

Complainants:

NGO Polekol, Svetogorska 37/2, Belgrade, Serbia;
Informal citizens' group Spasimo Studenicu (Save Studenica) Ušće, Serbia;
Europa Nostra Serbia, Cara Uroša 18, Belgrade, Serbia;

whose joint representative is NGO Polekol, Svetogorska 37/2, Belgrade, Serbia; whose legal representative is Žaklina Živković

Letter of concern about a threat to a World Heritage site
Threats to Studenica World Heritage Property (C389)

We, the undersigned civil society organizations, express our grave concern regarding the current state and the increasing threats to the natural and cultural heritage of the Studenica River Basin, recognized as a cultural landscape and part of the natural setting of the Monastery of Studenica, a World Heritage property inscribed on the UNESCO World Heritage List in 1986. A significant portion of this area falls within the boundaries of the Golija–Studenica Biosphere Reserve under the UNESCO Man and the Biosphere Programme (MAB) and is thereby protected.

We are concerned that the area may be irreversibly degraded or seriously compromised unless the UNESCO World Heritage Centre issues clear recommendations to the Republic of Serbia to prohibit the construction of small hydropower plants (SHPs) along the lower course of the Studenica River outside the boundaries of the Biosphere Reserve Golija - Studenica UNESCO (MAB) and within the broader Studenica River Basin, which is protected as a cultural landscape through the Special Purpose Spatial Plan for the Monastery of Studenica.

We further call upon UNESCO to actively participate in the ongoing development of a new Special Purpose Spatial Plan for the Golija Nature Park, to ensure effective protection of the cultural, landscape, and natural values of the area.

We wish to emphasize the deterioration of key features of the Studenica cultural landscape due to previously constructed small hydropower plants (SHPPs) and other endangering factors. The planned construction of the SHPP Studenica S4 Gradina, for which an Urban Development Project has already been approved, and the potential development of two additional SHPs downstream, would severely and irreversibly impact the Outstanding Universal Value (OUV) of the immediate setting of this heritage property.

The threats to the heritage site are:

The planned construction of the SHP Studenica S4 Gradina, and possibly two more downstream, within a river basin designated in spatial planning document as a cultural landscape;

Deregulation and weakening of legal protection frameworks, particularly through the new Regulation on the Protection of the Golija Nature Park, which introduces provisions and permits

activities incompatible with the objectives of cultural and natural heritage protection, in contrast to the former Regulation of 2001;

Inadequate spatial planning of ski resort infrastructure on Odvráčenica, near the springs of the Studenica River, including the planned construction of artificial snowmaking reservoirs, as stipulated in the Detailed Regulation Plan for the Golija Ski Centre (Municipality of Ivanjica, 2017).

We hereby inform you that a new spatial planning document is currently being drafted.

Each of these threats individually—and all collectively—could lead to irreversible degradation of this heritage area, unless decisive measures are undertaken to prevent the realization of these harmful projects and plans. Otherwise, within the short to medium term, the Outstanding Universal Value of the site may be lost.

Since the adoption of the Special Purpose Spatial Plan for the Monastery of Studenica, the Studenica River Basin has been formally recognized as a cultural landscape — a designation that was not in place in the 1980s when the Monastery was inscribed on the World Heritage List.

According to the 2018. Conservation Study developed by the Republic Institute for the Protection of Cultural Monuments (RZSK), titled “Protection Zones, Measures of Protection, Conditions for Preservation and Use of Cultural Heritage with Identification and Preservation of the Cultural Landscape of the Studenica Monastery”, the exceptional cultural-historical significance of the Studenica River Basin (characterized by sacred topography and the interplay between spiritual heritage, material heritage, and a distinctive natural setting) requires a specific approach to planning and management. This entails the implementation of the cultural landscape concept, with the Studenica Monastery as its core, establishing a strong connection between significant monuments and their surrounding natural environment, while identifying spatial systems that allow for understanding the historical continuity of life in the area.

Based on research, field reconnaissance, studies, urban planning documents, and current conditions, the adopted Plan defines a three-tiered protection regime.

- First-degree protection regime – the Studenica Monastery (property zone) and its immediate protected surroundings (core zone);
- Second-degree protection regime – the broader immediate and natural surroundings of the Monastery (buffer zone);
- Third-degree protection regime – the cultural landscape of the Studenica Monastery (the Studenica River Basin, the setting of the Monastery).

The Special Purpose Area associated with the Monastery of Studenica, which includes zones of first and second-degree protection (designated in line with the Operational Guidelines for the Implementation of the World Heritage Convention as core zone and buffer zone), has been extended to encompass the wider landscape surrounding the Monastery, where numerous cultural properties of significant value and exceptional natural features have been identified, recorded, and assessed. Thus, the entire Studenica River Basin is designated as a cultural landscape.

In areas under third-degree protection, the construction of infrastructure, hydrotechnical and other facilities that may negatively affect the quality of soil, water, air, biodiversity, landscape

values, cultural properties and their surroundings, or the spirit of the place, is strictly prohibited. Also prohibited is the destruction of plant and animal species protected as natural rarities. For these reasons, the CSO “Polekol” and the local informal citizens’ initiative “Save Studenica” have submitted a complaint to the Bern Convention.

The Special Purpose Spatial Plan for the Monastery of Studenica, in section 1.2.2. Protection of Landscape Values, explicitly stipulates that planning solutions must ensure: “the protection of landscape structure and unimpeded functioning of natural processes; protection of biodiversity; preservation and establishment of ecological networks; remediation and revalorization of degraded natural and aesthetic landscape values. The development of cultural landscapes must be based on recognizing their specific character, existing values, and carrying capacities, and planning solutions must ensure the preservation and enhancement of the distinctive structure and visual identity of the landscape, through the conservation of its characteristic landscape patterns.”

These provisions exclude the construction of dams and accumulation reservoirs on the Studenica River.

The energy exploitation of this area is unacceptable due to the proven negative impacts of SHPs on the environment, particularly in regard to the strict water protection requirements, and consequently, on the protection of nature and the cultural landscape.

Such projects are ecologically unsustainable and socially unacceptable. The residents of Ušće and neighboring villages have explicitly and repeatedly rejected the construction of SHPs, as expressed during public assemblies, with unanimous support from the scientific community and environmental protection organizations.

Due to changes in river hydrology and other constraints, the current Spatial Plan does not designate precise locations for potential SHPs or other renewable energy systems. All such potential locations (including those within the area covered by the Spatial Plan, as well as those under the jurisdiction of local self-government spatial plans) are subject to detailed planning through the preparation of Detailed Regulation Plans.

Contrary to imperative regulations, the Republic Spatial Planning Agency unlawfully approved the Urban Development Project for SHP Gradina S4 Studenica, bypassing the required process of detailed planning and Environmental Impact Assessment (EIA), thus creating a false legal and planning basis for the realization of the SHP project.

The integrated approach to the protection and management of this space entails the enhancement of the interaction between cultural and natural heritage, that is, the spiritual, material, and landscape values, through the implementation of the cultural landscape concept, in accordance with the Convention Concerning the Protection of the World Cultural and Natural Heritage, the European Landscape Convention, and other ratified international and national instruments that regulate the planning, protection, management, and conservation of cultural landscapes.

The cultural landscape of the Studenica River Basin, as the primary landscape feature of the entire area, should be comprehensively protected, with proactive measures undertaken to enhance its landscape qualities. Consequently, the construction of SHP Studenica S4 Gradina and other harmful projects and activities mentioned herein have no place in this setting.

Given all of the above, we respectfully request that UNESCO urge the Republic of Serbia to fully implement the adopted Special Purpose Spatial Plan for the Monastery of Studenica, and to

immediately halt any activities within the concerned area that are incompatible with the character of the Studenica Monastery as a World Heritage property, or with the status of the Golija–Studenica Biosphere Reserve, which is part of the UNESCO MAB network.

In light of the above, we respectfully request that:

- UNESCO urge the Republic of Serbia to consistently implement the adopted spatial planning document (Special Purpose Spatial Plan of the Studenica Monastery);
- UNESCO call upon the Republic of Serbia to cease all activities within the concerned area that are inconsistent with the character of the Studenica Monastery as a World Heritage property and the Golija-Studenica Biosphere Reserve, which is listed under UNESCO's Man and the Biosphere (MAB) Programme;
- UNESCO call upon the Republic of Serbia to ensure the protection and integrity of the cultural landscape of the Studenica River Basin and integrity of the natural heritage, in accordance with the World Heritage Convention, the Statutory Framework of the World Heritage Convention, the Operational Guidelines for the Implementation of the World Heritage Convention, the Convention on Biological Diversity, the Technical Guidelines for Biosphere Reserves, and relevant best practices;
- UNESCO participate in the drafting of the new Special Purpose Spatial Plan for the Golija Nature Park because of overlapping with Special Purpose Spatial Plan of the Studenica Monastery, in order to ensure the implementation of the Convention, associated instruments, and best practices, in the spirit of the Convention and in alignment with the values, objectives, and functions of area – property inscribed on the World Heritage List and the biosphere reserve.

Belgrade,
4.11.2025.

On behalf of the
submitting organizations

Jivković Zlatko



Attachments:

1. [Complaint to the Bern Convention](#)
2. [Special Purpose Spatial Plan for the Monastery of Studenica](#)
3. [Photos of the Lower Studenica Area under threat of dam construction](#)