THE IMPLEMENTING LEGISLATION TO REDUCE INDUSTRIAL EMISSIONS IN THE REPUBLIC OF SERBIA

Alignment with EU Legislation and Implementation Challenges



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Background

- Serbia is facing challenges related to air pollution
- Air pollution is a major problem in urban and industrial areas
- Major pollution sources include industrial activities, energy production, household heating, and transport.
- Emission control and monitoring remain important challenges
- A strategic, long-term framework has been adopted to improve air quality and ensure the effective implementation of pollution control measures

INTERNATIONAL FAMEWORK

European Union and International policy framework

Negotiation Chapter 27 (Environment and Climate Change)

- The Industrial Emissions Directive (IED 2010/75/EU) represents one of the most challenging aspects
- Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants (NEC Directive)
- Directive 2008/50/EC on ambient air quality and cleaner air for Europe and Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air (known as 4th Daughter Directive); New Directive (EU) 2024/2881 on ambient air quality and cleaner air for Europe

Convention on Long-range Transboundary Air Pollution (CLRTAP) and protocols

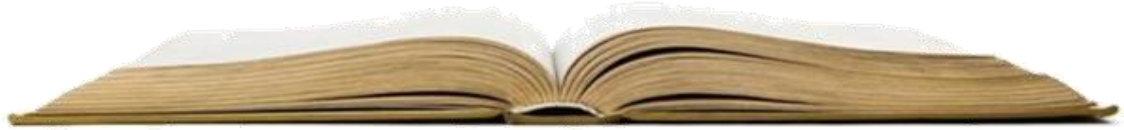
Energy Community Treaty: An additional legal mechanism that obliges Serbia to reduce emissions from Large Combustion Plants (LCP) through the National Emission Reduction Plan (NERP)

KEY NATIONAL LEGAL FGRAMEWORK

The Air Quality Programme of the Republic of Serbia for the period 2022-2030

The new **Law on Air Protection** was adopted in June 2025 to strengthen legal framework and align with EU acquis

The new **Law on Integrated Pollution Prevention and Control** was adopted in July 2026



The Air Quality Programme of the Republic of Serbia for the period 2022-2030







The general objective:
To reduce up to 2030 the health damage due to poor air quality by half compared to 2015 by reducing exposure to air pollution while also limiting the damage on ecosystems

Emphasis on reducing emissions in key sectors (energy, combustion plants, transport, industry, agriculture)





Objectives and targets



Specific objective 1: Reduce emissions of SO_2 by 92% and fine particles $PM_{2.5}$ by 58.3% from Energy sector (including traffic and residential combustion) in 2030 compared to 2015



Specific objective 2: Reduce emission of air pollutants and heavy metals from Industrial processes and product use through compliance with BAT AELs



Specific objective 3: Reduce NH_3 emissions from Agriculture sector by 20.5% compared to 2015



Specific objective 4: Promote transition to clean air for everyone (through awareness project)

THE NEW LAW ON AIR PROTECTION (2025)

- **A key legislative framework** introduces significant changes aimed at more effective air quality management.
- **Enhanced Transparency:** More comprehensive consultations and greater public involvement.
- **Stricter Penalties:** for industrial polluters.
- **Improved Inspections:** Specific clear mandates and procedures for faster, more effective inspections.
- **Next step:** New by-laws will be adopted to regulate emissions from small, medium and large combustion plants, emissions from other stationary point sources, and emission measurement methodologies.



Operators' Obligations for Emission Monitoring



The obligations for the operators concerning emission monitoring are clearly stated in the Law on Air Protection and in relevant by-laws.

01 Emission Monitoring

- Ensure regular monitoring and **continuous** automatic measurement of pollutants, with the approval of the Ministry.

Operators who do not perform continuous measurement of emissions are obliged to **conduct periodic measurements**, through authorized laboratories.

02 Air Quality

- Ensure air quality monitoring by the competent authorized laboratories.

03 Record-keeping and reporting

- Maintain records of measurement results and submit data to the National and Local Register of Pollution Sources within the prescribed deadlines.

Reporting Deadlines:
Quarterly, periodic, annually.

04 Monitoring of raw materials and equipment

- Keep records of the type and quality of raw materials and fuels, as well as the operation of emission prevention and reduction equipment.

05 Emission Reduction

- Take appropriate measures to reduce air pollutant emissions from stationary point sources.



Clean air | Compliant operations | A healthier environment

THE NEW IPPC LAW (2026)

The new legislation marks an important step in Serbia's ongoing efforts to reduce industrial pollution and strengthen environmental protection

- **Modernisation of the regulatory framework** – Modernisation of the integrated permitting system following more than 20 years of implementation of the previous legal framework.
- **Alignment with EU legislation** – Further harmonisation of national legislation with the Industrial Emissions Directive.
- **Extended scope of integrated permitting** – Inclusion of additional industrial installations within the integrated permitting regime.
- **Application of BAT and emission limit values (ELVs)** – Mandatory application of BAT conclusions when determining permit conditions, including emission limit values.
- **Digitalisation of permitting procedures** – Establishment of a central electronic database and an accompanying portal to streamline procedures and enhance transparency.
- **Strengthened oversight and public participation** – Clearer obligations for operators, improved monitoring of compliance with permit conditions, and enhanced public access to information and participation in decision-making.
- **Next steps** – Development of five secondary legal acts, with support from the IED Serbia project, to facilitate effective implementation of the new legal framework.



COMPETENT AUTHORITY FOR IPPC PERMITTING



The competent authorities for issuing IPPC permits in Serbia are divided across 3 levels:

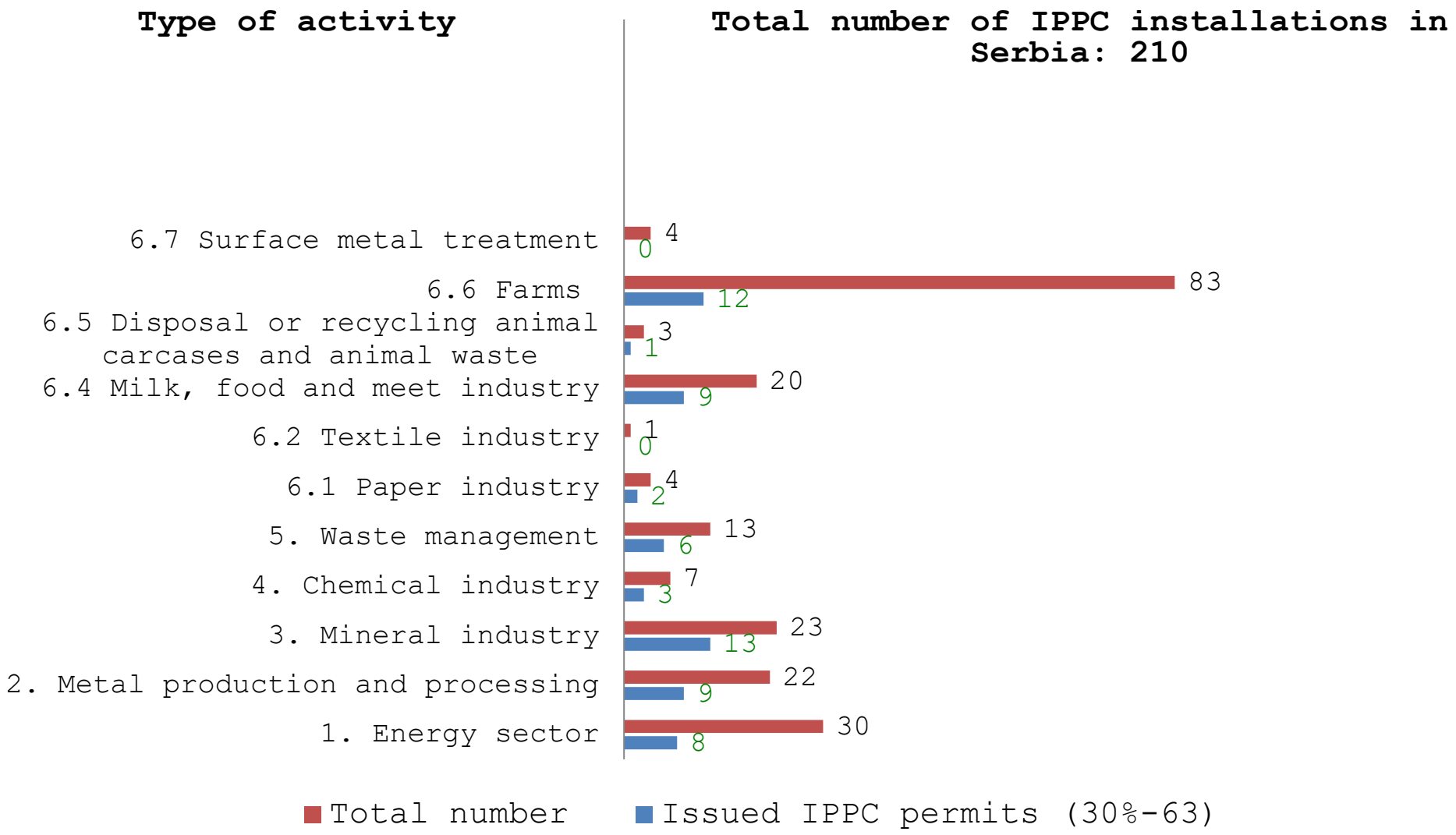
Ministry of the Environmetal Protection

Provincial Secretariat for Environmetal Protection

Local-self Government Units

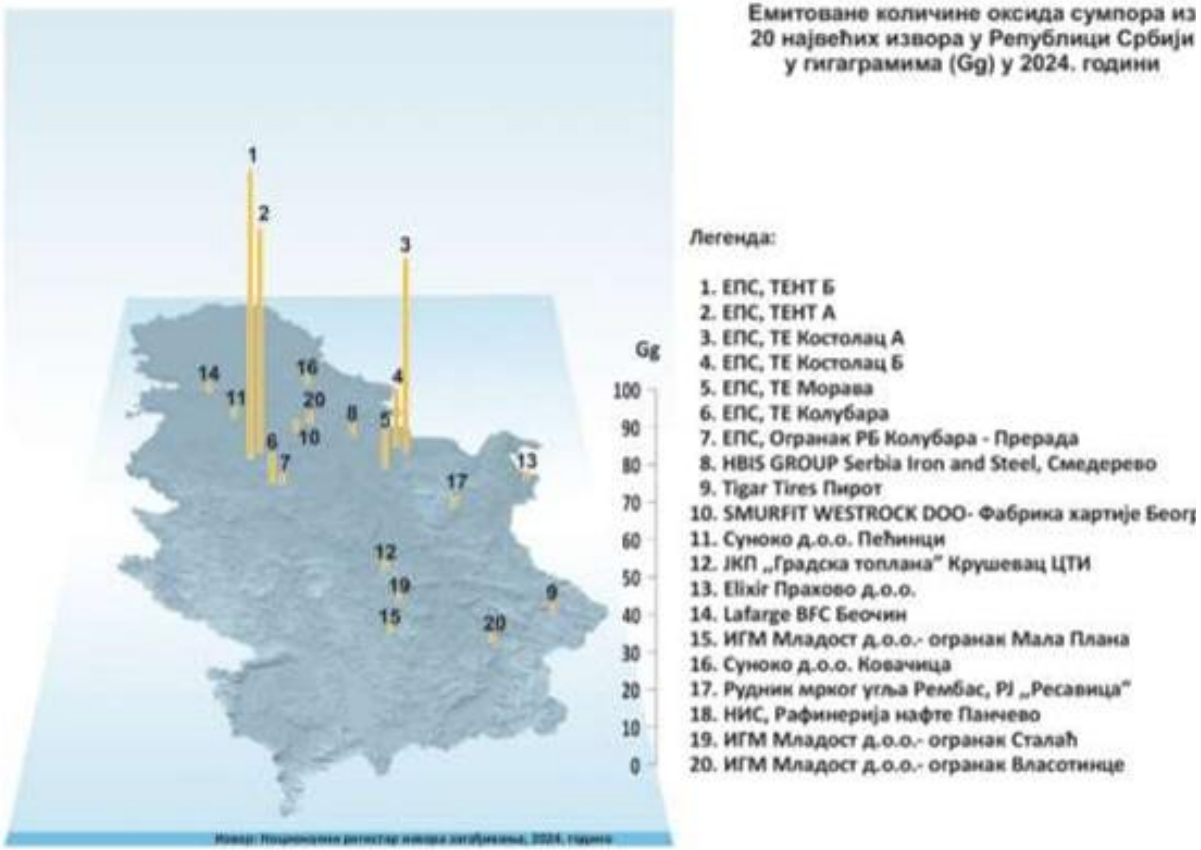
- The IPPC permitting procedure starts once the other permits (water, construction, use, and waste permits) have been obtained.
- Insufficient number of staff in the departments responsible for the IPPC permitting process
- It is assumed that one experienced permit writer can issue up to 4 IPPC permits per year

Current number of IPPC installations in Serbia



Large Point Sources in Serbia

SOx emissions from the 20 largest emission sources in Serbia in 2024 (Gg)



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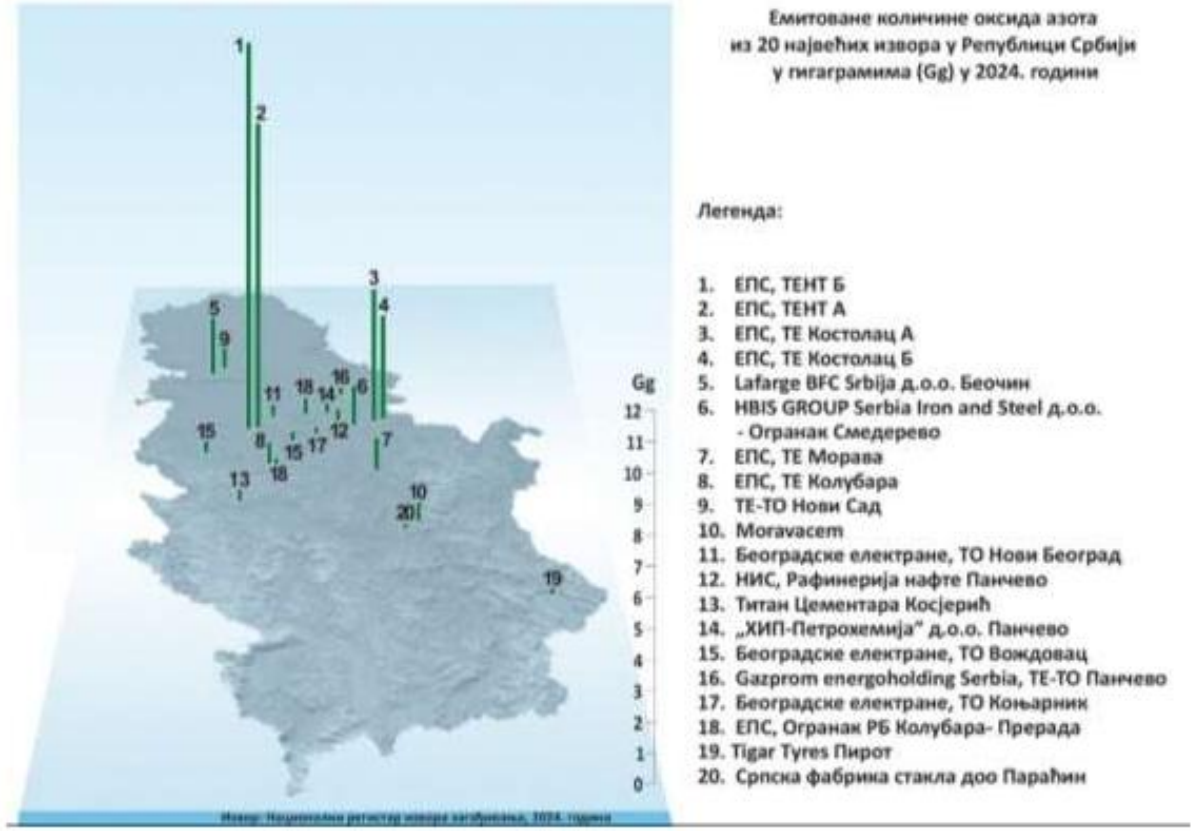
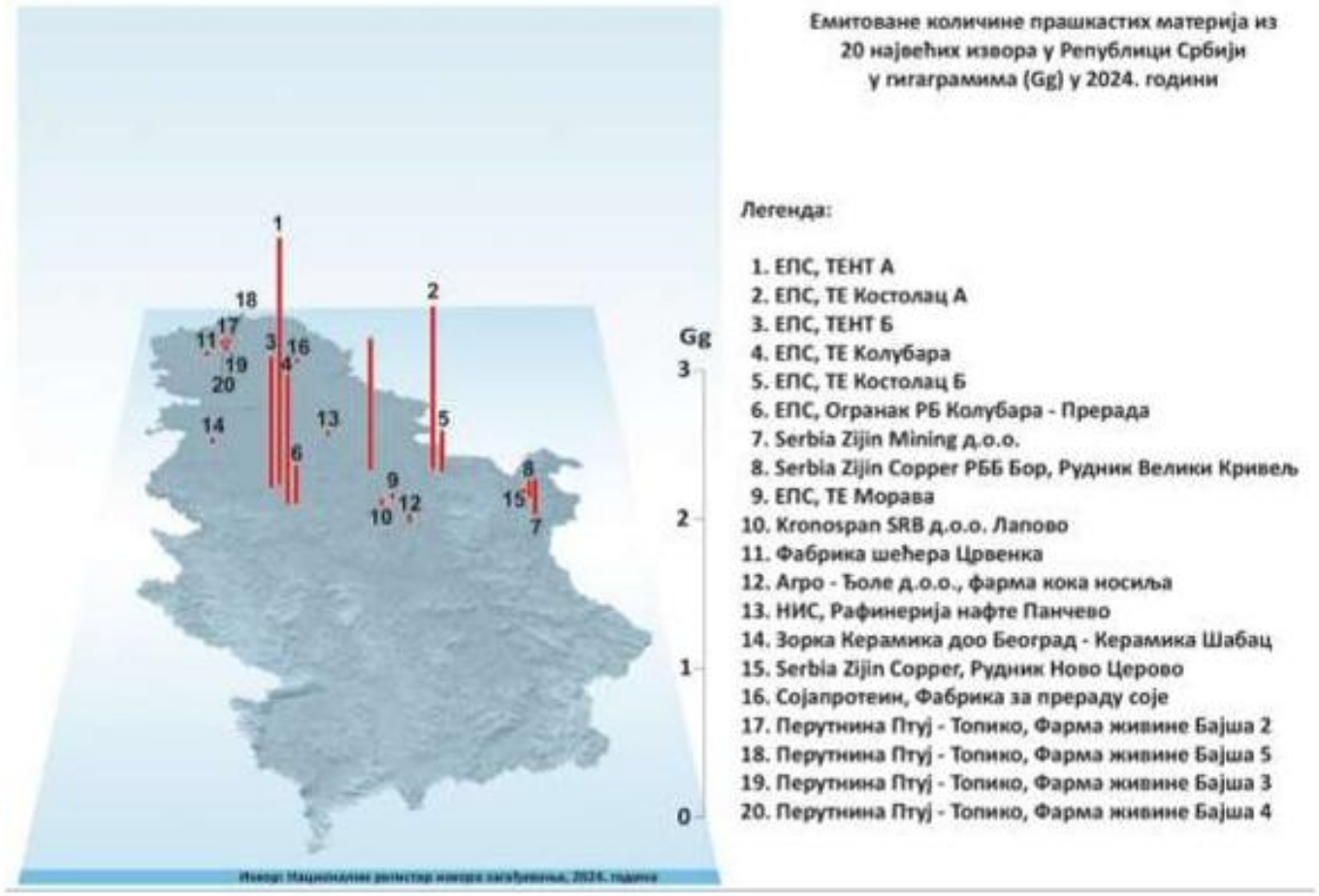


Source: Annual 2024 Report on the Environment, SEPA

Large Point Sources in Serbia

Dust emissions from the 20 largest emission sources in Serbia in 2024 (Gg)



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KEY CHALLENGES AND FUTURE STEPS

Institutional Capacity: Insufficient staffing and limited enforcement capacity.
Monitoring and Financing: Gaps in monitoring, financial constraints, and infrastructure limitations.
Permitting Gaps: Many applications remain incomplete due to missing permits and BAT compliance plans.
Industrial Upgrades: Existing IPPC installations require reconstruction to meet BAT requirements.
Compliance Assessment: Full assessment of BAT compliance depends on completing the permitting process.



CLOSING REMARKS

Serbia has made important progress in strengthening its legal framework for reducing industrial emissions and improving air quality

Priorities:

Complete secondary legislation
Enhance institutional capacity
Improve monitoring
Ensure operators meet their obligations
Ensure effective enforcement



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