



Municipal Infrastructure Support Programme

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CHAPTER 8

INSTITUTIONAL ASSESSMENT



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ABBREVIATIONS AND ACRONYMS

EAR	European Agency for Reconstruction
EIA	Environmental Impact Assessment
EU	European Union
IPPC	Integrated Pollution Prevention and Control
LRCD	Land and Road construction Directorate
MEP	Ministry of Environmental Protection
MEPSP	Ministry of Environmental Protection and Spatial Planning
NEAP	National Environmental Action Plan
NIP	National Investment Plan
NWMS	National Waste Management Strategy
OGRS	Official Gazette of the Republic of Serbia
PUC	Public Utility Company
RSEDP	Regional Socio / Economic Development Program
RS	Republic of Serbia
SWM	Solid Waste Management
SCTM	Standing Conference of Towns and Municipalities
SLA	Service Level Agreement
SWOT	Strengths, Weakness, Opportunities and Threats
TAMU	Tourism Advisory Monitoring Unit
TO	Tourism Organization



8 THE ANALYSIS OF LEGAL BACKGROUND

8.1 Introduction

In this chapter the following issues have been outlined and addressed:

- Overall regulatory framework;
- Policy documents including the roles and responsibilities of the key project stakeholders;
- Supervision and enforcement in tourism sector and main infrastructures (water, wastewater, waste disposal and communal roads) in Surdulica municipality;
- Description of the legal status of the Public Utility Company (PUC), Tourism Organisation (TO) and Land and Road Construction Directorate (LRCD) that will be managing the implementation, operation and maintenance of the tourism infrastructure as well as the infrastructures serving as a support to tourism development;
- Proposed measures for improvement of relations between the PUC, LRCD and TO that will take care of tourism development in Vlasina Lake.

8.2 Regulatory Framework

8.2.1 Legislative Framework

General background

In 2004, Serbia has launched an ambitious programme to modernise its environmental management and harmonise its environmental legislation with EU Directives.

Legislative, executive and judicial powers are mostly practiced through the legally prescribed scope of competencies of the Authorities of the Republic. Following existing legal framework in Serbia, certain competences have been delegated to the Local Self-government units in the recent period.

Law on Local Self Government

The Law on Local Government, see Ref. 8.1, (Official Journal of the RS no. 9/2002, 33/2004, 135/2004 and 62/2006) regulates, among other things, the range of activities that a local self-government unit¹ (Municipality) performs on its own territory. Within Law on Local Government, the overall territory of the Serbia is divided into a certain number of territorially and administratively defined units, i.e. Local governments. The principal act of the Law on the Local Government Unit is the Statute (Article 10). The Statute of each unit among others delineates:

- The rights and responsibilities of the specific local self-government and in which way they shall be exercised;
- The number of the delegates to be elected in the assembly of the local self-government unit;

¹ Law on Local Self Government, Article 4. 2006 The Republic of Serbia



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- The organization and procedures to be adopted and followed by the units' bodies and services;
- The regulations which must be followed by the citizens to run the activities within the competence of local self-government unit.

Referring to this Law, within its area of responsibility, a municipality should, among other things:

- To arrange and regulate ways of using and managing springs, public wells and drinking fountains, (by determining water management conditions, issuing water management approvals and licenses for facilities of local value);
- To create development programs;
- To create urban plans;
- To organize and guarantee the execution and development of communal activities (water filtering and distribution, production and provision of steam and hot water, public urban and suburban transport of passengers in traffic, waste management in towns and populated areas, landfill maintenance, etc);
- To issue construction sites organization programs, organize and provide construction sites organization and usage activities and determines compensation for construction sites organization and usage;
- To take care of environmental protection, issues natural values usage and protection programs and environmental protection programs, that is local action and sanative plans, in accordance with strategic documents and their own interests and specifications and determines special compensation for environmental protection and improvement.

Concerning relationship between Local Government and Public Utilities, Rights and Obligations of Local Self Government in the establishment of local public services are defined in the Article 6 of the Law.

According to the Law and the referent statute the unit defined as local self-government may establish enterprises, institutions and/or other type of organizations to provide adequate public services and fulfil the needs of the local population,

Environmental Protection Law (OGRS No. 135/04)

The new legal framework for environmental protection was introduced in the Republic of Serbia, in 2004, see Ref 8.2, by:

1. The Law on Environmental Protection;
2. The Law on Strategic Environmental Assessment;
3. The Law on Environmental Impact Assessment, and
4. The Law on Integrated Prevention and Pollution Control

The most significant issues addressed by the Law on Environmental Protection include:

- The main principles of environmental protection;
- Management and protection of natural resources;
- Measures and conditions of environmental protection;



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- Environmental programs and plans;
- Industrial accidents;
- Public participation;
- Monitoring and information system;
- Clearly identified competences of the Environmental Protection Agency;
- Reporting on environmental issues;
- Financing of environmental protection;
- Inspection services and fines.

This Law also foresees the creation of Ecological Funds for environmental investments. The above mentioned laws are harmonized with the EU Directives on Environmental Impact Assessment (85/337/EEC), Strategic Impact Assessment (2001/42/EC), IPPC (96/61/EC) and Public Participation.

More precisely the Law regulates:

- Protection of soil, water, air, forest, biosphere and biodiversity, plants and animals;
- Mandatory environmental monitoring: the programmes have to be adopted and performed every second year (including air monitoring);
- Responsibility of the Serbian Government to establish criteria for environmental measurements and regular reporting of the results to the Serbian Parliament yearly;
- Important obligation to pay tax amounting to 1% of the value of the investment on all new facilities that could possibly be the sources of environmental pollution, and which shall be used for environmental protection and promotion.

Law on Environmental Impact Assessment

Environmental Impact Assessment (EIA) has been implemented in Serbia from 1992 by the former Regulation on EIA.

Since 2004 there has been in Serbia a process of approximation to the European Union through the transposition of EU legislation that will greatly facilitate the implementation of environmental impact assessment requirement. The EIA procedure is harmonized with the relevant EU EIA Directive 85/337/EEC amended 97/11/EC.

Recently enforced EIA legislation in Serbia includes the **Law on Environmental Impact Assessment** ("OGRS", No. 135/2004) with several related regulations and decrees:

- Decree on determining the List of projects for which the Environmental Impact Assessment is mandatory and the List of projects for which the Environmental Impact Assessment may be required ("OGRS", No. 84/2005);
- Regulation on the procedure for public participation concerning EIA Study ("OGRS", No. 69/2005);



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- Regulation on the contents of the formal request for determining the necessity of EIA and the contents of the formal request for determining the scope of an EIA Study ("OGRS", No. 69/2005);
- Regulation on the contents of an Environmental Impact Assessment Study ("OGRS", No. 69/2005).

The formal EIA procedure in Serbia is not started until the stage of the project in which the permits for commencement of construction works and operation are applied for.

The full EIA procedure set in the 2004 Law on EIA takes about 260 days and comprises the phases of screening, scoping assessment and public consultation. It is expected that the revised EIA Law which is now in a process of adoption in the Serbian Parliament will facilitate the procedure and reduce the total procedure time to about 150 days.

The Law defines public participation at various stages of the EIA process. The public is informed at three different stages of the process and has the right to voice its opinion at each of these stages. At all stages the authorities have to, if requested to do so, provide complete documentation related to an environmental impact assessment (EIA) procedure, except for specified confidential business or state information.

The Law on Integrated Pollution Prevention and Control

As a part of the process of harmonization with environmental legislation, The Law on Integrated Pollution Prevention and Control (OGRS, No. 135/04) was enacted in 2004. The Law establishes rules for issuing integrated permits and is in accordance with the *EU IPPC Directive*. Although the majority of related by-laws were enacted in the period 2005–2007, the enforcement of the IPPC in Serbia practically has not been started yet. Only some pilot projects were realized in order to increase the capacities in the Ministry of Environment and the industry.

Preliminary list of 250 existing installations required to obtain an integrated permit was published by the Ministry of Environmental Protection and Spatial Planning in 2007. For the existing installations which are subject to IPPC, the Government should adopt a program of harmonization with the Law on IPPC by 2015. For new installations, the law becomes applicable as of the time of its coming into effect. At this moment it is not clearly defined when and how the enforcement of this Law will be implemented. It is expected that in the following period, the Government will adopt a Programme for coordination of specific types of industries with specific regulations of this Law, as well as limit values for air emissions and water discharge. Integrated permit will define operation conditions for installation (facility), comprising: implementation of best available techniques, conclusions stated in EIA study, limit values for emissions to air, water, soil, noise and vibrations, defined abatement systems, waste management, accident prevention/response measures and monitoring.



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According to the legislation, operators are obliged to ensure self-monitoring and to submit the results to the competent permitting authority. The Ministry of Environmental Protection and Spatial Planning (MEPSP) carries out the supervision over the implementation of this legislation. It carries out inspections through the environmental inspectors within the scope of activities set forth by this Law (especially over the installations and activities for which the permit is granted by the (MEPSP).

Law on Waters (OGRS No. 46/91, 53/93, 67/93, 48/94, and 54/96, and 101/05)

The Water Law of the Republic of Serbia, see Ref. 8.3, has been the most important legal basis for the protection of water use, and water management. In particular, this Law regulates *conditions for design, construction, operation and financing of water management* activities. The Law applies to all surface water and groundwater, including drinking water and thermal/mineral waters (Art.1).

Furthermore, Law on Water of the Republic of Serbia regulates the protection of waters; the protection from the detrimental effects of waters, land usage and management of the water as a wealth of general concern; the conditions and ways of carrying out the water management and inspection over the implementation of regulations of this law. The regulations of this law addresses all surface and ground waters, including drinking water, thermal and mineral water, as well as the boundary and trans-boundary water courses between the Republic of Serbia and other countries in the vicinity. The law stipulates that waters can be used only in a way that does not threat their natural characteristics, does not endanger the life and health of people, does not peril the wild plant and animal species, natural wealth and immobile cultural wealth.

The Permits related to Water Management should be obtained for the construction, modification and enhancement of water management facilities such as reservoirs, water supply systems, and any other facilities that may have an impact on water management process.

The prerequisite for a Water Management Permit is “Declaration of Consent”, which is granted by public authority i.e.:

- The Ministry responsible for water management, or
- The Municipality Department for Properties and construction

Declaration of Consent issued by the Ministry of Health and the Ministry of Environment is also necessary for water supply facilities. Construction of the facility must start within two years after the receipt of the Declaration of Consent.

The funding of water-related activities is outlined in Paragraph IX of the Water Law. The funding is provided for the following: the water use costs, protection of waters, drainage, irrigation, costs for substances extracted from water flows and costs related to the use of water management facilities and other services as well as the means of the budget of Republic of Serbia allocated for operations of public interest. Funds acquired from fees for use of waters, fees for water protection and fees for material extracted from water flows shall be paid to a dedicated account of the Ministry in charge for water management issues while funds acquired from drainage



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fees, irrigation fees and other services shall be the revenues of a water management company.

The Law further indicates that sources of water shall be protected by special measures and identified as zones of sanitary protection. These measures shall be allied to the surface of the water reservoir and 500 meters next to the reservoir bank. A Decision on identification and manner of sanitary zones protection shall be enacted by the Minister of Health and the Minister of Environmental Protection.

Law on Public Agencies and the Performance of Public Interest Activities

This law (OGRS no. 25/2000, 25/2002, 107/2005 and 108/2005), see Ref 8.4, regulates the status of public agencies, as well as the public interest activities with which they are entrusted. Public interest activities, in the sense of this law, beside others, refer to the activities in the fields of: railway, postal and air traffic; telecommunications; use, management, protection and improvement of public interest goods (waters, roads, mineral raw materials, forests, navigable rivers, lakes, river-banks, spas, game), as well as communal activities.

By their definition, public agencies perform activities which are recognized as activities of public interest. Public interest activities may be performed by economic agencies, that is, other forms of enterprises, parts of agencies and entrepreneurs, in accordance with the law which determines their legal status, when the authorities entrust them with the performing of such activities.

In broader sense a public agency is founded by the Republic of Serbia, while a public agency which performs communal activities or activities of interest for the work of local government can also be founded by the local government, through a decree passed by the local parliament or the parliament of the autonomous province.

The Law regulates the establishment of Public Utility Company, the internal organization, and the way of operating of Public Companies. A Company shall be established by a Founding Act and duly registered with the Serbian Business Registers Agency. Company regulations shall be defined in the Articles of Association/ Company Statute and any other documents required by Law.

Management is assured by a Manager who reports to the Management Board, which is the highest decision making body in the Company. The Management Board is supervised by a Supervisory Board who monitors the functioning of the Company, in particular the financial documents such as the annual report and proposals for the allocation of profits, and advises the Founders (the Municipality) accordingly.

The Law contains a numbers of provisions to protect the general interest in a Public Utility Company. The Municipality, in practice the Municipal Assembly, must approve the Statute (and eventual changes) and major policy issues, i.e. tariffs, disposal of company assets, capital investments, etc, and nominates the Management of the PUC, i.e. Supervisory Board, Management Board, and the Manager.



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The Ministry of Finance may send instructions to limit the annual increase in salary mass and tariffs. The annual accounts are submitted to the National Bank of Serbia and audited by external auditors. The Ministry of Finance through its Treasury sector controls financial aspects of the work of Public Utility Companies, which are indirect budget users.

The collection fees are set to cover for operational expenditures yet do not provide for full cost recovery which would enable investments. There is no tariff setting formulae and the increase of tariffs has been under Governmental control as of 2006 and the PUCs are obliged to set tariffs upon the projected increase in prices and salaries as determined by the Government of Serbia for the following year. Tariffs are also subject to the approval of the Municipality. The maximum annual increase for communal services is limited by the following acts: the Law on Public Companies and Performance of Operations of Public Interest, Article 22, and 22a and 22b; the Decree on Temporary Discontinuation of Proceedings regarding the Transfer of Budgetary Funds of the Republic of Serbia to Local Self-government Units, (Official Gazette 06/2006, from 23 January 2006) see Ref 8.5; and the Decree on manner and control of calculation and payment of salaries in public companies (OGRS 5/06) see Ref 8.6. According to the instruction no. 023-0263/2006, issued by the Ministry of Finance on 6th February 2006, see Ref.8.7, the fees could be increased by 9,3% cumulatively for the whole year of 2006. In year 2007, the limit is set at 7,5% and for the year 2008 at 10%

Law on Communal Activities

The law on communal activities, (OGRS no. 16/97 and 42/98 see Ref. 8.8) regulates communal activities and determines general conditions and ways in which they are to be carried out. Municipality, or town, organizes and provides the conditions for the performance of communal activities and their future development.

The performance of communal activities is based on the law and its regulations, and it is entrusted to the public communal or other type of enterprises, depending on the nature of a communal activity, actual conditions and needs of particular municipality, Communal activities, as defined with this law, are also communal service activities carried out in specific areas, as are the following:

- Collection and treatment of rain water and waste waters, which means collecting and disposing of waste, rain and surface waters from public areas by sewers, gutters, drainage or in other ways, their treatment and discharge from the network, the maintenance of sewerage networks, canals, gutters and other facilities for water disposal, cesspools cleaning, as well as used water collecting from the user's connection to the street network and draining through sewerage network, treatment and discharge from the network;
- Treatment and distribution of water (collecting, treating and distributing water to users for drinking and other needs, through the water supply network to the water meter of each user);
- Landfill maintenance (equipping landfills for safe disposal, treatment, neutralization and destruction of communal waste and waste with hazardous substances in towns and populated areas, as well as the selection and processing of secondary raw materials from the waste in landfills).



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The organization, operation and development of communal activities are ensured by a local government, especially through:

1. Material, technical and other requirements for construction, maintenance and functioning of communal facilities and for ensuring technical and technological system unity,
2. General conditions for permanent and continual carrying out of communal activities,
3. Necessary scope and quality of communal activities depending on the needs and material capabilities of users of these activities, material capabilities of the municipality, as well as possibilities for communal activities development,
4. Monitoring and control in carrying out of communal activities.

Carrying out of communal activities can be organized for two or more municipalities, that is, populated areas, under conditions regulated by the law and the agreement between those municipalities. Public communal services perform activities of water treatment and distribution and rain water and waste water collection and treatment (purification and distribution of waters, transport of passengers, maintaining clean settlements, green areas, roads, public lights, landfills for solid waste etc.) as the activities of general interest.

Law on Tourism and Tourism Development

The Law on Tourism was adopted in May 2005 and is in compliance with EU regulations in this field, (see Ref 8.9). The Law provides for various investment incentives for tourism industry and in particular, sets out the conditions for the declaration of a Tourist Area, definition of the Tourist Region, the way of operating of National and Local tourism organizations. Furthermore through this law the issues regarding tax amount and the way of tax charging is defined. It is interesting to point out that, according to this Law the a Tourist area is defined by the relevant Ministry for tourism and can be leased out to the private sector or to joint venture entity through tendering process.

Within the new Law, the Government has established Tourism Development Fund together with the separate program designed for managing and supporting different types of tourism development in Serbia. This fund is managed by the relevant national ministry and is used to finance the preparation of the national tourism strategy, training and investment programs, projects and infrastructure development, and other related activities that can help to improve investment conditions in the country. The Tourism Development Fund, set up in June 2005, regularly provides assistance to rural areas and popular spa centers. In 2006 around US\$ 8,5 millions were allocated to support investment in tourism including for Vlasina Lake.

The current Law on tourism was redrafted in order to compile with changes in tourism agency operation, and is expected for the law on tourism development to be adopted by the Assembly in the course of 2009.



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Tourism taxes

According to the existing Law, tourism taxes are levied by municipalities on hotel guests. In addition, where there are designated "tourist resorts" a Tourist Development Tax can be levied of which 80% would go into municipality funds and 20% into a government Tourism Development Fund.

Solid Waste Law

The institutions in Serbia in the solid waste sector operate under a regulatory framework that is determined at Central Government level. More precisely, the framework for Solid Waste Management (SWM) is provided by the Law on Waste adopted in 2008, (see Ref 8.10). The Law is in line with the relevant EU Directive. The specific objectives of this Law are:

- To ensure compliance with EU Directives;
- To promote efficient solid waste management by ensuring environmental protection and compliance with health and safety standards;
- To define the responsibilities at governmental levels: national, provincial, regional, and local level;
- To promote waste prevention, recycling and reuse;
- To develop methodology of waste disposal;
- To ensure rehabilitation of non-sanitary dumpsites;
- To promote public awareness;
- To introduce integrated planning system as of national to operational level.

Important features of this Law are:

a. Planning

The Government is obliged to develop a National strategy in combination with an action plan. Regional Waste Management Plans shall be prepared by two or more Municipalities while local Waste Management Plans shall be developed by a single Municipality. The planning horizon of all these plans is 10 years with a mid-term review/update. The operators are obliged to obtain an integrated solid waste management permit and to prepare an operational plan.

b. Actors

The Law distinguishes between the Parties that are obliged to set the conditions for SWM and the implementing Parties involved in SWM. The first category includes the Republic, the Autonomous Province of Vojvodina, Municipality or City, the Agency for Environmental Protection and the authorised professional organisations for waste testing and other organisation in line with the law while the second category comprises Producers, Owners, Waste Transporters as well as the Waste Treatment Facility and Landfill Operators.

c. Permitting and public information

Waste management permits are required for the activities listed below:

- (i) collection;
- (ii) transportation;
- (iii) storage;
- (iv) treatment, and



(v) final disposal of waste.

For two or more activities notwithstanding (i) and (ii) listed above, an integrated permit may be issued. Permits for activities in the territory of a group of municipalities are issued by the Ministry or by the Province. Municipality shall issue permits for collection, transport and temporary storage of waste in its own territory. The Operator submits requests for permits and the Ministry has to inform the public within 15 days of the receipt of the request.

d. Reporting

Municipalities, which have adopted a Regional Waste Management Plan, shall report on its Implementation every two years to the Ministry. The Ministry submits an annual environmental report to the Parliament. Producers and owners of waste shall maintain daily records on waste quantity, quality, generated and disposed of and report once a year to the Agency for Environmental Protection on waste delivered to the solid waste management facility, recyclable materials and waste and other materials transported to the facility. The Agency reports on its turn to the Ministry.

e. Supervision and inspection

The Ministry supervises the Agency and Directorate for Environmental Protection, Provincial authorities, Municipalities and Towns and authorized legal entities. Inspection is carried out by the environmental protection inspectors of the Ministry or by the inspectors at local level. The Municipalities are in charge of the inspection of collection, transport and temporary storage of non-hazardous waste. Inspectors are authorized to monitor implementation of solid waste plans, permits etc. prescribed by this law. Inspectors can order rehabilitation of the dumpsite/landfill after its closure and supervision of it up to 30 years after its closure. Inspectors can forbid storing, treatment or disposal of waste for the waste management facility for which the permit was issued.

f. Financing

Costs of solid waste management shall be aligned with the 'polluter pays' principle and shall include: costs of separation at source and collection, transportation, illegal dumping and closure/cleaning of such sites, other costs that are not covered by revenues and finally costs of design, construction and operation of solid waste treatment and disposal as well as costs of rehabilitation and maintenance of the site for the period of 30 years.

Law on Planning and Development

The Law on Planning and Development (OGRS no. 47/2003 and 34/2006), (see Ref. 8.11), regulates, among other things, the conditions and ways of planning and organizing space, the organization and use of construction sites and the construction of facilities. Law on Physical Planning of the Republic of Serbia (1996) completely includes the aspect of environmental protection in the development planning of the Republic. In the part of preparation of physical plan in other physical and urban plans related to urban and rural areas, there are envisaged measures that should move the development of settlements in Serbia in the direction of higher



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sustainability (for example). In order to achieve the Physical plan, elaboration of strategy for sustainable development of the Republic is envisaged.

As mentioned before, this Law proscribes that the conditions of environmental protection represent the obligatory part of arranging and construction in the framework of urban plans. Law also provides special for particular measures in the case of illegal construction, which represents a great problem for sustainable development of settlements in Serbia.

Issuing of construction permits is divided between the Republic, autonomous provinces, towns and local governments. The general rule is that the ministry for civil engineering issues permits (Article 89).

The Ministry (in this case the Ministry for Infrastructure of the Republic of Serbia) issues construction permits for the following relevant facilities:

- Interregional and regional facilities for water supply and sewage, systems for water supply and wastewater channeling in towns and urban populated areas with populations of over 100.000, facilities for the preparation of drinking water with capacity of over 40 l/s and wastewater filtering facilities in populated areas with populations of more than 15.000 or capacity of over 40 l/s;
- Dams and accumulations filled with water, barren remains or ash for which technical surveillance is instructed;
- Water management facilities for protection of urban and rural areas larger than 300 ha from large waters;
- Facilities and devices for waste removal through incineration and chemical techniques;
- Regional landfills for non-hazardous waste disposal for an equivalent of 200.000 citizens;
- Facilities for production, storage and destruction of hazardous substances and storage and destruction of harmful substances and hazardous waste;
- Highways and regional roads, road facilities and traffic adjuncts to highways and regional roads;
- Public railway infrastructure and adjuncts.

Communal services

Water supply and wastewater collection are defined as a communal activity (Law on Local Self-government 9/2002 (see Ref 8.1) which belongs in the real terms, to the Municipality. The Municipality may create to this purpose either a Public Utility Company (PUC), or entrust the activity to another enterprise.

The exploitation and development of public utility activities are financed from the sales of the products and services of the public utility. Other possibilities include compensations for the development and utilisation of construction land, voluntary local taxes, and other legally possible sources (grants and subsidies).



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Public utility activities may be organised for two or more municipalities together. In this case the municipalities will regulate their internal rights and commitments in a separate agreement.

Public Companies

The set-up of a PUC is regulated in the Law on Public Companies and Activities of Common Interest ("OGRS", no. 25/2000, 25/02, 107/05 and 108/05) (see Ref 8.4). The Law deals with the establishment, the internal organisation, and the operation of Public Companies. A Company shall be established by a Founding Act and duly registered with the Serbian Business Registers Agency. Company regulations shall be defined in the Articles of Association/ Company Statute and any other documents required by Law.

Management is assured by a Manager who reports to the Management Board, which is the highest decision making body in the Company. The Management Board is supervised by a Supervisory Board who monitors the functioning of the Company, in particular the financial documents such as the annual report and proposals for the allocation of profits, and advises the Founders (the Municipality) accordingly.

The Law contains a numbers of provisions to protect the general interest in a Public Utility Company. The Municipality, in practice the Municipal Assembly, must approve the Statute (and eventual changes) and major policy issues, i.e. tariffs, disposal of company assets, capital investments, etc, and nominates the Management of the PUC, i.e. Supervisory Board, Management Board, and the Manager.

The Ministry of Finance may send instructions to limit the annual increase in salary mass and tariffs. The annual accounts are submitted to the National Bank of Serbia and audited by external auditors. The Ministry of Finance through its Treasury sector controls financial aspects of the work of Public Utility Companies, which are indirect budget users.

The collection fees are set to cover for operational expenditures yet do not provide for full cost recovery which would enable investments. There is no tariff setting formulae and the increase of tariffs has been under Governmental control as of 2006 and the PUCs are obliged to set tariffs upon the projected increase in prices and salaries as determined by the Government of Serbia for the following year. Tariffs are also subject to the approval of the Municipality. The maximum annual increase for communal services is limited by the following acts: the Law on Public Companies and Performance of Operations of Public Interest, Article 22, and 22a and 22b; the Decree on Temporary Discontinuation of Proceedings regarding the Transfer of Budgetary Funds of the Republic of Serbia to Local Self-government Units, (Official Gazette 06/2006, from 23 January 2006); and the Decree on manner and control of calculation and payment of salaries in public companies (Official Gazette RS 5/06). According to the instruction no. 023-0263/2006, issued by the Ministry of Finance on 6th February 2006, the fees could be increased by 9,3% cumulatively for the whole year of 2006. In year 2007, the limit is set at 7,5% and for the year 2008 at 10%.



8.3 Policy Framework - National and Regional Development Strategies

8.3.1 National Level Strategies

The Government of the Republic of Serbia adopted and put into force in January 2007 *The Regional Development Strategy for the Republic of Serbia 2007-2012*², (see Ref 8.13). The strategy underlines the objective of infrastructure development in less developed regions of Serbia, as one of the most important requirements to achieve a balanced regional development and a sustainable economic and social growth in the Republic. In the year 2006 *National Environmental Action Plan* (NEAP), (see Ref 8.17) was adopted and put into force. This plan identifies policy objectives to be achieved and actions to be carried out in order to support the process of balanced social and economic development.

Both documents emphasize the need of tourism sector development and consequently, enhancement of relevant infrastructures (i.e. water and waste water network, waste water treatment, solid waste disposal, communal roads) in order to

- Ensure the supply of good quality services to the tourists in all regions;
- Enhance the capacity of municipal services and PUCs in the field of environmental protection in order to apply national and local regulations and to develop interregional cooperation.

Tourism Development Strategy

In the course of 2006, the Government of the Republic of Serbia adopted the Republic of Serbia tourism development strategy (see Ref. 8.13). The 'Tourism Strategy of the Republic of Serbia defines the objectives and priorities with regard to tourism development until 2015. This report is accompanied by two other documents: 'Second Report Competitiveness Plan' (from now on called Competitiveness Plan) and the 'Tourism Development Strategy of the Republic of Serbia: Second Report Strategic Marketing Plan' (from now on called Marketing Plan).

Furthermore, this strategy introduced, 20-odd tourism-related investment projects which have been identified as priority ones. For the purpose of this study, the most important among them is Master plan with business plan for tourism development on Vlasina Lake.

In general, the Tourism Strategy divides Serbia in four clusters: Belgrade, Vojvodina, South-West Serbia and South-East Serbia. For each of the clusters, priorities are defined and specific branding strategies developed. The aim is to brand it as a region that is 'still untouched, still undiscovered' and as a destination that one can visit all-year round.

Vlasina Lake is part of cluster South-East Serbia and regarded as one of its attractions and key destinations. Therefore, it is also estimated as one of the key investment projects.

² The Strategy was adopted on January 11 2007.



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In addition, the Tourism Strategy distinguished nine different tourism products, five of which should be further developed in South-East Serbia. These 'key products' are tours, special interests, mountains and lakes, health tourism and rural tourism. For Vlasina Lake, the category entitled as 'mountains and lakes' is defined as the most important. Priorities for this category are stated in the Competitiveness Plan.

Through strategy development process the following shortcomings have been identified in relation to the category "Mountains and lakes":

- Lack of management and promotion of the mountain and lake product;
- Poor road access and road maintenance;
- Low level of quality of transport by bus, train or taxi;
- Low level of quality of the system of protection, conservation and maintenance of culture and natural resources.

Sustainable Tourism Development

The Tourism Development Strategy emphasizes the importance of sustainable use of natural resources. This is, for example, expressed in the vision for tourism development in Serbia in general as in South-East Serbia in particular. Both visions stress that natural resources are highly valued. Reality is different, as the Competitiveness Plan indicates protection, conservation and maintenance of the natural resources are inadequate and improvement of it receives highest priority.

The policy documents, however, do not elaborate much on how sustainable use of the natural resources should be implemented. Only two objectives to realize sustainable tourism development are formulated. First, extension of natural parks is envisaged up to inclusion of 15%-20% of the territory of Serbia. Second, the Competitiveness Plan stresses that a selection should be made amongst possible lake destinations that will be developed for long-term tourist-recreational development, as to prevent proliferation of real estate construction by local population. By concentrating on certain areas, stress on natural resources in other areas will be less. This way, these natural resources can be protected and conserved in a more effective manner.



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Water Management Master Plan

The Water Management Master Plan was developed in 2001 by the Ministry of Agriculture, Forestry and Water Management and stipulates water supply objectives by 2021, (see Ref 8.14) These are:

- To provide water supply from public water supply systems for 90% of the population;
- To prevent and protect water sources, rehabilitate where required with a recommended regional approach;
- To construct, rehabilitate and upgrade water treatment facilities in compliance with local and European standards;
- To rehabilitate and develop water distribution network and to introduce measurement, monitoring and control;
- To provide specified unit consumption rates – for urban population 600 l/capita/day (including population itself, industries, institutional and public demand, losses) and for rural population 400 l/capita/day (population, cattle, public, losses).

The National Waste Management Strategy

National Waste Management Strategy (NWMS), approved in 2003, provides a comprehensive policy framework for rational and sustainable waste management in the country, (see Ref 8.15). This Strategy is confirmed in the Final National Environmental Strategy (NES) and the corresponding National Environmental Action Plan (NEAP). The NEAP component dealing with Waste Management for the period 2005 – 2009 identifies several policy objectives and actions. The policy objectives which are most relevant for the Pcinja district are the following: to construct sanitary landfills in each region by 2014 according to the technical and operational requirements of the Landfill Directive 99/31/EC; to develop integrated waste management plans; to (safely close and) re-cultivate dumpsites that pose the greatest environmental risks) and to increase recovery and recycling of packaging waste (glass, paper, cardboard, metal and plastics) to 25 % of their volume.

A number of EU Directives was prioritized for transposition into Serbian Law. Relevant for Waste Management are the EU Directives on Packaging (2005/20/EC) and the Landfill Directive (1999/31/EC). Furthermore, Serbia is a signatory to the Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and their Disposal. Harmonization with this convention as well as with the EU legislation is of special significance.

8.3.2 Regional Level Strategies

Tourism and Regional Socio/Economic Development Program

The integrated plan for socio economic development of Serbia 2005/2007 was prepared by EAR in May 2005. It tackle the issue of regional development for the less developed southern region of Serbia and provides the basis for Regional Socio/Economic Development Program (RSEDP). The RSEDP covers Pcinja and Jablanica district. The importance of this program is that it could be viewed as an preparatory step for European Economic Social Cohesion Policy.



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During the preparation of this Integrated plan, the Spatial Plan covering the Area of Infrastructure along Corridor 10 from Nis to the Macedonian border was taken into consideration. In this plan development of tourism at regional level has been recognised as one of the strategic goals to be achieved by 2015. More precisely, the objective is to *develop tourist potential in Southern Serbia and to create a better tourist image as tourist destination*.

The plan recommended that investment in tourism should be targeted at

- Improving the image of the region as a tourist destination;
- Improving the educational level of human resources engaged in tourism sector;
- Improving the tourism organisations functions;
- Increasing the accessibility and visibility of tourist attractions and developing new tourism products.

In relation to regional tourism development, Vlasina lake has been recognised as one of the key tourist attractions, especially for the recreational purpose (rural tourism and hunting).

Regional Waste Management Plans

According to National Waste Management Strategy and Regional Waste Management Plans the overall territory of Serbia is operatively divided into several regions in charge for waste management within their territory. Each region has specified number of municipalities, emphasized transfer stations, regional landfill, recycling centre and composting centre. According to this division Vlasina site belongs to the group of Pcinja region. For waste disposal from Surdulica and Vlasina to Regional landfill it is still necessary to decide between Vranje and Leskovac regional landfill.

8.3.3 Local Level Strategies

The Strategic Development Plan of Surdulica Municipality (2007-2011)

The plan was prepared by Surdulica Municipality in January 2007. However, the Development Plan has no section devoted to tourism nor is there much mention of tourism despite of the importance of Vlasina Lake as one of the primary destinations for visitors in South Serbia. Some importance of Vlasina Lake has been recognized but only in terms of its natural resource, the flora and fauna. There is also a section devoted to the need to preserve cultural heritage in the area with a list of specific historic buildings and structures that need to be protected. However, the SWOT analysis in the plan mentions that "tourism development" is an opportunity.

8.3.4 Spatial Plans

Spatial planning aspect in the region has three-level foundation:

1. Spatial plan of the Republic of Serbia from 1996;
2. Spatial plan for the special use area of Vlasina from 2004; and
3. Spatial plan for the Municipality of Surdulica from 2007



Spatial plan of the Republic of Serbia,

which designates the entire area of Vlasina as a precious spring of underground waters, stipulates that water and water infrastructure have the most important status indicated by the spatial and underground water area protection. Additionally, this area was identified in the Spatial plan of the Republic of Serbia as one of six priorities of the Republic of Serbia tourism development.

Following on the Spatial plan of the Republic of Serbia, the production of the *Spatial plan for the special use area of Vlasina* had to be tackled, as a plan of a lower order whose aim was to identify objectives and organizational policies and concepts regarding the arrangement, use and protection of the area of Vlasina, especially from the point of view of the protection of natural wealth, particularly water springs and sources, that is the development of tourism. This plan gives rise to the management program with regard to the area of outstanding features of Vlasina for the period 2006-2011.

Spatial plan for the Municipality of Surdulica, as the lowest ranking amongst the three cited documents, aimed to identify and engage spatial capacities of the Municipality of Surdulica, taking account of other, higher-ranking plans with respect to the protection of natural resources (based on the starting point of Spatial plan for the special use area of Vlasina), along with bringing in line the economic and particularly tourist development with the natural wealth of Vlasina.

Studying and evaluating the content of these documents result in the realization that the focus is on the development principles and frames connected with the idea of sustainability and the need for comprehensive, long-term protection of this area.

Frames proposed in the stated documents which are of particular importance for this Master plan are the following:

- Three main development zones have been envisaged on the Vlasina Lake (according to functional wholes) - Vlasina Rid, Vlasina Stojkovicева and Vlasina Okruglica
- 13 tourist sub-zones have been envisaged too
- Two separate locations have been planned, outside of the settlements, in terms of a camp and a hunting lodge.

8.4 Institutional Analysis

8.4.1 National Level Institution

In relation to water issue, **the Ministry of Agriculture, Forestry and Water Management** is responsible for the entire water sector in Serbia. The Directorate for Water is part of the Ministry, and it is consisted of the following departments:

- Department for Analytical Studies and Administrative Tasks in Water Management;
- Department for Water Supply and Protection;
- Department for Water-Related Inspections.



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Investments can be provided through the Ministry of Agriculture, Forestry and Water Management with their Directorate for Waters and Wastewaters.

Ministry of Infrastructure is directly involved in infrastructural policy planning and development. In 2006, the **Ministry of Finance** launched the National Investment Fund that is managed by Ministry for NIP in coordination with **Ministry for Infrastructure** and the **Ministry of Local Governments** in the sector of municipal infrastructure.

The Ministry of Environmental Protection (MEP) is the main environmental authority in Serbia. The main responsibilities are to ensure environmental protection, sustainable use of natural resources (air, land, minerals, fish, flora and fauna species), conservation of nature, and identification and implementation of measures to protect natural areas of significance to the country.

The Public Companies and State Aid Sector of the Treasury Department (**Ministry of Finance**) monitors the performance of the PUCs. The PUCs are monitored for salary levels and are given instructions and approval on their annual plans.

The Standing Conference on Towns and Municipalities (SCTM) serves as a Professional Association for all municipalities in the country. The members pay an annual fee in accordance with their size and their budget. The SCTM acts as a platform for exchange of best practices and advocacy. Municipal Water and Wastewater operators are united in professional associations, namely the Association for water technology and sanitary engineering and Waterworks Association.

Brief overview of environmental Institutions in Serbia

Several other authorities are also involved and responsible for important issues related to the environment; some of them are the following:

Institutes of Public Health are responsible for air and noise monitoring; soil; solid and liquid waste materials; chemical accidents; non-ionizing and ionizing radiation; microclimate elements; illumination and microbiological indicators; tracking the state of population health in relation to environmental risk factors caused by the environment (health risk assessment); and implementing measures for improving environmental protection. Institute for public health – Vranje is responsible for the abovementioned tasks in the area of Pcinjski region.

The Republic Hydro meteorological Institute is in charge of systematic monitoring and quality analysis of surface and underground water; issuing warnings in case of accidental contamination of water; and special monitoring during water contamination caused by the accident.

The Institute for the Protection of Cultural Monuments is in charge for protection of historical heritage. Local office in the city of Nis is responsible for the Pcinjski region.



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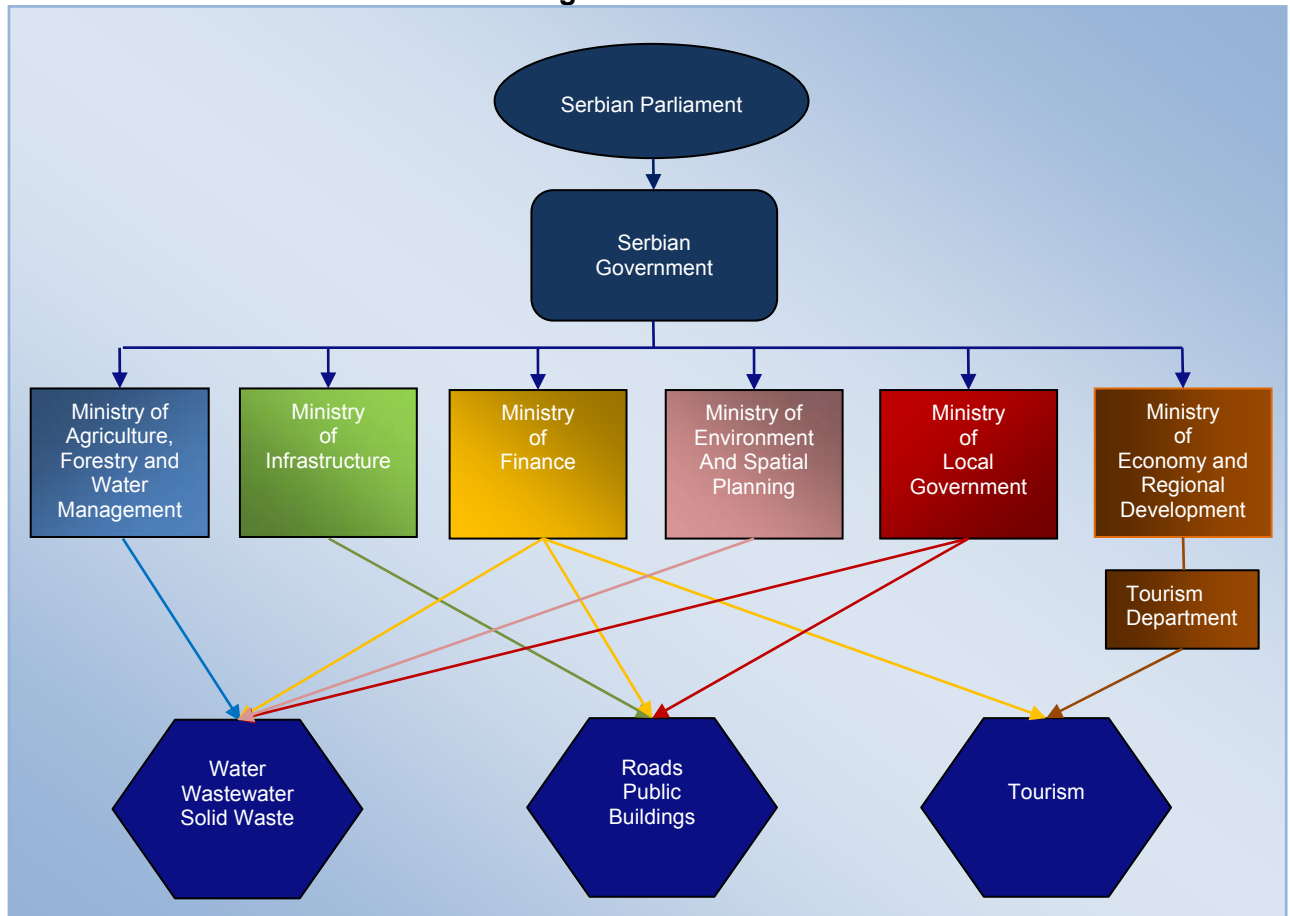
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Republic Institute for Nature Protection is in charge for categorization of all natural heritages, maintaining the inventory and preparing the adequate proposals for categorization and protection for approving by the responsible authorities. Local office in the city of Nis is responsible for the Pcinjski region.

Figure 8.1: Water/Wastewater/Solid waste/Infrastructure and Tourism Management in Serbia



8.4.2 Regional Level Institutions

Regarding planning for tourism development the role of Government at Regional Level is mainly coordinative and very limited. As mentioned before inside project area still there is no official regional organization fulfilling tourism or planning functions, though such organization is expected to be established in the near future.

8.4.3 Municipal Administration

Municipalities are headed by Mayors, who is regularly elected by Municipal Assembly. The Mayor is heading The Municipal Council, executive branch of the Local municipal government. The Municipality is responsible for the provision of communal services to its citizens and usually handles this by funding Public

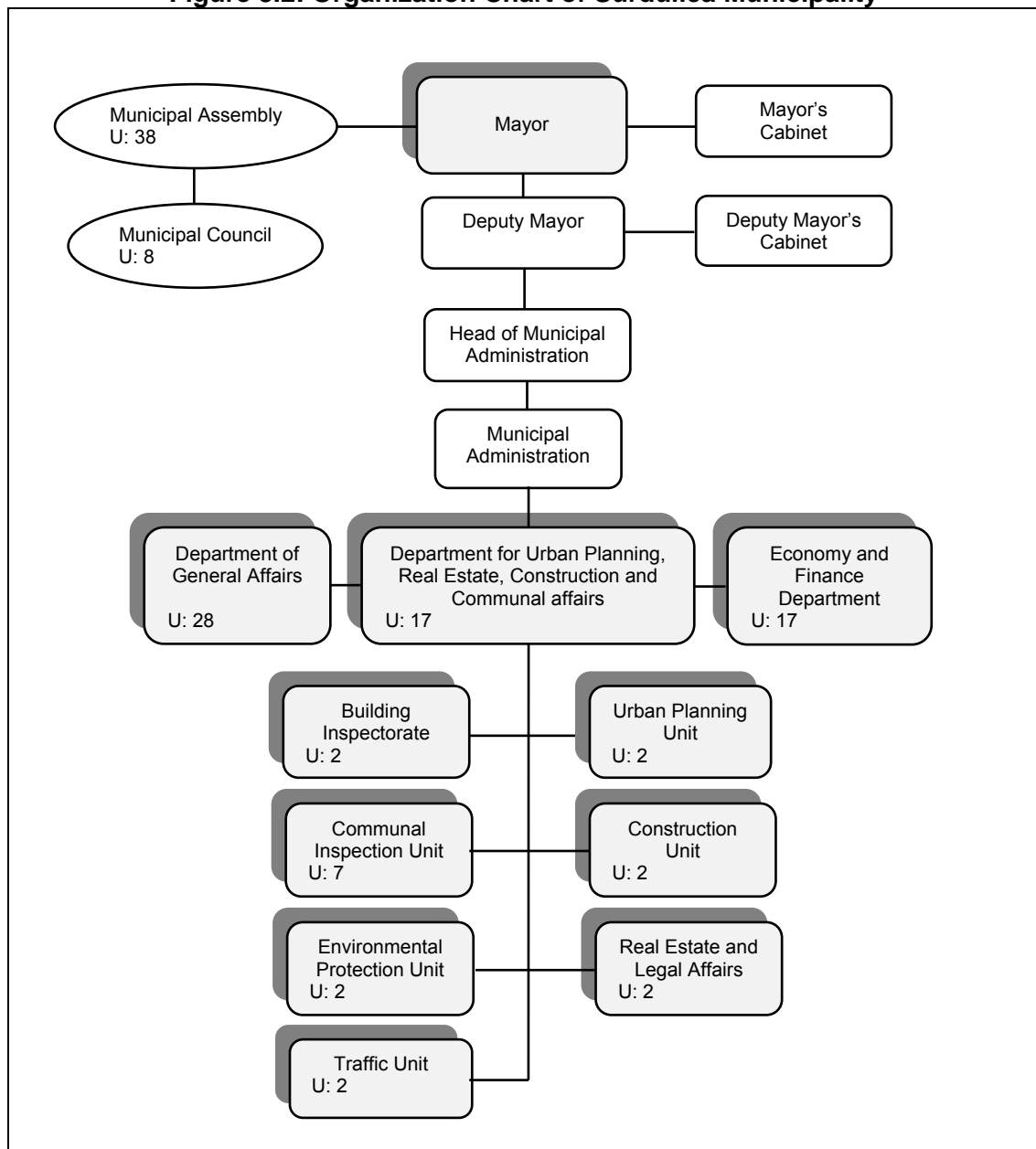


Enterprises and Public Utility Companies, which may offer combined or sector-specific services. Although, PUC is covering its direct operational and maintenance costs, it has to rely on the respective Municipality for the necessary investments. The Council needs to propose to Municipal Assembly to ratify the major decisions of the PUC, most notably tariffs and Annual plans.

8.4.4 Surdulica Municipality

The figure 8.2 summarizes the organization of the Surdulica Municipality.

Figure 8.2: Organization Chart of Surdulica Municipality





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Departments/Units directly connected to the PUC include: Economy and Finance Department the Urban Planning Unit and Real Estate and Legal affairs Unit, and partially the Inspection and Environmental Protection Department.

Under the overall supervision of the Mayor the Urban Planning Unit approves and controls the water, waste water and solid waste projects submitted by the PUC and/or other international development organizations, while the Environmental Protection Unit controls the projects from the environment protection point of view. Economy and Finance Department allocate sufficient financial means for implementation of different projects.

Departments/Units directly connected to the PE Land and Roads Construction Directorate (LRCD) (Land Development Public Agency) include: the municipal department for Economy and Finance, Urban Planning, Real Estate and Legal affairs, Traffic and Construction Units.

Under the overall supervision of the Mayor the above mentioned Departments.-Unit approve, relocate necessary funds and control the road and public building construction projects submitted by LRCD and/or other international development organizations. At the same time the Environmental Protection Unit controls the projects from the environment protection point of view.

Departments/Units which are in general, considered to be the most influential on the local operating of Local Tourism Organization are: Department for Economy and Finance and Department of General Affairs and Real Estate and Legal Affairs Department.

8.5 Statutory Documents PUC, LRCD, TO

The Law on Public Utility Companies (OGRS RS No. 25/2000, 25/2002 and 107/2005 and 108/2005), see (Ref 8.4), envisages that the PUCs/PEs must have a Founding Act and the Statutes to define their contents.

The **Founding Act** is the agreement to establish and operate the activities of public interest (water, wastewater, solid waste, roads, tourism promotion, etc.) wherein the company's rights and obligations to the Founder are defined in detail. The Founding Act defines (i) the purpose of the Company, (ii) the resources (capital) put at the Company disposal, (iii) the rights and obligations of and to the Founder, (iv) decision making, and (v) eventual profit sharing (vi) measures for environmental protection.

The **Statutes** are more detailed documents which determine roles and responsibilities of governing bodies Public Companies, organizations and enterprises, and provide a list of general enactments containing rule books, books on procedures and role of labour unions.

Usually the PUC's/PE's as well as TO governing bodies consist of: the Management Board, Supervisory Board, and PUC Director.



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The Statutes of PUC, Land and Road Construction Directorate and Tourist Organisation of Surdulica are attached in (Annex 8.16)

The set of above mentioned documents is prescribed by law, and is prerogative for the establishment of company's operations. However, it does not set performance levels for which the company would be responsible for to its Founder. The legal background that may enable introduction of additional agreements relevant for PE, PUC and is stipulated by the Law on Public Utility Companies (OGRS, no. 25/2000, 25/2002, 107/2005 and 108/2005 hereinafter: the Law, (see Ref 6.4), states in Article 8 that in addition to the Founding Act and the Statutes a contract may be concluded between a public utility company and a local self-government unit. The Contract may contain specifically provisions regarding: 1) work and operations of the company; 2) rights and obligations regarding utilization of the funds in state ownership for performing of the activities of common interest, in accordance with the Law; 3) company obligations regarding provision of conditions for continuous, tidy and quality satisfying of the consumers' needs for products and services; 4) mutual rights and obligations in case that economic and other conditions for performing of the activities of common interest are not met; 5) rights and obligations in case of disturbances in company operations; 6) other rights and responsibilities deriving from the provisions of the Law regulating performance of individual activities of common interest and of this Law; 7) other questions important for resolving and protection of the common interest.

Although there is a legal possibility for this type contracts to be prepared, this is not common practice in Serbia. Internationally, defining financial, operational and managerial requirements in a contract is usually done through the management contract or more specified Service Level Agreement (SLA). The purpose of such agreements is to define responsibilities within the company, at the same time as to limit the influence of the authority (the Founder) in day-to-day management including tariff setting. Experience with a SLA has been gained in Serbia for drinking water and wastewater with the PUC of Subotica Municipality

8.6 Recommended Institutional Structure

It is consultant's opinion that there is no need to establish a new public enterprise/company to implement and manage the project. Namely, already existing public bodies in Surdulica municipality (PUC, LRCD, TO) demonstrate sufficient potential to carry out these tasks on the condition that their human resources are strengthened in terms of the number of people employed and their professional qualification.

As a matter of fact, at present time, the PUC of Surdulica manages operating and maintenance of the water, waste water and solid waste systems in the municipality. On the other hand, LRCD is taking care about roads and public building construction and maintenance. Finally, in spite of its still weak structure, TO has been doing its best in the tourism sector.



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The project envisages implementation, management and operation of six components where each one falls within the scope of one of the above mentioned bodies. In particular:

- Water, waste water collection and treatment and solid waste fall within PUC's responsibility and scope;
- Communal roads and tourism centre construction falls within LRCD's responsibility and scope;
- Management and operation of tourism information centre fall within TO's responsibility and scope;

The project process shall be divided into two phases: the first one should initiate after signing the contract/s between the municipality and the financial institution, and would finish after the construction works are technically accepted. The second one starts with the technical acceptance of the works and lasts all the operation long.

A synthetic project process diagram is shown in figure 8.2.

1. First Phase

To implement and manage the project as a whole, the Project Implementation Unit (PIU) should be established. This unit would have overall responsibility over the project implementation and management, until the works of each project component are technically accepted.

PIU will be supervised by a Management Board and managed by a project manager. The Management Board will be composed of 4 members: one appointed by the Municipality, one by PUC, LRCD and TO respectively. PIU will report to the Municipality/Mayor.

Under PIU's supervision and control Surdulica PUC and LRCD will be responsible for the implementation and management of the pertinent project components. In particular:

- a) "JP Vodovod" shall take care of the construction, in all their phases, of the:
 - Water distribution system
 - Waste water collection and treatment
 - Solid waste collection and disposal
- b) The Land and Roads Construction Directorate shall take care for the construction, in all their phases, of the:
 - Communal roads
 - Touristic paths
 - Tourism information Centre

It will also be PUC's and LRCD's responsibility the operation and maintenance of the works carried out starting from their technical acceptance.

2. Second Phase

The second phase starts immediately after the technical acceptance of the works is carried out. To implement and manage the operations of the second phase it is needed to establish a Tourism Advisory Monitoring Unit (TAMU) that will monitor and evaluate project activities and performances. Also, TAMU will provide its advice in the case redirection of the project operations is needed.



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TAMU will be supervised by the Management Board and managed by selected project manager. The Management Board will be composed of 4 members: one appointed by the Municipality, one by PUC, LRCD and TO respectively. TAMU will report to the Municipality/Mayor.

Under TAMU's supervision and control the local Tourism Organization will be responsible for the implementation and management of all the operations related to tourism information and development including the management of the Tourism Information Centre.

In Tourism Information Centre the following activities (as rough guide) should be carried out:

- Tourism related trainings,
- Promotion and information spreading
- Educational activities associated with tourism and environmental issues on Vlasina area.

TAMU will also monitor PUC's and RLCD's performances in the operation and maintenance of the infrastructures built during the first phase of the project.



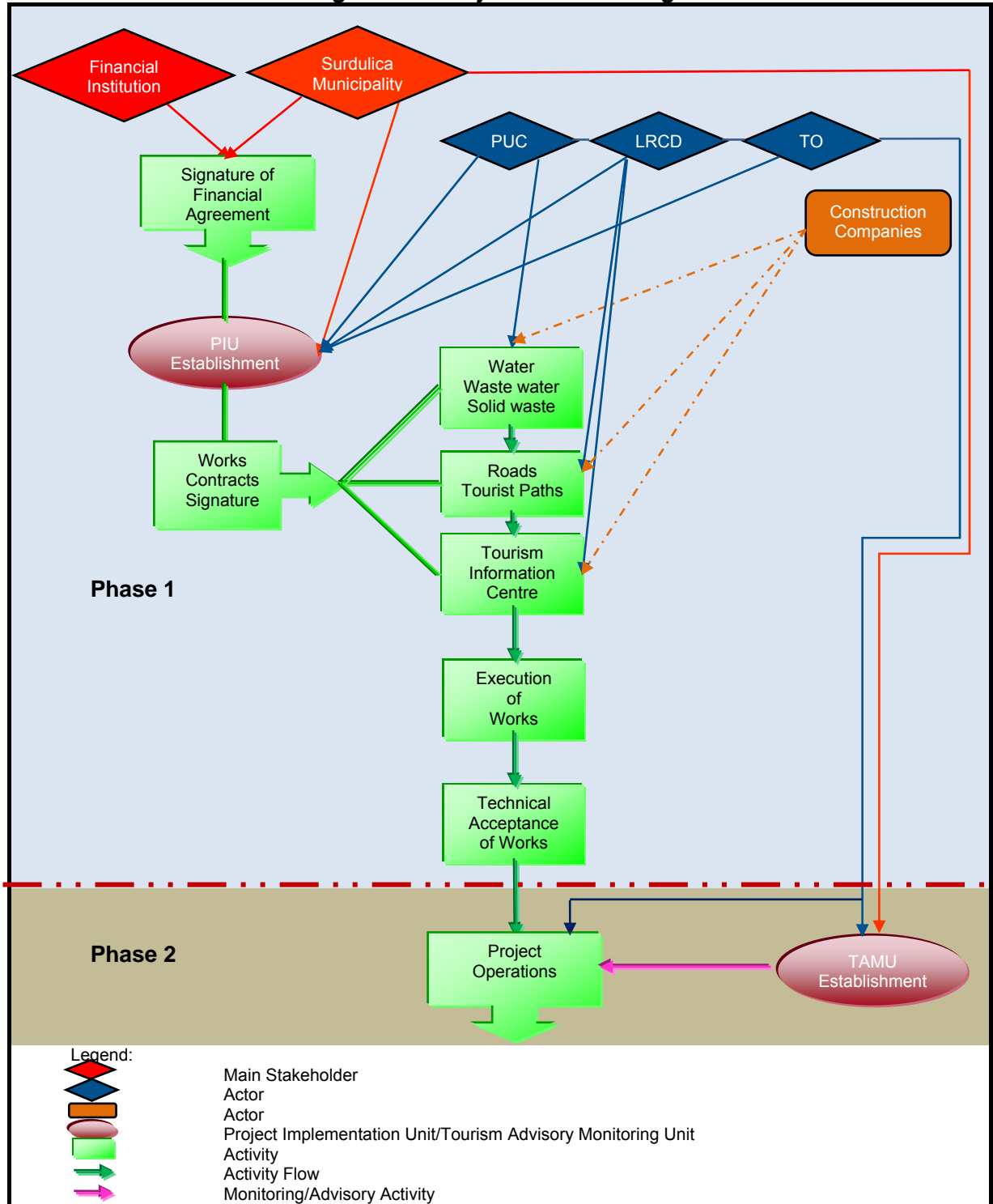
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Figure 8.3: Project Process Diagram





8.7 Legal Implication

Ownership and Transfer of Assets

Municipalities in Serbia and consequently the PUCs and PEs established by them are “pro forma” owners of their property, which is given to them by the Republic of Serbia. This means that the Municipalities are legally limited as to the issue of disposing of their property. They can only use them as “tenants” (occupying their premises indefinitely without paying any “rents”), whereas the State of Serbia decides upon changes in property ownership. Therefore, the Municipalities cannot use “their property” as collaterals if commercial banks granting loans require them to do so. However, there are other, equally firm, means that the Municipalities can use as collaterals.

Borrowing Capacity of the Company/Enterprise

Since PUC, LRCD and TO are non profit generating companies and, as a general rule, operate at 0% profit, it is quite difficult for them to draw investment loans at the capital market. In most cases PUCs and PEs are approaching capital markets only with the support of their local governments. In these cases, PUCs and PEs get the proceeds of a loan, but the local government carries the liability and only sometimes on-lends this to their PUCs/PEs.

The PUCs/PEs in Serbia relies on their founders, the municipalities, for capital borrowing and for any major investments.

According to the new Law on Budget System (2002) municipalities have equal borrowing rights as any other company in trade market. The difference is in providing collaterals. Each municipality has an account with the State Treasury, through which all the transfers from the State budget are directed to the Municipality. In case of borrowing, the bank usually requires signing a letter of authorisation with the Municipality to debit their account with the Treasury for any outstanding loan repayment. This proves to be rather firm collateral since the Municipalities have regular transfers from the State and therefore loans practically bear very little risk of being repaid.



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8.8 Risks for the Implementation

Table 8.1: Matrix of the risks

Risk	Category Financial, Environmental, Operational, Institutional Socio-economic	Probability H: High M: Moderate L: Low	Adverse effect From: 1 (Severe To: 5 (None)	Mitigation measures (for effects 1, 2 and 3 only)
PROJECT PREPARATION				
<i>Failure to sign the Financial Agreements</i>	Financial	M	4	
PROJECT IMPLEMENTATION				
<i>Limited project implementation capacity available</i>	Operational/ Institutional	M	3	Capacity enhancement programs in Municipal PUCs, LRCD and TO

8.9 References

- Ref. 8.1 Law on Local Self Government, (OGRS No. 9 /02)
- Ref. 8.2 Law on Environmental Protection (OGRS No. 135/04)
- Ref. 8.3 Law on Waters (OGRS No. 46/91, 53/93, 67/93, 48/94, and 54/96, and 101/05)
- Ref. 8.4 Law on Public Utility Companies, (Zakon o javnim preduzecima), (OGRS No. 25/2000, 25/02, 107/05 and 108/05)
- Ref. 8.5 Transfer of Budgetary Funds of the Republic of Serbia to Local Self-government Units, (Official Gazette 06/2006, from 23 January 2006)
- Ref. 8.6 Decree on manner and control of calculation and payment of salaries in public companies (OGRS 5/06)
- Ref.8.7 Instruction no. 023-0263/2006, issued by the Ministry of Finance on 6th February 2006,
- Ref.8.8 The Law on Communal Activities ("Official Gazette of The Republic of Serbia" No.16/97 and 42/98)
- Ref. 8.9 The Law on Tourism, adopted in May 2005
- Ref. 8.10 Law on Solid Waste adopted in 2008
- Ref. 8.11 The Law on Planning and Development (OGRS no. 47/2003 and 34/2006)
- Ref. 8.12 Environmental Protection Law (OGRS No. 135/04)
- Ref. 8.13 Regional Development Strategy for the Republic of Serbia 2007-2012
- Ref. 8.14 Water Management Master Plan
- Ref. 8.15 National Waste Management Strategy
- Ref. 8.16 The Statutes of PUC, Land and Road Construction Directorate and Tourist Organisation of Surdulica
- Ref. 8.17 National Environmental Action Plan (NEAP)