenda-republike-srbije-za-period-2024-2033-godine>.

Environmental Protection Strategy with its Action Plan would significantly support the implementation and monitoring of measures and policies aimed at applying the Green Agenda for the Western Balkans in Serbia, the delay in adopting this document sends a clear signal that political priorities currently lie elsewhere and that alignment with EU legislation is not a focus for decision-makers in Serbia.

According to the draft Environmental Protection Strategy, the estimated financial resources needed for the period from 2024 to 2033 amount to over 27 billion euros. It is commendable that this overarching strategic document dedicates special attention to financing as a separate pillar of reforms and includes a list of goals and measures in this area. However, the overall impression is that this part of the draft Strategy is neither concrete enough nor ambitious. The planned activities are defined too generally, without a clear strategic commitment regarding the direction in which the reform of the environmental protection financing system should go, and some of the set deadlines already seem unrealistic. For example, key activities such as the Analysis of Instruments for Sustainable Financing and the Definition of the Institutional and Legal Framework are scheduled for the end of 2025, while the Strategy itself had not been adopted as of July 2025. It is important to highlight that the implementation of one of the activities listed in the draft Strategy has already begun during 2024. This concerns the development of a methodology for labeling and monitoring projects and measures in the Republic of Serbia's budget that have a positive impact on the environment and climate. This process, known as "green tagging," represents the first step toward introducing green budgeting, thereby aligning Serbia with global trends in public finance management.

The analysis of financing for environmental protection and climate change for the period from 2014 to 2023, presented in the 2024 report by Coalition 27, showed that Serbia allocated approximately only one-third of the amount that, according to the National Strategy for Approximation in the field of environmental protection, should have been invested. This is far below the level of investment needed to make progress in aligning with European legal *acquis* and environmental protection standards, which have since become even more ambitious.¹³

13 Coalition 27, *Shadow Report on Chapter 27: 'Years go by, we stand still'* (Young Researchers of Serbia, 2024), <https://www.koalicija27.org/wp-content/uploads/2024/11/Izvestaj-iz-senke-2024.pdf>.

However, in recent years, one encouraging trend has become noticeable. The most significant positive change since 2021 has been a substantial increase in the financial resources that the state allocates to environmental protection. This trend continued in 2024 and, according to government plans, is expected to continue in 2025. Sector-wise, investments are dominated by water protection and waste management, which are areas that typically require the largest infrastructure investments and consequently absorb the biggest portion of the available budget funds. However, this progress is overshadowed by the fact that the increase is not the result of fiscal and institutional reform but largely relies on external sources of financing: EU pre-accession funds, bilateral donations, loans from international financial institutions, and increasingly, intergovernmental credit arrangements. Heavy dependence on external funding sources raises concerns about the long-term sustainability of Serbia's environmental policies and systemic investments in environmental protection and climate change.

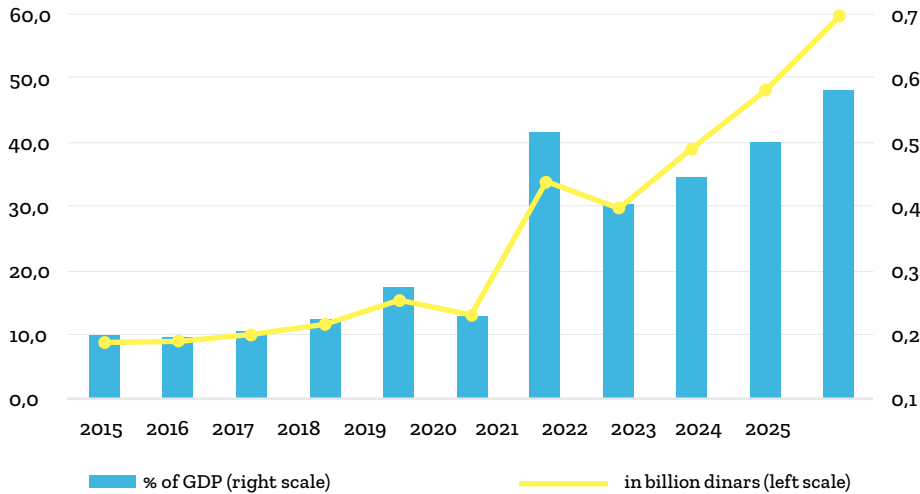


Chart 1. Republic Budget Expenditures for Environmental Protection, 2015–2025 (in billion dinars and % of GDP)

Source: Calculations based on data from the final accounts of the Republic of Serbia's budget and the Budget Law of the Republic of Serbia for 2025.

Note: The data for 2025 represent the planned expenditures for environmental protection according to the Budget Law of the Republic of Serbia for 2025, while for previous years, the actual final expenditures are shown.



The absence of an operational Green Fund prevents the establishment of an effective financing system and jeopardizes transparent monitoring of investments in the field of environmental protection in Serbia. For this reason, it was not possible to conduct a more detailed analysis of the financing aspect for the implementation of selected measures in the further analysis.

Overview of Achievements in the Implementation of Four Selected Actions from the Action Plan for the Implementation of the Sofia Declaration on the Green Agenda for the Western Balkans in the Republic of Serbia

Action No. 1: Adopt or Update National Climate Change Laws to align them with the European Union Climate Law

By signing the Sofia Declaration on November 10, 2020, the Republic of Serbia committed, among other things, to adopting a Climate Change Law that would include a vision of achieving climate neutrality by 2050 and would be aligned with the European Union Climate Law.¹⁴

Prior to the Declaration, the National Assembly of the Republic of Serbia ratified the Paris Agreement on May 29, 2017, thereby making the commitment to limit the increase in average global temperature well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels a part of the domestic legal system.¹⁵ After the ratification of the Paris Agreement, the process of drafting the Climate Change Law began, with its adoption originally planned for 2018.¹⁶

The Climate Change Law¹⁷ came into effect in Serbia in March 2021. Compared to the European Climate Law, which obliges member states to reduce the EU's net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels, in line with the European Green Deal, the Climate Change Law in the Republic of Serbia does not set explicit emission reduction targets for 2030, nor does it establish interim

14 Regional Cooperation Council, *Action Plan for the Implementation of the Sofia Declaration on the Green Agenda for the Western Balkans*, 5, accessed on 17. 06. 2025, <https://www.rcc.int/files/user/docs/637b6b83ba51c1b8607763d-6c557d121.pdf>.

15 *Law on the Ratification of the Paris Agreement*, Official Gazette of the Republic of Serbia International Treaties, No. 4/2017.

16 Government of the Republic of Serbia, *Work plan of the Government for 2018*

17 *Climate Change Law*, Official Gazette of RS, No.26/2021-3.

targets. Instead, it provides for the development of a Low-Carbon Development Strategy with an Action Plan and an Adaptation Program for Climate Change within two years of the Law's entry into force. The preparation of these documents is an obligation undertaken by Serbia through the signing of the Paris Agreement, as well as one of the EU's requirements.

The Climate Change Law transposes parts of EU legal acts (Directive 2003/87, Directive 2009/29, and Regulations 600/2012 and 601/2012) that regulate the European Union Emissions Trading System (EU ETS). Specifically, the Law provides for the introduction of a Monitoring, Reporting, and Verification (MRV) system. The MRV system establishes a structured framework for monitoring and assessing greenhouse gas (GHG) emissions. The Law mandates the adoption of secondary legislation to establish this system within a prescribed deadline of one year, by March 31, 2022 (except for regulations concerning aviation operators, for which the planned deadline was January 1, 2023). Within the legal deadline, two pieces of secondary legislation were adopted, while the last, third regulation, the *Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions*, was adopted with a delay of over a year, in 2023.¹⁸ The Law does not provide for setting a price on greenhouse gas emissions nor for their charging; in other words, it does not fully transpose Directive 2003/87 or establish an instrument for charging GHG emissions. (See the chapter: *Alignment with the EU Emissions Trading System and/or Introduction of Other Carbon Pricing Instruments*.)

With the introduction of the MRV system, albeit delayed beyond the legal deadline, the obligation to monitor GHG emissions on the territory of the Republic of Serbia has been established for the first time. While this represents significant progress, there remains considerable room for further alignment with the EU directive. One indicator of the misalignment between Serbia's Climate Change Law and EU climate policy regulations is the omission of certain sectors covered by the European Union Emissions Trading System in the domestic law. The Law recognizes the importance of transport, placing the transport sector under its scope through provisions related to aviation and road transport, fuel consumption, and CO₂ emissions from new

18 Ministry of Environmental Protection, *Rulebook on Monitoring and Reporting on Green House Gas Emissions*, Official Gazette of RS, No.118/2020 (2023).

passenger vehicles. However, the Law does not cover maritime transport or the building sector, which are sectors set to become part of the EU ETS starting in 2027. It is commendable that the Law further reaffirms Serbia's obligations under the United Nations Framework Convention on Climate Change (UNFCCC), such as the implementation of the Clean Development Mechanism, and the availability and transparency of data. Bylaws have also been adopted^{19,20} to establish the National GHG Inventory System and provide the foundation for preparing National GHG Inventory Reports.

Although the Climate Change Law stipulates that data from the GHG Inventory must be publicly disclosed through the annual state of the environment report by the Serbian Environmental Protection Agency, the publicly available data currently only cover GHG emissions up to the year 2022.²¹ As of June 2025, data for 2023 and 2024 had not yet been published. According to the law, the deadline for preparing the Environmental Status Report is May 31 of the current year for the previous year.²² At the time this analysis was being prepared, the Environmental Status Report for 2024 had not been prepared or published on the website of the Environmental Protection Agency.

Unlike the European Union Climate Law, which legally obliges EU member states, as well as the EU as a whole, to regularly prepare and update their Nationally Determined Contributions (NDCs) and to assess progress in line with the five-year cycle established under the Paris Agreement, the Climate Change Law of the Republic of Serbia does not legally establish this process, despite Serbia having ratified the Paris Agreement back in 2017. In other words, the Climate Change Law does not define a legal obligation for the development, submission, enhancement, or reporting on the achievement of NDCs, even though this requirement existed well before the Law was adopted.

19 Government of the Republic of Serbia, *Regulation on the types of data, authorities, organizations, and other natural and legal persons submitting data for the preparation of the national GHG inventory*, Official Gazette of RS, No.43/2023.

20 Ministry of Environmental Protection, *Rulebook on the Content of the National Greenhouse Gas Inventory and the National Greenhouse Gas Inventory Report*, Official Gazette of RS, No.55/2023.

21 Ana Ljubičić, Anđelka Radosavljević, Biljana Jović, et al., *State of the Environment in the Republic of Serbia Report for 2023* (Environmental Protection Agency, 2024), 89, <https://sepa.gov.rs/wp-content/uploads/2025/02/ZivotnaSredina2023.pdf>.

22 *Environmental Protection Law*, Official Gazette of the RS, No. 135/2004, 36/2009, 36/2009 other law, 72/2009 other law, 43/2011 Constitutional Court Decision, 14/2016, 76/2018, 95/2018 other law, 95/2018 other law and 94/2024 other law; Art. 76.

The Climate Change Law established the National Climate Change Council as an advisory body to the Government of the Republic of Serbia. Unlike the : European Scientific Advisory Board on Climate Change, which consists solely of members from the scientific community, Serbia's Climate Change Council includes representatives from the Ministry of Environmental Protection and other governmental bodies and organizations, as well as members of the scientific and professional community, civil society representatives whose work is relevant to climate change policy and implementation, and a representative from the Commissioner for the Protection of Equality. The Council currently has 32 members, of which one member (the Environment Improvement Center) represents the civil sector on behalf of the Green Chair network of civil society organizations.²³ The Republic of Serbia has recognized the importance of involving a broader range of stakeholders in the formation of the Government's advisory body, which certainly represents a significant improvement of previous practices.

The National Climate Change Council is tasked with monitoring and evaluating the effects of climate policy implementation, advising the Government of the Republic of Serbia on issues relevant to climate change, ensuring the integration of climate considerations into other sectoral policies, and providing recommendations for amending regulations and public policies in accordance with European legislation and United Nations standards. In essence, the Council is expected to ensure both horizontal and vertical coordination across various sectors and levels of governance, in order to mainstream climate change into different areas and ensure effective implementation of climate policies. According to the *Rules of Procedure of the National Climate Change Council*, council meetings are required to be convened on a semi-annual basis.^{24,25} However, since the adoption of the Climate Change Law, the Council has met only four times, despite the numerous challenges Serbia faces in the field of climate policy. No sessions were held during 2023, and the most recent meeting of the Council took place in December 2024.

23 Ministry for Environmental Protection, Minister's Office, *Minutes of the 4th session of the National Climate Change Council* (Belgrade, 16 December 2024), accessed on 25.06.2025. https://www.ekologija.gov.rs/sites/default/files/2025-01/zapisnik_iv_sednica_nacionalnog_saveta_za_klimatske_promene_16.12.24.pdf.

24 Ministry of Environmental Protection of the Republic of Serbia, *Rules of Procedure of the National Council for Climate Change*, Official Gazette of the Republic of Serbia, No. 26/21.

25 National Climate Change Council, *ekologija.gov.rs*, accessed on 05.06.2025, <https://www.ekologija.gov.rs/dokumenta/klimatske-promene/nacionalni-savet-za-klimatske-promene>.

Genesis of the Establishment of the Legal Framework for Climate Change

Work on the Climate Change Law, in a certain sense, began as early as 2013 within the framework of two projects that were financed through the European Union's Instrument for Pre-Accession Assistance (IPA).²⁶

In its original version, which was drafted in 2015, this law was titled the *Law on Monitoring, Reporting, and Verification of Greenhouse Gas Emissions from Industrial and Energy Installations*. At that time, the Ministry responsible for environmental protection informed the public in February 2016 about the drafting of the mentioned Law, with the aim of monitoring and reporting on GHG emissions from industrial facilities, and announced its adoption by the end of 2016.²⁷

The Climate Change Law, which appeared under this name in public during the public debate in 2018, was the result of the work of a working group composed of representatives from government institutions, the business sector, and civil society organizations. The environmental and climate-focused civil sector had 2 representatives out of the 23 members of the Law drafting working group. The working group was predominantly made up of representatives from the private sector and business associations. The public debate on the Draft Climate Change Law lasted from March 15 to April 20, 2018, and during this period, the Ministry of Environmental Protection held public presentations in six cities across the Republic of Serbia (Novi Sad, Kragujevac, Belgrade, Niš, Pirot, and Prijepolje). More than 300 participants attended these meetings.²⁸ The interest of civil society organizations (CSOs) in participating in the law-making process was high, as evidenced by the fact that around 70 different CSOs submitted comments during the public debate.

26 Danijela Božanić, Srđan Kukolj, and Mirko Popović, *The Law on Climate Change of the Republic of Serbia* (Regulatory Institute for Renewable Energy and Environment, February 2024), 8.

27 Press Release: *Draft of the First Law in the Field of Climate Change Prepared*, [ekologija.gov.rs/9.02.2016](https://www.ekologija.gov.rs/9.02.2016), accessed on 05.06.2025, <https://www.ekologija.gov.rs/saopstenja/vesti/izradjen-nacrt-prvog-zakona-u-oblasti-klimatskih-promena>.

28 Ministry of Environmental Protection of the Republic of Serbia, *Report on the Public Consultation on the Draft Climate Change Law*, accessed on 06.06.2025, <https://www.ekologija.gov.rs/informacije-od-javnog-znacaja/izvestaji-sa-javnih-rasprava/izvestaj-o-javnoj-raspravi-o-nacrtu-zakona-o-klimatskim-promenama>.

From the time the public debate was held in 2018 until the adoption of the Climate Change Law in 2021, there was a change in international obligations. In 2020, the Republic of Serbia became a signatory to the Green Agenda for the Western Balkans, committing to align with EU legislation in the area of climate change. As a result, the version of the Law presented during the 2018 public debate was not harmonized with the provisions of the Green Agenda for the Western Balkans, and no further consultations with the stakeholders were organized after the signing of this document. Consequently, the interested public was deprived of the opportunity to respond and contribute to greater alignment of the Climate Change Law with the Green Agenda.

The Low-Carbon Development Strategy

The Low-Carbon Development Strategy for the period 2023 to 2030, with projections to 2050, was adopted on June 1, 2023, more than three years after the public debate on the Draft Strategy was completed (January 2020).²⁹ The deadline for adopting the Strategy, according to the Climate Change Law, expired on March 23, 2023. Additionally, the Climate Change Law stipulates that the Strategy is implemented through the adoption of an action plan, which, according to the Strategy, must be adopted within one year from the date this public policy document comes into effect.³⁰ This violates the provisions of the Law on the Planning System of the Republic of Serbia, which defines that the Action Plan is an integral part of the Strategy and is generally adopted simultaneously with the Strategy or, in cases of deviation from this rule, the Action Plan must be adopted within a maximum of 90 days from the date the Strategy is adopted. A separate Action Plan for the implementation of the Low-Carbon Development Strategy was not adopted, and therefore it has not been possible to implement the Strategy even one year after its adoption.³¹

At the fourth meeting of the Climate Change Council of the Republic of Serbia, it was emphasized that the Action Plan for the Low-Carbon Development Strategy

29 National Assembly of the Republic of Serbia, *Low Carbon Development Strategy for the period from 2023 to 2030 with Projections to 2050*, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/strategija/2023/46/1/reg>.

30 Climate Change Law, Official Gazette of RS, No.26/2021-3.

31 National Climate Change Council, [ekologija.gov.rs](https://www.ekologija.gov.rs/dokumenta/klimatske-promene/nacionalni-savet-za-klimatske-promene), accessed on 05.06.2025, <https://www.ekologija.gov.rs/dokumenta/klimatske-promene/nacionalni-savet-za-klimatske-promene>.

will not be developed separately. Instead, the Strategy will be implemented in accordance with the INECP Action Plan, which was prepared by the Ministry of Mining and Energy in August 2024, given that the policies and measures of these two public policies are complementary. Such practice is uncommon, and the first reports on the implementation of the INECP are expected only in 2026. Therefore, at the time of writing this report, it is not possible to assess whether and how the Low-Carbon Development Strategy is being implemented, and consequently, whether the provisions of the Climate Change Law are being followed.

Additional confusion is caused by the inconsistency between the defined GHG emission reduction targets in the Low-Carbon Development Strategy and the Integrated National Energy and Climate Plan. The Low-Carbon Development Strategy estimates a GHG emissions reduction of 33.3% compared to 1990 levels, which contrasts with the INECP's target of reducing GHG emissions by 40.3% by 2030 relative to 1990.

According to the adopted document, the vision of the Low-Carbon Development Strategy is for the Republic of Serbia to become a low-carbon society by 2050 with a competitive and resource-efficient economy that provides citizens with new green jobs and a quality life in a climate-resilient society. However, the Strategy does not set a goal of carbon neutrality for the Republic of Serbia by 2050. During the development of the Strategy, several scenarios were modeled: one baseline scenario (B2), which the Strategy also refers to as the "no-action" scenario, and four greenhouse gas mitigation scenarios (M1, M2, M3, and M4). The baseline scenario B2 assumes that no new policies or measures affecting GHG emissions will be adopted by 2050, except for those policies and measures that already existed in 2015. In that case, Serbia's GHG emissions would increase by 3.2% by 2030 and by 10.7% by 2050 compared to the 2010 levels. Among the mitigation scenarios, the most optimal for the period up to 2030 is scenario M2, which assumes full implementation of the entire EU legislation, fully transposed and enforced. Under this scenario, it is estimated that GHG emissions would be reduced by 33.3% compared to 1990 levels, while by 2050 the reduction should reach 65.4% compared to 1990. A review of the targets and measures shows that Serbia has shifted the greatest effort for decarbonization to the period after

2030. Thus, by adopting the INECP as the Action Plan of the Strategy, no clear guidance has been provided for Serbia's decarbonization in the later period, i.e., between 2030 and 2050.

Strengthening Administrative Capacities

The necessity of strengthening the administrative capacities of the Republic of Serbia at all levels is a recommendation from the European Commission that is repeated year after year in the Reports on Serbia. When it comes to climate change, the Negotiating Position for Chapter 27³² cites one of the main challenges as the insufficient number of employees in the MoE and the Environmental Protection Agency. For example, regarding the EU Monitoring Mechanism (Regulation 252/2013, Monitoring Mechanism Regulation MMR), it is stated that four additional employees are needed as a technical minimum for the effective fulfillment of MMR requirements in the Climate Change Department of the Ministry of Environmental Protection, and four additional employees as a technical minimum for the effective fulfillment of MMR requirements in the Environmental Protection Agency.³³ Additionally, for the EU Emissions Trading System, there is a need to engage full-time employees—specifically, two employees in the Ministry's Climate Change Department and two employees in the Environmental Protection Agency. Based on a request for access to public information submitted to the Ministry of Environmental Protection in early July 2025, it was noted that the number of staff engaged in the Climate Change and Ozone Layer Department increased from five to eight, four of whom are permanently employed.³⁴ The data on administrative capacities at the local level are neither consolidated nor accessible.³⁵

32 Government of the Republic of Serbia, „Negotiating Position of the Republic of Serbia for the Intergovernmental Conference on the Accession of the Republic of Serbia to the European Union for Chapter 27 Environment and Climate Change” (Ministry for European Integration, 2019), accessed on 27. 06. 2025, https://www.mei.gov.rs/upload/documents/pristupni_pregovori/pregovaracke_pozicije/pg_pozicija_27.pdf.

33 Coalition 27, Chapter 27 in Serbia: „Years go by, we stand still” (Young Researchers of Serbia, 2024), 206.

34 Ibid.

35 Ibid.

Awaiting the New Law

The Climate Change Law introduced a system for monitoring, evaluating, and reporting on GHG emissions and further confirmed the obligation to prepare an inventory of greenhouse gases. Additionally, the Law served as a basis for the development of strategic documents, particularly the long-term Low-Carbon Development Strategy and the Program for Adaptation to Changed Climate Conditions.

The process of adopting and implementing the Climate Change Law reveals a number of serious systemic shortcomings and misalignments with international commitments. The law was enacted after several years of delay, without additional public consultations following the assumption of new international obligations, and its alignment with European legislation and the requirements of the Paris Agreement remains limited. The lack of clearly defined emission reduction targets, the absence of an obligation for regular updates of nationally determined contributions, as well as delays in adopting subordinate regulations, point to weaknesses in the normative framework.

Administrative capacities, especially at the level of ministries and agencies, remain insufficient for the implementation of climate policies, with most newly hired staff not being permanently employed. The lack of systemic personnel and organizational solutions, particularly at the local level, further reduces the possibility of effective enforcement of the law.

The climate policy of the Republic of Serbia still represents more of a formal than a functional step toward implementing ambitious measures to address and combat climate change, calling into question the genuine commitment to climate transition and fulfilling international obligations. According to the National Programme for the Adoption of the Acquis (NPAA) 2024–2027, the adoption of a new Climate Change Law is planned for the fourth quarter of 2026.³⁶

³⁶ Ministry of European Integration of Republic of Serbia, *Amendments to the NPAA 2024–2027 were adopted at the Government session on August 7, 2025*, accessed on 11.08.2025, https://www.mei.gov.rs/upload/documents/nacionalna_dokumenta/npaa/izmene_i_dopune_npaa_2024-2027.pdf.

Action number 3: Implement National Energy and Climate Plans and long-term strategies (LTS) and where necessary, update them to integrate clear plans for fossil fuel phaseout and just transition.

Serbia's energy and climate policy is defined by several laws, strategic, and planning documents, none of which set a clear goal for achieving climate neutrality by 2050. The Integrated National Energy and Climate Plan, a document intended to integrate and "reconcile" the development of the energy sector with climate goals, contains measures and activities that are insufficiently ambitious in terms of climate and foresee the use of coal even after 2050. The Government of the Republic of Serbia adopted the Integrated National Energy and Climate Plan at its session on July 25, 2024,³⁷ one month after the deadline set by the Energy Community for submitting the final versions of INECP.

Serbia's obligation to develop the INECP also stems from regulations adopted at the Energy Community level, of which Serbia has been a member since 2006. At the 20th meeting of the Energy Community Ministerial Council, member states, including Serbia, unanimously adopted binding targets related to the use of renewable energy sources (RES) and greenhouse gas emissions reduction by 2030. Serbia agreed to a binding target of 40.7% share of renewable energy and a 40.3% reduction in greenhouse gas emissions compared to 1990 levels.³⁸ Despite this, the adopted version of the INECP establishes that the national contribution regarding the share of RES in gross final energy consumption will be at least 33.6% by 2030, which is not in line with the decision of the Energy Community Ministerial Council.

³⁷ Government of the Republic of Serbia, *Integrated National Energy and Climate Plan of the Republic of Serbia for the period until 2030 with a vision until 2050*, Official Gazette of RS, No.70/2024.

³⁸ Ministerial Council of the Energy Community, *Decision No. 2022/02/MC-EnC amending Decision No. 2021/14/MC-EnC*.

Missed Opportunities

A particular challenge regarding the content of the INECP is that the Republic of Serbia does not commit to carbon neutrality by 2050 through this document. It only indirectly mentions the cessation of coal energy production by 2050, but not carbon neutrality or zero greenhouse gas emissions.

The Ministry of Mining and Energy published the official draft version of the INECP in December 2023, following public consultations. The document, without significant or substantive changes compared to the version put out for public debate, was submitted to the Government of the Republic of Serbia for adoption. In accordance with the Agreement that the Republic of Serbia has with the Energy Community, the Ministry forwarded the draft document to the Energy Community Secretariat, which published its recommendations on the INECP on November 11, 2023. Serbia was recommended to increase its targets regarding the share of RES in gross final energy consumption, to begin reducing coal use for electricity production before 2030, and to introduce measures for a just energy transition in the document to ensure the entire process aligns with the needs of both citizens and the economy. It was also emphasized that the INECP does not foresee achieving climate neutrality by 2050, and that the most ambitious scenario anticipates a 75% reduction in GHG emissions compared to 1990 levels. Regarding the prominent role of coal production until 2030 and plans related to the modernization of the mining industry, more detailed measures and policies to prepare society and the economy for the complete phase-out of coal production and the transition to energy generation from renewable sources mostly do not exist.

The recommendation of the Energy Community is that the opinions of the interested public, collected during the public consultation, need to be taken into account. It is also necessary to describe how the process of regional consultations was conducted, as well as to explain the correlation between Serbia's Integrated Plan and the plans of neighboring countries.³⁹

39 Energy Community Secretariat, *Recommendations on the Draft Integrated Energy and Climate Plan of the Republic of Serbia for the period 2025–2030* (2023), accessed on 27.06.2025, <https://www.energy-community.org/dam/jcr:bc024cab-6c45-44bb-9a73-0e0cc73f1bbb/EnCS%20Recommendations%20draft%20Serbian%20NECP%20FINAL.pdf>.

According to Article 8b of the Energy Law, the Ministry of Mining and Energy is obligated to monitor the implementation of the Integrated National Energy and Climate Plan and to prepare a report on its implementation every two years. Since the INECP was adopted in Serbia on June 25, 2024, the report can be expected in 2026, in accordance with the legal deadline.

On the other hand, the deadline for the first report on the implementation of the INECP, according to the Energy Community, was March 15, 2025, in line with Regulation 2018/1999.⁴⁰ The reporting process to the Energy Community is carried out through two platforms: Reportnet and Reponener. The Republic of Serbia has entered data into these platforms according to the defined structure and method of information submission. At the time of writing this report, the data is undergoing verification in cooperation with the European Environment Agency.

In addition to substantive inconsistencies, the process of drafting the INECP was marked by a series of procedural shortcomings. The manner in which the participatory process was conducted raises questions about whether public involvement was intended as a meaningful contribution to the quality of the document or merely as a formal obligation to satisfy administrative procedural requirements. Work on the INECP began in March 2021, and the public consultation was opened more than two years later, from June 13 to July 28, 2023. Public presentations of the draft document and the strategic environmental assessment report were held in July in Belgrade, Niš, and Novi Sad, during the summer holiday season, when public attendance and engagement are typically lower. This repeatedly used practice by public authorities diminishes opportunities for inclusive dialogue and undermines the potential for effective public participation in decision-making on environmental matters.^{41,42}

40 By EU Regulation 2022/2299, adopted in December 2024 by the Permanent High Level Group, the rules for the implementation of Regulation 2018/1999 were further defined with regard to the structure, format, technical details, and procedure for the Integrated National Energy and Climate Progress Report.

41 Aleksandar Bogdanović and Marija Todorović, *PAR Principles Mainstreaming in Sectoral Policies Report for Serbia / Environment* (2024), https://weber-new.s3.us-west-2.amazonaws.com/wp-content/uploads/2022/08/27152850/2-PAR-Principles-Mainstreaming-Report-for-Serbia_compressed-1.pdf.

42 Sofia Nikolakiki, Georgios Janakidis and Bojana Stamenković, *Further Development of Energy Planning Capacities: Report on Public Consultations* (Ministry of Mining and Energy, 2023), accessed on 24.06.2025, https://www.mre.gov.rs/extfile/sr/2653/Public_consultations_report_Annex_INECP_SEA_SR.pdf.

Other sectoral strategies also do not set a target of net-zero GHG emissions by the middle of the 21st century. The National Assembly of the Republic of Serbia, at its session held on November 27, 2024, adopted the **Energy Development Strategy of the Republic of Serbia until 2040, with projections to 2050**.

The text of the Strategy contains numerous vague formulations and measures without specified deadlines. For example, some of the stated goals include “continuous reduction of greenhouse gas emissions” and “increased use of renewable energy sources for heat production.” Goals defined in this way are neither measurable nor time-bound, which further complicates the monitoring of their achievement.

Interestingly, the vision promoted by this Strategy is that by 2050, the domestic energy sector should be as carbon neutral as possible. In practice, this means stepping back from the commitment for the Republic of Serbia to actually become carbon neutral by mid-century, which is contrary to the obligations undertaken by signing the Paris Climate Agreement, the Green Agenda for the Western Balkans, and the commitments Serbia has under the Energy Community.

In the adopted text of the Energy Development Strategy, the role of citizens as one of the key actors in the energy transition is not adequately defined, which represents a significant shortcoming. Prosumers and renewable energy communities and/or energy cooperatives, who can significantly contribute to local energy production and consumption, are mentioned only in passing. Clearly defining the role of these actors is essential for the democratization of the energy sector and for ensuring the inclusion of all relevant stakeholders in the transition toward more sustainable energy systems.

The Strategy does not elaborate on the concept of a just energy transition; instead, this issue is once again deferred to another document, **the Action Plan for Just Transition**. Notably, the Strategy also introduces consideration of the use of nuclear energy, which is announced for the period after 2040.

The document does not meet the standards defined by the Law on the Planning System, which defines a strategy as a public policy document that establishes

strategic directions of action in a given area in a comprehensive manner. Among other things, a strategy is required to include goals that are clearly defined, measurable, achievable, realistic, and time-bound, as well as measures that contribute to the achievement of those goals, along with an analysis of the effects of those measures on individuals, legal entities, and the budget.

The process of developing the Energy Development Strategy began in August 2021, when the Ministry of Mining and Energy issued a Decision to establish a Working Group responsible for monitoring the implementation and managing the process of drafting and adopting the new Energy Development Strategy of the Republic of Serbia until 2040, with projections to 2050, as well as the Program for implementing the Strategy and preparing the Report on the Strategic Impact Assessment of the Program for implementing the Energy Development Strategy. This decision also appointed representatives of two civil society organizations as members of the Working Group. During July and August 2024, a public consultation on the Strategy was organized, continuing the trend of holding public consultations during the summer months. Such timing is not in accordance with the principles of the Aarhus Convention, which is based on transparency, accessibility, and public participation in decision-making related to the environment. The Program for implementing the Strategy has not yet been developed.

Serbia has not set the Goal of Carbon Neutrality until 2050

Although the Republic of Serbia has committed internationally to achieving climate neutrality by the middle of the 21st century, its legal and strategic documents, including the Integrated National Energy and Climate Plan, the Energy Development Strategy, and the Low-Carbon Development Strategy, do not set a clear, measurable, and binding target on this path. Decarbonization measures are insufficiently ambitious, vaguely defined, and often lack deadlines, which hampers effective implementation and progress monitoring.

The documents have often been adopted with delays, without adequately considering the comments of the stakeholders, with insufficient frequency of public consultations,



and without proper involvement of citizens and local communities. This further undermines the transparency and legitimacy of the process. The absence of an Action Plan for the Low-Carbon Development Strategy and the lack of a clear plan for the gradual shutdown of thermal power plants indicate a lack of political will to genuinely implement the requirements of the Paris Agreement and the Green Agenda for the Western Balkans.

Despite formal alignment with the regulations of the Energy Community and the EU, the content of the policies remains largely inconsistent with the Union's climate goals. Serbia still lacks a functional and coherent framework for implementing an ambitious climate policy, and a significant part of the responsibility for decarbonization has been shifted to the period after 2030, without a clear plan on how this will be achieved.

Action number 5: Align with the EU Emissions Trading System and/or Introduce Other Carbon Pricing Instruments

The bedrock of the European Union's climate policy is the Emissions Trading System for greenhouse gases (EU ETS), which provides a cost-effective basis for reducing GHG emissions.⁴³ This instrument is aligned with the European Union's long-term development strategy, the European Green Deal, whose vision for Europe to become a climate-neutral continent by 2050 was embraced by Serbia through the signing of the Sofia Declaration on the Green Agenda for the Western Balkans.

The European Union Emissions Trading System, which covers around 40% of GHG emissions in the EU, is based on the traditional "cap-and-trade" system.⁴⁴ This system represents a partial shift away from classical state interventionism by introducing market mechanisms as part of the solution to combat climate change. In order for the EU to achieve its vision of carbon neutrality by 2050, it was decided that the limit on maximum GHG emissions would be reduced linearly by 2.2% each year, starting in 2021.⁴⁵

In response to the risk of "carbon leakage" (the potential relocation of industry from the EU to countries with less ambitious climate policies), the European Union announced the introduction of the Carbon Border Adjustment Mechanism (CBAM) through the European Climate Law.⁴⁶ Regulation (EU) 2023/956 on the establishment of CBAM was adopted on May 10, 2023, by the European Parliament and the Council, based on a proposal by the European Commission. The purpose of the mechanism is to encourage the EU's trading partners to take steps toward

43 Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 (European Climate Law), Official Journal of the European Union, No. L 243/1.

44 Femke de Jong, *Carbon Leakage Myth Buster* (Carbon Market Watch, 2015), 3, accessed on 15. 06. 2025, <https://carbonmarketwatch.org/wp-content/uploads/2015/10/CMW-Carbon-leakage-myth-buster-WEB-single-final.pdf>.

45 Directive (EU) 2018/410 of the European Parliament and of the Council of 14 March 2018 amending Directive 2003/87/EC to enhance cost-effective emission reductions and low-carbon investments, Official Journal of the European Union, L 76/3, accessed on 21.06.2025. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018L0410>.

46 Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 (European Climate Law), Official Journal of the European Union, No. L 243/1.

reducing their dependence on fossil fuels and to adopt stricter measures in their national climate policies.⁴⁷

Under CBAM, emissions of carbon dioxide equivalents will be charged⁴⁸ on imported products in the same way they would have been if those products were produced within the territory of the European Union. CBAM covers emissions of carbon dioxide (CO₂) and, where applicable, emissions of nitrogen oxides (NO_x) and perfluorocarbons (PFC_x). It applies to both direct and indirect greenhouse gas emissions. Direct emissions refer to greenhouse gases emitted from the point of production up to the point the product is transported to the EU. Indirect emissions refer to those generated during the production of the electricity required to manufacture the product, as well as emissions resulting from heating and cooling processes during production.

The Law on Climate Change transposes parts of EU legal acts (Directive 2003/87, Directive 2009/29, and Regulations 600/2012 and 601/2012), which regulate the European Union Emissions Trading System. The law provides for the introduction of a Monitoring, Reporting and Verification (MRV) system, which establishes a systematic framework for tracking and assessing greenhouse gas emissions. The Government of the Republic of Serbia has adopted the necessary bylaws for the implementation of the MRV system by enacting the following regulations:

- *Rulebook on Verification and Accreditation of Greenhouse Gas Emissions Verifiers*⁴⁹ (adopted in 2021, within the legal deadline), which ensures the independence of verifiers, as they are essential for providing confidence to the competent authorities and other stakeholders that the emissions report, as required by the Rulebook on Monitoring and Reporting of GHG, is an accurate, truthful, and fair representation of emissions.

47 Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism, Official Journal of the European Union, L 130/52.

48 Carbon dioxide equivalent (CO₂eq) is a measure used to express the total effect of different greenhouse gases in a single unit, as if all those gases were carbon dioxide (CO₂).

49 Ministry of Environmental Protection, *Rulebook on Verification and Accreditation of Verifiers of Greenhouse Gas Emission Reports*, Official Gazette of RS, No.107/2021.

- *Regulation on Types of Activities and Greenhouse Gases*⁵⁰ (adopted in 2022, within the legal deadline), which defines the types of activities and GHG for which installation operators are required to obtain a GHG emissions permit.
- *Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions*⁵¹ (adopted in December 2023), which defines the content of the monitoring plan (a requirement for issuing GHG emissions permits to installation operators), the methodology for emissions monitoring, as well as the procedures and accompanying documentation to be submitted with the monitoring plan. The Rulebook also provides for amendments to the operator's monitoring plan if the approved plan does not reflect the actual nature or operational mode of the installation or aircraft activities.

The law introduces a system for issuing GHG emission permits to installation operators by the Ministry of Environmental Protection, representing the initial step in the MRV system. Specifically, operators identified in the Regulation on Types of Activities and Greenhouse Gases are required to submit a Request for the Issuance of a GHG Emission Permit. One of the conditions for obtaining this permit is the timely submission of a GHG emissions monitoring plan.

Due to delays in adopting the Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions, it was not possible to establish the MRV system for as long as three years after the law was passed. The reason was the fact that the basic conditions, content, and methodology for preparing the Monitoring Plan, which is an integral part of the application for obtaining a GHG emission permit, were not yet defined.

It is important to note that the Rulebook was adopted at the end of 2023,⁵² after the European Union had already adopted CBAM, which currently requires the EU's trading partners to report accurate and verified data on the GHG emissions of every product entering the EU customs territory by the end of 2025.

50 Government of the Republic of Serbia, *Regulation on Types of Activities and Greenhouse Gases*, Official Gazette of RS, No.13/2022 (2022).

51 Ministry of Environmental Protection, *Rulebook on Monitoring and Reporting of Greenhouse Gas Emissions*, Official Gazette of RS, No.118/2023.

52 *Ibid.*

According to the Law, existing operators up to 2023, that is, legal entities conducting activities that emit greenhouse gases into the atmosphere, were obligated to submit a Request for the Issuance of a GHG Emission Permit by the end of June 2024.⁵³ According to the current timeline and delays in adopting the necessary bylaws, the first permit was issued on September 30, 2024, almost 4 years after the law came into effect. As of June 1, 2025, the Ministry has issued 90 GHG emission permits. The permit issuance process has been digitalized in the Republic of Serbia, as the Ministry of Environmental Protection developed the e-GHG portal, an electronic system for monitoring, reporting, and verification. The platform is intended for operators of stationary installations to submit permit applications, communicate with the Ministry and/or the Environmental Protection Agency. Additionally, the platform provides guidelines, instructions, and other resources useful for operators in preparing their GHG reports.⁵⁴

The Integrated National Energy and Climate Plan (INECP), adopted in July 2024, recognizes, within the dimension of decarbonization and reduction of greenhouse gas emissions, the importance of aligning the legislation of the Republic of Serbia with the EU Emissions Trading System. The INECP foresees a specific measure to improve the existing regulatory framework, namely: *MP_D1 Implementation of measures for alignment with the EU Emissions Trading System and/or introduction of other carbon pricing instruments*. This measure aims to accelerate the phase-out of conventional fuels. It is intended that the revenues collected from the application of carbon pricing mechanisms will be used to stimulate investments in renewable energy sources, increase energy efficiency measures, and mitigate the social and economic consequences of decarbonization.

Although the introduction of internal carbon pricing in the energy sector and other sectors subject to the CBAM regulation represents a form of the Republic of Serbia's response to this EU mechanism, it cannot be said that it eliminates the costs of CBAM implementation for companies. Namely, CBAM foresees the determination of a price for GHG emissions and the charging of those emissions upon the entry of

⁵³ Climate Change Law, Official Gazette of RS, No. 26/2021-3, Art. 76.

⁵⁴ eGHG MRV Information System, e-ghg-portal.ekologija.gov.rs, accessed on 17.06.2025, https://e-ghg-portal.ekologija.gov.rs/sign_in.

products into the EU customs territory. The fundamental condition for a possible exemption from the payment of so-called CBAM certificates is the existence of a GHG emissions charge in the country of origin of the product, in this case, Serbia.⁵⁵ Once Serbia introduces internal GHG emissions pricing, the Republic of Serbia, and not the EU Member States (as is the case under CBAM implementation), will collect the charge. If the Republic of Serbia charges a carbon tax⁵⁶ to a company at a level equivalent to the value of EU ETS emission allowances, the company will be exempt from paying the CBAM charge when exporting its products to the EU. However, the company will still be obligated to pay for the generated GHG emissions to the Republic of Serbia under the internal emissions pricing system.

The planned timeframe for the implementation of this reform measure is from 2024 to 2030. However, the INECP does not clearly specify the timeline for the phases of establishing the mechanism, nor does it set deadlines for the adoption of the necessary legal and bylaw acts. The estimated cost of introducing the internal GHG emissions pricing mechanism is €0.2 million.⁵⁷

The Energy Development Strategy of the Republic of Serbia until 2040, with projections until 2050, adopted in November 2024, also emphasizes the importance of actively preparing for the introduction of carbon pricing and alignment with the EU ETS. According to the Strategy, following the establishment of a regulatory and institutional framework for the monitoring, reporting, and verification of greenhouse gas emissions, a system for charging emissions from sectors covered by the EU ETS will be introduced. The price of emission allowances, i.e., the carbon tax, would be set by the Government of the Republic of Serbia or an authority designated by the Government, with the intention that the carbon tax gradually increases and approaches the price of EU ETS allowances, in line with Serbia's progress toward EU accession.

55 Janko Jačović, Marko Pajović and Damir Dizdarević, *CBAM: Carbon Tax; Who doesn't pay now, will pay later* (Belgrade Open School, 2023), 14.

56 The term „carbon tax“ as adopted in the Energy Development Strategy of the Republic of Serbia, refers to a tax that will be levied on GHG emissions generated during a company's production process within the territory of the Republic of Serbia.

57 Government of the Republic of Serbia, *Integrated National Energy and Climate Plan of the Republic of Serbia for the period until 2030 with a vision to 2050*, Official Gazette of RS, No.70/2024, 43.

This policy document also reaffirms the goal of reducing GHG emissions and the introduction of the European Union Emissions Trading System or a similar system until Serbia becomes a member of the European Union. However, a detailed timeline outlining the necessary steps for establishing such a system is not defined in this policy document either.

The first indications of timelines and steps for the introduction of the carbon pricing instrument were proposed in the Draft Environmental Protection Strategy with the Action Plan, which was presented to the public during the public consultation period from December 4 to 24, 2024.⁵⁸ The Draft Strategy recognizes the importance of responding to the Regulation on the establishment of CBAM and foresees conducting an analysis of the modalities for introducing GHG emissions pricing (according to the Energy Development Strategy, the "carbon tax") and selecting the most optimal solution for the Republic of Serbia, including plans and a timeline, which will be defined after the completion of the analysis.⁵⁹

According to the proposed Action Plan, the cost-benefit analysis of introducing a carbon price, based on which a decision will be made on implementing an emissions trading system or a similar instrument, is scheduled for the last quarter of 2025. The preparation and adoption of the relevant regulations are expected to take place by the end of 2026. Training of employees in the competent national body, as well as all other relevant authorities, organizations, and plant operators for the selected carbon pricing instrument, is planned for the last quarter of 2028. Meanwhile, efforts will focus on establishing the institutional framework and operationalizing the system for monitoring, reporting, and verification in accordance with the current Climate Change Law.⁶⁰

Since the Environmental Protection Strategy with the Action Plan has not yet been adopted, the timelines set out in the Action Plan are questionable in terms of their current relevance. According to the deadlines given in the Action Plan, it is clear

58 Committee on Economy and Finance of the National Assembly of the Republic of Serbia, *Conclusion No. 353-12022/2024-2*.

59 Ministry of Environmental Protection, *Draft Environmental Protection Strategy* (Belgrade, 2024), 38–39.

60 Ministry of Environmental Protection, *Action Plan for the Implementation of the Environmental Protection Strategy, Measure 1.1.5*. (Belgrade, 2024), 9–11.

that Serbia will not respond in a timely manner to the introduction of CBAM, which even after the proposed amendments in the EU Omnibus package⁶¹, intended to simplify it, is scheduled to implement the charge on embedded emissions starting February 2027.⁶² The European Commission has reached a provisional political agreement with the European Parliament and the Council, with their formal adoption expected in September 2025.⁶³ According to the timeline set in the Action Plan of the Environmental Protection Strategy, Serbia plans to amend the regulatory framework at that time, so that it would enable the introduction of carbon pricing, i.e., the establishment of the so-called carbon tax.

Even if the implementation of the model begins in 2027, only three years remain to align Serbia's carbon pricing with the price of EU ETS emission allowances, compared to the timeline outlined in the Western Balkans Green Agenda Action Plan.

The introduction of the carbon pricing system will also require amendments to the legislative framework governing climate change, specifically the current Climate Change Law, which at present only transposes part of Directive 2003/87, namely, the provisions related to the establishment of the system for monitoring, verification, and reporting of GHG emissions.

As already emphasized by measure MP_D1 of the INECP, it is necessary to build regulatory, as well as institutional and organizational capacities for collecting funds and directing them toward projects, measures, and activities that lead to the decarbonization of the energy sector and the economy as a whole. By introducing costs and pricing for emissions, thereby assigning a financial value to each ton of emitted GHG, in addition to integrating climate change considerations into companies' financial plans, this will lead to increased production costs, particularly the price of electricity, which will, in turn, cause a chain reaction resulting in higher prices for

61 A set of simplified rules proposed by the European Commission on 26 February 2025 called the Simplification Omnibus, which includes amendments to several different regulatory areas, including CBAM, CSRD, CSDDD, and the EU Taxonomy within a single comprehensive amendment.

62 *Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2023/956 regarding the simplification and strengthening of the carbon border adjustment mechanism (CBAM)*, COM (2025) 87 final.

63 *Carbon Border Adjustment Mechanism (CBAM): Council and Parliament Strike a Deal on Its Simplification*. Press Release, Council of the European Union, 18.06.2025, accessed on 21.07.2025, <https://www.consilium.europa.eu/en/press/press-releases/2025/06/18/carbon-border-adjustment-mechanism-cbam-council-and-parliament-strike-a-deal-on-its-simplification/>.

other products and services. Therefore, as emphasized by the Energy Development Strategy, it is essential that the funds collected from carbon tax payments be primarily directed toward projects and innovative solutions aimed at reducing GHG emissions and mitigating climate change: the use of renewable energy sources, carbon capture and storage, alleviation of the social impacts of rising energy costs, improvement of energy efficiency, and so on. Additionally, a high carbon price creates a favorable investment environment for investing in sustainable production processes.⁶⁴

Is There Reason for Optimism?

The importance of earmarked use of funds collected from carbon taxes has been recognized both in the INECP and in the Energy Development Strategy of Serbia. However, the absence of an operational Green Fund, i.e., the institutional prerequisite for systematic investment in the environment, and thereby in decarbonization, calls into question the idea of earmarked use of these funds.⁶⁵

In Serbia, there is no earmarked character to the fees collected under the “polluter pays” principle. Moreover, the current budget line is labeled the Green Agenda, which in essence covers multiple areas and not just decarbonization. This raises concerns about the way funds from the proposed “carbon taxes” are collected, monitored, and earmarked for targeted investment.

In addition to the lack of transparent and reliable collection of funds from carbon tax revenues, the Draft Environmental Protection Strategy plans to finance the necessary regulatory measures for establishing a carbon pricing system through the European Union’s Instrument for Pre-accession Assistance. The start of preparations for the Law on Amendments to the Law on Climate Change is planned for the first

64 National Assembly of the Republic of Serbia, *Energy Development Strategy of the Republic of Serbia until 2040 with projections to 2050*, Official Gazette of RS, No.94/2024, 65–67.

65 Coalition 27, *Chapter 27 in Serbia: ‘Years go by, we stand still’* (Young Researchers of Serbia, 2024), 7.

quarter of 2027,⁶⁶ raising questions about whether the IPA fund will still be available, given that discussions on the transformation of the EU budget for the period after 2027 are currently underway.⁶⁷

A Race we are Falling Behind at

The Republic of Serbia has, through the Law on Climate Change and accompanying bylaws, begun establishing an MRV system (monitoring, reporting, verification), albeit with delays that have affected its timely implementation. Although the digital platform e-GHG is a step forward, the late adoption of rulebooks and the slow pace of progress suggest that Serbia will not be able to respond in time to the requirements of the CBAM. The introduction of domestic emissions pricing is planned by 2030, but the lack of a clear timeline in strategic documents further complicates alignment with the EU ETS. Establishing an emissions pricing system will be crucial for Serbia's decarbonization, but it will require substantial financial investments and careful management of economic and social impacts.

66 Ministry of Environmental Protection, *Action Plan for the Implementation of the Environmental Protection Strategy* (Belgrade, 2024), 4.

67 Belgrade Open School, *Non-Governmental Organizations: The New EU Budget Should Secure Dedicated Funds for Environmental Protection and a Just Transition in the Western Balkans* (Belgrade, December 11 2024), accessed on 26. 07. 2025, <https://www.bos.rs/rs/vesti/3/2090/nevladine-organizacije-novi-budzet-evropske-unije-treba-da-osigura-namenske-fondove-za-zastitu-zivotne-sredine-i-pravednu-tranziciju-na-zapadnom-balkanu.html>.

Action No. 15: Draw up equivalents to Territorial Just Transition Plans for carbon-intensive regions

Public policy on a just transition in Serbia is still in its early stages. The domestic energy sector is dependent on the extraction of low-calorific coal, lignite, and most of the power plants were built in the second half of the last century. The average age of coal-fired thermal power plants in Serbia is 49 years, with the oldest, Kolubara A, having been built in 1956.⁶⁸

Despite the heavy dependence on fossil fuels and outdated production processes, currently no public policy document provides concrete solutions or a detailed action plan for social and economic growth in conditions of coal phase-out.

The development of the Just Transition Action Plan is envisaged as one of the measures in the Integrated National Energy and Climate Plan, which states that the deadline for adopting the Just Transition Action Plan cannot exceed 90 days from the date of INECP's adoption. At the time of writing this report, the Just Transition Action Plan had not been adopted (more than a year after INECP was adopted). This continues the trend of inconsistent adherence to deadlines set in already adopted documents, thereby delaying their implementation and the achievement of established goals.

In the recommendations issued by the Energy Community Secretariat regarding the draft INECP of the Republic of Serbia⁶⁹, the Secretariat assessed that the aspects of a just transition were not sufficiently considered in the INECP, meaning that the INECP does not contain measures and policies related to just transition, except for those concerning the implementation and monitoring of the Just Transition Plan.

68 Mirjana Jovanović (BOS - Belgrade Open School), Mirko Popović (RERI - Regulatory Institute for Renewable Energy and Environment) and Viktor Berishaj (CAN Europe Climate - Action Network Europe), *Breaking the Myth: A Chronology of Coal Use in Serbia*, https://caneurope.org/content/uploads/2021/12/OP-ED_Razbijanje-mita-o-uglju_28_Dec_21_SRB.docx.pdf.

69 Energy Community Secretariat, *Recommendations to the Draft Integrated Energy and Climate Plan of the Republic of Serbia for the Period 2025–2030* (2023), <https://www.energy-community.org/dam/jcr:bc024cab-6c45-44bb-9a73-0e0cc73f1bbb/EnCS%20Recommendations%20draft%20Serbian%20NECP%20FINAL.pdf>.

The measure MP_D6 prescribed by the INECP states that the Just Transition Action Plan will establish development pillars that will contribute to achieving the goals, with an emphasis on improving infrastructure and alternative use of land currently occupied by lignite mines. Furthermore, the measure will include tax reliefs together with subsidies to attract investments, the drafting of spatial plans, and remediation and reclamation measures to determine the use of available land after the closure of lignite mines, as well as deadlines for the implementation of investments.

In the description of the measure concerning the adoption of the Just Transition Action Plan in the INECP, it is stated that the action plan will include recommendations for improved institutional and administrative structures, necessary policy reforms to support a just transition, and a range of potential targeted investments.

The development of the Just Transition Action Plan is also mentioned in **the Energy Development Strategy of the Republic of Serbia until 2040, with projections to 2050**, which was adopted in November 2024. The Strategy recognizes just transition as an "important concept," and in one section even states that "the most important focus of the Strategy relates to a just energy transition." Despite this, none of the Strategy's set goals directly address the just transition process; rather, it states that the adoption of a separate document, the Action Plan, is the first step on this path.

The adoption of the Just Transition Action Plan, which will define regulatory, social, educational, financial, and other measures for establishing and implementing the just energy transition process, is also recognized in **the Reform Agenda of the Republic of Serbia**. There were no public consultations on the Reform Agenda in Serbia, despite clear requirements in European regulations that all stakeholders, especially social partners and civil society, be involved in the preparation of reform agendas. There was no public call for civil society participation in the drafting of this document, which the Government adopted in October 2024.

As foreseen by the Reform Agenda, the implementation of the Just Transition Action Plan involves two concrete steps: the establishment of the Just Transition Fund (by December 2025) and the execution of a pilot project for retraining and upskilling workers employed at the public enterprise for underground coal mining Resavica

and Kostolac (by June 2027). Although details regarding the establishment and functioning of the Fund are not yet known, it is stated that funds for the Fund will also be secured through "(...) increased utilization of critical mineral resources, which our country is rich in." However, how the increased use of critical mineral resources will lead to the establishment of the Just Transition Fund is not explained.

Additionally, it is unclear why workers at the Kolubara Thermal Power Plant have been excluded from the retraining and upskilling project, given that Elektroprivreda Srbije announced a tender at the end of October 2024 for the preparation of closure plans for the two oldest thermal power plants in Serbia — TPP Kolubara in Lazarevac and TPP Morava in Svilajnac. The retraining program for workers employed at these power plants remains unknown, and the situation is similar for their colleagues employed in thermal power facilities across the country.

The strategic, legislative, and institutional framework that would enable the transition from fossil fuels to renewable energy sources to be carried out in a socially just and economically sustainable manner is still being established at the national level.

A similar situation exists with public policies at the local level. None of the municipalities where coal is mined have started preparing or drafting documents that would address the issue of a just energy transition, nor is this issue defined in the currently active development documents. For example, the development plan of the City of Požarevac for the period 2023–2030 contains no measures related to retraining, upskilling, or any other programs for workers in the mining industry, even though one of the mines employing over 2,500 people is located within the territory of that city, in Kostolac. According to employment data from the Statistical Office of the Republic of Serbia (SORS) for 2020, as much as 48% of the workforce in Kostolac consists of people employed in mines and quarries or in the fields of electricity, gas, steam, and air conditioning. Practically, this means that every second employed person in Kostolac would be directly affected by the cessation of fossil fuel use.

Meanwhile, numerous energy facilities across Serbia are approaching the end of their operational life, raising questions about their future status and use.

From the Diagnostics of Just Transition to the Action Plan

The Ministry of Mining and Energy conducted a call for applications in mid-2022 aimed at civil society organizations for membership in the Working Group for the development of the document Diagnostics of Just Transition. Following the call, three civil organizations were included in the Working Group: the Belgrade Open School (BOS), the for Renewables and Environmental Regulatory Institute (RERI), and the BFPE Foundation for a Responsible Society.

Shortly after the announcement of the competition results, civil society organizations were invited to the first meeting of the Working Group, held in July. At that meeting, the project task was presented, defined by the European Bank for Reconstruction and Development (EBRD) and the Ministry of Mining and Energy, which focused on activities related to just transition in regions covered by surface coal mines — the Kolubara and Kostolac coal basins. After intensive work during the summer and autumn of 2022, members of the Working Group received a draft of the document Diagnostics for Just Transition, which included the Action Plan for Just Transition. Following the submission of comments on this document in October and November 2022, there were no further activities or announcements related to the work of this Working Group, except for sporadic updates and promises by representatives of the relevant Ministry, mostly at public events dedicated to the energy transition, that work on the document would soon be completed.

A new meeting of the Working Group was scheduled two years later, only in November 2024. At that time, the members were presented with a document significantly different from the one the Working Group had previously worked on. The new document focuses primarily on the situation in the public enterprise for underground coal mining Resavica, while the Kolubara and Kostolac coal basins were excluded from consideration. Additionally, the Working Group members were given only a few days to comment on the substantially revised document, and representatives of the Ministry of Mining and Energy announced that the Just Transition Action Plan presented at that meeting would be adopted without a public discussion.

As with the previously analyzed measures, the process of public participation was also problematic. Specifically, the planned adoption of the document contradicted the guidelines and standards for public participation established by the European Bank for Reconstruction and Development, which supported the document's development. As a result, the civil society organizations involved in the Working Group decided from that point onward not to participate further in the Working Group's process, refusing to legitimize such a method of document preparation. They issued a joint statement on the matter and called on the Ministry to open the process of adopting the Just Transition Action Plan to the public.

Following another delay in the process and contrary to earlier announcements by the Ministry of Mining and Energy, a public consultation on the Just Transition Action Plan was eventually held from May 21 to June 10, 2025. The public consultation program included only one public presentation of the document in Belgrade, on June 9, just one day before the end of the consultation period. The 20-day window provided by the Ministry of Mining and Energy for the public consultation was insufficient for a thorough review of such an important document. Likewise, holding only one presentation in Belgrade was inadequate for ensuring meaningful participation from local communities and the interested public. Particularly concerning is the fact that no presentations were held in municipalities located within the coal basins, such as Lazarevac, Obrenovac, Kostolac, Požarevac, and other towns whose residents will be most directly and significantly affected by the transition process.

Although expectations for the Action Plan were high, especially since the document had been announced in several previously adopted strategic and sectoral policy documents, the version presented to the public cannot be considered an action plan in the sense defined by the Law on the Planning System. Rather, it resembles yet another preparatory document that postpones concrete actions until after 2030.

The draft Just Transition Action Plan includes a total of 15 short-term and long-term activities to be implemented at the national and local levels. The total cost of these activities is estimated at slightly over €88 million, with funding planned from a combination of international donations and national and local budgets. In a joint statement, 18 organizations called on the Ministry of Mining and Energy

to draft a new proposal that would include concrete measures and activities for a just transition.⁷⁰

Most of the proposed measures are either “preparatory” or involve additional analyses and research. The redistribution of the workforce within companies that make up the coal-based energy production value chain cannot be considered a sustainable transitional measure; on the contrary, it risks prolonging coal dependency. By violating the Law on the Planning System and failing to carry out the provisions on ex-ante analysis, the Ministry of Mining and Energy has effectively exempted itself from the obligation to conduct a thorough assessment of the current situation, which would serve as the foundation for identifying meaningful measures and activities in the action plan.

Main Deficiencies in the Just Transition Action Plan

In May 2025, *Policy Guidelines 01/2025 Just Transition as a Part of Integrated Energy and Climate Planning*. The goal of this document is to ensure a unified and coherent approach to just transition planning in the member states of the Energy Community.

The Just Transition Action Plan of the Republic of Serbia (in the form presented during the public consultation in June 2025) is not aligned with the Energy Community Guidelines, particularly in the chapter concerning the governance mechanism (Section 5.5).

The Energy Community’s political guidelines include a recommendation for the broad inclusion of stakeholders, which means all relevant interested parties, not only state institutions and public enterprises, in the implementation, monitoring, and evaluation of the Just Transition Action Plan.

The Energy Community’s political guidelines clearly state that “a resilient economy cannot be built without the inclusion of those who will live in the future and shape it.

⁷⁰ Associations call on the Ministry of Mining and Energy to draft a new Just Transition Action Plan, Belgrade Open School (June 9, 2025) accessed 07.07.2025, <https://www.bos.rs/rs/vesti-ekz/256/2100/udruzenja-pozivaju-ministarstvo-rudarstva-i-energetike-da-izradi-novi-akcioni-plan-pravedne-tranzicije.html>.

The engagement and commitment of the public and all stakeholders are key to the success of the just transition plan. In particular, to address the specific situation and role of women in the transition toward a climate-neutral economy, gender equality should be promoted.”

The Energy Community’s political guidelines also highlight the need to establish partnerships, both at the vertical level (between central and local governments) and at the horizontal level (cross-sectoral partnerships).

The Ministry of Mining and Energy published a report from the public consultation, which includes responses to more than 70 comments received during the consultation. However, most of the comments were not accepted. It was announced that the document would be adopted in July 2025.

Delaying Just Transition

Despite the formal recognition of the importance of a just energy transition, Serbia still lacks a functional strategic, legislative, and institutional framework that would enable a fair and sustainable phase-out of coal. Although the development of the Just Transition Action Plan was announced in several strategic documents and foreseen in the Reform Agenda, the proposed Plan lacks concrete, measurable, and time-bound measures, and fails to ensure the adequate inclusion of local communities and vulnerable groups, contrary to the standards of the Energy Community and the EBRD. The process of drafting the Action Plan has been marked by delays, lack of transparency, and limited public participation, especially from those most affected by the transition. Rather than serving as a foundation for planning and implementing a just transition, the document remains at the level of a preparatory text, with no clearly defined goals or mechanisms for implementation. As a result, a critical opportunity was missed to make the transition from fossil fuels to sustainable energy sources inclusive and fair, particularly for the communities most impacted.

Recommendations

Although Serbia has made some progress recently in aligning its national policies with the goals of the Green Agenda for the Western Balkans, through the development of certain planning and strategic documents, laws, and bylaws, the overall progress in implementing key measures from the Action Plan for the implementation of the Sofia Declaration on the Green Agenda for the Western Balkans remains limited. Lack of institutional efficiency, absence of publicly available reports on the work of responsible bodies, frequent failure to meet legally set deadlines, as well as insufficient involvement of civil society organizations and the public in decision-making processes, pose serious obstacles to achieving the goals of a just and climate-neutral transition.

Aligning with the EU climate policy would enable Serbia not only to fulfill its obligations under the Sofia Declaration and accelerate its EU accession process but also to improve the quality of life of its citizens through more sustainable resource management, inclusive and transparent decision-making, and understanding the process of just energy transition as a civilizational opportunity to shift towards sustainable societal development and long-term environmental protection.

Below are the main recommendations for improving the implementation of the analyzed measures, aimed at enhancing the application of the Sofia Declaration on the Green Agenda for the Western Balkans in Serbia. This list of recommendations is not exhaustive and is based on the analysis of the implementation of the Action Plan for the Green Agenda for the Western Balkans, as well as years of advocacy by the Belgrade Open School for good governance in environmental protection and achieving climate neutrality by 2050 through the successful adoption of European legal norms and standards.

General recommendations

- ➔ The Government of the Republic of Serbia should include representatives of civil society organizations in the Working Group for the implementation of the Sofia Declaration on the Green Agenda for the Western Balkans to ensure greater transparency and consideration of the interests of diverse social groups, as well as to contribute to better, more sustainable solutions aligned with community needs.
- ➔ The Ministry of Environmental Protection should prepare and publish regular reports on the work of the Working Group for the implementation of the Sofia Declaration on the Green Agenda for the Western Balkans, making them publicly accessible to enable citizens and relevant stakeholders to monitor progress in the implementation of the Green Agenda.
- ➔ The Minister of Environmental Protection should establish thematic subgroups focused on specific areas of the GAWB to ensure more efficient implementation of measures and activities
- ➔ The Ministry of Environmental Protection and the Ministry of Mining and Energy should improve participatory processes in the development of public policy documents and regulations by ensuring effective public engagement. This can be achieved through careful planning of public consultation processes (e.g., avoiding holiday periods or vacation seasons, and preventing simultaneous consultations or public debates for multiple documents).

Thematic recommendations

- ➔ The Ministry of Environmental Protection, in cooperation with the Ministry of Energy and Mining and the Ministry of Finance, should draft proposals for amendments to the Climate Change Law to establish a CO₂ emissions charging mechanism and achieve full alignment with the EU ETS Directive.
- ➔ The Ministry of Environmental Protection should develop an Action Plan for the implementation of the Low-Carbon Development Strategy for the period 2023–2030, with projections up to 2050.
- ➔ The Government of the Republic of Serbia and the Ministry of Environmental Protection should improve the functioning of the National Climate Change Council by holding regular sessions, reporting to the public on the Council's activities, and providing recommendations to the Serbian Government on climate change issues, including sectors beyond the Ministry of Environmental Protection's jurisdiction
- ➔ The Environmental Protection Agency and the Ministry of Environmental Protection should make the information on the GHG inventory public, verifiable, and easily accessible in accordance with the Climate Change Law (Article 58) and international commitments such as the Aarhus Convention and the Paris Agreement.
- ➔ The Ministry of Environmental Protection should conduct a cost-benefit analysis of implementing a carbon pricing instrument. A detailed timeline must be established with clear implementation phases for the carbon pricing instrument, including deadlines for adopting secondary legislation, responsible institutions, organizing training for operators and civil servants, the start of carbon tax collection, and deadlines for aligning the tax price with the EU ETS emission allowances.

- ➔ The Government of the Republic of Serbia should adopt the Environmental Protection Strategy with updated deadlines for developing and implementing the carbon pricing instrument to timely respond to the introduction of the Carbon Border Adjustment Mechanism (CBAM).
- ➔ The Ministry of Finance should re-establish a dedicated Environmental Protection Fund with clearly defined goals and mechanisms for using funds collected based on the “polluter pays” principle and draft specific laws and bylaws that will regulate the introduction of carbon taxes and their investment in climate change mitigation.
- ➔ It is necessary to strengthen the capacities of the Ministry of Environmental Protection, Ministry of Finance, Ministry of Mining and Energy, Environmental Protection Agency, and other relevant institutions through recruitment and continuous training of staff for the implementation of the MRV system, carbon tax, and CBAM obligations.
- ➔ The Ministry of Mining and Energy should align the INECP with the Energy Community Ministerial Council Decision No. 2022/02/MC-EnC and set targets consistent with the commitments of the Energy Community and the Green Agenda for the Western Balkans.
- ➔ The Ministry of Mining and Energy should adopt the Energy Community’s political guidelines on just transition as a binding framework for the preparation and implementation of the Just Transition Action Plan, ensuring it contains concrete, operational measures focused on local communities.

The recommendations from this report clearly highlight the need for greater transparency, strengthening administrative capacities, and establishing effective mechanisms for carbon dioxide emissions charging, as well as the necessity to set climate neutrality by 2050 as a clear goal of all sectoral policies.

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