

Environmental Civil Society Organizations' letter to GFA Consulting group

The letter has been prepared by RES Foundation and Coalition 27, represented by the following members: Belgrade Open School, CEKOR, Climate Action Network Europe, NGO Fractal, GM Optimist, Young Researchers of Serbia (YRS) and WWF Office in Belgrade, with support of Bird Study and Protection Society of Serbia, and One Degree Serbia.

Dear GFA Team,

First of all, we would like to congratulate GFA on the winning of the tender for the implementation of the project EuropeAid/135966/DH/SER/RS to develop Climate Strategy and Action Plan in Republic of Serbia. We are pleased that the organization of such a respectable track record in considering local needs and cooperation with stakeholders including government, private sector, NGOs and citizens will work on Climate Strategy in Serbia.

Activities envisaged by the Terms of Reference will crucially affect future climate change policy of the Republic of Serbia. In turn, this policy will shape other sectorial policies, most notably energy policy. It will influence economy, development of the local communities, environment and life of the citizens of Serbia.

We believe that the new strategy needs to be based on the real needs of Serbian citizens and Serbian economy. Thus, developing new emissions scenarios, accounting for the best available technologies particularly in the energy sector is necessary. Environmental improvements, reduced health hazards, improved resilience, generation of sustainable employment opportunities, reduction of poverty should be also targeted when developing this strategy. These achievements require genuine public participation and compliance with the principles of good governance.

Preparation of the Climate Strategy and Action Plan is a great opportunity for the Republic of Serbia to re-assure its commitment to the EU goals and values. Also, we are certain that the provisions of the Aarhus Convention and Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context will guide GFA's work in this project including the facilitation of public participation in the initial stage of the process when all options are still open for discussion. Therefore, we invite you to design and execute the activities of the project in a way that secures public participation and transparency of the process.

We would like to underline that a **new climate policy should not be based on the previous elements of climate policy in Serbia**, due to both its poor quality and poor legitimacy. Intended Nationally Determined Contribution (INDC), submitted by the Republic of Serbia to UNFCCC, Serbian Nationally Appropriate Mitigation Actions (NAMAs), Energy Development Strategy (EDS), and the First Biennial Update Reports (FBUR) are examples of such policy elements.

INDC of the Republic of Serbia is based on the comparison of emissions between different geographical areas. Serbian pledged emissions reductions of 9.8% are calculated as difference between projected emissions without Kosovo in 2030 and with Kosovo emissions in 1990. Serbian FBUR confirmed this geographical inconsistency. In essence, INDC implies a 15% increase in emissions compared to 2013. We call on you to refrain from using the pledge as the basis for your work.

NAMAs were frequently used as sources for climate change policy. The list of NAMAs cannot represent valid grounds for a new policy unless thoroughly revised. The NAMAs list contains projects based on invalid data, projects with unclear boundaries and projects with enormous reduction costs. We call on you to refrain from using NAMAs as the basis for your work.

Serbian **FBUR** has been prepared with several breaches of guidelines when presentation of mitigation measures is concerned. While it contains the explanation of geographical coverage of GHG inventories, GHG emissions developments for sectors are inconsistently presented in numerous tables in which time series contain data on emissions with different geographical coverage. NAMAs were used as a source for the presentation of mitigation actions despite an obvious non-relevance of numerous NAMAs.

The **Energy Development Strategy** (adopted in 2015) proposes a new 2900 MW of lignite based capacities (presented as an infrastructure measure that leads to mitigation in FBUR) at the same time envisaging an increase in GHG emissions from the energy sector and stagnation of efficiency in energy transformation. This document cannot serve as the background document for climate change policy in the post-Paris era. We call on you to refrain from using the EDS as the basis for your work.

In addition, kindly note that GHG emissions in Serbia in 2014, were significantly reduced (more than 6 million tones comparing to 6 year average) as a consequence of lignite unavailability due to the floods. While this disaster had a tremendous impact on capital infrastructure, the lost electricity production and associated GHG emissions reductions were not so dire. Serbia may certainly achieve less costly GHG emissions reduction in a controlled manner. For further information, we invite you to consider the attached documents.

Finally, we would like to inform you that we shall make this letter publicly available. The letter will also be sent to the Ministry of Agriculture and Environmental Protection and to the Delegation of the European Union to the Republic of Serbia.

We sincerely hope that the GFA will seriously consider the arguments laid out in this letter and will use them as a starting point when developing this crucial strategic document. With this in mind, you can count on our support and cooperation in the process of Climate Strategy development.

We thank you for considering our concerns.

On behalf of above mentioned organisations.

Kind regards,

Jovana Dragić,
Secretary, Coalition 27