



Republic of Serbia

Ministry of Mining and Energy

Ministry of Finance

Department for Contracting and Financing of EU
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ЗА ТЕБЕ

Further Development of Energy Planning Capacity

EuropeAid/135625/IH/SER/RS

Contract no: 48-00-00140/2019-28

Public Consultations Report



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Public Consultations Report

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1. INECP SCOPE AND PROCESS DESCRIPTION

1.1 Overview of NECP and key objectives

By gradually harmonizing national legal framework with the EU acquis, the Republic of Serbia performed numerous legislative alignments in the areas of climate change, environment, and energy. The Republic of Serbia prepared Integrated National Energy and Climate Plan (INECP) covering the period up to 2030 in response to the Recommendation of the Ministerial Council of the Energy Community (2018/1/MC-EnC) on preparing for the development of Integrated National Energy and Climate Plans by the Contracting Parties of the Energy Community and relevant Policy Guidance by the Energy Community Secretariat (PG 03/2018). The structure and content of the INECP is prescribed by the EU Governance Regulation 2018/1999.

The Integrated Energy and Climate Plan along with the related Strategic Environmental Impact Assessment Plan of the INECP constitute the key instrument for the GHG emissions reduction in the Republic of Serbia. Furthermore, the project will improve the process of energy planning in the country, incorporating the EU policies on climate change mitigation and environmental protection, in the context of the country's accession to the EU and obligations of the Energy Community Secretariat.

The five dimensions INECP addressing in an integrated way, as per provisions of the Rulebook on the detailed content and guidelines for determining the national goals of the Integrated National Energy and Climate Plan, the method of its preparation and reporting on its implementation (Official Gazette of RS, no. 49/22), are: Decarbonisation, Energy Efficiency, Energy Security, Internal Energy Market, and Research, Innovation and Competitiveness. For all five dimensions of the Energy Union national objectives and targets and respective policies and measures have been included, of which 67 are reform policy measures and 100 are investment policy measures. The mandatory structure and the content of the INECPs is outlined in Annex I of the Governance Regulation and includes Section A describing National Plan and Section B describing Analytical Bases. The INECP provides two chapters describing impact assessment of the current situation and projections with existing policies and measures (WEM) scenario and with additional measures (WAM) scenario.

Increased penetration of RES in energy mix along with targeted energy efficiency measures aiming to reduce the final energy consumption by increasing energy performance represent key priorities of the plan. This clean energy transition pathway tends to enhance the energy security, safeguards energy dependency while ensuring a realistic reduction of lignite use, by up to 25% in 2030 compared to 2019, contributing to a meaningful reduction of the GHG emissions by 2030. The target for the overall GHG emissions reduction for 2030 is 40.3% compared to the 1990 levels (including LULUCF). Objectives of all five INECP dimensions will consequently contribute to the meaningful reduction of the GHG emissions by 2030. Two main objectives of Energy Efficiency improvement include restraining final energy consumption at the level of 9.7 Mtoe in 2030 and primary energy consumption at the level of 14.68 Mtoe in 2030, by implementation of planned policies and measures for renovation of existing building stock, designing of efficient financing mechanisms, and promotion of innovative financing instruments.

The draft Strategic Environmental Assessment (SEA) of the INECP report describes, evaluates, and assesses possible significant impacts on the environment that may occur through the implementation of the INCEP and determines mitigation measures to reduce negative impacts. The assessment integrates the objectives and principles of sustainable development into the INECP, while considering the need to avoid or limit negative effects of policy measures of the INECP dimensions.

1.2 Description of NECP process and the associated timeline

The process of developing and preparing the Integrated National Energy and Climate Plan has been launched in 2021 within the framework of the project “Further Development Energy Planning Capacity”. The Government of the Republic of Serbia represents the national adoption authority for a period of up to ten years, as per the Law on Energy, while the Ministry of Mining and Energy (MOME) is responsible for the preparation of the INECP in cooperation with other relevant ministries. During the development and preparation of the document, the Consultant provided technical support to the MOME, as well to the other institutions and bodies involved in the process.

Following the identification of the relevant institutions, bodies and companies, the Working Groups have been established. At the beginning of 2021, two Working Groups (WG) were established, composed of numerous representatives of the relevant institutions and major companies from the public and private sectors. Specifically, WG1 is modelling-orientated and responsible for analytical work, while WG2 is policy-orientated and tasked with the drafting of the INECP.

Discussion sessions and overall communication is realized through the Working Group meetings that have been held regularly, but also through the introduction of the regularly conducted meetings dedicated to each of the five dimensions. A series of bilateral and multilateral meetings have been held with various stakeholders, resulting in 14 Working Group meetings and about 50 bilateral meetings. Three more Working Group meetings are planned by the end of the project. The set data for the end of the project is 8 December 2023. The INECP consultations with the other Energy Community Contracting Parties that are developing and preparing their INECPs in parallel with the Republic of Serbia, have been realized through the already existing bodies and mechanisms for regional cooperation.

The Energy Community Secretariat has been closely following the progress of the overall process from the beginning of the development, providing the necessary support. Formally, this involvement of the EnC Secretariat is realized through the work of Ministerial Council of the EnC, as well as within the various existing thematic coordination groups, platforms, and initiatives at the level of the Energy Community, but also other regional energy-related and climate-related formats where Energy Community actively participates. Once the draft INECP had been completed, the Republic of Serbia has submitted the document to the Energy Community Secretariat for the purpose of consultations and provision of recommendations.

Timely opportunity should be given to the public to effectively participate in the drafting of the INECP document and SEA of INECP through public consultations, cross-border consultations, and public hearings. Consultations with the Energy Community Secretariat are carried out as part of public consultations. Consultation with the region is implemented in parallel with the public consultation of the Draft Plan. The results of this consultation process will be incorporated in the final version of the plan. After the completed consultations and public hearings, report on the held public consultations, cross-border consultations, and public hearings on the Draft INECP and SEA of INECP is prepared, which lists the submitted comments and sources of comments, as well as information whether the comments were accepted or not with adequate explanations. These reports are published on the MOME website.

MOME should play a strong coordination role in the post-project implementation period to ensure the continuous operation of the Working Group. This would be crucial for the use of the modelling capability in future updates of the energy strategy of the country as well as in the monitoring and revision of the INECP and any other Energy Policy obligations of the country.

The process of INECP drafting was presented before the Serbian Parliamentary Energy Policy Forum on 8 February 2022. Early public consultations on Draft INECP published working scenarios (Scenario 1, Scenario 2, Scenario 3, and Scenario S) were conducted by MOME in the period from 9 August 2022 to 5 September 2022.

During the process the interested parties were invited to share their comments, suggestions and questions on the mentioned scenarios, with the note that no comments were submitted on Scenario 6 (Fit for 55), since it was done with the sole purpose of the insight into scenario with objectives of the Republic of Serbia being equal to the EU objectives.

Public Consultation on Draft INECP was held in the period from 13 June to 27 July 2023, and Public Consultation on Draft SEA of INECP in the period from 23 June to 5 August 2023. During the Public Consultations, three joint Public Hearing sessions were held for INECP and SEA of INECP, in Belgrade on 11 July, in Novi Sad on 12 July, and in Niš on 14 July 2023. After the completion of the public consultation process, the process of preparation of Final versions of INECP and SEA of INECP was conducted in the period from August to October 2023. The graphical representation of the described Public consultation timeline is given in Figure 1.1.



Figure 1.1: Public Consultation on consolidated Draft INECP & Draft SEA of INECP timeline

In addition to public hearing events, civil society organization the Belgrade Open School (BOS), in cooperation with the Renewables and Environmental Regulatory Institute (RERI), organized Green Talks on the topic of the Integrated National Energy and Climate Plan. The event was held in Dorćol Platz on June 28, 2023, and brought together more than 50 representatives of the Ministry of Mining and Energy, international organizations, local associations, the academic community, experts in the field of energy, activists. The Civil Society for Energy Transition project is financed by the British Embassy in Belgrade, and the Belgrade Open School implements the project in cooperation with the Renewables and Environmental Regulatory Institute (RERI) and seven other local partners, in the period from December 1, 2022, until March 31, 2024.

Also, a meeting was organized in a hybrid format within the three working groups of the National Convention on the EU by an environmental and development organization Center for Ecology and Sustainable Development - CEKOR on 25 July 2023. Thematic discussion and recommendations were mainly on INECP ambitions, nuclear scenario analysis and Strategic Environment Assessment impact of the plan.

2. KEY POINTS OF THE PUBLIC CONSULTATION EVENTS

2.1 Public hearing event in Belgrade

The first public hearing event was held in Belgrade in the organization of Chamber of Commerce and Industry of Serbia on 11 July 2023. In the Table 1, participants from the Ministry of Mining and Energy, Chamber of Commerce and Industry of Serbia and consultants are listed.

Table 1: Participants from the Ministry of Mining and Energy, Chamber of Commerce and Industry of Serbia and consultants

	<i>Participant</i>	<i>Organization</i>
1	Dubravka Đedović	Minister of Mining and Energy
2	Marko Čadež	President of the Chamber of Commerce and Industry of Serbia
3	Milan Aleksić	Assistant minister of Mining and Energy
4	Veljko Kovačević	Special Advisor in Ministry of Mining and Energy
5	Biljana Ramić	Head of the office for the strategic planning in the energy sector at Ministry of Mining and Energy
6	Sofia Nikolakaki	LDK Consultants
7	Dr Georgios Giannakidis	External expert
8	Christos Tourkolias	External expert
9	Vangelis Karagiannis	LDK Consultants
10	Melina Mikelis	LDK Consultants
11	Dejan Filipović	External expert
12	Violeta Erić	External expert
13	Titomir Obradović	External expert

Public hearing was opened by Mr. Marko Čadež, President of the Chamber of Commerce and Industry of Serbia:

Energy sector and the green energy transition are the most important topics for the economy of Serbia and the Western Balkans (WB), which concern each company individually, and therefore it is important to establish a social consensus through dialogue in which direction we will develop our economy and become part of the EU. There is no more important topic that the economy needs to discuss than energy. If we do not use the green energy transition in the right way, we can have big challenges when it comes to our production and competitiveness in international markets. Key words in defining the future direction of Serbian energy sector are dialogue, investments and new technologies. Our future is at stake, as well as the economy of the region, and that is why it is important that we all dedicate ourselves to the enormous work ahead of us and integrate the domestic and regional economy into the structures of the European economy. In CCIS, we have a good dialogue between scientific institutions, the economy and the state, and this will decide the success, in cooperation with the education system, which we need to adapt further to the needs of the digital and green economy. An important segment of the development of domestic energy sector and energy independence of the Western Balkans is the importance of the mineral wealth of Serbia and the region, which we can use in a sustainable way and also offer it to European industry.

Introductory speech for the public hearing on INECP and SEA of INECP was given by Mrs. Dubravka Đedović, Minister of Mining and Energy:

This document sets goals for Serbia's energy sector in the coming decades, in order to ensure secure supply, energy independence and efficient and economical management of the decarbonization process. INECP is our obligation arising from the Law on Energy, but also our international obligations, and it is also a plan that is necessary to set goals that concern primarily energy efficiency, renewable energy sources and reduction of harmful gas emissions. Achieving the goals from INECP will contribute to a healthy environment, security of supply and greater availability of energy to customers with more green energy. Key goals include increasing the share of RES in electricity production to 45%, significantly increasing energy efficiency, and reducing greenhouse gas emissions by 40.4% by 2030 compared to 1990. Achieving these goals also implies the construction of new production capacities, including solar and wind power plants with a total capacity of 3.4 GW, as well as a new gas power plant with a capacity of 350 MW.

Introductory part of the Draft of the Integrated National Energy and Climate Plan of Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Sofia Nikolakaki, LDK Consultants, while key results and projections of the plan were presented by Dr Georgios Giannakidis, External expert. Draft Strategic Environmental Assessment (SEA) of the Integrated National Energy and Climate Plan of the Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Violeta Erić, External expert.

2.1.1 Public feedback and responses

After the presentations on INECP and SEA of INECP, a public discussion was held. In the following chapter feedback from the public and responses from the Ministry and the relevant experts are presented:

Participant and organization: dr Ilija Batas-Bjelić, The Institute of Technical Sciences of SASA

INECP feedback: In his opening address, Marko Čadež mentioned the key word, the most important thing is the future. Is this the strategy of the future? We received quick, easy and cheap solutions, which slowly lead us to a solution. Compliments to the experts, but when the experts leave, we will have to see what we are going to do with the heating plants, the systems based on fossil fuels. We have to deal with global energy disruptions. An active governing body will have to deal with these problems on a daily basis.

Participant and organization: Nenad Nikolić, Prudence consulting

INECP feedback: In December, the European Community set the goal that we have to reduce 62% of the thermal capacity by 2030. Only 10% of electricity production from RES is increasing, from where will the rest 20% be compensated and financed? How to reduce the 40% of methane emitted by the livestock industry? The document is bad for investors.

Participant and organization: Milenko Jovanović, National Ecological Association

INECP feedback: The basic question is who will implement the plan? Which energy experts? A change in the energy balance that leads to cleaner energy sources, which affects the environment, who believes that this will be achievable? A similar document, a strategic document for air quality, was adopted on December 8th (Air Protection Program for the Republic of Serbia for the period 2022-2030 with an action plan). There was a massive problem, and those who denied it are now implementing it. How to implement even the best document in an environment that is politically oriented, not professionally?

Veljko Kovačević, Special Advisor in Ministry of Mining and Energy:

Response: Public discussion will improve the document. Politics in power made it possible to prepare the document, the goals should be implemented - how and how much to reform energy companies. The most important thing to say is that this all depends on the public, which has to put pressure in order for us to understand each other and to implement common set goals. Let us agree on the minimum goals and set a verifiable benchmark to see if the goals are achieved.

Participant and organization: Dušan Karas, The Science and Technology Centre (NTC), NIS

INECP feedback: It is important that there is a defined environment in order to deal with our business in an efficient manner - the goals of decarbonization. Carbon capture and storage conference in Trondheim (The Trondheim Carbon Capture and Storage Conference 2023, <https://www.sintef.no/projectweb/tccs-12/>), presentation by Helga Flesche Kleiven from the University of Bergamo: All current climate models and all scenarios show that the only way to keep the temperature rise to 1.5 degrees Celsius is to focus on removing carbon dioxide from the atmosphere. In order to prevent the consequences of climate change, we must not only reduce emissions, but also remove carbon from the atmosphere. The plan cannot exist without carbon capture and storage on the scale as it should. That would give us the right guidelines and framework. CO2 contaminates the atmosphere, so it is necessary to elaborate the strategy and concept in more detail.

Dr Georgios Giannakidis, External expert:

Response: We are considering in our analysis Carbon capture and storage but in a longer term. This document focuses on 2030, based on a current cost and technology our analysis shows this could be possible but in the more longer term.

Participant and organization: Hristina Vojvodić, RERI

INECP feedback: The general comment is that the document didn't highlight strategic directions. We don't have a clear picture of whether Serbia has decided to introduce ETS mechanism, whether we are introducing CBAM, we don't have an answer to the question when we will abandon coal for the production of electricity. How is it possible to achieve the same GHG reduction of 40.3% compared to 1990 with 33.6% production from renewable energy sources in gross final consumption as stated in this document and 40.7% as stated in the decision of the Ministerial Council, which is stated as one of the legal bases in the creation of this document? It is predicted that the factor of utilization of thermal energy capacities will be around 70% in 2030, is there an economic analysis of the justification of such use of thermal energy capacities? How will it be ensured that thermal power plants in 2030 (already in 2028) are harmonized with the requirements of the directive on industrial emissions?

In earlier versions of the document, consultations with key actors were mentioned as a source modeling data, is there more exact information now? For 2050, 180 thousand tons of copper per year are predicted - wrong data for modeling. The copper smelter in Bor, which was opened by the Minister of MRE, put into trial operation a few months ago, has a capacity of more than 200 thousand tons per year - the conclusion is that the wrong data was used, so how will this further affect the results and measures which will be applied later? It is not clear the source of the information that from 2030 lithium production will be 6000 tons per year.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: The obligation to implement the ETS is only for EU members. CBAM becomes binding from October 1st this year, but the financial charges come into effect from January 1st, 2026. The EU regulation for CBAM

was adopted in May this year, so it was too late to be included in the plan. The document will be updated when the process of monitoring and revising the energy policy from a strategic perspective begins. The drafting, structure and content of the document is prescribed by the EU Governance Regulation 2018/1999, and the document was written in that sense. The Energy Sector Development Strategy (the draft will be available in the fall) is prescribed by the Law on Energy and it is certain that in terms of presentation and information details it will differ from the plan. In the process of creating the document, a large number of data were used, e.g. from energy companies, the Statistical Office (provided a large number of data for the analysis of the industrial sector), a large number of bilateral meetings with companies and institutions. Its focus is on 2030 (commitments), and for 2050 it is a projection, and it is unlikely to be absolutely accurate for 2050 (vision). This is a process, which through monitoring includes revising, with new analysis of information and data.

Sofia Nikolakaki, LDK Consultants:

Response: Different portfolio of technologies can achieve the emission target, for example with natural gas power plant, combination of different technologies to achieve less ambitious but more realistic ways to reduce GHG.

Dr Georgios Giannakidis, External expert:

Response: The economic analysis of the operation of the thermal power plant was performed, the results are in the annex. Lithium is included - it was decided to include extra demand in the plan (less than 0.2%) if industry grows in general, for this demand to be satisfied.

Participant and organization: Ognjen Pantić, BOŠ

INECP feedback: PM_EE1: For energy efficiency, residential buildings are defined in the plan, in the first measure the unit is the building, while in the other measures the unit is m²? Was the square footage of those buildings and their specific consumption taken into account during creation of the measure, the design and calculations, because comparison cannot be performed with other measures if used unit is not the same?

PM_EE2: Refers to public buildings, the rate of investment, that is the amount of funds foreseen for public buildings is far less than for residential buildings and non-residential public buildings, it is calculated that is 50 euros per m², why are the planned funds much less for that sector?

PM_EE3: It is noticeable that the square footage has been significantly reduced in this policy measure compared with the text of INECP from October 2022, 30 times less area in m², while the financial resources have been reduced only twice.

The just transition has not been processed to the same extent as in the EU countries, where there are more data on the social structure of the region, employment needs, retraining, and skills. The measure exists. The problem is that the MRE is appointed both as an implementing and as a monitoring authority, and the Ministry of the Environment is also a monitoring authority. The proposal is to have the Ministry of Labor and Employment, the Ministry of Education, the Chamber of Commerce, and the Social and Economic Council as monitoring bodies. Indicator should not be GHG emissions, but some indicative factor (which speaks of the successful economic and social transformation of the region).

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Just transition requires additional analysis, the analysis is being done through the other project Just Transition Diagnostic Study: Serbia, it is in the final phase, adoption is expected in September, it includes a large number of organizations and ministries and contains an action plan for the just transition. For 20 years,

the EU countries have intensively pursued these goals of this plan, in this sense, they have at their disposal numerous funds, unlike us. The countries that adopted the plans are now in the process of revising the energy plans, they have a recommendation from the European Commission that they must strengthen the aspect of just transition. The next revision of our plan will have new information, when will be cover more.

Christos Tourkolias, External expert:

Response: Residential sector used number of buildings, non-residential used m2. Different categories of residential buildings (apartments, single house), different categories of non-residential buildings (public, sport centers, offices, commercial). We can create consumption as reported in Eurostat per respective sectors - the first step, then different renovation rates are taken into account, deliberate savings, then everything is calculated, and investments are estimated. Data are in full compliance with official energy data from Eurostat.

Dr Georgios Giannakidis, External expert:

Response: Residential buildings are reported in number of buildings for the more clear understanding, but analysis we had used m2 as well.

Participant and organization: Aleksandar Vukalović, eSecurity

INECP feedback: At the beginning, the Minister said that the laws were applied, and directives of the EU were harmonized - which would be the representative directives? Has the storage of electrical energy been considered and its participation in the overall balancing? Critical infrastructure protection is recognized in some way? Digitization of the energy sector (it should say sector not system) has it been considered? Measure 16 mentions traffic on roads and waterways but does not mention cities.

Milan Aleksić, Assistant minister of Mining and Energy:

Response: Seven directives are being adopted in the second phase, and two directives that have been postponed for the third phase are being adjusted at the end of this year and next year. All our companies that are concerned with these directives are involved in the transposition. Many projects for the digitization of the energy sector are planned, both on the technical side and on the procedures - for easier obtaining of permits, for the digitization of control and production, transmission and distribution systems. A new reversible hydroelectric power plant in Bistrica is planned for the storage of electricity, as well as battery storage. Special regulation will deal with the storage of electricity."

Participant and organization: Vidosava Džigić, The Chamber of Commerce and Industry of Serbia

INECP feedback: None of the climate change resilience measures. Estimates for weather disasters for droughts (9 billion euros per year), floods (7.4 billion euros) - are directly related to the energy sector, but also to other sectors that have been mentioned. To give an overview on the resilience of small and medium-sized enterprises against climate change, because the resilience is very low.

Christos Tourkolias, External expert:

Response: The plan includes measures related to resistance to climate change.

Participant and organization: Aleksandar Vukalović, eSecurity

SEA of INECP feedback: Where a technological accident is mentioned, it should be mentioned in cases of emergency situations, because there is a law that defines them.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Comment will be considered. Enormous effort, energy, and a lot of patience were invested in the creation of this document. A lot of professionalism on the part of both the consultant and the working group.

Participant and organization: Professor dr Petar Đukić, Faculty of Technology and Metallurgy of the University of Belgrade

SEA of INECP feedback: The three-year preparation of three parallel documents is underway. Today we are doing something that other countries started 25 years ago. The goals of the energy transition are not in question, almost all agree with the energy, climate and technology goals. The analysis of the consequences of the implementation of this document is well presented. The entire economy in the world is in transition - not to strive for zero emissions only in the energy sector, but for the entire economy.

Participant and organization: Hristina Vojvodić, RERI

SEA of INECP feedback: Cross-border consultations - is it planned to be organized and when is it planned? The application of BAT technologies (Best Available Technology) in thermal energy complexes is expected. It can be seen from the document that the application of BAT technologies in accordance with the Law on Integrated Prevention and Control of Environmental Pollution is expected to lead to a reduction of GHG, and based on this, can our thermal power plants comply with the directive on industrial emissions from 2028? What are the measures that will lead to implementation from 2028, when the obligation starts? Has the specific implementation plan that is attached to the negotiating position for Chapter 27 - Environmental protection, where, among other things, transitional periods for thermal energy facilities, going even up to 2035, been considered?

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Documents (INECP and SEA) for cross-border consultations were forwarded to the Ministry of the Environment, which is responsible for conducting cross-border consultations. According to the law, the deadline for cross-border consultations is 30 days from the moment the neighboring countries receive the documents. Their feedback and suggestions are expected.

Melina Mikelis, LDK Consultants:

Response: What needs to be understood is that we are evaluating at a strategy level, we are not evaluating any individual infrastructure project, because this will be done at a lower level.

Participant and organization: dr Marina Nenković-Riznić, Institute for Architecture and Urban & Spatial Planning of Serbia

SEA of INECP feedback: To what extent were the results of Strategic Assessments for the Energy strategy taken into account, for the environment program and strategy, and especially for the Low-carbon development strategy?

Melina Mikelis, LDK Consultants:

Response: The document is very massive, we are taking into consideration a lot of data, data from environmental agencies. The entire list should be checked to know exactly which data is taken into account.

Participant and organization: Aleksandar Vukalović, eSecurity

SEA of INECP feedback: Has it been considered in any way whether there is a need to consider the obligations from negotiation Chapters 24 and 31?

Melina Mikelis, LDK Consultants:

Response: SEA is taking into consideration beyond basic obligation. Best practices and extra factors are taken into account.

2.2 Public hearing event in Novi Sad

The second public hearing event was held in Novi Sad in the organization of The Regional Chamber of Commerce and Industry of the South Bačka Administrative District on 12 July 2023. In Table 2, participants from the Ministry of Mining and Energy and consultants are listed.

Table 2: Participants from the Ministry of Mining and Energy and consultants

	<i>Participant</i>	<i>Organization</i>
1	Milan Aleksić	Assistant minister of Mining and Energy
2	Biljana Ramić	Head of the office for the strategic planning in the energy sector at Ministry of Mining and Energy
3	Sofia Nikolakaki	LDK Consultants
4	Dr Georgios Giannakidis	External expert
5	Christos Tourkolias	External expert
6	Melina Mikelis	LDK Consultants
7	Violeta Erić	External expert
8	Titomir Obradović	External expert

Public hearing was opened by Mr. Milan Aleksić, Assistant minister of Mining and Energy:

INECP will give us basic guidelines for the development of the energy transition in the Republic of Serbia. It includes all those measures that will improve the lives of people and our gross domestic product, as well as a cleaner environment. The plan is binding, but it also has predictions (up to 2050). It represents the basis of Serbia's new energy policy. Energy independence will contribute to the improvement of our economy. It is expected to bring more jobs and be more attractive for foreign investments and for further development of the economy. By adopting of such a large and ambitious plan, but with realistic goals, as a country we show that we want to contribute to the realization of the global climate agenda and follow the European mission in the field of energy sector, which is in line with our level of development.

Introductory speech for the public hearing on INECP and SEA of INECP was given by Mrs. Biljana Ramić, Head of the office for the strategic planning in the energy sector at Ministry of Mining and Energy:

The Integrated National Energy Climate Plan is a document prepared in accordance with Articles 8a and 8b of the Law on Energy and obligations from the Energy Community Treaty. All members of the European Union and members of the Energy Community are obliged to create such a document to define their contribution to the Green Agenda, that is, the policy of the European Union in the field of energy and climate. What is crucial in order to achieve these goals are actually the measures related to the implementation of energy efficiency. They are the ones that mostly affect not only the savings in energy consumption, but also the realization and reduction of greenhouse gas emissions and the increase in the share of renewable energy sources in the gross

final consumption. This is why these measures take the largest share when it comes to certain investment costs, which are required for the implementation of the measures until 2030.

Introductory part of the Draft of the Integrated National Energy and Climate Plan of Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Sofia Nikolakaki, LDK Consultants, while key results and projections of the plan were presented by Dr Georgios Giannakidis, External expert. Draft Strategic Environmental Assessment (SEA) of the Integrated National Energy and Climate Plan of the Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Violeta Erić, External expert.

2.2.1 Public feedback and responses

After the presentations on INECP and SEA of INECP, a public discussion was held. In the following chapter feedback from the public and responses from the Ministry and the relevant experts are presented:

Participant and organization: Mila Bačić – Milinski, The Science and Technology Centre (NTC), NIS

INECP feedback: New buildings are built according to new standards regarding energy efficiency, but there is a problem with existing buildings, which leads to the concretization of cities through uncontrolled construction. If the influence of the location on the buildings, green areas, and orientation of the buildings are not considered, in that case the buildings require much greater cooling and more difficult heating. If it is not possible to influence the already built objects, then it is necessary to influence the laws on construction and urbanism, in order to plan the construction in terms of the orientation of the locations of green areas, the construction area in relation to the free area, because the current built-up area creates cities as large consumers of energy. Is that topic being processed and to what extent and what about the vision until 2030 and 2050? Is there a green roofs overview?

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: It is a very important question. If it is possible to be submitted in the written form. It is necessary to check whether to strengthen the existing measures with descriptions in this sense. Close cooperation was achieved with the Ministry of Construction, Transport and Infrastructure, while very detailed databases related to the categorization of buildings in Serbia were used.

Christos Tourkolias, External expert:

Response: Specialized measures to promote smart and carbon neutral cities were introduced. Spatial planning dimension in order to target urban regeneration has to be improved. The necessity will be highlighted, and measure improved. Regarding green roofs, this measure was introduced and exploited in Greece since 2010, but a lot of difficulties in the implementation were confronted: considerable problems especially in Winter due to humidity and considerable problems with the stability of the buildings. Based on experience emphasis must be given promoting insulation of building envelope.

Participant and organization: Bojan Martinović, NIS

INECP feedback: The calculation results include current emissions and how to reduce them. Will the document include a detailed calculation that we will be always able to rely on and to what levels of detail will it go (global at the level of power plants, or at the level of facilities)?

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Three types of software were used, SEMS (Serbian energy modeling system, based on the TIMES energy modeling tool) - data were collected at the level of plants and facilities and were classified by region, Antares for the integration of a large number of RES in the system and a tool for macroeconomic analysis of the impact of all measures and policies on the Serbian economy. Projections of the energy balance were made, and based on that, projections of GHG emissions, in detail by all sectors. We are obliged to follow the trajectory of achieving the GHG reduction objective by 2030 for each year. If the goal is not achieved, the causes must be detected, and explanations given. According to the regulation, there is only one year deadline to correct the causes for which the goal is not being achieved. There are measures from a dimension that directly concerns the reduction of emissions, but also measures from other areas contribute to the reduction.

Dr Georgios Giannakidis, External expert:

Response: Detailed calculation of the emissions not only in the energy sector but also transportation, industry, buildings, is given. Different sectors are included in participation in the emission. The document includes measures that are quantifiable in the contribution to the reduction of the emissions.

Participant and organization: Stanka Leskovac, NIS

INECP feedback: There is a goal of 17% increase in the CO2 sink, i.e. taking it from the air, most often by means of plants. How can we get back what we have lost from the green space based on the built factories? A proposal to introduce the obligation to build a forest around each factory to compensate for the lost space. There is a rulebook or regulation to reduce the total energy by 1%, but there is no indicator of reducing the intensity of emissions in the plan. Increased economic activity leads to an increase in electricity consumption, and higher energy consumption leads to an increase in emissions.

Dr Georgios Giannakidis, External expert:

Response: For the land use and negative emissions, policies according to the analysis of the Ministry of the environment were incorporated. The increase of industry is causing an increase of negative emissions overall. An emission indicator is not shown - can be calculated and added (CO2 intensity).

Ministry:

Response: In the energy management system, there is an obligation to reduce consumption. In energy management system database, there are indicators that can be determined and monitored.

Participant and organization: Professor dr Đorđe Đatkov, Faculty of Technical Sciences Novi Sad

INECP feedback: The impression is that the biogas and biomethane sector is marginalized by this document because we have much greater potential. They can represent instruments for satisfying the share criteria in the transport sector. By 2030, half of the biogas plants will lose their privileged producer status, and if no other instrument is found for those plants that have resources at their disposal to continue their work in the field of RES, those plants will shut down. Biomethane is one of the cheapest fuels. It is necessary to separate it from biohydrogen in the document, because biomethane is 20 years mature technology, and biohydrogen is the fuel of the future, because the technologies are still in development. One of the chances represents existing plants, which already have part of the infrastructure, and can be adapted, instead of building new ones.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Submit comments and suggestions in the written form so that we can include them in the document.

Participant and organization: Goran Knežević, The Serbian Biogas Association

INECP feedback: Facilities for the production of biogas or biomethane, apart from the contribution of RES, can solve environmental problems, because the perfect raw material for these plants is organic waste for someone else, and the end result is either biomethane or biogas or heat or electricity or all together.

Christos Tourkolias, External expert:

Response: The potential of biomethane is enormous but it is very difficult to exploit. There is theoretical potential, but the question is, is it economical and feasible. In Greece very attractive compensation price was provided for promotion of biogas, but in the previous 10 years there were only 100MW of units for electricity production. The reason is that investors have not managed to ensure the supply of raw material. They operate their plants with a capacity factor of less than 60%. In Europe the tendency is not to produce biogas for electricity but for other uses like heating and transport. Pilot project of biomethane - if you are able to gather raw material both from agriculture activities and livestock, it is a good opportunity to promote further alternative fuels.

Participant and organization: Zoran Trpovski, Chamber of Commerce and Industry of Vojvodina

INECP feedback: The Ministry of Environmental Protection is the executive authority for measures related to waste management. At the same time, Novi Sad, as the second largest city in Serbia, does not have primary waste selection or is in the process of starting it. The problem in this area is implementation at the local level in local self-governments. What mechanism should be used in order for local self-governments to act in accordance with the adopted objectives?

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Local self-governments are responsible for many measures, so it would be useful if there was a legislative mechanism for the implementation of the assigned activities. A report on the implementation of the plan will be written, which will be sent to the Energy Community and the European Commission, and in which it must be stated in what way the plan is being realized.

Titomir Obradović, External expert:

Response: The preparation of the Sustainable Development Strategy of the Republic of Serbia - Green Agenda is underway. INECP is one part of the first pillar of this strategy, which is decarbonization. Great attention was paid to the horizontal connection between all competent authorities at the national and local levels. Commitments will emerge from the strategy. All other strategies must assume certain obligations and must not be in conflict with this strategy, which is the umbrella document for the sustainable development of the Republic of Serbia and the protection of the environment and human health.

Participant and organization: Ivana Pajić, Bird Protection and Study Society of Serbia

SEA OF INECP feedback: A complete energy transition is being implemented to prevent climate change. There is no reference to biodiversity in the plan. What are the guarantees for the implementation of the measures from the SEA report and what is the plan for that? We have resources from agriculture, such as biogas and biomethane, while other RES are planned in the plan with a significantly more negative impact on biodiversity. Climate change negatively affects biodiversity, but not helping to biodiversity create new climate change. Will the negative impacts from SEA be incorporated into the plan? Comment and review of the impact on small and medium-sized agricultural producers.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: There must be a connection between INECP and SEA. The public hearings were organized in order to receive quality feedback and constructive suggestions on what is not sufficiently emphasized in the document itself and what can be improved.

Melina Mikelis, LDK Consultants:

Response: Biodiversity is a parameter that has most measures in the full report. When the locations are selected for the wind farms there are specific considerations about biodiversity in the area. For specific wind farm projects more detailed environmental study must be done because SEA is dealing on strategic level not lower level - environmental impact must be minimum. Climate change spreads across all the sectors. If we counter climate change it has positive effects on biodiversity, on soil, and on water. Balance must be strike on positive effect and negative ones. A number of measures in the SEA contribute to sustainable agriculture.

Participant and organization: Nikola Jovičić, Public Utility Company "Čistoća i zelenilo" Subotica

SEA OF INECP feedback: There are a certain number of unsanitary landfills that need to be rehabilitated. In Subotica is one of them, which has a significantly negative impact on the environment, because it is located near several lakes. It also has an impact on water purification. On average, it receives 50 thousand tons of waste per year - a total of over 2 million and 200 thousand tons of waste. The rehabilitation project exists, but there is a lack of money. More than 6.5 million euros are needed for the implementation of the rehabilitation and recultivation project of the landfill, and this is the cheapest option - conservation to prevent environmental impact. The technical documentation of the project was completed in 2018, it was refined in 2021, and this year the economic structure of the project was revised. Near Subotica, there is a regional landfill Bikovo where "Čistoća i zelenilo" disposes waste. Third parties are the problem. In the vicinity of Subotica, the construction of a high-speed railway is currently underway, from where large amounts of excavated soil can be used for work on an unsanitary landfill. Project should start as soon as possible, preferably this year.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: The problem is beyond the scope of this document. It should be recognized that it is necessary to strengthen and implement measures that lead to environmental protection. Link this document with other strategic documents such as the Waste Management Strategy. All comments will be forwarded to the relevant ministries.

2.3 Public hearing event in Niš

The third public hearing event was held in Niš in the organization of The Regional Chamber of Commerce and Industry of the Nišava, Pirot and Toplica Administrative Districts on 14 July 2023. In Table 3, participants from the Ministry of Mining and Energy, The Regional Chamber of Commerce and Industry and consultants are listed.

Table 1: Participants from the Ministry of Mining and Energy, The Regional Chamber of Commerce and Industry and consultants

	<i>Participant</i>	<i>Organization</i>
1	Milan Macura	Assistant minister of Mining and Energy
2	Aleksandar Milićević	Director of the Regional Chamber of Commerce Niš

3	Biljana Ramić	Head of the office for the strategic planning in the energy sector at Ministry of Mining and Energy
4	Sofia Nikolakaki	LDK Consultants
5	Dr Georgios Giannakidis	External expert
6	Christos Tourkolas	External expert
7	Vangelis Karagiannis	LDK Consultants
8	Dimitrije Isoski	External expert
9	Titomir Obradović	External expert

Public hearing was opened by Mr. Milan Macura, Assistant minister of Mining and Energy:

INECP is one of the most important strategic documents defining the process of energy transition and what we will be doing in the field of energy in the coming decades. With this document, we will increase the share of renewable energy sources in electricity production to 45%, the share of renewable energy sources in gross final energy consumption to 33.6%. We will significantly improve energy efficiency, with the plan that final energy consumption in 2030 will amount to a maximum of 9.6 million tons of oil equivalent, while primary energy consumption in 2030 will be a maximum of 14.68 million tons of oil equivalent. This document contains the ways in which we will reach the set goals and targets. The plan defines a total of 156 measures, of which 68 are reform measures.

Introductory speech for the public hearing on INECP and SEA of INECP was given by Mrs. Biljana Ramić, Head of the office for the strategic planning in the energy sector at Ministry of Mining and Energy:

In addition to the already held public consultations in Belgrade and Novi Sad on the topic of INECP, several public hearings organized by non-governmental organizations were held in the previous period. This public discussion consists of two parts, the first part is a presentation and discussion on the topic of the Integrated National Energy and Climate Plan, while the second part is a presentation and discussion on the topic of the report on the Strategic Environmental Assessment of the impact of this plan. The preparation of these two documents was realized through a project financed by the European Union from the IPA fund, entitled Further Development of Energy Planning Capacity. A consortium consisting of the Greek companies CRES and LDK Consultants, as well as domestic consultants, participates in the realization of these two documents.

Introductory part of the Draft of the Integrated National Energy and Climate Plan of Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Sofia Nikolakaki, LDK Consultants, while key results and projections of the plan were presented by Dr Georgios Giannakidis, External expert. Draft Strategic Environmental Assessment (SEA) of the Integrated National Energy and Climate Plan of the Republic of Serbia (INECP) up to 2030 with the vision up to 2050 prepared for public consultation and public hearing, was presented by Dimitrije Isoski, External expert.

2.3.1 Public feedback and responses

After the presentations on INECP and SEA of INECP, a public discussion was held. In the following chapter feedback from the public and responses from the Ministry and the relevant experts are presented:

Participant and organization: Toplica Marijanović, Association of Young Researchers Bor

INECP feedback: Proposals and objections to the plan have been prepared, which are divided into five groups:

1. Supplement with estimates and measures for the mining sector. The mining sector does not exist in the program, but it is a major source of GHGs, both nitrogen oxides produced during mining and carbon oxides from the operation of heavy machinery in mines. Large areas have been degraded by mining and emit GHGs, but when recultivated can become sinks of these gases.
2. The second group refers to data from the analytical part related to cathode copper. The projection of cathode copper production for the year 2050 is 188 thousand tons, but it will already reach 200 thousand tons next year plus copper production in ore exported from the mine - today's production is already higher than projected.
3. Waste heat is little mentioned. Central heating used part of the waste heat from metallurgy to heat Bor, and because of that Bor had the lowest heating price at one time.
4. Construction of new settlements resulting from the relocation of villages, settlements and parts of the city due to the opening of new surface mines - a plan to be built with zero net emission of carbon oxides.
5. The fifth group refers to the construction of solar and wind power plants. Construction is planned in areas on the IUCN list of protected habitats for flora and fauna - measures should be foreseen to limit and set rules for construction.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: In the preparation of this document, a large number of input data from energy companies and The Statistical Office of the Republic of Serbia on all industrial branches were used. Three types of software were used: SEMS (based on the TIMES tool for energy modeling) - used for projections of the energy balance of the Republic of Serbia until 2050, Antares for the analysis of the participation of large RES in the system, and software for macroeconomic analysis. For certain areas there is not enough data.

Dr Georgios Giannakidis, External expert:

Response: Coal mining activities and machinery activities related to the energy sector are included in the analysis. Other emissions from the other sectors are received from the Ministry of the Environment. For the copper in analysis an overall number is used, because this is high level analysis that don't go in very detail. Waste heat from the industrial sector is something that can be incorporated. Green villages when there are relocations is high level decision of the country - could be included. For the construction of wind and solar plants there are specific rules already foreseen in SEA.

Participant and organization: Jelena Nikolić, Energy cooperative Elektropionir

INECP feedback: When we talk about the energy rehabilitation of buildings, do we only observe the unit area of the building, or are some other parameters as well? Are energy-poor households with energy-poor buildings taken into account? Which indicator shows the level of more energy efficient vehicles? The measures use green hydrogen, renewable hydrogen or just hydrogen. The Law on the use of renewable energy foresees only renewable hydrogen - the terms from the law must be used. The first set of measures presented are about promoting GHG reduction, how are the results quantified? All promotional measures can contribute to a reduction, but it cannot be said with certainty that this will happen. The first set of measures should lead to a reduction of GHG by 40%, but if the integral table at the end of the document is checked, it can be seen that these measures are defined in the WEM scenario, but if the graph on page 188 (4.7) is checked, an increase in CO2 emissions can be seen. Measures are proposed that are expected to contribute to a significant reduction of CO2, and on the other hand, there are higher emissions in 2045 compared to 2020. Does the WEM scenario lead to the current state? This document relies heavily on foreign donations rather than our budget funds. What if policies change? Just energy transition is mentioned only in two measures, and the only indicator for

those measures is the reduction of CO₂ emissions. The potential of our country when it comes to waste heat is extremely important for modeling our energy system.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Energy poverty was not considered as a separate aspect. Amendments to the Law on Energy expand that concept, now there is only a vulnerable customer, but the concept of energy poverty is much broader. Just transition looks at the energy transition from the economic and social aspects. This is dealt with in detail by the study conducted by the MRE in cooperation with the EBRD - The Just Transition Diagnostics Study for Serbia. It is in the final stage, the draft is expected in September, and there will be a public hearing in the fall. The European Commission gave a recommendation that member states must strengthen their INECPs with the aspect of a just transition. In the revision of our INECP, a fair transition will be more included. The structure of the document includes three basic goals, reducing GHG, increasing RES and improving energy efficiency (EE). The largest number of measures and funds is for EE. WEM is the reference scenario with current measures, and two more scenarios with additional measures, with and without nuclear power, were analyzed. Nuclear power plants are being activated worldwide for GHG reduction goals. It is not possible to realize everything through the budget. The goals are demanding and require a combination of public and private investments. There are several hundred private producers in the field of RES, and there are many interested ones. A large number of measures refer to consumers - e.g. for the improvement of buildings. This is a process that includes the obligation to revise the goals, which must not be lower than the initial ones, but only higher.

Christos Tourkolias, External expert:

Response: The measures for upgrade of the building envelope and the replacement of existing heating systems with new ones were distinguished. Renovation of building envelope with different renovation packages was examined, with different costs, different savings and then the most cost effective heating and cooling system was estimated. Renovation of the buildings is the most important measure in order to combat energy poverty. Old and existing vehicles have to be replaced. Different technologies are examined, because from 2035. industry would not produce current types of gas; all types of gas will be zero emission. Least cost solution has been selected. Subsidies is the most obvious solution for the funding. No country is able to fulfil targets only with subsidies, and that's why alternative financing sources are introduced (soft loans, guarantees). Utilization and exploitation of waste heat within industry was maximized.

Participant and organization: Jelena Nikolić, Energy cooperative Elektropionir

INECP feedback: When comparing the integral table with the measures proposed in the reference scenario and the future scenario, it can be seen that the measures for research and innovation are foreseen only in the WEM scenario. Most of the measures refer only to the WEM scenario.

Christos Tourkolias, External expert:

Response: The WEM scenario includes some measures that are not sufficient to balance CO₂ emissions due to increased economic activity. The intensity of CO₂ in the WAM scenario has been reduced, as additional measures have been introduced in the WEM scenario. WAM scenarios include both the WEM scenario and additional measures.

Participant and organization: Jelena Preradović Stevanović, Philip Morris International

INECP feedback: There is a little mention of industry in the plan. Measures are foreseen to encourage the production of electricity from RES for own needs. If we look at the amendments to the Law on the Use of

Renewable Energy Sources, a restriction on RES production for industry's own needs was introduced, so it is contradictory because it is encouraged in the plan.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: There is no adequate economic development strategy, and this is a problem because energy should follow economic development. The effort is to regulate RES integration in the production system of the electric power system. Two years ago, the Law on the Use of RES was adopted for the first time, there were also the law amendments, and probably soon there will be the law amendments again in order to be able to respond to the needs of the market. In doing so, the network age and the possibilities for connection should be taken into account.

Participant and organization: Nebojša Rančić, Media & Reform Center Niš

SEA of INECP feedback: Regionalization and implementation of all ideas and projects is done using the bottom-up method, while the plan is done from top-down. It is very important to tailor measures based on local needs in relation to pollution producers and in relation to biodiversity and protected areas. Will the document offer steps on how to implement it at the regional level? Through these documents, the local level should also be considered, and guidelines should be given for implementation in local communities and regions. Include the Standing Conference of Towns and Municipalities as a good sectoral connection mechanism in the aspect of document finalization through presentation and providing training to representatives of local self-governments.

Biljana Ramić, Head of the office for the strategic planning in the energy sector at MOME:

Response: Perhaps the proposal should be presented as a reform measure - the implementation of national plans at the regional and local level. The energy balance represents Serbia by statistical region, but it is not possible to go into that level of detail when it comes to certain measures. The plan provides a framework for the country. A strategy for the development of energy sector is being prepared and a program for implementing the strategy as well, which will have to take into account what will be done in the field of energy in the next few years - here is the chance for regions or local self-governments. The local community is key for the implementation of most measures.

Participant and organization: Toplica Marijanović, Association of Young Researchers Bor

SEA of INECP feedback: Supplement SEA based on the supplements of INECP. It is up to the Ministry of Environmental Protection to assess whether to repeat the public hearing after supplementing the documents.

3. SUBMITTED FEEDBACK AND RESPONSES

3.1 Submitted feedback and responses on INECP

This Public Consultation Report provides an in-depth analysis of the received comments and feedback on the Serbian Integrated National Energy and Climate Plan (INECP). The INECP sets forth a comprehensive strategic vision for the country's energy sector. The extensive review of the INECP from stakeholders has identified several key areas, where improvements and clarifications are needed to ensure the successful implementation of these ambitious goals.

This wide range of comments and suggestions can significantly enhance the INECP, and these recommendations aim to ensure that the INECP is comprehensive, robust, and aligned with national and international energy and climate objectives.

During the public consultation process, we received objections, proposals and suggestions by multiple stakeholders. The detailed list of the respondents and their specific comments can be found in the Annex.

A total of 549 comments were received broken down as follows:

General Comments: 54 comments

Chapter 1 – OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN: 58 comments

Chapter 2 – NATIONAL OBJECTIVES AND TARGETS: 19 comments

Chapter 3 – POLICIES AND MEASURES: 325 comments

Chapter 4 – NATIONAL OBJECTIVES AND TARGETS: 44 comments

Chapter 5 – NATIONAL OBJECTIVES AND TARGETS: 44 comments

Annexes: 5 comments

Generic Comments

The responses emphasize the importance of considering the dependencies of policy measures on wider policy developments. This includes factors such as the Carbon Border Adjustment Mechanism (CBAM), Just Transition, and Emissions Trading System (ETS). Understanding and addressing these dependencies are crucial for ensuring the coherence and effectiveness of the proposed measures.

The received feedback also highlights that the INECP includes overly ambitious targets (e.g. heat pumps) on one hand, while other comments suggest that there are less ambitious targets (e.g. share of RES, decarbonisation of the mining sector).

In addition, the responses focus on the significance of revisiting projections and plans related to energy generation from coal/lignite power plants and their associated emissions. This revision is crucial to align the INECP with the latest scientific findings, technological advancements, and international commitments such as the Paris Agreement.

The comments further emphasise the importance of clarifying the source of funding for policy measures, as well as their implementation cost and timeline. This information is vital for ensuring the financial feasibility and successful implementation of the proposed measures. Additionally, providing a clear description and specific quantified objectives for each policy measure would enhance understanding of their intended outcomes and impact.

Furthermore, the comments stress the importance of clarifying specific figures and values across the INECP. Clear and transparent figures are essential for facilitating a comprehensive understanding of the plan's targets, objectives, and expected outcomes. Additionally, it is recommended to provide a detailed analysis of high-impact or high-cost policy measures to understand their feasibility, costs, and potential benefits.

Finally, respondents suggest that the Serbian INECP must undergo meticulous proofreading and editing to rectify typographical errors and broken weblinks within the document. It is also essential to ensure that cross-references are working appropriately, and the translation is consistent and of high quality. These corrections are crucial for maintaining the document's credibility and ensuring the accuracy and reliability of the information provided.

Decarbonisation and Energy Efficiency

Respondents highlight the need to include clearer references to associated documents such as EU Directives & Regulations, as well as national legislation and strategies (e.g. the Infrastructure Development Plan from MoME) in the INECP. This would provide a comprehensive framework for the policy measures proposed in the INECP, ensuring their alignment with existing legal and strategic frameworks.

Furthermore, the comments stress the importance of quantifying and specifying objectives for policy measures related to energy efficiency, heat pumps, renewable energy sources (RES), heating, and waste. Clear objectives facilitate progress monitoring and evaluation, enabling stakeholders to assess the effectiveness of the measures in achieving the desired outcomes.

The feedback also stresses the need to consider additional policy measures that promote energy efficiency in urban planning and the industrial sector. These measures can significantly contribute to achieving energy efficiency targets and reducing energy consumption in key sectors of the economy.

Additionally, the comments question whether the INECP truly reflects the volume of ancillary services needed to support the system, considering the significant changes proposed to achieve the required targets. The increasing integration of renewable energy sources and the transition to a more decentralized energy system necessitate robust ancillary services to ensure grid stability and reliability.

The responses underscore the significance of taking into account how policy measures are interconnected with broader policy advancements. These encompass elements such as the Just Transition Action Plan and the Emissions Trading System (ETS) among others. Grasping and resolving these interdependencies is essential for maintaining the consistency and efficiency of the suggested measures.

Finally, some comments underline the need to develop detailed action plans to further clarify the implementation of policy measures. This will help ensure their effective execution. Some respondents also focused on the significance of the mining sector's decarbonisation, considering its substantial environmental footprint and potential for transformation.

Energy Security

The received comments suggest providing clearer descriptions and specific quantified objectives for policy measures. These revisions would enhance the comprehensibility and effectiveness of the proposed measures, enabling stakeholders to understand their purpose and expected outcomes.

The comments further emphasize the need for a detailed analysis of high-impact or high-cost policy measures, such as grid infrastructure and generation capacity. This analysis would provide valuable insights into the feasibility, costs, and potential benefits of these measures, ensuring their successful implementation.

Additionally, the responses highlight the importance of digitalization and cybersecurity in ensuring energy security. As the energy sector becomes increasingly reliant on digital technologies, robust cybersecurity measures are necessary to protect critical infrastructure and ensure the uninterrupted supply of energy.

There are also some comments stressing the importance of assigning the appropriate entities for monitoring the progress of the policy measures. The assignment of these monitoring entities should be in line with the local legislative and regulatory framework.

Internal Energy Market

Under this section, the comments suggest revisiting the monitoring entities for certain policy measures and clarifying the source of funding, implementation cost, and timeline. These revisions would ensure the successful implementation of the measures and facilitate progress monitoring and evaluation.

The comments also suggest expanding the scope of certain policy measures, such as wholesale market access and competition, in order to increase their impact. This expansion would contribute to a more efficient and competitive energy market, promoting fair competition and benefiting consumers.

Moreover, the received feedback recommends revisiting the inclusion of already finalized policy measures to ensure their continued relevance and alignment with the overall objectives of the INECP. This revision would enable the plan to reflect the latest advancements and changes in the energy landscape.

Finally, some comments underline the need to develop detailed and comprehensive action plans to ensure the effective implementation of policy measures. This will help ensure their effective execution. There are also comments that highlight the vital role accelerating the implementation of high-impact policy measures aimed at alleviating energy poverty.

Research, Innovation, and Competition

In the section, the comments highlight the limited inclusion of Carbon Capture, Utilization, and Storage (CCUS) technologies in the INECP. Given the importance of CCUS in decarbonization efforts, it is recommended to create different sub-measures for different technologies within the Research, Innovation, and Competition (RIC) framework. This approach would enable a tailored and specific focus on various clean energy technologies, such as RES, hydrogen, and CCUS, to maximize their potential and impact.

Current Situation and Projections with Existing Policies and Measures

The received feedback highlights the importance of making clearer references to associated documents such as EU Directives & Regulations, as well as national legal and regulatory frameworks in the INECP. This would ensure alignment with broader energy and environmental policies.

Furthermore, respondents underline that it is essential to prioritize the need for additional ancillary services and their associated costs within the context of the INECP. As the energy landscape continues to evolve with the integration of renewable energy sources and the shift towards a more decentralized energy system, the importance of robust ancillary services cannot be overstated. These services play a pivotal role in ensuring the stability and reliability of the grid, which are essential for the successful implementation of the proposed policy measures.

In terms of specific targets, respondents suggest that:

there is a need to revisit the targets regarding district heating (DH) systems. This will ensure that the targets are ambitious and in line with the overall objectives of the INECP,

it is recommended to reassess the projections and plans regarding the increase in the production of coal, copper, lignite, lithium, and borate. This revision will ensure that the INECP aligns with the latest scientific findings, technological advancements, and international commitments, such as the Paris Agreement,

it is important to consider the inclusion of indirect emissions from mining activities in the analysis. This will provide a more comprehensive understanding of the overall emissions associated with the mining sector,

and by addressing these areas of improvement, the INECP will become more comprehensive, robust, and aligned with national and international energy and climate objectives.

Impact Assessment of Planned Policies and Measures

The comments emphasise on the need for detailed analysis for high-impact or high-cost policy measures. Conducting such analysis would provide valuable insights into the feasibility, costs, and potential benefits of these measures, thereby ensuring their successful implementation.

The comments also highlight the importance of highlighting the dependencies of policy measures with wider policy developments, such as the Carbon Border Adjustment Mechanism (CBAM), Just Transition, and Emissions Trading System (ETS). Understanding and addressing these dependencies are crucial for ensuring the coherence and effectiveness of the proposed measures.

Furthermore, revisiting the projections and plans regarding energy generation from coal/lignite power plants and the share of renewable energy sources (RES) in transport is recommended. This revision is necessary to align the INECP with the latest commitments of the Republic of Serbia with regards to decarbonising the energy sector.

To provide a more comprehensive analysis, it is suggested to include an additional scenario with net zero emissions from the energy sector in 2050. This scenario would present a more ambitious and sustainable pathway towards decarbonization.

In terms of specific policy measures, it is recommended to delete the nuclear scenario, as it may not align with the overall objectives of the INECP. Additionally, providing clearer descriptions and specific quantified

objectives for certain measures, such as inclusion of nuclear power plants, would enhance stakeholders' understanding of their purpose and expected outcomes.

Conclusion

In conclusion, the above provides a comprehensive outline of the received comments and suggestions, which address various aspects of the INECP. These recommendations aim to enhance the plan's quality, effectiveness, and alignment with national and international energy and climate objectives.

However, addressing the identified areas of improvement is crucial to ensure the INECP's effectiveness and the achievement of its ambitious goals. The successful implementation of these measures will require a collaborative effort involving government agencies, private sector stakeholders, and civil society to drive Serbia towards a sustainable and resilient energy future.

Next Steps

In this context, the INECP will be meticulously checked and updated in order to ensure that the final version does not include any typographical errors, missing links or broken references and cross-references. This exercise will also include the process of cross-checking values and adding figures to facilitate the reader's experience.

The INECP will be updated and improved in line with the received feedback, with reasonable endeavours to incorporate and address the comments from stakeholders to the largest possible extent. However, it needs to be stressed that revision of targets will not take place at this stage, since this is not the aim of this public consultation. Such improvements should be expected during the next phase of the project (i.e. Monitoring and Revision of INECP), where policy measures and targets will be reassessed and reevaluated.

It is also important to highlight that the INECP analysis did not include the APKM due to the unavailability of relevant data and statistics.

Finally, the INECP does not include any action plans and implementation plans, since it is a high-level strategy document with the aim to provide the overarching targets for the energy sector until 2030. These detailed action plans and implementation plans will be developed on the basis of the INECP and will include the necessary details in order to ensure the successful achievement of national goals.

3.2 Submitted feedback and responses on SEA of INECP

The text of the Draft Report on the Strategic Environmental Assessment (SEA) of the National Energy and Climate Plan (INECP) was published on the website of the Ministry of Mining and Energy and the e-Consultation portal, and all interested parties had the opportunity to submit objections, proposals, suggestions and comments, both electronically, as well as by post in the period from June 23 to August 5, 2023. During the public discussion, until August 5, objections, proposals and suggestions were received by:

- Ministry of Environmental Protection;
- Republic Directorate for Water, Ministry of Agriculture, Forestry and Water Management;
- Environmental Protection Agency;
- Republic Hydrometeorological Institute of Serbia;
- International Organizations for Migration;

- Joint Stock Company "Elektromreza Srbije";
- Joint Stock Company "Transnafta";
- Regulatory Institute for Renewable Energy and Environment (RERI);
- Network of civil society organizations "Climate Forum";
- Center for the Improvement of the Environment;
- "Media and Reform Center Nis";
- "Coalitions 27";
- Citizens Association "Polekol";
- Joris Zantvort Damjanović;
- Dragan Srećković;
- Marija Tasić;
- Damir Bećirbašić.

After the end of the public consultation, the Working Group considered all the received comments, proposals and suggestions.

A total of 67 comments were received broken down as follows:

- GENERAL COMMENTS: **17 comments**
- CHAPTER 1 NON-TECHNICAL SUMMARY: **1 comment**
- CHAPTER 2 INTRODUCTION: **6 comments**
- CHAPTER 3 BACKGROUND INFORMATION FOR THE STRATEGIC ENVIRONMENTAL ASSESSMENT: **25 comments**
- CHAPTER 4 KEY ASPECTS OF THE APPROACH TO THE ENVIRONMENTAL IMPACT ASSESSMENT: **4 comments**
- CHAPTER 5 ASSESSMENT OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND MEASURES TO REDUCE NEGATIVE IMPACTS ON THE ENVIRONMENT: **8 comments**
- CHAPTER 6 GUIDELINES FOR THE DEVELOPMENT OF STRATEGIC IMPACT ASSESSMENTS AT LOWER LEVELS OF HIERARCHY: **1 comment**
- CHAPTER 7 ENVIRONMENTAL MONITORING PROGRAM DURING THE IMPLEMENTATION OF THE INECP: **1 comment**
- CHAPTER 10 CONCLUSIONS OF THE SEA: **1 comment**
- REFERENCES/LITERATURE: **2 comments**

Please note that remarks, proposals and suggestions submitted after August 5, which did not contain specific proposals for amendments and additions to the Draft Report, those which referred to the Plan itself or which were already the subject of discussion during the public hearing, were not taken into consideration.

Of the 67 comments received through the consultation for the Draft Report on Strategic Environmental Assessment of the INCEP:

- 7 comments referred the INECP document rather than the SEA. Such comments referred to among others the design of the strategy or specific measures have been transferred to INECP for review.
- 5 comments referred to topics within the sphere of competencies of the relevant ministries that implement the procedure rather than the SEA Consultant.
- 24 comments were rejected on different grounds including principally that the request went beyond the scope / was outside the scope / was not in line with requirements for the SEA or the comment referred to lower hierarchy level assessment aspects.

- 30 comments were adopted out of which a large number are relevant to language corrections, missing titles or abbreviations, or the update of information based on more recent data, all of which will be addressed. Constructive and concrete proposals in terms of improving the text with additional information were also accepted. The Non-technical summary will be incorporated in the conclusion chapter as requested. Finally, it should be noted that in addition to the scenarios developed for the INECP that were extensively assessed, other alternative(s), which were considered/discussed during the preparation of INECP will be reviewed to satisfy the request of entities that participated to the public consultation process. An overview of additional scenario(s) discussed during the preparation of the INECP, and a comparative evaluation as far as the level of detail on these alternative(s) allows will be included in the SEA. It should be noted that location alternatives are excluded as the strategy is national. Scenarios that were assessed by the drafters of the INECP as non-realistic will also not be presented.

The complete Table with all received comments and specific information on how they were addressed is included in Annex.

3.3 Recommendations from the Energy Community Secretariat

The Energy Community Secretariat has sent 31 recommendations for the revision of the Draft INECP. All recommendations have been considered thoroughly and further revisions have been implemented in this final version. For all recommendations there are justifications how they are considered. Recommendations and justifications are given in Annex III.

3.4 Regional Public Consultations

During the Regional Public Consultation period until November 21, 2023, only one comment has been received by The Ministry of Environment, Waters and Forests of Romania on the Strategic Environmental Impact Assessment of INECP, within the regional consultation procedure. Relevant clarifications have been provided accordingly. Comment and clarification are given in Annex IV.

4. ANNEXES

ANNEX I: INECP PC COMMENTS

i. General comments

stakeholder	comment	explanation	response
EPS	The term "CONSUMER" is incorrectly used, corrected in the entire text of INECP.	Considering that the Energy Law defines terms customer/end customer, or producer-costumer.	INECP text is revised
EPS	In the text of INECP it is stated that in addition to renewable energy community, "energy community" exists. Correct it.	Law on Use of Renewable Energy Sources does not recognize the term "energy community" but uses the term and defines "renewable energy sources community" (Article 62).	INECP text is revised
EPS	Split the documents Low Carbon Development Strategy and Action Plan in all other policy measures of the INECP.	Explanation is given in the comments of PM_D2 and PM_D4 (sheet Chapters 3.1 and 3.2).	INECP text is revised
EPS	It is necessary to change the name of the company EPS JSC throughout the document. Specifically, instead of a public company, it should be a joint-stock company, and for abbreviated name, instead of PE EPS, it should be EPS JSC.	The change is necessary due to the status changes of the company - the transition from a public company to a joint-stock company.	INECP text is revised
EMS	General comment	Being that at the session held on June 15, the Government of the Republic of Serbia adopted the "Conclusion on the acceptance of the starting points of the Plan for the development of energy infrastructure and energy efficiency measures for the period until 2028, with projections until 2030", which defines goals in all areas of energy	It is taken into account.

stakeholder	comment	explanation	response
		sector, it is needed to align INECP document with the given conclusion.	
EMS	The comment refers to the full text of INEKP	Rename North Continental South-East (CSE) to North Corridor in entire document.	INECP text is revised
AERS	General Comment on Chapter 3: Was a cost-benefit analysis done for the introduction of all the mentioned measures?	For each mentioned measure, the costs are foreseen, and how was the analysis of the benefits carried out?	For a certain number of measures, valid TYNDP is used but in some cases where there was no any other information, cost benefit analysis results are used, which software gave during modeling.
AERS	Comment on all measures: How were the costs shown for each measure in the line "Implementation costs" calculated, and if they were not calculated, what are the sources from which they were taken?		For a certain number of measures, valid TYNDP is used but in some cases where there was no any other information, cost benefit analysis results are used, which software gave during modeling.
AERS	GENERAL COMMENT: Picture titles should be placed below the pictures		Not accepted
NIS	General remark: In one part of the policy measures Implementing Entity is not stated.		Comment is accepted and the INECP text is edited.
EBRD	Budget figures in the "policy and measures" are largely unjustified	It would be helpful to provide an overview of how estimates were made in the annex (e.g. communication campaign more expensive than national GHG inventory system)	Amounts are coming from existing studies and models
EBRD	Measures do not include the needs to address environmental remediation from lignite mines, and	Suggest to consider upstream impacts of the energy transition	Suggested is the subject of Just Transition Diagnostics study and strategic documents in the field of mining

stakeholder	comment	explanation	response
	potential use of sites (e.g. for RE deployment)		
EBRD	General comment for the majority of the measures in the draft NECP - Quantified objectives in policy measure could be defined further as appropriate KPIs	As it stands, it would be tricky to monitor progress against objectives	Some measures are qualitative and some are quantified. The format defined by INECP enables the monitoring of their implementation, in order to achieve the fulfillment of nationally defined goals.
EBRD	The measures omit investments for climate resilience, which are important for energy security	One example is the need for climate adaptation studies and investments in HPPs, which are already suffering from increased hydrological variability. Other energy infrastructure assets are exposed to floods and extreme mass movements.	Suggested is the subject of the document Program of Adaptation to Changed Climate Conditions, which is being prepared by the Ministry of Environmental Protection.
EBRD	It would be helpful to include MWh projections by fuel by year to understand the evolution of the electricity mix, and as well as associated graph with CO2 emissions reductions in the electricity sector		The detailed results are given in Annex V of INECP.
EBRD	NECP does not include auctions among measures to support RE deployment. Suggest considering its addition.		It is already included in PM_D19
EBRD	Gas interconnectors and oil pipeline	The number of planned investments in this domain seems quite high (Bulgaria, Romania, North Macedonia, Leskovac, Vranje, etc.). Feasibility, bankability, availability of gas in the medium/long term and high capex should be taken into consideration. While we recognize the value of interconnectors for energy security and	All projects are from the valid TYNDP. It is justified to use gas as a transitional fuel.

stakeholder	comment	explanation	response
		<p>diversification, it would also be helpful to see more detail on the economic viability of significant natural gas and oil related investments, especially in the context of Serbia's decarbonization commitments.</p>	
CEKOR	<p>General comment: The basic problem of this document, as well as of all development projects that are considered and positioned in the territory of the Republic of Serbia, is that there IS no Spatial plan of the republic of Serbia and that all development plans that are in the form of special purpose plans, any detailed regulations, master plans, or whatever are called, they can and MUST be considered illegal, because by not creating a spatial plan of the Republic of Serbia, Serbia was deliberately brought into an illegal state, where a basic document is necessary for regulating development policies, because without a spatial plan and a Strategic environmental assessment, it is not possible to legally adopt individual projects (solar or any other power plants, mines, traffic projects, etc.) nor systematic development strategies and policies.</p>		<p>INECP as a strategic document give general directions. Details should be presented in other appropriate acts.</p>
CEKOR	<p>General comment: First, we want to emphasize that this document also makes it completely clear that Serbia is still not ready to face the need for mass insulation of individual and collective buildings in the housing sector as soon as possible. The fact that around or over 60% of electricity is used in housing, but</p>		<p>Comment is noted. Energy efficiency is considered in the analysis</p>

stakeholder	comment	explanation	response
	<p>also the fact that over 60% of the population must be considered energy poor, shows that it is in the exclusive national interest to finally face the fact that an actual energy census has never been conducted in Serbia, which would show how much electricity and energy could be saved if all residential units were insulated in a mass insulation process. Only then would we really see how much electricity we really need to produce from 2024 to 2050, and only then would this strategic planning make full sense. The public interest is not to help a producer, but to provide the population with enough energy, but only when we have reduced the needs as much as possible, because let's not forget that THE BEST ENERGY IS THE ONE THAT DOESN'T NEED TO BE PRODUCED.</p>		
CEKOR	<p>General comment: Given an unambiguous expected required balance of coal from 2024 to 2050 and expected, required balances after 2050. It is known that the opening of a mine requires up to 10 years, huge investments that are measured in billions of euros, displacement, provision of huge areas of land, which besides direct costs also have opportunistic costs, because that land is practically forever taken from agriculture, and agriculture on that land could generate income every year for the next 1,000 years, as much as it takes to restore 3 cm of humus, which is forever disabled due to the opening of mines, disposal of ash, etc.</p>	<p>Provide detailed balance sheets of required coal and estimated emissions from its burning in the period 2024-2050 and after 2050.</p>	<p>Detailed analysis is done and shared with the working group, which CEKOR was part of. Data with detailed figures are included in Annex V</p>

stakeholder	comment	explanation	response
	<p>It is also clear from other strategies and plans that EPS has explored in considerable detail balance and off-balance coal reserves both on the territory of Serbia and on the territory of the Autonomous Province of Kosovo, and in this context a more detailed expected balance of the required quantities of coal must be given in accordance with various scenarios, and since we know that serious investments are underway in Montenegro and B&H and that EPS imports coal from there, it is necessary to state how much of the coal needed by EPS will be imported.</p>		
CEKOR	<p>General comment: Regardless of the volume of INECP document, neither the scenarios nor the output data on impacts (e.g. emissions, pollution, employment, POLLUTION by various other main pollutants because it is clear that CO2 emissions are not the only pollution, GDP growth) but it would be even more important to see income growth (expected wage growth because it is clear from economic theory that even significant GDP growth is not always automatically reflected in population income growth).</p> <p>The document is congested with individual measures, some of which are very small, and it is not possible to get a clear picture of how each of those measures will affect various scenarios. It is not logical that the measures are all equal and suddenly we get completely different outcomes</p>		<p>It should be underlined that the discussion on scenarios has been implemented during the previous 2 years and it is not part of the INECP. The INECP has committed targets for 2030 and the measures are described for that period.</p> <p>Regarding nuclear power plant scenario and its implication with RIC is correct, but the nuclear option is only a scenario for the after 2030 period and has not been further considered.</p>

stakeholder	comment	explanation	response
	<p>in different scenarios. It is quite clear that the same measures do not lead to different outcomes, or a detailed specification must be given that, for example, more will have to be invested in one measure in scenario with 100% renewables, or less in the coal scenario, which is the prevailing scenario, or in the nuclear scenario.</p> <p>Practically, it would be necessary to make a separate list of measures for each scenario and prove how each of those measures will contribute to obtaining different outcomes. Currently, the document gives the impression that these measures are expected to, we don't know how, lead to these different consequences. For example: Support for innovation and scientific research, or new technologies in a situation where the scenario with a nuclear power plant is implemented, simply will not have the same fiscal space as in the case of not proceeding with a nuclear power plant, because, for example, for a nuclear power plant, it will be necessary to train several thousands of experts, but also the entire economy will be dramatically strained and focused on trying to get involved in the nuclear power plant project, which will most certainly make it seriously impossible for those economic societies to direct themselves towards new technologies of a different type.</p> <p>From all of this, it is clear that even the narratively, and even less graphical, tabular</p>		

stakeholder	comment	explanation	response
	representations do not show the difference in the impact of various scenarios on various indicators, and the individual measures that took up more than half of the document absolutely do not show how they will achieve the goals, and many of the measures have such the factor of uncertainty and unknown impact, and there is no clearly defined time period for their adoption and implementation, so it is completely unclear how different levels of implementation of certain measures will lead to different outcomes.		
CEKOR	General comment: We consider that this plan should be discussed and adopted by National Assembly of Republic of Serbia, not the Government, because it is a higher document than the Energy Strategy itself, which is adopted by the National Assembly.		This is not a subject of public consultation
CEKOR	General comment: It is unclear why and based on which decision the Government decided to do energy balancing, energy production plans, climate actions and everything else without considering the territory of the Autonomous Province of Kosovo.	Revise the study with a complete analysis including Kosovo and Metohija.	This is not a subject of public consultation. Document contains all information for Republic of Serbia in accordance with all other documents in the field of energy and climate.
Ministry of Construction, Transport and Infrastructure	General comment: The term "per capita" in the analysis (per head)	In our language, the term "per resident" is more acceptable.	Both terms are acceptable
Media & Reform Center Niš	General comment: The role of the civil sector should be redefined and strengthened, and the role of the civil sector should be increased at the	Apart from the consultations, public discussions and work in individual working groups, the role of the civil sector should be	This is not a subject of public consultation

stakeholder	comment	explanation	response
	local level, which could be an additional content of the measures proposed by Media and reform center in chapters 3.1 and 3.4.	particularly emphasized, and especially at the local level, the work of CSOs (civil society organizations) in permanent working bodies such as Councils and Commissions, where they represent a synergy of activism and knowledge. Implementation and monitoring of the Just Transition and the corresponding Action Plan is just one example (as stated in the document). However, that role should be in the process of proposing the adoption and control of the execution of regulations and planning documents, which is in accordance with the principles and standards of Open Administration, of which Serbia is a signatory as a world initiative and standard of good governance at the state, provincial and local levels. This is also in accordance with the norms from the Law on the Planning System of the RS.	
RERI	General comment: Public consultation is conducted in the period that disables effective public engagement in procedures of preparing the regulations	Article 8, paragraph 1 (a) of the Law on Confirmation of the Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters ("Official Gazette of RS - International Agreements" No. 39/09) states that it is necessary to establish sufficient deadlines for effective public participation. In this regard, in order to clarify certain provisions of the "Aarhus Convention" and to facilitate their application, in November 2015, the United Nations Economic Commission for Europe created the	Comment is not accepted. Ministry of Mining and Energy is preparing this document from 2021. For the purpose of preparation document, multisectoral working group were established. The representatives of European Commission, Energy Community Secretariat were included and informed about all results and Reports. During the process of the preparation INECP there

stakeholder	comment	explanation	response
		<p>"Maastricht Recommendations on Promoting Effective Public Participation in Decision-making in Environmental Matters", and in Article 77 it is stated that the legal framework should clarify the calculation of deadlines, which should be defined in clear terms, so in the same Article, under point e) it is stated that "whenever possible, the main holiday seasons (e.g. summer, end of December) should be avoided, as a time to hold the procedure of public participation". Despite the mentioned recommendations, the title authority continues with the harmful practice of holding public consultations and debates in the summer period, which prevents the effective participation of the public in the procedures for the preparation of regulations. This should especially be kept in mind, since this is a document of exceptional importance for the citizens of the Republic of Serbia, and one of the most important documents in the field of energy and climate change, which represents the basis of the energy policy of every country that has accepted this public policy document.</p>	<p>were many meetings with relevant stakeholders and consultations with faculties and institutes in Belgrade, Nis, Novi Sad and Kragujevac. Public consultations and transborder consultations were organized in accordance with the Law on Strategic Environmental Impact Assessment ("Official Gazette of the RS", no. 135/04 and 88/10) and Rules of Procedure of the Government ("Official Gazette of RS", no. 61/06, 69/08, 88/09, 33/10, 69/10, 20/11, 37/11, 30/13, 76/14 and 8/19). During the process of preparation INECP, RERI organized public hearings in November 2021, March 2022, and July 2023. MoME participated in the mentioned public consultations. MoME was in constant communication with the Ministry of Environmental Protection in order to include comments and updates after the deadline of August 5, 2023. Therefore, the period of consultation was not so strict and comments have been accepted even long after the deadline of the Consultation period.</p>

stakeholder	comment	explanation	response
			<p>For example, we have received comments from the Romanian Ministry of Environment, Waters and Forests on the Strategic Environmental Impact Assessment for the INECP by 11th October 2023 which will be responded accordingly. Please note that until today, 13th November 2023, MoME received comments only from Romania.</p>
RERI	<p>General comment: Ministry of Mining and Energy hasn't published starting basis for the creation of the strategic document in question</p>	<p>Article 77, paragraph 9 of the Law on State Administration ("Official Gazette of the RS", no. 79/05, 101/07, 95/10, 99/14, 47/18 and 30/18) obliges state bodies to implement certain provisions on public participation in the preparation of development strategies, action plans and other public policy documents, which are applied during the preparation of draft laws. Thus, Article 77, paragraph 1 of this law prescribes that state administration bodies are obliged to provide conditions for public participation during the preparation of draft laws, other regulations, and acts, in accordance with this law. Paragraph 2 of the same article prescribes that ministries and specific organizations are obliged to inform the public via their website and e-government (e-uprava) portal about the start of drafting the law, while they also publish basic information about the planned solutions that will be proposed. Paragraph 3</p>	<p>This is not a subject of public consultation</p>

stakeholder	comment	explanation	response
		<p>prescribes that when starting the preparation of a draft law that significantly changes the legal regime in one field or that regulates issues that are of particular interest to the public, ministries and specific organizations via their Internet pages and e-government portal also publish a starting document that contains a presentation of problems in a certain area and their causes, goals and expected effects of adopting laws, as well as basic principles for regulating social relations in that area, including the rights and obligations of subjects to which the law applies (starting bases).</p>	
RERI	<p>General comment: An ex-ante analysis of the effects was not carried out prior to the creation of the document</p>	<p>The Law on the Planning System ("Official Gazette of the RS", no. 30/18) and the Regulation on the methodology of public policy management, impact analysis of public policies and regulations, and the content of individual public policy documents ("Official Gazette of the RS", no. 8/ 19) clearly establish the framework for conducting an ex-ante analysis of the public policy documents impact. An ex-ante impact analysis must be carried out before making a decision on the creation of a public policy document and consists of clearly defined steps (Article 31 of the Law on the Planning System). Article 41 prescribes the corresponding application of the obligation to carry out regulations impact analysis. For the purposes of ex-ante impact analysis, it is necessary to describe the</p>	<p>It is not subject to public consultation. Please note that the process was carried out in accordance with the obligations from the international treaty - Treaty on the establishment of the Energy Community between the European Community and the Republic of Albania, the Republic of Bulgaria, Bosnia and Herzegovina, the Republic of Croatia, the Former Yugoslav Republic of Macedonia, the Republic of Montenegro, the Republic of Romania, the Republic of Serbia and the Provisional The United Nations Mission in Kosovo in accordance</p>

stakeholder	comment	explanation	response
		identified problems in detail, and to create an analysis of the achieved results of the implementation of previous public policy documents, since the identified problems are largely the result of the unsuccessful implementation of the previous strategic documents. In that case, the measures and activities will have their foundation in facts and will provide a basis for determining the desired change, public policy goals, available options and indicators based on which the achievement of the INECP objectives will be measured.	with Resolution 1244 of the United Nations Security Council ("Official Gazette of the RS", number 62 of July 19, 2006) and in accordance with Regulation 2018/1999. Having in mind that, Article 50 of the Law on the Planning System of the Republic of Serbia (Official Gazette of the Republic of Serbia, No. 30/2018) is applied.
RERI	General comment: INECP was submitted to the Energy Community Secretariat before the end of public consultations on this document	Article 10 of the Decision of the Ministerial Council D/2021/14/MC-EnC, which adopted the adapted regulation 2018/1999, prescribes that each Contracting Party shall attach a summary of the views of the public to the Energy Community Secretariat along with the submission of the INECP draft. That before submitting the draft INECP to the Energy Community Secretariat, it is necessary to conduct a public consultation and prepare a report on it, it was also confirmed by Recommendation 2018/01/MC-EnC of the Ministerial Council of the Energy Community (Recommendation 2018/01/MC-EnC), which clearly prescribes the procedure for the creation and adoption of this document.	This is not a subject of public consultation. We kindly remind that Energy Community Secretariat was included from the very beginning of the project and was informed on all results.
RERI	General comment: The holder of the plan drafting unjustifiably separated the public consultation on INECP and	Article 19, paragraph 2 of the Law on Strategic Environmental Impact Assessment prescribes that public insight and public	Comment is not accepted. The INECP and SEA Public

stakeholder	comment	explanation	response
	<p>on the Strategic Environmental Assessment of INECP</p>	<p>debate are organized as a rule within the framework of presenting the plan and program for public insight and holding a public debate in accordance with the law regulating the procedure for adopting the plan and program. The applicant points out that the reasons why the plan maker separated these two procedures are not clear.</p>	<p>Consultations were almost parallel.</p>
<p>RERI</p>	<p>General comment: The results of public consultations on the scenarios are not presented, nor are the reasons why certain suggestions were not integrated into the document</p>	<p>In August and September 2022, the ministry that is in charge of plan drafting conducted public consultations on the scenarios. The applicant points out that in accordance with Article 24 of the Law on the Planning System, it is prescribed that the competent proponent considers the suggestions made by interested parties and target groups during the consultation, the competent proponent informs the consultation participants about the results of the consultations, and especially about the reasons why certain suggestions were not included into a public policy document, and that information about the results of the consultations carried out, which in particular includes information about the consulted parties, the scope and methods of the consultations, the issues that were discussed during the consultations, as well as the objections, suggestions and comments that were taken into consideration and those that were not taken into account, as well as the</p>	<p>The document is prepared in accordance with regulation under obligation of Energy Community treaty. We kindly remind that Ministry of Mining and Energy established multi sectorial Working Group, including NGOs, Energy Community, EU Delegation in Serbia, EBRD, and others. Methodology and basic input data were published on MoME website and e-consultations website since April 2022.</p>

stakeholder	comment	explanation	response
		<p>reasons for their non-acceptance, the competent proponent presents in the framework of the public policy document. However, the holder of the plan did not act in accordance with the previously cited provisions. In addition, the Applicant indicates that it was necessary to conduct public consultations for the entire document (and not only for the scenarios) so that the public would have the opportunity to become familiar with the proposed solutions. In the aforementioned way, key omissions and errors contained in this document would be avoided.</p>	
KFW	Gaps in structuring and preparing document identified	<p>Referring to the following aspects:</p> <ul style="list-style-type: none"> • missing Table of Content, • partially working cross-references, • Chapter 4 and Chapter 5 have numerous half-blank and fully empty pages. <p>Recommendation: Document should be revised accordingly.</p>	Comment is accepted and the INECP text is edited according to what is proposed.
ilija.batas@gmail.com	<p>General comment:</p> <p>The plan is essentially not ambitious, and it makes no sense to adopt it.</p>	<p>The proposed plan cannot be called a plan for climate and energy in the essential sense as the European Commission foreseen it for the member states and later taken over by the contracting parties of the Energy Community, because in its essence this plan should express the ambition to solve the problem of climate change. The plan for energy and climate is intended to solve the problem of climate change and to undertake ambitious obligations, not to verify the impossibility of</p>	Comments are considered. INECP define the Energy Transition, and changes in the structure of the energy mix. Targets are ambitious and realistic.

stakeholder	comment	explanation	response
		<p>changing the existing situation. Despite the initial promises from the Ministry and the hope that the transition will be "painful" and "green" in this document, which is adopted with a delay of one year, the current practice of using lignite is not abandoned. This practice is presented as "ambitious and realistic" and the only possible solution, despite the practically infinite number of scenarios that can satisfy the ambition of the energy transition that was started in the EU and is related to climate change while reducing costs for the citizens of Serbia. The plan does not envisage ambitious changes as seen by the EU, on the contrary. The ambition of this proposal lies in the availability of lignite reserves until 2050 (which we currently import from Indonesia because the energy transition has begun there as well, so they don't need it and it's cheap, but transport is unreasonably expensive). The ambition of this plan is also in the fact that by increasing the consumption of fossil fuels, higher excise taxes and revenues for the budget are collected, while on the other hand, the citizens of Serbia are exposed to unnecessary political, economic and health risks. The ambition of this plan is also with regard to the growth of the gross domestic product on the premises of consumption growth. One can see the ambition of using controversial nuclear</p>	

stakeholder	comment	explanation	response
		<p>energy, with indebtedness and import dependence. The ambition to achieve full energy independence of the country is not seen as a priority that is complementary to the goals of decarbonization through the intensive application of renewable energy sources and through the accelerated improvement of energy efficiency indicators. No ambition is noticeable to apply and transfer the latest technologies to Serbia. All goals and ambitions and more than these have so far already been seen in the documents to which Serbia has previously committed itself. There are no breakthroughs. The backbone of the plan is the use of lignite until 2050, with the hope that in the eyes of the reader of the text, the appearance of a real transition will be created. The European plan for climate and energy of the Republic of Serbia should show ambitions for everything else except what is foreseen here.</p>	
<p>EPS Scientific Council</p>	<p>General comment: Bearing in mind the complexity of the situation in which such an important package of documents (for the future of Serbia's energy sector) is being prepared, it is a worrying fact that the state does not provide financing from its own sources for their preparation, but with foreign assistance (has to) hire foreign consultants, instead of for such a delicate field</p>		<p>This is not a subject of public consultation</p>

stakeholder	comment	explanation	response
	<p>as energy, it has a national specialized multidisciplinary institution and to hire its professional staff in it, which would be specially prepared within the higher education institutions. Therefore, it is not surprising that, instead of continuous, this kind of ad hoc work of foreign experts, with the participation or assistance of bulky working groups (in the list of working group participants, Serbian Academy of Sciences and Arts is also mentioned, which is not true and casts doubt on the actual participation of the other mentioned organizations, and the fact that the public discussion is planned and conducted during the annual vacation casts doubt on the organizers' desire for it to be comprehensive and fruitful) composed of domestic experts, cannot even give a good result. Thus, this time (See the corresponding remarks of The Academy of Engineering Sciences of Serbia on the original version of 05.09.2022) the INECP was submitted to the public discussion as an incomplete and technically disordered document (the Serbian language version, although the English version also contains shortcomings), which would have to be withdrawn and sent back for thorough revision and corrections before being submitted to the Government for adoption.</p>		
<p>EPS Scientific Council</p>	<p>General comment: Thermal power plant projects: The Government of Serbia has adopted a</p>		<p>This is not a subject of public consultation</p>

stakeholder	comment	explanation	response
	<p>specific implementation plan of Directive 2010/75/EU on industrial emissions, which foresees the possibility of issuing an integrated permit for blocks TENT A1 and A2 until 2032 and TEKO A until 2030. The alternative plan of the EPS envisaged that the investments required for the installation of new expensive systems to protect the environment, which cannot be recovered in the remaining life of the blocks, would be directed towards the completion of the construction of the new TPP Kolubara B as a replacement capacity. For the final choice between these two alternatives, there remains the need to check with a serious professional analysis which of them is more justified to invest the planned funds.</p>		
<p>EPS Scientific Council</p>	<p>General comment:</p> <p>Hydropower projects: In addition to the necessary construction of the reversible hydroelectric power plants Bistrica and later Đerdap 3, the possibility of building ten hydro power plants with dam toe powerhouse on the Ibar River and five cascade hydro power plants on the Velika Morava River is indicated. Due to a series of circumstances that occurred on the ground after the initial projects and due to the unknown attitude of the partners at the time, there is doubt about the possibility of these hydroelectric plants being built. On the other hand, earlier ideas, and projects for joint (with neighbors) use of the significant energy</p>		<p>This is not a subject of public consultation</p>

stakeholder	comment	explanation	response
	<p>and water management potential of the Drina River should not be abandoned, as has been done.</p>		
<p>EPS Scientific Council</p>	<p>General comment:</p> <p>Guaranteed prices: Since the state can no longer administratively determine the guaranteed purchase prices of electricity, it is necessary to harmonize the price policy with the policy valid in the EU while ensuring price parity. Also, since the expected taxes on GHG emissions increase the costs of fossil fuel production and directly affect the structure of production capacities, the dynamics of the application of those taxes should be precisely defined in INECP. At the same time, it is important to ensure with the Plan that these taxes are not transferred abroad, but that they are used to the maximum in Serbia.</p>		<p>This is not a subject of public consultation</p>
<p>EPS Scientific Council</p>	<p>General comment:</p> <p>After reading both versions of INECP's proposal in Serbian and English due to the need to clarify unclear wording and questionable data, we concluded that the text was drafted first in English (in order to submit it to the Secretariat of the Energy Community), and that it was for the public hearing quickly translated into Serbian and released into public debate without control. The translation itself has errors, so it requires language proofreading. Apart from linguistic ones, the text has numerical errors in</p>		<p>Comments are considered and text is revised for the final version</p>

stakeholder	comment	explanation	response
	<p>the statement of estimated costs, a lot of imprecise and unclear wording and omissions that need to be corrected.</p> <p>Observed omissions, deficiencies and errors indicate incompleteness and unpreparedness of a very important document presented for public discussion, and it is necessary to withdraw it for thorough revision with very strict control in order to eliminate observed deficiencies. There is a fear that such a disorganized, unclear, and incomplete INECP would lead to great difficulties in its direct application, but also that it could indirectly cause damage in the preparation of the new Energy Development Strategy if its intended use for its preparation (instead of arising from it) was performed without the above corrections.</p>		
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo</p>	<p>General comment:</p> <p>The INECP document should be reduced to a rational and realistic document.</p>	<p>The INECP document contains a good part of policy measures that are in the domain of promotion and education, many activities, and huge planned funds for a short period of time.</p> <p>RECOMMENDATION: If there is space and time, the considered document should be reduced to a rational measure in order to have a realistic and usable document.</p>	<p>Noted</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i</p>	<p>General comment:</p> <p>It is not logical that the INECP of a sovereign state relies dominantly on the financial funds of</p>		<p>Noted</p>

stakeholder	comment	explanation	response
<p>zeleno, Milica Damnjanović</p>	<p>other states or groups of states such as the EU. The measures proposed by the INECP of Republic of Serbia are according to the proposal, primarily financed from EU funds and undefined "other funds". Why is the future of the citizens of Republic of Serbia put in the hands of the funds that the citizens of Republic of Serbia cannot decide how it will be used? What will happen if there is a change in the foreign policy of the EU or a change in the foreign policy of the Republic of Serbia? Does this plan mean that INECP of Republic of Serbia can only be achieved if the EU stands behind the decisions of the citizens of the Republic of Serbia? What will happen if there are political pressures related to the funds that are through INECP planned to be realized? For example, in INECP of Republic of Croatia, which is a member of the EU, most of the measures are financed from the budget/other inflows/own funds, and secondly from EU funds.</p>		
<p>dragan.sreckovic@gmail.com, joriszantvoort@gmail.com, Plavo i zeleno, Ekoaktivizam, The United Branch Trade Unions "Independence"</p>	<p>General comment: The main objection to the two strategic documents of INECP and the Just Transition Diagnostics is the time mismatch. While INECP is in the final stage and the public debate is ongoing, the document "Just Transition Diagnostics" has not reached the final version yet.</p>	<p>If there was quick adoption and the start of the implementation of INECP, then the transition process would begin long before the theoretically designed care measures for the workers who will be affected in this process. The time gap between these two documents seems too great, and there is a real danger that the time mismatch between these two documents will cause unwanted consequences on the labor market and take</p>	<p>This is not the subject of public consultation of INECP</p>

stakeholder	comment	explanation	response
		away the possibility of implementing a true just transition.	
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, The United Branch Trade Unions "Independence"</p>	<p>General comment: The analysis of the dynamics of predicted disruptions in the labor market was done according to several scenarios predicted by INECP. The authors of the Just Transition Diagnostics themselves warn of the fact that INECP is very ambitious in the decarbonization of the energy sector, which necessarily requires high costs.</p>	<p>This is also the reason why the concept of an energy just transition must be approached much more responsibly than is the case at the moment. The statistical maneuvers used by INECP to measure the projected decline, i.e. the growth of the employment rate at the national level, have no effect on the fairness of the transition to the green economy, but can only have the purpose of blurring the nature and scope of problems on the labor market.</p>	<p>This is not the subject of public consultation of INECP</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, The United Branch Trade Unions "Independence"</p>	<p>General comment: It is still unclear why the two strategic documents of INECP and the Just Transition Diagnostics are in two different working groups? It remains unclear how the Chamber of Commerce and Industry of Serbia found a place among the actors, and no place was found for social partners. Why do the authors of this document propose new interdepartmental bodies, while forgetting the role of the Social and Economic Council and local employment councils?</p>	<p>It is necessary to promote social dialogue both at the sectoral and national level, in order to identify the social impacts of industrial and environmental policies and manage them accordingly. Extend the scope of collective bargaining at the sectoral level to low-carbon transition issues in order to consider the impacts of the decarbonization process on employment and wages, as well as retraining needs and occupational safety and health.</p>	<p>The comment in general is the subject of the Study the Diagnostics of Just Transition.</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, The United Branch</p>	<p>General comment: A just transition is based on the fact that no one is its victim. With that, it is necessary to ensure a just transition of employees, as well as the opening of decent and quality jobs.</p>	<p>The social dialogue should enable the unification of the strategy of reindustrialization, innovation, the application of clean technologies and investment in green infrastructure, together with the measures necessary to make the</p>	<p>The comment in general is the subject of the Study the Diagnostics of Just Transition</p>

stakeholder	comment	explanation	response
Trade Unions "Independence"	In your opinion, who is in charge of training and retraining workers for green workplaces?	transition as peaceful as possible: social protection, training for new knowledge and skills, policies in the field of the labor market and development and rebuilding the community.	
jorizantvoort@gmail.com	General comment: Since this plan does not deal with climate, my proposal is to remove the word 'climate' from the title of the plan.	This draft deals only with the energy transition, and to a very small extent with the climate crisis, although it is called an energy and climate plan. The words drought, flood, and heat are not mentioned, and e.g. exhausting only once.	The INECP refers to the mitigation actions and not adaptation actions which are subject of separate document under the title Climate Change Adaptation Programme.
mayacvetinovic@gmail.com, Let's Protect Jadar and Rađevina, nikorade1918@gmail.com, rakicmarinko4@gmail.com, tomicko2000@gmail.com, Čuvari Petruške krajine, jadranka.bramwell@gmail.com	General comment: Nowhere in the document you do not mention the mining waste. How could such a "mistake" sneak in and do you think you should do something about it? Do you think that in any way you can start to solve the big problem of tailings pond?	According to the information available to us, about 60 million tons of tailings are disposed annually in Serbia. Is it possible that in a document such as INECP (at least officially) there is no mention of a solution to that problem anywhere, not even on the wish list?	The INECP is a strategic level document for setting the overall targets for Greenhouse gasses emissions and renewable energy. Detailed environmental effects of mining activities are addressed in specific environmental effect studies. Also, waste is the subject of the documents in the field of mining
dusicalekic@gmail.com, dmagroteka@gmail.com	General comment: The second question is related to tailings pond? Why is there no mention of tailings pond anywhere in your document?	According to available information, about 60 million tons of tailings are disposed annually in Serbia. Do you think it's not a problem as long as you don't mention it anywhere?	The INECP is a strategic level document for setting the overall targets for Greenhouse gasses emissions and renewable energy. Detailed environmental effects of mining activities are addressed in specific environmental effect studies. Also, waste is the subject

stakeholder	comment	explanation	response
			of the documents in the field of mining
Marš sa Drine, UDRUŽENJE ZA ZAŠTITU ŽIVOTNE SREDINE - AEP	General comment: OPINION/COMMENT: the projection on lithium and boron should be deleted from INECP.	Based on the above-mentioned commonly known facts, it is clear that this projection is unrealistic and unfounded, so we request the deletion of this projection from INECP.	Accepted. Thank you for the comment

ii. Chapter 1

stakeholder	comment	explanation	response
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter “Decarbonisation – GHG Emissions”, in paragraph 4, it is wrongly stated that Industrial Policy Strategy is adopted in 2018. Correction should be implemented also in the footnote (page 13).	Industrial Policy Strategy of the Republic of Serbia from 2021 to 2030 (“Official Gazette of RS”, No. 35/20)	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter “Decarbonisation –RES”, in paragraph 2, supplement stating the facts when the Energy Law was adopted with all amendments and supplements to the law and add these facts also in footnote (page 13).	Taking into consideration that the Energy Law determines the basic goals of energy policy and the way to achieve it, as well as the conditions for reliable, safe and high-quality energy delivery, it is necessary that this document contains information about its amendments and supplements and when they were published. The Energy Law (“Official Gazette of RS”, No. 145/14, 95/18 and 40/21 and 35/23-other law).	All mentioned amendments and supplements are already stated in different parts of chapter ii. Comment is accepted and INECP text is edited

stakeholder	comment	explanation	response
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter “Decarbonisation –RES”, in paragraph 2, supplement stating the bylaws that were adopted based on the Law on Use of RES (pages 13/14).	Taking into consideration that in the chapter ii, under subchapter “Decarbonisation –RES” are stated bylaws that establish incentive measures for privileged producers of electricity that have ceased to be applied, it is necessary to supplement the text by specifying the by-laws adopted based on the Law on Use of RES: Decree on market premium and feed-in tariff ("Official Gazette of RS", number 45/23); Regulation on the assuming of balance responsibility and the model contract on the assuming of balance responsibility ("Official Gazette of the RS", number 45/23); Regulation on the model contract on market premium ("Official Gazette of RS", number 112/21).	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter “Energy Efficiency”, in paragraph 3 correct the statement that compliance with Energy Efficiency Directive 2012/27/EU will be achieved by adoption of by-laws, considering that the by-laws based of Law on Energy Efficiency and Rational Use of Energy were adopted (page 15).	By-laws based of Law on Energy Efficiency and Rational Use of Energy that were adopted are: Decree on eco-design of products that affect energy consumption ("Official Gazette of the RS", number 132/21); Decree on the obligations of the guaranteed supplier and on the obligations of the Authorized Contracting Party with regard to financial incentives for high-efficiency cogeneration ("Official Gazette of the RS", number 30/22); Decree on the minimum energy efficiency requirements that must be met by new and reconstructed buildings ("Official Gazette of RS", number 44/22);	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
		Decree on the obligors of the energy management system ("Official Gazette of the RS", number 59/22); Decree on Energy Labeling of Products Affecting Energy Consumption ("Official Gazette of the RS", No. 21/23); Decree on the contract model on the feed-in tariff for the sale of electricity produced in a micro-cogeneration unit or small cogeneration ("Official Gazette of RS", number 43/23).	
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter "Energy Efficiency", in paragraph 6 supplement by stating when Law on Planning and Construction (LPC) was adopted (page 16)	Taking into consideration the importance of the issues regulated by this law for the implementation of measures and policies of INECP, as well as the fact that this information is provided for other laws in the text, add the following in the footnote: Law on Planning and Construction ("Official Gazette of the RS", No. 72/09, 81/09 - correction, 64/10 - CC, 24/11, 121/12, 42/13 - CC, 50/13 - CC, 98/13 - CC, 132/14, 145/ 14, 83/18, 31/19, 37/19 - other law, 9/20, 52/21).	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union, subchapter "Energy Efficiency", in paragraph 7 supplement by stating when Law on Public Procurement was adopted (page 16)	Law on Public Procurement ("Official Gazette of RS", number 91/19)	Comment is accepted and the INECP text is edited

stakeholder	comment	explanation	response
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter "Internal Energy Market", in paragraph 2, where it is stated that ownership structure of DSO is unbundled from Public Enterprise EPS, edit and supplement the text (page 18)	On December 29, 2020, the Government of the Republic of Serbia and the Public Enterprise "Elektroprivreda Srbije" concluded the Agreement on the transfer of shares in the Distribution System Operator "EPS Distribucija" Ltd Belgrade from the Public Enterprise "Elektroprivreda Srbije" Belgrade to the Republic of Serbia. By the decision of the Agency for Economic Registers number BD 99765/2020 of December 31, 2020, the registration was carried out according to which the Republic of Serbia was incorporated as a member of the company with a share of 100% of the capital.	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter "Internal Energy Market", in paragraph 7 it is wrongly stated the Energy Agency regulates the right to guaranteed supply of electricity (page 18).	Correct the text, given that pursuant to the Energy Law (Article 50), the Energy Agency adopts a methodology for determining the price of electricity for guaranteed supply and approves the decision on the price of electricity.	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter "Internal Energy Market", in paragraph 8 (page 18), it is wrongly stated that the new Energy Law is from 2021.	To correct, taking into consideration that Amendments to the Law on Energy were adopted then (Official Gazette of RS, no. 40/21)	Comment is accepted and the INECP text is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter "Internal Energy Market", in paragraph 9, delete the words "along with the Law on..." („у спрези са Законом о...“) (page 19).	Legally and technically incorrect, considering that are the Amendments to the Law on Use of RES.	The text is revised in order to clarify the presented information.

stakeholder	comment	explanation	response
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter “Internal Energy Market”, in paragraph 10, entirely correct the text about the energy poverty (page 19).	Considering that from the text it is not clearly stated that in the period from 2015 to 2022 a by-law was applied, which ceased to be valid on the day of the adoption of the new Decree on the Energy Buyer ("Official Gazette of RS", number 137/22). In this regard, make corrections in footnote 48, as well.	Comment is accepted and the INECP text is supplemented with the new decree and the text about the old one is edited
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter “Energy Security”, correct the name of the Strategy for Development of Information Security for the period 2017 – 2020 (paragraph 10, page 22).	Full name is the Strategy for Development of Information Security in Republic of Serbia for the period 2017 – 2020 (Official Gazette of RS, no. 53/17)	Comment is accepted and the INECP text is edited. The new Strategy is mentioned.
EPS	1 OVERVIEW AND PROCESS FOR ESTABLISHING THE PLAN, 1.2 Overview of current policy situation, chapter ii, subchapter “Research, Innovation and Competitiveness”, correct the name of the Strategy of Scientific and Technological Development of Serbia (paragraph 4, page 24).	Strategy of Scientific and Technological Development of Serbia from 2021 to 2025 “The Power of Knowledge”	Comment is accepted and the INECP text is edited
Elektrodistribucija	Proposal with the purpose of harmonization with the legal regulation.	On page 18, paragraph 1, it is necessary to precise the text that relates to Distribution System Grid Code, where “adopted in February 2019” should be replaced with “adopted in July 2017, with amendments adopted in February 2019”.	Comment is accepted and the INECP text is supplemented. Also references are added both for Distribution Grid Code (https://www.aers.rs/Index.asp?l=1&a=94.1) and for Transmission Grid Code (https://www.aers.rs/Index.asp?l=1&a=94)

stakeholder	comment	explanation	response
RHMZ	<p>Integrated National Energy and Climate Plan of the Republic of Serbia for the period 2030 with the projections up to 2050 (INECP) does not contain reference to the Law on Meteorological and Hydrological Activities, which regulates issues of importance for the planning and use of basic types of renewable energy sources (RES), related to hydro, solar and wind energy.</p> <p>In line with the abovementioned, proposition is to add in chapter “1.2 Overview of current policy situation”, subchapter “ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union”, below part “Decarbonization – GHG Emissions”, at the end of the first paragraph following text: “Also, in 2010, the Law on Meteorological and Hydrological Activities (“Official Gazette of RS”, No. 88/2010) was adopted, which regulated the issues of systematic meteorological and hydrological measurements and observations, monitoring and research of the state and changes in weather, climate, water resources and the regime of surface and underground water, solar radiation, energy potential of the sun, wind and water on the territory of the Republic of Serbia, which is of importance for planning the development on the use of hydropower, solar and wind energy as the basic types of RES”.</p>	<p>In INECP chapter: 1.1 Executive Summary (overview/scope of the plan), under “iii. Key objectives and priorities of the plan” (page 4 of the document), key goals of the plan are defined, which relate to the increased share of RES in the energy mix of Serbia, mainly through exploitation of wind and sun energy, as well as improvement of the energy security of the country and other.</p> <p>On page 13 of the plan, in chapter “ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union”, under point “Decarbonization – GHG Emissions” in the first sentence it is emphasized that decarbonization is articulated in two key axes, i.e., reduction of emission and renewable energy sources.</p> <p>In chapter „2.4 Energy security“ the following is emphasized „Obviously, the optimal utilization of domestic energy sources should be ensured to enhance the energy security. The identification of the existing potential and the most cost-effective utilization of domestic energy sources is an essential target within the framework of the NECP. Emphasis will be given on the utilization and use of RES potential, both for electricity production and for direct use in end-uses contributing substantially towards energy security”.</p> <p>In picture 4.1.1 participation of RES in gross electricity production over 2010-2020 is shown, which has been stable also in 2020</p>	Comment is accepted and the INECP text is edited

stakeholder	comment	explanation	response
		with an amount of 29% and based primarily on hydro energy. Stability of this type of RES is expected also in projection until 2050, so it is important to conduct systematic meteorological and hydrological measurements and monitoring of the state and changes in the water regime on the territory of Serbia in accordance with the Law on Meteorological and Hydrological Activity (Article 5 of the Law).	
AERS	<p>Subchapter “Decarbonisation –RES”</p> <p>In addition to the Law on RES, as further stated in the text, the adaptation of the domestic legal and institutional framework to the legal acquis of the European Union in the field of energy was also done with the Amendments to the Law on Energy from 2021 through the introduction of the energy activity of hydrogen production as motor fuel, production and mixing of bioliquids, it was specified that there is an energy activity for the trade of oil, oil derivatives, biofuels, bioliquids, compressed natural gas, liquefied natural gas and hydrogen. Hydrogen and liquefied natural gas have been introduced into the extended concept of motor fuels, which makes it possible to trade ecologically acceptable fuels at stations for supplying means of transport, that is, to use them as energy sources in traffic.</p> <p>In this chapter, we should also mention Directive (EP) 2009/28, which refers to renewable energy sources to reduce the emission of greenhouse</p>	Subchapter “Decarbonisation –RES” lists only a small part of the current regulation that was adopted with the aim of decarbonizing the energy sector and stimulating the production and use of energy from renewable sources. The comment lists and explains in detail the current regulations related to the production and placing of hydrogen, biofuels and bioliquids on the market, as well as the mixing of biofuels, i.e. bioliquids, with fuels of petroleum origin.	Comment is accepted and the INECP text is edited

stakeholder	comment	explanation	response
	gases, in the part that refers to the mandatory content of biofuels in motor fuels, it was implemented in domestic legislation starting in 2019 after the following were adopted: Regulation on the share of biofuels on the market (Official Gazette of the RS No. 71/2019), Rulebook on technical and other requirements for biofuels and bioliquids (Official Gazette of the RS No. 73/2019) and Regulation on Biofuel Sustainability Criteria (Official Gazette of the RS No. 89/2019). In 2020, the Rulebook on calculating the share of renewable energy sources was adopted (Official Gazette of RS No. 37/2020).		
NIS	Chapter 1, page 13, third paragraph: After 33% add words: "in energy sector".	According to the document, decrease of 33% is related only to energy sector, and that should be emphasised, because total reduction should be 40.2%.	Comment is partially accepted, by adding "excluding LULUCF", instead of adding "in energy sector".
EBRD	p. 5 mentions transfer "transition towards a climate neutral economy". For which year is the target set?	Serbia committed to a course for 2050 climate neutrality per Sofia and Berlin Declarations, but to our knowledge has not set it out in official documents. Figure 5.1 seems to suggest that climate neutrality is not reached in 2050, but would be good to confirm.	The main goal of INECP is to define policy goals and measures until 2030, with projections until 2050, with the fact that these measures will be updated in future revisions of the plan. In Chapter 5 it is stated that it is expected that coal-fired thermal power plants will stop producing electricity by 2050.
EBRD	Is there a plant-level timeline for lignite assets phase out by year? What does phase out entail (i.e. decommissioning/repurposing etc.)?	The target of 25% reduction in lignite based generation is for 2030 (p 5) and scenario S projections (p 292) give an indication of plants that will be in operation past 2030, but	INECP is strategic level document. Details should be presented in other relevant acts.

stakeholder	comment	explanation	response
		do not specify pre-2030 phase out timeline and what happens to assets.	
EBRD	Would Serbia consider adding just transition as one of the qualitative objectives for NECP?	Just transition is prominently mentioned in NECP, but not listed among objectives on p.5	INECP text is revised according to proposed
EBRD	IFIs and development partners are not included in figure 1.14. on "governance of the preparation..."	Consider including all working group members for transparency	INECP text is revised according to proposed, and missing partners are added
BOS	Chapter 1, page 5: Data on building renovation trend until now are missing, as well as data on state funding for building renovation in the previous years.	<p>The document states that a renovation rate equal to 1% approximately on annual basis will be fostered.</p> <p>It would be preferable to provide information on amount of this renovation rate in practice so far, for all three groups of buildings, in previous years, so that the trend could be observed, and based on the trend, determine what the realistic rate is.</p> <p>In addition to the trend of renovation of buildings in m2, it is necessary to show the trend of financial allocations of the state for renovation of buildings in previous years. Based on this trend, it can be determined how realistic are the planned allocations from the budget for EE in the building industry for the period up to 2030.</p>	No official data about the existing renovation rate are available. It is considered that the existing renovation levels are very low. Moreover, the existing programmes for the energy upgrade of the buildings are limited according to the available information justifying the assumption about the low renovation levels.
BOS	Chapter 1, page 1: Total ambition of INECP of Serbia is 33% (Scenario S) reduction of GHG emissions until 2030 when compared with 1990, without LULUCF sector. Although this ambition is	Emissions of GHG in Serbia in 1990 amounted to 81.5 MtCO ₂ e, while according to the INECP emissions in 2019 were 61.5 MtCO ₂ e, which is already reduction of 24.4%. Therefore, plan draft in reality has the goal of	The target which is set by the INECP is consistent with the target of the Serbian updated Nationally Determined Contribution (NDC) and Low

stakeholder	comment	explanation	response
	<p>presented as high, it is not enough to get Serbia on the path to decarbonization and climate neutrality.</p>	<p>additional reduction of 8.6% compared with 1990 or 11% compared with current emissions in 2019, or only 6.8 MtCO₂e.</p>	<p>Carbon Development Strategy. It is considered as a realistic target for 2030 (which is a medium term time horizon) setting the basis for a more aggressive pathway in the horizon towards 2050.</p>
<p>BOS</p>	<p>Chapter 1, pages 1 and 12: In subchapter “i. Political, economic, environmental, and social context of the plan” on page 1, it needed to process in one paragraph key goals of sustainable development from Agenda 2030 UN, which are related to energy and climate policy.</p> <p>In subchapter “ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union”, on page 12, appropriate goals that Serbia has accepted are also not stated, so here they should be processed.</p>	<p>The UN 2030 Agenda contains the key goals of sustainable development until 2030, which should be the basis of all public policies, both in the world and in Europe and Serbia. Among these goals for the energy and climate policy, the most important are COR: 7 (Available and renewable energy), 11 (Sustainable communities, especially air quality and waste management), 12 (Sustainable production and consumption) and 13 (Climate action: Take urgent action in the fight against climate change and its consequences).</p> <p>Serbia has ratified the 2030 Agenda. The European Union, with the European Commission's communication number COM/2016/0739 entitled "Next steps for a sustainable European future", confirmed that it will integrate the sustainable development goals of the 2030 Agenda into planning documents. The communication was accompanied by the document "New European consensus on development: Our world, our dignity, our future". Agenda 2030</p>	<p>Information is added. INECP is compliant with goals from Agenda 2030. Document is prepared based on EU governance regulation.</p>

stakeholder	comment	explanation	response
		<p>is a document of exceptional importance and relevance when creating EU legislation. Since INECP was transposed into our legislation based on The Energy Community Treaty, it is certain that Agenda 2030 should be mentioned as a relevant context and an international document, which must be considered when creating the document. In addition, it is also necessary to analyze the individual goals of INEKP from the point of view of Agenda 2030, whose sustainable development goals the Republic of Serbia should integrate into its planning documents.</p>	
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 1, pages 1-3: On page 2 list all sectors that belong to the "energy efficiency" subfield (construction, industry, transport, agriculture...).</p> <p>On page 3, after the two paragraphs describing energy efficiency in the construction sector, it is necessary to add descriptions of the goals and contributions of other sectors belonging to the "energy efficiency" subfield (industry, transport, agriculture...).</p>	<p>Page 2 states that " Energy Efficiency that presents specific sub-area regarding the aim to present the country's commitment towards increased energy efficiency across all sectors."</p> <p>On page 3, in the clarification of national goals in the field of energy efficiency, only energy efficiency in construction is mentioned. In this way, the impression is that the energy efficiency sub-area refers only to the construction sector.</p> <p>Also, in Annex 1 - The summary table of measures with implementation costs on page 286 clearly shows that the energy efficiency subfield includes other sectors as well.</p>	<p>Concerning page 2, following sectors are added: industrial, transport, construction, and agriculture, as stated in the Chapter 3.2.</p> <p>Page 3 text about EE is supplemented to include other sectors.</p>
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 1, page 16: It is needed to update the number of energy certificates.</p>	<p>The number of energy certificates is changed on a daily level. It is needed to update the number just before the adoption of the document.</p>	<p>The last number and date is added Source: https://www.crep.gov.rs/Energe</p>

stakeholder	comment	explanation	response
			tskiPasosi.aspx (could also be added as a reference)
Ministry of Construction, Transport and Infrastructure	<p>Chapter 1, page 17:</p> <p>On page 17 after the sentence "In addition, amendments to the LPC made in 2020 establish a legal basis for the development and adoption of the " Long-Term Strategy for Encouraging Investment in the Renovation of the National Buildings Fund of the Republic of Serbia until 2050", which was adopted in the first quarter of 2022." it is necessary to add following sentences: "In 2023, the Ministry of Construction, Transport and Infrastructure proposed the Draft Law on Amendments to the Law on Planning and Construction, and the Government approved the Proposal for that law and forwarded it to the National Assembly for consideration and adoption. In the proposal of the Law, considerable attention is devoted to the further improvement of energy efficiency: Articles 12 and 13 of the Energy Performance of Buildings Directive (2010/31/EU) are directly transposed and the preparation of the National methodology for calculating the energy characteristics of buildings is foreseen. Also, the Proposal of the Law foresees the prescription of the validity period of energy passports - 10 years, as well as the obligation to attach an energy certificate when certifying a contract on the sale of real estate or concluding a lease contract.</p>		Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 25: Figure 1.14 Governance of the preparation and development of the Integrated National Energy and Climate Plan with the reference "Project Progress Monitoring Body: Project Steering Committee". Several ministries are listed there, but not MCTI. Should MCTI be on this board considering that energy efficiency measures in the construction sector represent a large number of regulatory measures and a large percentage of estimated required financial investments?		MCTI is added in the mentioned Figure as a relevant project progress monitoring body.
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 4: Excellent defined priority (last paragraph in page 4)	Electromobility based on electric energy obtained from lignite in any case is not sustainable.	Noted.
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 7: Different data for Long-term unemployment rate in Republic of Serbia on figure 1.3.	Long-term unemployment rate for Republic of Serbia in the text (paragraph above the figure) is 5.3 %, and in the figure is 5.5 %.	Text is considered and revised.
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 7: Wrong interpretation of Long-term unemployment rate	Second sentence of the first paragraph on page 7 states "In comparison to the selected countries (see Figure 1.3), Serbia has the third smallest long-term unemployment rate, very close to the EU countries, while all other countries are above 12%." Value of the rate in Serbia is not similar, it is twice as high as the value for the EU, but it is much more favorable than the rate in the other observed countries that are not members of the EU.	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 7: Add word "observed" in the second sentence of the second paragraph on page 7.	In the sentence "All countries, except Bulgaria, have a lower consumption per capita than Serbia" add the word to state the sentence "All observed countries..." so it would be clear it refers only to countries from the figure.	Comment is accepted and the INECP text is edited. Observed is added.
Ministry of Construction, Transport and Infrastructure	Chapter 1, page 13: Word "report" replace with the word "document" in the fifth paragraph on page 13.	Strategy for Cleaner Production in the Republic of Serbia is a strategic document, not the report.	Comment is accepted and the INECP text is edited. Report is replaced with document.
EMS	On page 17 (Chap. 1.2), we ask that the part of the text that reads: " Ten-year power transmission network development plan (TYNDP) is prepared by the Transmission System Operator (TSO "Elektromreza Srbije" - EMS) be supplemented so that, after corrections, it reads: " Ten-year plan for the development of the power transmission network (Transmission System Development Plan of the Republic of Serbia) - TYNDP is prepared by the Transmission System Operator (OPS "Elektromreza Srbije" - EMS)		Comment is accepted and the INECP text is edited.
EMS	On page 21 (Chap. 1.2), we ask that the part of the text that reads: "...transmission system operators for electricity and natural gas are obliged to submit a ten-year network development plan to the regulator for approval every year " so that, after corrections, reads: "... transmission system operators for electricity and natural gas are obliged, according to the Law on Energy, to submit a ten-year (transmission)		Comment is accepted and the INECP text is edited

stakeholder	comment	explanation	response
	network development plan for which they are in charge to the regulator for approval every year		
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 1, page 5: The document states that a renovation rate equal to 1% approximately on annual basis will be fostered.	It would be preferable to provide information on amount of this renovation rate in practice so far, for all three groups of buildings, in previous years, so that the trend could be observed, and based on the trend, determine what the realistic rate is. In addition to the trend of renovation of buildings in m2, it is necessary to show the trend of financial allocations of the state for renovation of buildings in previous years. Based on this trend, it can be determined how realistic are the planned allocations from the budget for EE in the building industry for the period up to 2030.	No official data about the existing renovation rate are available. It is considered that the existing renovation levels are very low. Moreover, the existing programmes for the energy upgrade of the buildings are limited according to the available information justifying the assumption about the low renovation levels.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 1, pages 1 and 12: In subchapter “i. Political, economic, environmental, and social context of the plan” on page 1, it needed to process in one paragraph key goals of sustainable development from Agenda 2030 UN, which are related to energy and climate policy. In subchapter “ii. Current energy and climate policies and measures relating to the five dimensions of the Energy Union”, on page 12, appropriate goals that Serbia has accepted are also not stated, so here they should be processed.	The UN 2030 Agenda contains the key goals of sustainable development until 2030, which should be the basis of all public policies, both in the world and in Europe and Serbia. Among these goals for the energy and climate policy, the most important are COR: 7 (Available and renewable energy), 11 (Sustainable communities, especially air quality and waste management), 12 (Sustainable production and consumption) and 13 (Climate action: Take urgent action in the fight against climate change and its consequences).	Information is added. INECP is compliant with goals from Agenda 2030. Document is prepared based on EU governance regulation.
RERI	Chapter 1, page 5: Inconsistency of set goals	As the draft INECP proclaims as one of the most important goals is the increase in the	Information is given in the final version of INECP

stakeholder	comment	explanation	response
		<p>share of RES, the fact that the goal related to RES has been changed in compared with the goal established by the Decision of the Ministerial Council of the Energy Community of December 15, 2022, is surprising, and so that it was reduced by 7.1%. At the same time, the goals related to the reduction of GHG emissions remain approximately the same. It is not clear how reaching a share of 40.7% of RES in Gross Final Energy Consumption (as stated in the EC Ministerial Council Decision) and 33.6% share of RES in Gross Final Energy Consumption (as stated in the INECP draft) gives approximately the same reduction of GHG emissions (40.3% - including LULUCF by 2030 compared to 1990)? We did not manage to get an answer to the above question during the public hearing. In addition, how are the decarbonization goals achieved in INECP related to primary energy consumption (14.7 Mtoe), which is close to the adopted goals in the above-mentioned decision of the Ministerial Council while significantly reducing the goal for RES? Based on which provision did Serbia unilaterally deviate from the goals set by the Decision of the Ministerial Council of the Energy Community of December 15, 2022?</p>	
The Environment Improvement Center; Climate	Chapter 1, page 4, iii. Key objectives and priorities of the plan, paragraph 2:		Information is given in the final version of INECP

stakeholder	comment	explanation	response
<p>Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>At the 20th meeting of the Ministerial Council of the Energy Community, held in Vienna on December 15, 2022, a decision was made (https://www.energy-community.org/dam/jcr:421f0dca-1b16-4bb5-af86-067bc35fe073/Decision_02-2022-MC_CEP_2030targets_15122022.pdf) and the goals for the participation of RES in the gross final energy consumption in 2030 were unanimously adopted. The binding target for Serbia is 40.7%, and the Minister of Mining and Energy Mrs. Dubravka Đedović voted for it at that meeting. Six months after that, the Ministry of Mining and Energy offered for public debate a draft of the integrated national energy and climate plan (INECP) in which the target for RES participation in the gross final energy consumption was set at 33.6%, which is far lower than the level that was agreed at the meeting of the Ministerial Council.</p> <p>Article 8a of the Law on Energy defines that the Integrated National Energy and Climate Plan is prepared in accordance with the assumed obligations arising from the international agreement.</p> <p>For what reasons does the Republic of Serbia does not respect the law, nor the assumed obligations arising from the international agreement on the Energy Community, less than half a year ago?</p>		
RERI	Chapter 1, page 1: Second National Determined Contribution (NDC)	In Article 4 of the Law on the Confirmation of the Paris Agreement (Official Gazette of RS -	Comment is accepted and the INECP text is edited. Word

stakeholder	comment	explanation	response
	<p>do not define the intended reduction of emissions, but rather the reduction of greenhouse gas emissions (GHG), and the word "intended" should be deleted, here and in every other place where the intended reduction of emissions is mentioned.</p>	<p>International Agreements, No. 4/2017), paragraph 2, it is stated that each party "will prepare, publish and fulfill all subsequent national determined contributions that it intends to achieve." So it is not about the intended contributions, but about the obligation of the signatories of the Paris Agreement. Paragraph 3, Article 4 of the same law establishes that any subsequent national contribution will represent progress and will reflect the highest possible ambition of the signatory party. Therefore, it is possible to increase the ambition in the next NDCs, which will also be binding. The Paris Agreement is a legally binding international agreement, and NDCs represent one of the key instruments for achieving the goals of the agreement.</p>	<p>"intended" is removed on pages 1 and 13 (1 and 14 in document version on Serbian)</p>
RERI	<p>Chapter 1, page 1: The document does not show the connection with the National Low Carbon Strategy, which was recently adopted. Regardless of the fact that this strategic document required a fundamental revision before adoption, it was nevertheless adopted by the Government of the Republic of Serbia as a long-term strategic document.</p>	<p>Regulation (EU) 2018/1999 of 11 December 2018 on the Governance of the Energy Union and Climate Action, incorporated and adapted by the Ministerial Council Decision 2021/14/MC-EnC of 30 November 2021 on incorporating Regulation (EU) 2018/1999 in the Energy Community acquis communautaire and amending Annex I of the Treaty clearly indicates that INECP must be aligned with the long-term climate strategy. Annex I of this Regulation states that the INECP contains an overview of existing energy and climate policies and measures related to the five dimensions of the Energy</p>	<p>Comment is accepted and the INECP text is edited. Low Carbon Development Strategy is added in Chapter 1.1.</p>

stakeholder	comment	explanation	response
		<p>Union, while the presentation of national goals also requires compliance with the long-term climate strategy. If the author of the document decided to present the key strategic and normative documents in this part of the document, it was necessary to explain in detail the connection with the climate strategy, regardless of the fact that both INECP and the climate strategy require a fundamental revision in order to serve their purpose in the system of public policies. The low-carbon development strategy of the Republic of Serbia was adopted in accordance with the Law on the Planning System, which requires compliance of planning documents (Article 23) and mandates respect for the principle of consistency and compliance in the process of managing the public policy system. It is not clear how the Ministry of Mining and Energy did not recognize INECP as a public policy document, and this omission requires an explanation. Namely, in the explanation attached to the INECP Draft, the Law on Planning System is not mentioned as a legal basis.</p>	
RERI	<p>Chapter 1, pages 4-5: It was stated: "This clean energy transition pathway tends to enhance the country's energy security, safeguards its energy dependency while ensuring a realistic reduction of lignite use, contributing to a meaningful reduction of the GHG emissions by 2030". It is not clear what</p>	<p>The Republic of Serbia has information on the use of lignite and energy production from fossil fuels. This information is concrete and is found in publicly available documents. If the proposer wanted to set a concrete, precise and measurable goal, then he should have provided accurate data and an exact</p>	<p>The reduction of GHG implies a reduction in the production of electricity produced from coal, so a reduction of, for example, 1% cannot be assumed. We believe that the goal is realistically ambitious, taking</p>

stakeholder	comment	explanation	response
	<p>"realistic reduction of lignite use" means, nor what "meaningful reduction of GHG emissions" is. These statements need to be explained.</p> <p>On page 5 it was stated that: "Another essential objective within the framework of the INECP is the ambitious, as well as realistic, programme for reducing the share of lignite in electricity production, i.e., lignite phase-out, by up to 25% in 2030 compared to 2019". First of all, it is not clear on the basis of which evidence the Proposer concluded that this goal is ambitious, especially if we bear in mind that it is imprecise - up to 25%, could be even 1%? Why was 2019 taken as the base year, is there any special reason for that? In what sense did the Proposer conclude that the goals of reducing GHG emissions are significant (especially considering that this goal is also completely imprecise)? For what or for which goals is this GHG reduction significant?</p>	<p>goal, not up to 25%. In the document Starting points of the Plan for the development of energy infrastructure and energy efficiency measures for the period up to 2028 with projections up to 2030, it is stated that the amount of electricity from coal will decrease from 23,755 GWh in 2021 to 19,080 GWh in 2030, so the share of coal in the considered period will decrease from 62.1% to 47.4%, which is not 25% but 14.7%, although we are not talking about the same base year. The report of the Energy Agency from 2019 shows that the production of electricity from thermal power plants (dominantly by burning lignite because lignite participates with 98% in the structure of domestic coals) was 23,169 GWh, and a reduction of 25% would amount to -5,792.25 GWh. According to the Energy Balance for the year 2019, the production of 37,989 million tons of coal from surface exploitation is planned, and a reduction of 25% would amount to -9.5 million tons. How would this reduction be reflected in the operation of thermal power plants? However, although lignite is dominantly used in the production of electricity, it is also used for other purposes. It is necessary to give an exact, precise, and measurable goal for reducing the use of lignite and justify this goal and the base year. Then it is necessary to establish measures to achieve this goal, with indicators related to</p>	<p>into account the very short period left until 2030, as well as the aspect of security of supply. We refer to 2019 as a year for comparison, since it was the latest available "normal year" with statistics was 2019 (due to the abnormal levels of consumption in 2020 and 2021 because of Covid)</p>

stakeholder	comment	explanation	response
		the reduction of GHG emissions in the energy sector, which is not given anywhere in INECP, even though the energy sector contributes to total GHG emissions with about 80%.	
RERI	<p>Chapter 1, iii. Key objectives and priorities of the plan, page 4:</p> <p>The key goal in the dimension of decarbonization is described first qualitatively, and later quantitatively, which introduces ambiguities and increases the level of possible confusion. In other words, this goal is vague, imprecise, and, by all accounts, methodologically flawed. It was stated that the goal is to ensure a reduction of GHG emissions by 13.2% in 2030, compared to 2010, or by 33% in 2030 compared to 1990 (excluding emissions from non-energy sectors, i.e., agriculture, waste, land use, land use change and forestry). First of all, this goal is imprecise because it is not in line with the Second NDC of the Republic of Serbia, which needs to be at least explained. The goal from the 2nd NDC is a 33.3% reduction in GHG emissions by 2030 and not 33%? Then, the NDC predicts a decrease of 13.2% compared to 2010 in all sectors (without LULUCF), which is not the case here.</p>	<p>According to the IPCC (Intergovernmental panel on climate change) methodology, the emission sectors are as follows: 1) energy, 2) industrial processes, 3) agriculture, forestry, and other land use (AFOLU), 4) waste sector. Emissions inventories are submitted to the UNFCCC shown by these sectors. On the other hand, the EU shows reductions in GHG emissions through reductions in the ETS and the sector determined by the Joint Responsibility, and also defines targets in the LULUCF sector. However, the INECP proponent states that the target of 33% excludes non-energy sectors and states waste, agriculture, land use, land use changes and forestry. Hence, it does not state industrial processes anywhere or manage this sector as part of the energy sector, which is methodologically imprecise. Therefore, in addition to the fact that the target differs from the NDC by 0.3% (if it is an accidental omission, it is only devastating in the document prepared by the Ministry of Energy) it is also unclear in terms of the sectors that are covered. National Communications and Biennial Update Reports provide data on GHG emissions by sector. Is there any point in drawing attention</p>	<p>33% is a mistake made during translation of the document. In the document version on English this data is correct. The mistake is corrected in the Serbian version of the INECP text. Goal of 13.2% reduction is correctly stated.</p> <p>Targets are clear, mistakes are checked and corrected. Annual level of emissions are given in Chapter 5. Emissions per sector are added in an Annex V together with the other detailed data.</p>

stakeholder	comment	explanation	response
		<p>to why it is important that the Republic of Serbia regularly fulfills its international obligations? Still, we have the Second National Communication (report), which contains data on emissions by sector, as well as data for 2010. In this sense, it is possible and necessary to quantify the goals according to the data presented in the Second National Communication. This is necessary in order to determine the goals and measures of policies and the indicators of these measures because goals and indicators do not exist for most measures. In the Second National Communication, total emissions from all sectors (economy-wide target) without LULUCF for 2010 amount to 64,813.65 Gg CO₂ eq, which is a reduction of 13.2% - 8555.4018 Gg CO₂ eq, i.e., the goal is to achieve emissions (without LULUCF) in 2030 of 56,258.2482 Gg CO₂ eq. It is also necessary to define the levels of emissions in the years from 2023 to 2030, so that the efficiency of the INECP measures and policies implementation could be monitored on an annual basis, or at least on a biennial basis, in order to facilitate reporting according to the Paris Agreement, so it would be possible to apply corrective measures in a timely manner, in case of need. Again, we remind you that the goal does not apply to all sectors, but excludes waste, agriculture, land use, land use changes and forestry. So, the</p>	

stakeholder	comment	explanation	response
		omission related to the determination of the key goal of INECP cannot be eliminated by changing this paragraph, because, we assume, the goal is based on calculations and concrete data?	
RERI	<p>Chapter 1; 1.2. Overview of current policy situation, page 6:</p> <p>In the already mentioned Regulation (Governance Regulation...) in Annex I, it is stated that chapter 1.2 presents an overview of the current situation in terms of public policies, where the National Low Carbon Strategy should have been presented. In addition, in this chapter the Proposer presents the reports that the Republic of Serbia is obliged to submit to the UNFCCC, which are not public policy documents but reports. The proposer does not present other documents that were created before the INECP and does not explain the connection of these documents with the INECP, their significance for the creation and implementation of the INECP.</p> <p>Here we are referring to the following documents: 1. Starting points of the Plan for the development of energy infrastructure and energy efficiency measures for the period up to 2028 with projections up to 2030, a document prepared by the Ministry of Energy stating that the goal of the Starting points is to define the basic directions of strategic development that will be part of the new Energy Sector Development Strategy of the Republic of Serbia</p>	<p>In this part of the document, it is necessary to explain the connection with the mentioned documents, their place in the system of public policies and the relationship of INECP with these documents. It is particularly important to present the Starting points of the Plan for the development of energy infrastructure and energy efficiency measures for the period up to 2028 with projections up to 2030, because this document is significant for INECP in terms of its content, as it indicates the goals of the strategic development of the energy sector, among other things: Basing the power portfolio dominantly on those sources of electricity production whose raw materials can be provided without creating import dependence of the Republic of Serbia, i.e. "safe and reliable supply of power thermal energy capacities" and provision of the necessary quantities of coal for the operation of thermal power plants whose operation will continue after 2030. This document also lists specific projects, i.e., measures that are foreseen until 2030, and which are of essential importance for INECP and the achievement of INECP's goals.</p>	<p>Added in the final version of INECP.</p>

stakeholder	comment	explanation	response
	in accordance with the obligations assumed in the Memorandum on Economic and Financial Policies; 2. Road Map for Energy Support in the Republic of Serbia, which the Government of the Republic of Serbia agreed with; 3. EPS Go Green Road document that brings together the most important investment projects in the field of renewable energy sources.		
RERI	Chapter 1, i. National and Union energy system and policy context of the national plan, page 6: It is stated that 2019 is defined as the reference year. Why then 2019 is not the reference year for all other INECP defined objectives?		This chapter presenting current context and status of the energy sector, it is not presenting objectives, as the last year with the statistics, normal year, before Covid.
RERI	Chapter 1, 1.2. iv. Governance structure of implementing national energy and climate policies, page 25: This chapter was not prepared in accordance with the requirements of the Energy Governance Regulation and the Policy Guidelines by the Energy Community Secretariat on the development of INECP, where it is stated that this chapter contains "The administrative structure of implementing national energy and climate policies, including responsibilities of main administrative bodies and their interactions."	In this part, the administrative structure for creating INECP is briefly described, which is not in accordance with the requirements of the Energy Governance Regulation. It is necessary to rewrite the whole chapter.	This chapter is revised accordingly.
RERI	Chapter 1; 1.3. Consultations and involvement of national and Union entities and their outcome, page 26: The involvement of the National Assembly,	INECP is a public policy document, and the National Assembly is the key legislative body. It is completely unacceptable to exclude the National Assembly from the process of creating the INECP. In addition to the decision	Text is supplemented

stakeholder	comment	explanation	response
	<p>regional and local authorities, interested parties, and social partners is not described.</p>	<p>from the Energy Law, the National Assembly was excluded from the adoption process, which is a confirmation of the state of democracy and the rule of law in the Republic of Serbia, the National Assembly could have been involved through consultations and informing parliament members about the drafting of this document.</p> <p>It is necessary for the proponent to explain what it means to include regional and local authorities on an ad hoc basis? It is necessary for the proposer to explain how he included the social partners. Finally, it is necessary for the Proposer to describe what the results of the consultation were.</p>	
KFW	<p>Chapter 1, page 1, i. Political, economic, environmental, and social context of the plan</p> <p>A few important milestones of Western Balkans' and Serbia's commitments to the green transformation could be added</p>	<p>Referring to the following:</p> <ul style="list-style-type: none"> • At the Berlin Process Western Balkans Summit 2022, Serbia signed a joint Declaration on Energy Security and Green Transition in the Western Balkans which emphasizes the commitment to improving regional cooperation in the process of energy sector transformation and the European Green Deal. • At the 20th Ministerial Council of the Energy Community in 2022, the Decision amending Decision 2021/11/41/MC-EnC has been adopted, including a set of ambitious 2030 targets for GHG emissions reduction, energy efficiency and RES. <p>Recommendation: Above presented should be included in the document as important</p>	<p>Comment is accepted and the INECP text is edited. Both milestones are added.</p>

stakeholder	comment	explanation	response
		milestones for the political, economic, environmental, and social context of the plan.	
KFW	Chapter 1, page 23, paragraph 4: Thematic bilateral cooperation with the Federal Republic of Germany should be taken into consideration	Climate Partnership between the Republic of Serbia and the Federal Republic of Germany not mentioned in the document at all, although a Joint Declaration has been signed in October 2021. Furthermore, the Working Group on Climate Partnership has been formed in 2022, coordinated by the Ministry of European Integration, which is not mentioned as well. Recommendation: Climate Partnership should be included in the document as bilateral cooperation of a strategic importance for both countries.	Comment is accepted and the INECP text is edited. https://nemackasaradnja.rs/en/what-we-do/
KFW	Chapter 3.1, page 63-64, PM_D40: Timeframe of planned activities on green hydrogen-related legislative and regulatory framework should be aligned with the policy matrix under the policy-based financing with donor community	The implementation timeframe of activities is not aligned with the policy matrix of a programmatic series of policy-based financing under the partnership of the World Bank (“First Serbia Green Transition Programmatic Development Policy Loan”), KfW (“Reform of the Energy and Environmental Sectors of Serbia”) and Agence française de développement (“Green Agenda Programmatic Development Policy Loan”). Recommendation: To harmonize and align planned activities with relevant policy matrix in order to be consistent.	Corrected
KFW	Chapter 1, page 12:	In Chapter 1, following umbrella laws and planning documents are missing:	Low Carbon Development Strategy is added. Other

stakeholder	comment	explanation	response
	Existing legislative and regulatory framework regarding environmental protection not fully updated and addressed	<ul style="list-style-type: none"> • Air protection Program for the period 2022-2030, • Law on Air Protection, • Low-Carbon Development Strategy, • Law on Integrated Prevention and Control of Environmental Pollution. <p>Additionally, legislative and regulatory framework on waste management is completely missing, although document contains a few policy measures that address this area.</p> <p>Recommendation: The environmental protection-related legislative and regulatory framework should be reviewed accordingly.</p>	<p>documents are included in SEA.</p> <p>Legislative and regulatory framework on waste management is checked and revised.</p>
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damjanović, Coalition 27	<p>Chapter 1, page 2, paragraph 2:</p> <p>It is stated that “the Republic of Serbia prepared Integrated National Energy and Climate Plan (INECP) covering the period from 2021 to 2030.” Now is 2023, and almost a quarter of the planning period has already passed, and the plan has still not been adopted. Why is the introduction of the plan delayed and due to the shorter deadline, how will the fulfillment of the goals defined by the plan be ensured?</p>		It is checked and revised in the INECP text.
EPS Scientific Council	<p>Chapter 1, page 6:</p> <p>Regulatory framework: The overview of the existing regulatory framework covers mainly the earlier period, although most of the relevant laws were passed recently (in 2021 at the latest). We note that the</p>		INECP is a document that defines the goals for the year 2030, while the period after 2030 is a vision of possible development. Bearing in mind the need for base energy as well as the possibility of using coal in

stakeholder	comment	explanation	response
	<p>existing law prohibiting the construction of nuclear power plants (scenario SN) is an obstacle to the possible consideration of their construction, which must be repealed, primarily due to the need to retrain personnel for this area due to the need for radiation protection, which exist independently of the construction of a nuclear power plant in Serbia. Also, regulatory measures for the protection of energy-vulnerable households and the provision of compensation for the short-term mitigation of energy poverty should be transferred to the state. Please note that the existing National Council for Scientific and Technological Development at the Ministry of Science, Technological Development and Innovation was not consulted on these and other relevant issues.</p>		<p>this sense until 2050, the scenario with nuclear energy was considered as a possible response of the Republic of Serbia for its contribution to the Green Agenda. If the scenario were to be used as a basis for re-examining the justification of the Law Prohibiting Construction of Nuclear Power Plants and only if that Law were repealed, it would be possible to enter into a further procedure which is both elaborated by international practice and Acts in great detail, which could lead to the making of regulatory, investment and other decisions. Certainly, the prerequisite is building of professional capacities, relevant national institutions and the adoption of the necessary regulations, which was discussed in detail in the process of analyzing this scenario.</p> <p>The Ministry of Mining and Energy also carried out the process of gathering the opinions of various educational institutions, scientific institutes and associations on special</p>

stakeholder	comment	explanation	response
			<p>topics, in accordance with their competences and relevance. Following institutions were contacted and consulted: The Faculty of Mechanical Engineering, University of Belgrade, Faculty of Forestry, University of Belgrade, Faculty of Electrical Engineering, University of Belgrade, Faculty of Technology and Metallurgy, University of Belgrade, Faculty of Mechanical Engineering, University of Niš, Faculty of Agriculture, University of Novi Sad, Nikola Tesla Institute, Mihajlo Pupin Institute, SANU, Faculty of Engineering, University of Kragujevac, Vinča Institute, Faculty of Technical Sciences, University of Novi Sad, Ministry of Agriculture, Forestry and Water Management.</p>
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 1, page 1: Total ambition of INECP of Serbia is 33% (Scenario S) reduction of GHG emissions until 2030 when compared with 1990, without LULUCF sector. Although this ambition is presented as high, it is not enough to get Serbia on the path to decarbonization and climate neutrality.</p>	<p>Emissions of GHG in Serbia in 1990 amounted to 81.5 MtCO_{2e}, while according to the INECP emissions in 2019 were 61.5 MtCO_{2e}, which is already reduction of 24.4%. Therefore, plan draft in reality has the goal of additional reduction of 8.6% compared with 1990 or 11% compared with current emissions in 2019, or only 6.8 MtCO_{2e}.</p>	<p>The target which is set by the INECP is consistent with the target of the Serbian updated Nationally Determined Contribution (NDC) and Low Carbon Development Strategy. It is considered as a realistic target for 2030 (which is a medium term time horizon) setting the</p>

stakeholder	comment	explanation	response
			basis for a more aggressive pathway in the horizon towards 2050.
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović</p>	<p>Chapter 1, page 4, 14, 31, 59:</p> <p>iii. Key objectives and priorities of the plan. On page 5 it is stated: Another priority is the promotion of electromobility, which will rely considerably on the electricity production by RES, while considerable energy savings will be delivered contributing simultaneously to the attainment of the energy efficiency targets. Finally, the further exploitation of RES for the coverage of the thermal and cooling needs in buildings, the penetration of RES distributed technologies for electricity production and the promotion of advanced biofuels in transport sector consist additional priorities within the framework of the INECP for the further deployment of RES.</p> <p>1.2 Overview of current policy situation. On page 14 it is stated: In order to reach the planned share of renewables in the final energy consumption in transport, incentives can be provided to the biofuels producers only for units producing advanced biofuels.</p> <p>National objectives and targets. On page 31, it is stated: Finally, the contribution of electric vehicles is expected to be substantial for the further promotion of RES. It should be noted</p>	<p>In the above paragraphs, the term "advanced biofuel" is used. However, it is not specified to which biofuels and technologies to obtain these biofuels it refers to. The assumption is that the term is taken from the Law on the Use of RES, but also in the mentioned law, the exact definition of the mentioned term is missing. Namely, Article 4 (Meaning of terms) defines: 25) advanced biofuels are biofuels produced from special raw materials prescribed by the by-law from Article 78 of this law; However, in Article 78 of the same law it is stated: The Government, at the proposal of the Ministry, prescribes in more detail the incentives from Article 76 of this law and measures for reaching the share of renewable energy sources in traffic, obligations of fuel suppliers in connection with achieving the share of renewable energy sources in traffic, method and the criteria for awarding incentives, the method of fulfilling that obligation, the method of keeping the register of taxpayers, the method of placing biofuels and biomethane on the market and electric energy from renewable sources for driving motor vehicles, reporting regarding the achievement of the share of renewable energy sources in traffic, as well as other elements regarding the achievement of the</p>	<p>These two terms are not the same. Advanced biofuels are only 2nd generation biofuels, biofuels that meet sustainability criteria could be 1st or 2nd generation.</p>

stakeholder	comment	explanation	response
	<p>that 40 thousand electric vehicles (both passenger and light-duty) approximately will be registered until 2030. Last but not least, the contribution of biofuels will remain dominant, with a particularly increasing share of advanced biofuels until 2030 (49 ktoe without assuming the foreseen multipliers).</p> <p>Policy measures. On page 59 it is stated that PM_D33 will foster the production of domestic biofuels (mainly advanced) through the provision of subsidies and fiscal incentives.</p>	<p>share of renewable energy sources in traffic. When adopting the act referred to in paragraph 1 of this article, the Government:</p> <p>1) may exempt or establish different obligations for different fuel suppliers or for different fuels, considering the level of development and costs of different fuel production technologies; 2) establishes a special obligation for fuel suppliers to place advanced biofuels on the market; 3) enables fuel suppliers that deliver electricity, i.e. renewable liquid, and gas fuels of non-biological origin to the market for traffic needs, to be exempted from the obligation to place a share of advanced biofuels on the market from point 2) of this paragraph. The Ministry keeps the register of taxpayers from paragraph 1 of this law, which contains in particular the following data: 1) registration number, name, social security number, tax identification number, head office, and activity with activity code of the system taxpayer; 2) on the mandatory share of energy from renewable sources on the market of system taxpayers for the current calendar year; 3) on the realized share of biofuel energy from renewable sources on the market of system taxpayers for the previous calendar year.</p> <p>Given that the corresponding bylaw that more closely defines the term "advanced biofuels" and the raw materials that can be</p>	

stakeholder	comment	explanation	response
		used to obtain them has not yet been adopted, it is proposed to use "biofuels that meet sustainability criteria" instead of the mentioned term, considering the existence of the corresponding Regulation which has already defined sustainability criteria.	
MIVUS	Chapter 1, pages 3, 5, 31, 32: In the incentive measures, measures to subsidize the renovation of the national building fund are not explicitly stated, which must be stated, because without subsidies, the renovation activity is unenforceable. In some cases, EU states cover 100% of the subsidies amount for the renovation of the housing stock and saving energy on heating and cooling results in a financial gain for the state.	Clearly introduce incentives and subsidies as measures to support the renovation of the national building stock.	Measures to subsidize the renovation of national building fund are clearly stated in Chapter 3.2, ii, page 75.
MIVUS	Chapter 1, page 5: In stating the benefits resulting from the improvement of energy efficiency, the "increase in the value of the housing stock" is not mentioned.	Add increase in the value of housing stock as a benefit of improving energy efficiency.	Comment is accepted and the INECP text is edited.
MIVUS	Chapter 1, page 5: An annual renovation rate of residential buildings of 1% is foreseen, according to the provisions of the Long Term Buildings Renovation Strategy. The European renewal rate is 3% and in Serbia it must be at least 2% per year.	It is necessary to update the Long Term Strategy because it was apparently adopted before the war in Ukraine and the changes it brought.	Noted

iii. Chapter 2

stakeholder	comment	explanation	response
EPS	2 NATIONAL OBJECTIVES AND TARGETS, in chapter 2.3 “Improvement in energy efficiency”, state the full name of Long-term Strategy for Encouraging Investments in Renovation of the National Building Stock of the Republic of Serbia (paragraph 3, page 31).	Long-term Strategy for Encouraging Investments in Renovation of the National Building Stock of the Republic of Serbia until 2050 (Official Gazette of RS, no. 27/22)	Final version is adopted accordingly.
AERS	Chapter 2, page 31: It is stated: “Similarly, the mixing of hydrogen or biomethane into the natural gas network will contribute also to sector coupling.”	A general statement was made, while it is not clear how applicable it is to the gas pipeline system in Serbia. We are not aware of any pilot project, i.e. a study confirming that it is possible to use hydrogen, i.e. a mixture of hydrogen and natural gas, which in certain percentages would not have harmful effects on the equipment and pipelines of the existing gas pipeline system, especially bearing in mind that 49.56% of the gas pipelines on which transport is carried out by Transportgas Serbia LLC are over 40 years old. It is necessary to determine factually that the mentioned possibility is realistic, otherwise the possibility of including hydrogen in the transport system is called into question, and linked with that, the planned shares of other energy sources.	We agree that detailed studies are needed for the status of gas pipelines in Serbia and their ability for hydrogen blending. However, in this analysis blending of Hydrogen is considered at a max of 5% (energy share) in 2050 corresponding to less than 15% share in volume. Blending is considered to take place only after 2040 at low levels of 1% energy initially. These are conservative estimates, consistent with international bibliography and given the time period until 2040 and 2040 analyses can be done and necessary measures can be taken.
EBRD	RES in gross final energy consumption (GFEC) in 2030 is 33.6% in the NECP, while as per the decision of the	Please explain the basis of the 2030 RES in GFEC target as presented in the draft INECP and reasons for the reduction of the target of 40.7% from last December?	Different electricity generation mix can achieve the same target of GHG emissions reduction.

stakeholder	comment	explanation	response
	Ministerial Council of the Energy Community of 17 December 2022, 2030 target RES in GFEC is 40.7%		
EBRD	Considering the significant role of LULUCF in achieving 40% GHG emission reduction target in 2030, it would be beneficial to have more details		This part is covered in detail in the approved NDC. The INECP used the outputs of the NDC for the non-energy emissions
EBRD	The target of 7GW heat pumps by 2030 seems overly ambitious (p.31).	This is one for every 10 inhabitants, or one for every fourth household, all to be installed within seven years. We recommend to include reference to both Large scale centralized and Small scale individual heat pumps integration in existing and new DH systems/buildings	Considering the large number of individual combustion plants that use fossil fuels, as well as the fact that the largest part of the district heating system is based on fossil fuels, there is a great potential for the use of heat pumps.
EBRD	Section 2.2. - The national objective for the penetration of RES has been specified as "the RES share in the gross final energy consumption should amount at least to 33.6% in 2030" including: the share of RES in electricity to reach 45.2%, the share of RES in covering heating and cooling demand to reach 41.4% and the share of RES in the transport sector to reach 7%	Compared to the RED II directive, overall RES target in the gross final energy consumption seems to be sufficient. However, transport-related RES share could be explained in a more detailed way.	The penetration of RES in transportation was extensively discussed with the stakeholders and the key issue of the availability of second generation biofuels and the restriction for first generation biofuels, together with the cost of deploying EVs were considered to reach the shares presented in the analysis.
EBRD	Under Section 2.6. Research, Innovation and	Under this section only one quantitative commitment is provided: doubling the	This is the only "quantitative" target that can be taken into

stakeholder	comment	explanation	response
	Competitiveness is defined as the specific area regarding the aim to present the country's commitment towards supporting breakthroughs in low-carbon and clean energy technologies. However, the level of detail provided doesn't show the commitment supporting the innovative technologies	R&D expenditure by 2030. More details should be provided.	account in this stage. During monitoring process, quantifiable data on the developments should be provided in order to give a more detailed analysis.
EBRD	Page 31. The mixing of hydrogen or biomethane into the natural gas network is claimed to contribute also to sector coupling.	The details of blending % should be provided.	Blending of Hydrogen is considered at least at 1% (in energy share) in 2040 and 5% (energy share) in 2050. These conservative shares of blending were considered taking into account the concerns expressed related to the age of the existing gas network. Biogas blending is part of the solution and depends on the relative competitiveness of biogas.
EBRD	Page 31 – Utilization of RES in DH system is envisaged mainly by biomass, biogas, hydrogen and does not even mention heat pumps.	Heat pumps and utilisation of heat energy storages and power to heat solutions are expected to be predominant technologies for decarbonisation of DH systems. For instance Denmark plans to increase largescale heat pumps share in DH system to 56% by 2040.	DH systems with heat pumps are included as candidate technologies, but the relevant costs means that they are not part of the solution with the current assumptions
BOS	Chapter 2, pages 31-32: Why is document, mentioning energy performance contracts and energy services?	From practical experience so far, these mechanisms have not proven to be sufficiently transparent or efficient enough to	The measures in which this is mentioned were prepared in accordance with the Law on

stakeholder	comment	explanation	response
		"increase and maximize the current levels of own funds leverage".	energy efficiency and rational use of energy
alexandar141002@gmail.com, tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 2, pages 31-32: In the document, energy performance contracts and energy services, is mentioned.	From practical experience so far, these mechanisms have not proven to be sufficiently transparent or efficient enough to "increase and maximize the current levels of own funds leverage".	The measures in which this is mentioned were prepared in accordance with the Law on energy efficiency and rational use of energy
RERI	Chapter 2, 2.1 Climate change, emissions and reduction of greenhouse gases, page 30: The central goal of reducing GHG emissions was determined imprecisely and vaguely. Is the 40.4% target different from the 40.3% target previously stated in the short overview?	Namely, the Decision of the Ministerial Council of the Energy Community (2022/02/MC-EnC) of December 15, 2022, established the goal of reducing GHG emissions (including LULUCF) by 40.3% in 2030 compared to 1990, i.e., 47.82 MtCO ₂ eq in 2030. Why do these values differ? The INECP Draft states that the target of 40.4% includes agriculture, waste and LULUCF. Does this mean that it excludes energy sector and industrial processes? We have previously expressed objections to the imprecision and methodological unfoundedness of the established goals.	The percentage is 40.3% including agriculture and LULUCF and waste. This is checked and correct in the whole document.
RERI	Chapter 2, 2.1 Climate change, emissions and reduction of greenhouse gases, page 30: Climate change adaptation is listed as one of the national priorities, and that the Republic of Serbia will create and adopt a National Strategy for Adaptation to Climate Change. Where did the proponent find that Serbia will adopt this strategy?	Namely, the Law on Climate Change determines that the Ministry prepares a Program for Adaptation to Changed Climate Conditions and that the Program is adopted by the Government. The creation of this Program is ongoing, and it is truly devastating that the Proposer does not know this. Anyway, who wrote this document? In this part of the document, the Proposer is	Please note that basic main information is that priority should be given on the climate change adaptation. The name of the document which main subject is climate change adaptation was technical error. In the final version of INECP it is highlighted in Chapter 2 that the adaptation

stakeholder	comment	explanation	response
		expected to present the objectives. Is the adoption of this document one of the key goals? That is a legal obligation, it is not clear why is that the goal of INECP.	of climate change is considered as a priority targeting to the completion and effective implementation of the Climate Change Adaptation Programme with Action Plan.
RERI	Chapter 2, 2.2 Renewable energy sources (the last paragraph), page 31: It is not clear whether it is a goal or a statement, but among the national goals it is stated that approximately 40 thousand electric vehicles will be registered by 2030. Where is this goal represented in the measures?	Measure PM_EE12 contains a quantified objective of 20.5 thousand electric vehicles. Measure PM_EE14 contains a quantified objective of 18.9 electric light duty vehicles. How is this objective of 18.9 vehicles achieved? Measure MP_EE18 contains a quantified objective of 2.4 thousand electric buses.	18.9 electric vehicles is a mistake. Corrected. Objective of PM_D35 states: 20.5 thousand electric vehicles, 18.9 thousand electric LDV and 2.4 electric buses = around 40k
RERI	Chapter 2, page 31: It is necessary to envisage more ambitious goals for the connection of photovoltaic power plants	The planned capacity of photovoltaic power plants, especially at the distributed level (500 MW of solar power plants and an unknown amount of thermal power plants on biomass), considering the requirements for connection, is insufficiently ambitious. It is necessary to plan larger capacities of photovoltaic power plants, especially in the field of civil energy, as well as the method of allocation of quotas in distribution networks for this production. The aforementioned is not correlated with the fact that support measures for prosumers (PM_D24 - PM_D28) as well as energy communities (MP_D37) are explained in detail. Why is a modest capacity of 500 MW planned in the goals?	This is the minimum capacity we envisaged to be installed
dragan.sreckovic@gmail.com,	Chapter 2, page 30:	In what way and according to what criteria will the most economical approach for the	In which way and according to what criteria the most

stakeholder	comment	explanation	response
jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	National objectives and targets. On page 30, it is stated: The electrification and the coupling of the final consumption sectors are also promoted in order to increase the share of RES in the final energy consumption. Initially, the gradual electrification of the transport sector comprises a major challenge until 2030. More specifically, a considerable penetration of electric vehicles is expected to substantially influence a number of dimensions in the NECP. The aim is to achieve this penetration at the most cost-effective approach for the national economy, while ensuring that certain prerequisites for the electrification of the transport sector, such as the simultaneous development of the charging infrastructure and the adoption of the regulatory framework are timely fulfilled.	national economy be determined? Does this mean that economic criteria will be the most important, that is, other criteria will be neglected or suppressed?	economical approach for the national economy will be determined is the subject of laws and by-laws that should help the introduction of electric vehicles, and is not the subject of this document.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 2, page 30: It is stated: New innovative RES technologies for electricity production will be promoted also within the NECP through pilot projects in order to assess their effectiveness, such as: hydrogen production, small wind turbines etc.	Law on use of RES defines the term “renewable hydrogen”. In the INECP text, the terms hydrogen, green hydrogen, renewable hydrogen are used. Terminology should be harmonized with the law. In addition, the mentioned paragraph related to pilot projects is vague and imprecise. Will the new and innovative RES technologies for electricity production be promoted through pilot projects, as stated, or/and all other new and innovative RES technologies? Where is the mentioned production of hydrogen in that context? Is it the production of renewable hydrogen using electricity generated from RES or is it the production of	Comment noted. It is corrected in the final version of INECP.

stakeholder	comment	explanation	response
		<p>electricity using hydrogen that does not have to be renewable, or is the hydrogen production example given here by mistake? Ultimately, hydrogen production is a technology for storing or transforming energy and is not a source of energy in itself.</p>	
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izelena, The United Branch Trade Unions "Independence"</p>	<p>Chapter 2, pages 33-34: The INECP draft as part of the narrative of national goals in the area of dimension 2.6. Research, innovation and competitiveness defines that concrete and dedicated plans will be expressed for areas that will be more affected by the transition to a low-carbon economy, which is reflected through policy measures. It is declaratively emphasized (in paragraph 5) that "the challenges faced in the lignite-dependent areas during the transition to a low-carbon economy can be tackled with tailored solutions to support the structural transformation and to accelerate the process of economic diversification and technological transition."</p>	<p>Here we do not go into what those solutions are, except through the policy measure PM_RIC16, which seems that the working group implied that the development of the national goal defined in this way will be further developed through policy measures in some other national document, primarily through the revision of the Sustainable Development Strategy. However, the problem with such an approach is that the National Development Strategy is a higher-level document, and it is questionable whether the objectives and policy measures can be defined in this way in accordance with the Law on the Planning System.</p>	<p>Yes, the rationale behind this is that any Region in the EU (at least) is responsible for drawing up its own Research & Innovation Strategy for Smart Specialization (RIS3). In this way, the regions and local communities are expected to identify, structure and make full use of their competitive advantages, to support innovation and to focus on investments, in order to achieve the intended transformation of local economies by involving relevant stakeholders in all stages.</p> <p>This is the so-called entrepreneurial discovery process, a bottom-up approach, focusing on enterprises identifying new, innovative activities and the relevant technology needs.</p> <p>One of the pillars / thematic</p>

stakeholder	comment	explanation	response
			<p>areas or sectors of this process is (usually) the "Energy" related one (while the one of "Environment and Sustainable Development" can be also considered as such). Thus, it is at the discretion of each region/district whether to place these subjects on the agenda (RIS3). In addition, it must be mentioned that the Smart Specialisation Strategy is drawn up and implemented both at the national and regional levels, through interaction between the two levels. So, as far as the "regional" strategies are drawn up, these are fed to the national one (except if a 'top-down' procedure is followed, according to which first the national priorities for the Smart Specialization are described / defines, and then the regional ones are derived from a slight modification of the national ones).</p>
<p>nikorade1918@gmail.com</p>	<p>Chapter 2, page 33: Foreseen increase of electric cars in Serbia is not realistic</p>	<p>In Serbia, there is no interest in these cars, no practical place in the transportation system, no security conditions, no electrical network for charging, no additional electricity in the system to replace the current cars.</p>	<p>In order to achieve the decarbonization targets, road transportation should contribute as much as possible and electric vehicles powered by the</p>

stakeholder	comment	explanation	response
		A dirty energy mix would not even reduce carbon emissions.	renewable electricity is an important option to be considered.

iv. Chapters 3.1 and 3.2

stakeholder	comment	explanation	response
EPS	3 POLICIES AND MEASURES, in chapter 3.1.1 GHG emissions and reduction, subchapter i. "Policies and measures to achieve the target set under Regulation (EU) 2018/842...", supplement the text with activities on the adoption of by-laws that are in progress (page 35).	In the final adoption procedure, that is, the Proposal for the Rulebook on the contents of the National Inventory of GHG and the National Report on the Inventory of GHG was prepared.	Information about the recently adopted by-laws are added
EPS	PM_D1 Preparation for and Introduction of carbon tax – correct the percentage of GHG emission reduction (with LULUCF) (page 35).	By decision of the EC Ministerial Council 2022/02/MC-EnC dated 15.12.2022, predicted goal of reducing GHG emissions, including LULUCF, by 40.3% (47.82 MtCO ₂) by 2030.	The percentage of the GHG emissions is corrected
EPS	PM_D1 Preparation for and Introduction of carbon tax – Correct the name of the Ministry and specify needed financial resources (page 35).	Ministry of Mining and Energy	The names of the involved ministries have been checked and corrected. In regards to the needed financial resources the tax will be transferred to the energy prices so as to be paid by the end-users.
EPS	PM_D2 Adoption, Implementation and monitoring of the Low-carbon Development Strategy and Action Plan... - edit the name of this policy measure (page 36).	Edit the name of this measure, taking into consideration that the Government of Republic of Serbia adopted Low Carbon Development Strategy for the period of 2023 – 2030 on 1st of June 2023 ("Official Gazette of RS", number 46/23). In accordance with point 9.1. of the Strategy, the Action Plan will	The name of the policy measure is edited according to the recently adopted strategy.

stakeholder	comment	explanation	response
		be adopted within one year from the date of adoption of the Strategy.	
EPS	PM_D4 Organizing awareness campaigns for better information dissemination – Split the documents Low Carbon Development Strategy and Action Plan (page 38).	Being that the Action plan is the document that will be adopted separately from the Strategy and will be adopted in the period within one year from the Strategy adoption.	Text is revised in accordance with the comment.
EPS	In the introductory part of the policy measures that relates to Waste Management Sector, names of the documents for management of waste and sludge are wrongly stated, together with the status of their preparation – correct (page 42).	The Waste Management Program for the period 2022 – 2031 was adopted (Official Gazette of RS, No. 12/22). The public discussion regarding the Sludge Management Program Proposal was held on 16.01.2023 until 06.02.2023. The final preparation of the document for adoption is underway.	The section is corrected and enhanced.
EPS	In the introductory part of the policy measures that relate to Agriculture, Forestry and Other Land Use (AFOLU), (i) Agriculture –the publication dates of the mentioned laws where not given, which is not the case in the previous part of the INECP text, links are given for the search – correct (page 45).	For the sake of legal and technical harmonization, it is necessary in the entire text of INECP to state the publication dates of the regulations in the same way, as well as uniformly state the full names or abbreviations of business names of legal entities. Correct the footnotes by indicating the number of the "Official Gazette" in which the following were published: Law on Agriculture and Rural Development ("Official Gazette of RS", No. 41709, 10/13- other law, 67/21- other law and 114/21); Law on Incentives in Agriculture and Rural Development ("Official Gazette of RS", No. 10/13,142/14,103/15, 101/16 and 35/23); Law on Regulation of	The required information for the mentioned regulations have been provided in a homogeneous way. Additional information is added.

stakeholder	comment	explanation	response
		Agricultural Products Market ("Official Gazette of RS, No. 67/21").	
EPS	In the introductory part of the policy measures that relate to Agriculture, Forestry and Other Land Use (AFOLU), (i) Agriculture – in paragraph 3, incorrect, unacceptably big error, it is stated that the parliamentary committee passes the law (page 46).	Correct the text of the entire paragraph, the National Assembly of the Republic of Serbia enacts laws.	Comment is accepted and the INECP text is edited.
EPS	In the introductory part of the policy measures that relate to Agriculture, Forestry and Other Land Use (AFOLU), (ii) Land Use, Land Use Change and Forestry – state the dates of adoption of given law and strategy (page 46, paragraphs 2 and 3).	Correct the footnotes by indicating the number of the "Official Gazette" in which the following were published: Forest Law ("Official Gazette of RS", No. 30/10, 93/12, 89/15 and 95/18 – other Law) and Forestry Development Strategy of The Republic of Serbia ("Official Gazette of RS", No. 59/06).	Additional information is added.
EPS	PM_D13 Measures for reducing emissions from fertilizers use – wrongly stated as main objective reduction of GHG (page 50).	Correct the main objective of this policy measure – reduction of NO ₂ , which can be deduced from the policy measure description.	The main objective of the policy measure is corrected.
EPS	3 POLICIES AND MEASURES, chapter 3.1.2 Renewable energy, subchapter i. "Policies and measures to achieve the national contribution to the binding EU level 2030 target for renewable energy and trajectories as presented in 2.1.2 including sector- and technology-specific measures" under "Electricity", correct the text of the first paragraph and harmonize with national legislation and EU directives in the field of electricity that should be implemented (page 52).	The legal regulations for the participation of renewable energy sources producers in the electricity market will be applied, with an impact analysis of the obligation of different types of renewable energy sources plants to assume the balancing responsibility. Taking into consideration that Law on Amendments to the Law on the Use of RES establishes the obligation to provide balancing services by the guaranteed supplier, it is necessary to differentiate between privileged producers and other	The text is adapted taking into account both the national legislation and the EU directives.

stakeholder	comment	explanation	response
		<p>producers on the energy market.</p> <p>Note that independent aggregator is not envisaged as a market participant in our legislation.</p>	
EPS	PM_D19 - Support scheme based on tendering procedures (auction scheme) for commercially cost-effective RES technologies – it is necessary to correct the name of the policy measure and in that sense harmonize the description (page 53).	The description of the policy measure is not aligned with the name of the policy being that the in description the support scheme based on the public procurement is not explained, so it is unclear how renewable energy sources would be supported through public procurement procedures.	The description of the measure is improved so as to be aligned with the name.
EPS	PM_D20 - Application of the legislative framework for the participation of the RES producers in electricity market – correct the text (page 53).	Description of the policy measure should be harmonized according to the point 28 of this table.	The text is adapted taking into account both the national legislation and the EU directives.
EPS	PM_D21 - Support RES technologies that will not participate into the tendering procedures – it is necessary to correct the name of the policy measure and harmonize the description (page 54).	Description of the policy measure does not correspond to the name of the measure, considering that the division done in PM_D19 and PM_D21 should not be based on public procurement procedures.	The description of the measure is improved so as to be aligned with the name.
EPS	PM_D23 - Fostering the further utilization of guarantees of origin for energy from RES – rearrange the description of the policy measure considering the legal nature of this instrument (page 56).	<p>Guarantees of origin have the exclusive function of providing proof to the end customer that a given share or amount of energy is produced from RES.</p> <p>Rearrange the description in part related to the transport by clearly stating in which way the production of energy from RES is stimulated in the transport sector.</p>	The description of the measure demonstrate clearly the role of the GoOs in all end-uses.
EPS	PM_D29 - Adaptation, enhancement and expansion of the grid networks for avoiding	Specify based on which national document is this policy measure foreseen.	It should be noted that the INECP does not include only policy

stakeholder	comment	explanation	response
	congestions and enabling the optimal penetration of RES – Relevant National Planning Document is missing (page 57).		measures, which are currently foreseen in the national context-legislation, but can propose additional ones so as to be taken into account during the adoption of the new legislation or the modification of the existing one ensuring the achievement of the specified laws.
EPS	3 POLICIES AND MEASURES, chapter 3.1.2 Renewable energy, subchapter i. “Policies and measures to achieve the national contribution to the binding EU level 2030 target for renewable energy and trajectories as presented in 2.1.2 including sector- and technology-specific measures” under “Heating and Cooling” – specify "Official Gazette of RS" where the rulebook is published (paragraph 1, page 57).	Rulebook on Energy Efficiency in Buildings ("Official Gazette of RS", No. 61/11).	The text is revised. The rulebook is mentioned.
EPS	PM_D35 - Development of the required infrastructure for recharging electric vehicles – Relevant National Planning Document is missing (page 61).	Law on Use of RES	The text is revised. The Law on Use of RES is added.
EPS	PM_D36 - Provision of fiscal and economic incentives to foster the further deployment of electric vehicles – correct the name of Relevant National Planning Document – law (page 61).	LAW on Tax on the use, possession and carrying of goods ("Official Gazette of RS", No. 26/01,80/02,43/04,31/09,101/10, 24/11 and adjustment of dinar amount is carried out every subsequent year).	The name of the mentioned law is corrected.
EPS	3 POLICIES AND MEASURES, chapter 3.1.2 Renewable energy, subchapter iv. “Specific measures to introduce a one-stop-shop, streamline administrative procedures, provide information and training, and empower	The Law on use of RES does not recognize the term self-consumer. The term “producer-customer” is used (Article 4, point 23). CORRECT THIS IN THE ENTIRE TEXT OF INECP!	It should be noted that the official definition in RED (2018/2001/EE) is Renewables self-consumers (Article 21). Therefore, we do not

stakeholder	comment	explanation	response
	renewable self-consumers and energy communities” – correct the title to replace the term “self-consumer” with the term “producer-customer” and harmonize further text with the legal definition of the term (page 66).		recommend to use the term producer customer.
EPS	PM_D28 - Establishing public accessible registry for RES electricity producers – correct the name and the description being that public registries are already maintained (page 69).	The Law on use of RES foresees the following registries: registry of privileged, temporarily privileged producers who have the status of producer from RES, registry of producers-customers and estimate of their production, registry of guarantees of origin, which are maintained and publicly available.	The description of the measure is aligned with the existing registries.
EPS	3 POLICIES AND MEASURES, chapter 3.2 Dimension Energy Efficiency PM_EE3 - Financing programs for the renovation of non-residential buildings (not public) – correct the name of the Rulebook on Energy Certification (page 78).	Rulebook on conditions, content and method of issuing certificates on energy properties of buildings ("Official Gazette of RS", No. 69/12, 44/18 – other law and 111/22).	The name of the rulebook is corrected.
EPS	PM_EE16 - Promotion of energy efficiency in inland waterways transport – correct the validity period of both Strategy of the water traffic and Sustainable Urban Development Strategy (page 90).	Strategy on waterborne transport development of The Republic of Serbia, 2015 - 2025 ("Official Gazette of RS", No. 3/15 and 66/20) Strategy of sustainable urban development of the Republic of Serbia until 2030 ("Official Gazette of RS", No. 47/19), and not for the year 2030. IN THE ENTIRE TEXT OF INECP, CORRECT THE TITLE OF SUSTAINABLE URBAN DEVELOPMENT STRATEGY, BEING THAT THIS IS A DOCUMENT THAT WAS ADOPTED FOR	The description of the strategies is corrected.

stakeholder	comment	explanation	response
		THE PERIOD UNTIL 2030, NOT ONLY FOR 2030.	
AERS	Chapter 3.1, page 64 Policy measure code: PM_D40 Definition of the technical specifications for the transmission, storage and ejection of the produced renewable hydrogen and biomethane into the natural gas infrastructure.	It is unclear how the participation of hydrogen is planned at all, without previously defining this measure? Is it even possible to inject hydrogen into the existing gas infrastructure?	The aim of the proposed measure is to define all the required issues related to the consumption of hydrogen. All the preconditions will be explored including the technical requirements for the injection of the produced green hydrogen to the existing gas infrastructure. Generally, the injection of green hydrogen is feasible under the prerequisite that the gas network is hydrogen ready as it is called. Otherwise, its potential transformation should be examined in the case that hydrogen will be part of the energy transition of the country.
NIS	Chapter 3.1, page 35: Title of the measure PM_D1 should be rephrased.	This policy measure should foresee adoption of carbon tax, not only preparation. Namely, due to the entry into force of the CBAM from October 2023, some countries of the Region are already announcing domicile taxes on CO2, which will not be part of ETS, but will still affect the reduction of the CBAM tax on the export of products from the Region to EU countries.	The policy measure is modified holistically.
NIS	Chapter 3.1, page 36: Title of the measure PM_D2 should be rephrased.	Low-carbon Development Strategy was adopted on 01.06.2023.	The title is rephrased.

stakeholder	comment	explanation	response
NIS	Chapter 3.1, page 36: Implementation Timeframe of the policy measure PM_D2 should be checked.	Adopted Strategy is referred to the period 2023-2030.	The reason for the change of the timeframe was the alignment with the respective timeframe of the INECP.
NIS	Chapter 3.1, page 36: Title of the measure PM_D4 should be supplemented.	It is not clear about what information are in question.	The title is rephrased.
NIS	Chapter 3.1, page 40: It is needed to explain in measure PM_D5 what products are in question.	In description of the measure as products "petrochemical and carbon black acid" are stated, without stating specific products.	The main objective was to demonstrate which processes can be benefited by the planned measures and not to specific products.
NIS	Chapter 3.1, page 40: In the measure PM_D5, it is needed to change name of "Second National Communication of the Republic of Serbia under the UNFCCC (2017)" in Relevant National Planning Document.	It is a little confusing why the newer version of the report is not used, since there is also a report with the emissions from 2018 (Third Report), and the INECP itself states and emissions in 2019 which implicates that forth report according to the UNFCCC exists.	The most recent report is used as relevant national planning document.
NIS	Chapter 3.1, pages 47-48: For policy measures PM_D7, D8, D9 we suggest checking reality of the objective: "Increase the carbon sink in the Serbian Forest by 17% by 2030, compared to 2010"	It is questionable if this objective is real, primarily of the following reasons: <ul style="list-style-type: none"> • In 2010 through sinks removed 5627 tons of CO2. • In 2030 6584 tons of CO2 should be removed. • In 2018 4550 tons of CO2 is removed, which means that Serbia until 2030 must increase removing for ~ 45%. It should be considered how many years one tree needs to grow to be able to absorb significant amount of CO2.	It is important to mention here that this specific objective (i.e. "Increase the carbon sink in the Serbian Forest by 17% by 2030 and between 22% and 132% by 2050, compared to 2010") is fully compatible with the relevant target/objective set in the "LOW CARBON DEVELOPMENT STRATEGY" adopted by Government in 2023.

stakeholder	comment	explanation	response
NIS	Chapter 3.1, page 48: Policy measure PM_D9 should be supplemented with commitments towards investors.	This measure is highly questionable considering the intense devastation of green areas in cities and industrial zones. Therefore, we propose to supplement it with a proposal to introduce a legal obligation for investors: <ul style="list-style-type: none"> • To plant at least 3 new ones for every tree cut down. • For the area in the industrial zone occupied by industrial object/ infrastructure to plant a forest in another place or to fence industrial plot with trees. 	The sentence "A potential provision of legal obligations for investors will be explored in order to regenerate green areas" has been added in the description of the PM, while the new type of measure includes "investment and reform".
NIS	Chapter 3.1, pages 53-54: For policy measure PM_D20 additional clarifications or precisions are needed.	It is not clear what does the following statement mean "the application of the imposed obligation for renewable energy stations" if it is about the private investors. It is not clear how they will be forced to invest in RES plants. In the event that building permits are not granted, e.g., natural gas plants, investors may decide not to invest in the energy sector at all, which may result in the participation of RES plants in the energy sector not being increased.	PM_D19 is the main instrument for mobilizing the potential RES investors so as to accomplish their investments. PM_D20 is a supplementary measure to the previous one in order to impose obligations in regards to their participation into the electricity market.
NIS	Chapter 3.1, pages 53-54: For policy measure PM_D20 Implementation Timeframe should be moved forward, meaning towards 2023.	It is not clear why would we have to wait two years for this measure, because it could be possible that some technology has already appeared and there are investors?	Comment is accepted, and INECP text is revised.
NIS	Chapter 3.1, page 59: Policy measure PM_D33 should be supplemented.	Policy measure should be supplemented with information whether 49 ktoe of biofuels is calculated with or without multipliers.	The provided quantity of biofuel is without the effect of multipliers. A clarification is added.

stakeholder	comment	explanation	response
NIS	Chapter 3.1, page 59: In policy measure PM_D33 inspect if “mostly advanced” is an adequate term.	In the Law subsidies are planned only for the production of advanced fuels.	It is corrected so to refer only to advanced biofuels.
NIS	Chapter 3.1, page 61: In policy measure PM_D36 Description should be supplemented/rephrased.	Some of the mentioned subsidies already exist, so it needed to rephrase “PM_D36 will provide subsidies and fiscal incentives...” in different way.	The text is modified so as to depict the existence of subsidies.
NIS	Chapter 3.1, page 73: For policy measure PM_D42 Implementation Timeframe should be moved forward, meaning towards 2023.	To recognize the realization of the mandatory RES share, it is necessary that the sustainability criteria have been met, so we need them as soon as possible. In addition, something has already been done on this issue, there is a starting point, and it should be resolved relatively quickly.	Generally, the timeframe of the majority of the policy measures has set to 2025-2030 so as to be fully aligned with the timeframe of the INECP. Nevertheless, it can be differentiated in specific cases if needed.
NIS	Chapter 3.2, page 75: In part “ii. Long-term strategy for Encouraging Investment in...” (or in some other) it is needed to add new point with the title: “MEASURES FROM THE FIELD OF URBAN PLANNING”	Measures to achieve energy efficiency in urban areas from the aspect of urban planning with the goal of achieving better microclimatic conditions. The concreting of urban units, as a consequence of increased housing density, degraded the microclimate conditions of housing, which results in increased energy consumption needs (especially during the summer months). It is necessary to define the aspects whose proper application achieves positive effects on the microclimate of new residential areas. For existing city structures, define measures for the reconstruction of buildings, roads, and city centers in terms of:	PM_EE41 was enhanced with this dimension.

stakeholder	comment	explanation	response
		<p>1) Occupancy - permitted percentage of built-up construction plots.</p> <p>2) Obligation to form green belts along newly planned roads and in new city districts.</p> <p>3) Optimal orientation of objects.</p> <p>4) Renovation of flat roofs in the direction of Green Roofs, instead of a superstructure that increases the density of housing, which brings with it a list of problems.</p> <p>5) other measures.</p>	
NIS	Chapter 3.2, page 86: In policy measure PM_EE10 it is needed to correct the Description.	The regulations 443/2009/EC and 510/2011/EC have been retracted and are not in force from 31.12.2019.	The text is corrected mentioning Regulation (EU) 2019/631.
NIS	Chapter 3.2, page 86: In policy measure PM_EE10 in Union Policy add and Regulation (EU) 2019/631.		The regulation is added.
NIS	Chapter 3.2, page 88: Policy measure PM_EE13 should be supplemented.	Directive 2014/94/EU on the deployment of infrastructure for alternative fuels should also be mentioned, which should also be transposed into the RS legislation.	The mentioned directive is added.
NIS	Chapter 3.2, page 90: In the Description of the policy measure PM_EE16 after "...and the promotion of renewable..." add "...and alternative...".	In addition to electricity (which can also be from RES), alternative energy sources include LNG/CNG, which also contribute to reducing emissions. In addition, directive 2014/94/EU foresees the obligation to build infrastructure for alternative fuels on inland waterways.	The main objective of the policy measure is to promote energy efficiency in inland waterways transport and to maximize synergies with RES. To this direction, the current description was extended so as to include both alternative fuels and renewable gases more explicitly.
NIS	Chapter 3.2, page 99: In the policy measure PM_EE28, where Directive articles are stated, add articles 8, 16, and 17.		Generally, the linkage with the article was become only for the cases that articles are linked to

stakeholder	comment	explanation	response
			the achievement of targets. For articles that were not included it was concluded that these have indirect relation with this measure.
NIS	Chapter 3.2, pages 99-100: For policy measure PM_D28 Implementation Timeframe should be moved forward, meaning towards 2023.	Increase of Energy Efficiency is the most effective way to reduce emissions, and because of that implementation timeframe should not be set to start in two years.	Generally, the timeframe of the majority of the policy measures has set to 2025-2030 so as to be fully aligned with the timeframe of the INECP.
NIS	Chapter 3.2, page 100: In the policy measure PM_EE29, where Directive articles are stated, add articles 8, 16, and 17.		Generally, the linkage with the article was become only for the cases that articles are linked to the achievement of targets. For articles that were not included it was concluded that these have indirect relation with this measure.
NIS	Chapter 3.2, page 101: In the policy measure PM_EE30, where Directive articles are stated, add articles 8 and 17.		The mentioned directive articles are linked indirectly with PM_EE30.
NIS	Chapter 3.2, page 103: In the policy measure PM_EE33, where Directive articles are stated, add article 6.		Generally, the linkage with the article was become only for the cases that articles are linked to the achievement of targets. The article is added.
NIS	Chapter 3.2, page 104: In the policy measure PM_EE34, where Directive articles are stated, add article 15.		Generally, the linkage with the article was become only for the cases that articles are linked to the achievement of targets. For articles that were not included it was concluded that these have

stakeholder	comment	explanation	response
			indirect relation with this measure.
NIS	Chapter 3.2, page 105: In the policy measure PM_EE35, where Directive articles are stated, add article 16.		Generally, the linkage with the article was become only for the cases that articles are linked to the achievement of targets. The article is added.
EBRD	The current Rulebook on Energy Efficiency in Buildings is dated 2011 and needs an urgent update (policy support was already provided 2018 – 2021).	This Rulebook is referred to on several occasions in the NECP (Chapter 3.2). The text of the NECP is not clear about the concrete timeline to update this Rulebook.	The need to update the Rulebook on Energy Efficiency in Buildings is mentioned.
EBRD	For measure PM_D6, a more social ‘main objective’ and ‘progress indicators’ would be more appropriate	CO2 emissions reduction does not reflect key purpose of JT Action Plan of addressing socio-economic effects of transition and ensuring that people stand to benefit	The objective and the progress indicators have been enhanced. Just transition plan has not been finalized yet. Action plan of Just transition plan will be finalized after the adoption of the INECP.
EBRD	PM_D41 Important for biomass to be sustainable (e.g. have certifications) for it to be counted as low carbon	Consider emphasizing in the measure	It is ensured that biomass is sustainable.
EBRD	PM_EE34 – would be helpful to include further details (e.g. fuel source) for the CHPs		More quantitative data has been added about the penetration of CHPs.
EBRD	PM_EE42 Does the measure include ancillary services (e.g. reactive power control) - please consider expending/ providing information to that effect in the draft NECP	Reactive power control and other services will become increasingly important for ensuring system stability with fossil fuel phase out and RE scale up	The main objective of this policy measure is the improvement of the energy efficiency in the respective infrastructures. It is inserted in PM_D28.

stakeholder	comment	explanation	response
EBRD	Under Energy Efficiency, industry sector decarbonization is planned to be achieved via: PM_EE7 Enhancing the role of energy performance certificates, PM_EE19,20 AND 21 Support schemes/Regulatory measures/supplementary measures for the promotion of energy efficiency in industrial sector Investment	In its current format of the NECP, it is hard to understand the contribution of the policy measures especially for industry sector. As process emissions constitute an important part of the industry-related emissions, not enough attention was given in the document.	The main objective of the policy measures PM_EE21 and PM_EE22 is the improvement of the energy efficiency in the industrial sector. PM_D5 aims at the reduction of the process emissions through the implementation of technological changes in production processes in specific industries.
BOS	Chapter 3.1, page 39: Referring to the still not adopted document in PM_D6, Title: Implementation and monitoring of Just Transition and related Action Plan, makes this measure rather vague and subject to different interpretations.	This measure is listed under the "Decarbonization" dimension. The measure, in essence, refers to a document that is still being drafted and is not a public policy document - it is the "Just Transition Diagnostics" document.	The INECP includes all the policy measures, which will be implemented for the achievement of the specified targets. To this direction, it is acceptable to include planned activities, such as the Just Transition Action Plan.
BOS	Chapter 3.1, page 39: Include different Government instances to monitor measure PM_D6, Title: Implementation and monitoring of Just Transition and related Action Plan.	It is noticeable that the Ministry of Mining and Energy was appointed both as Implementing Entity and as Monitoring Entity for the implementation of this measure, while next to it only the Ministry of Environmental Protection was mentioned for the monitoring. If we are talking about the establishment of a just transition process at the national level, it is necessary to include practically all government sectors: Ministry of Labor, Employment, Veteran and Social Policy, the Ministry of Education, The	All the mentioned governmental bodies have been added.

stakeholder	comment	explanation	response
		Ministry of Economy, the Chamber of Commerce of Serbia and regional chambers of commerce, local self-government units, The Social and Economic Council etc.	
BOS	Chapter 3.1, page 39: The indicator of just transition progress should be changed, in the way that it is not observing just GHG reduction for the measure PM_D6, Title: Implementation and monitoring of Just Transition and related Action Plan.	The annual GHG reduction was set as a Quantified objective. Quantified objective should be focused on the success of just transition process, which is not reflected only in reduced emissions from energy sector, but rather in successful economic and social transformation of the regions, which are most economically depended on coal exploitation.	The objective and the progress indicators have been enhanced. Just transition plan has not been finalized yet. Action plan of Just transition plan will be finalized after the adoption of the INECP.
BOS	Chapter 3.1, page 39: The analytical basis of INECP should provide more detailed data about the economic and social structure of municipalities where the coal basins are located.	The analytical basis of INECP should provide more detailed data about the economic and social structure of municipalities where the coal basins are located and companies in the chain of production and supply of coal for energy production, as well as data on the number of potentially threatened jobs, retraining needs, additional training, severance pay, etc. then on the demographic and social structure of those areas, vulnerable and marginalized groups, and other data that comprehensively provide an overview of the just transition topic situation.	The analytical presentation of the context, which is related to the just transition areas, will be performed in the Study Diagnostic Just Transition Serbia. The INECP provides the general framework. Therefore, we believed that a general description is sufficient.
BOS	Chapter 3.1, page 39: Include European Commission recommendation, resulted from EU member's Integrated National Energy and Climate Plans evaluation.	European Commission recommendation, resulted from EU member's Integrated National Energy and Climate Plans evaluation, states that INECP must include following elements: - (1) detailed social impact, influence on employment and skills; (2) need	The majority of the mentioned elements have been already addressed. More specifically, the social impacts have been estimated in Section 5.2 including discussion about the skills, while

stakeholder	comment	explanation	response
		<p>for skills and incompatibility of skills; (4) planned goals, measures, schedules, mitigation measures; (5) number of households affected by energy poverty etc.</p>	<p>energy poverty issues have been dealt within dimension about the energy market. Finally, information about the measures has been provided for almost all measures.</p>
<p>BOS</p>	<p>Chapter 3.2, pages 74-75: Summed values given in tables showing new and cumulative final energy savings in period 2024-2030 are not correct, nor are the values in the tables consistent with the text.</p>	<p>In text presenting Energy Efficiency dimension (Chapter 3.2) energy savings scheme by implementing new and alternative measures in the period 2021-2030 is presented, to contribute to Article 7 of Directive.</p> <p>In tables 3.1 and 3.2 at the beginning of the chapter, new and cumulative final energy savings in the period 2024 - 2030 are shown. However, the sums of the values are not correct, nor do the values in the tables align with the text accompanying these tables.</p> <p>1. The cumulative savings in 2025 compared to 2023 is 144 ktoe. For 2026, according to this plan, it should be 216 ktoe, not 217 ktoe as stated in the table. Such mistakes were made for all other years.</p> <p>2. The document does not provide information on the methodology or criteria taken into account when estimating the annual final energy savings of 72 ktoe.</p> <p>When determining the necessary new and cumulative final energy savings, the trend of increasing energy use, especially electricity, the increase in the number of electrical</p>	<p>The differences are justified by the rounding of the annual target (72.2496 ktoe). The used methodology is described: "The calculation of the energy saving target was estimated taking into account the average final energy consumption of the period 2018-2020 (9,031 ktoe based on EUROSTAT's data) assuming energy saving factor equal to 0.8% in the period 2024-2030". The trend of increasing energy use is not taken into consideration for the determination of the specified target.</p>

stakeholder	comment	explanation	response
BOS	Chapter 3.2, pages 74-75: Why are measures in table 3.2 presented as alternative?	<p>devices, the tendency to switch to hybrid and electric vehicles, etc. should be considered.</p> <p>Table 3.2 presents alternative measures for reaching the goal from Article 7 of the Directive for the period 2024-2030.</p> <p>The proposed measures (for example upgrade of building envelope, installation of heat pumps) have been implemented until now, so the questions arise, in what way are these measures labeled as “alternative”?</p>	It is done in accordance with Article 7 of the Directive which describes explicitly which measures entitled as alternative. Alternative measures are classified as all these measures that are initiated by the State justifying the significant contribution to the implementation of the measure.
BOS	Chapter 3.2, page 75: Why INECP and the accompanying documents, which represent the analytical basis, don't give a review of the experiences from the previous practice of renovation of residential and commercial buildings?	<p>Dimension “Energy Efficiency” envisages implementation of a long-term strategy for the renovation of the national stock of residential and commercial buildings (in the public and private sectors) and envisages the inclusion of policies and incentive measures that enable cost-effective deep renovation and deep renovation in stages.</p> <p>INECP, nor other documents that the consultants had access to, do not contain a review of experiences from previous practice that indicate a series of failures in the implementation of such programs, including, among other things, uneven distribution of existing funds, insufficient subsidies for poorer citizens, dependence on capability and financial state of local self-governments that participate in granting subsidies to citizens, etc.</p>	The aim of the INECP is to present all the required measures for the attainment of the targets. We agree that the current performance of the existing measures should be taken into account, but in any case this cannot be hinder the further implementation of the measures. Obviously, the existing experience should be used so as to design more effective policy measures.

stakeholder	comment	explanation	response
		<p>It would be desirable for the text to provide a realistic assessment of the effects achieved so far through the application of policy measures, financial, fiscal, and regulatory measures, as well as further elaboration of the proposed measures for the next period that take into account the removal of the failures identified so far in practice.</p>	
BOS	<p>Chapter 3.2, page 76: Why is document stating Energy Performance Certificates and renovation passports, if certificates on the energy performance of buildings already exists?</p>	<p>Text further states that the role of the Energy Performance Certificates will be enhanced aiming at their transformation into renovation passports to facilitate the implementation of the most cost-effective interventions.</p> <p>If this certificate means a certificate on the energy performance of buildings, its role Refers to EU Directive 2012/27/EU as modified by Directive 2018/202/EE is fully determined by the "Rulebook on Conditions, Content and Manner of Issuing Energy Performance Certificate of Buildings" ("Official Gazette of the RS" No. 69/2012, 44/2018 and other Law and 11/2022) which certainly enables the issuance of energy passports for buildings that are being renovated. They do not prevent the implementation of the most cost-effective interventions.</p>	<p>The aim of the proposed measure is to improve the existing framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD. It should be noted that there is no obligation to identify the most cost-effective energy efficiency interventions in the current version of the energy performance certificates.</p>
BOS	<p>Chapter 3.2, page 76: Measure PM_EE1 envisages renovation of 131 thousand residential buildings. However, it is not</p>	<p>Number of residential buildings foreseen for renovation</p>	<p>Information on average square footage of buildings is added.</p>

stakeholder	comment	explanation	response
	<p>elaborated enough, and it does not provide insight in ways of: implementation, effects, methodology and criteria for setting target indicators, or presented assessments.</p>	<ul style="list-style-type: none"> • What is the average square footage of these buildings and what is the percentage from the total fond? • How much is their specific energy consumption? 	<p>Other information was not available.</p>
BOS	<p>Chapter 3.2, page 76: Estimate of final energy savings in financial program for residential buildings renovation (PM_EE1)</p>	<p>Proposed policy measure states final energy saving of 35 ktoe, but it does not state using which measures or activities will the set goal be achieved and based on what was this estimation done.</p>	<p>It is added that the estimated energy savings will be delivered by the renovation of the residential buildings. More clarifications are provided so as to demonstrate that interventions will be occurred to the building envelope.</p>
BOS	<p>Chapter 3.2, page 76: Installation of heat pumps in financial program for residential buildings renovation (PM_EE1)</p> <p>Measure PM_EE1 also foresee installation of 2 GW heat pump capacity with estimated final energy savings of 34 ktoe.</p>	<ul style="list-style-type: none"> • In what way and based on which parameters is the installed capacity and savings estimate determined? Is there a performance assessment of the buildings intended for the installation of heat pumps? • Will heat pumps be installed in all 131 thousand residential buildings foreseen for installation of heat pumps? • Is it planned to connect residential buildings planned for reconstruction to the district heating system and what percentage? • For buildings that are not connected to the district heating system, it is necessary to show the trend of heat pumps installation in the last few years in order to be able to assess whether the plan of 2 GW by 2030 is achievable. <p>In cases where the building is already</p>	<p>Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. In cases where the building is already connected to the district heating system, the heat pump</p>

stakeholder	comment	explanation	response
		<p>connected to the district heating system, the heat pump will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating. In this way, the investment in the heat pump does not refer to financing the renovation of residential buildings, but rather the district heating system within which the heat pump should be integrated.</p>	<p>will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating.</p> <p>It is not planned the installation of central heat pumps in the district heating network.</p> <p>The heat pumps can be installed either in the renovated buildings or in non-renovated buildings.</p> <p>Information is added in regards the penetration of heat pumps until 2030.</p>
BOS	<p>Chapter 3.2, page 77: Financing of policy measures implementation for residential buildings renovation (PM_EE1)</p>	<p>Implementation cost for measure PM_EE1 is 1,311 M€. When this number is divided by the number of residential buildings foreseen for renovation, it results in the amount of 10,007 euros per building. Considering that average square footage of the buildings foreseen for renovation is not given in the document, the amount of allocated funds defined in this way does not provide enough information.</p> <p>It is needed to show distribution of determined funds per Quantified objective (35 ktoe for buildings and 34 ktoe for heat pumps).</p>	<p>Information about the average square footage of the residential buildings is added. The allocation of the funds to two different types of interventions is already provided.</p>
BOS	<p>Chapter 3.2, page 78: Policy measure PM_EE3 foresee renovation of</p>	<p>The measure states that subsidies are intended for the energy renovation of non-</p>	<p>Firstly, it is estimated the demand for space heating after</p>

stakeholder	comment	explanation	response
	<p>87,681 thousand m2 non-residential buildings (not public). The measure does not provide a clear insight in implementation methods, effects, methodology, and criteria for setting the quantified objectives or presented assessment.</p>	<p>residential buildings with an emphasis on specific end uses of the service sector such as schools, the health sector, sports activities, or cultural buildings.</p> <ul style="list-style-type: none"> • The measure itself refers to non-public buildings, while the description of the measure mentions public buildings, so a precise definition of what is meant by "not public non-residential buildings" is necessary, and clarification of whether these are private buildings. 	<p>the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. It is stated more clearly that the policy measure do not refer to public buildings.</p>
BOS	<p>Chapter 3.2, page 78: Number of non-residential (not public) buildings foreseen for renovation in Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>Data about the number of buildings and their specific energy consumption is missing?</p>	<p>This data is not available.</p>
BOS	<p>Chapter 3.2, page 78: Assessment of final energy savings in Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>Proposed policy measure states final energy saving of 32 ktoe, but it does not state using which measures or activities will the set goal be achieved and based on what was this estimation done.</p>	<p>The expected energy savings will be resulted both by the energy upgrade of the building envelope and the installation of heat pumps. In regards the applied methodology, it is estimated firstly the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the</p>

stakeholder	comment	explanation	response
			<p>delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated due to the installation of heat pumps.</p>
BOS	<p>Chapter 3.2, page 78: Installation of heat pumps in Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>In what way are installed capacity and estimated savings determined? Will the heat pumps be installed on all 87.681 thousand m²?</p> <p>Measures PM_EE1 and PM_EE3 foresee installation of heat pumps. Measure PM_EE1 foresees that 2 GW installed capacity of heat pumps achieve savings of 34 ktoe, while in measure PM_EE3 foreseen installation of 5.7 GW installed capacity of heat pumps achieve estimated final energy savings of 60 ktoe. This disproportion should be explained.</p>	<p>Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. The heat pumps can be installed either in the renovated buildings or in non-renovated buildings. The disproportion is explained by the different energy saving</p>

stakeholder	comment	explanation	response
			potential of the two examined sectors (residential and non-residential buildings) due to the fact that the least cost solution is the driven for the selection of the energy efficient interventions.
BOS	Chapter 3.2, page 78: Financing of implementation of measure Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)	<p>For the implementation of the measure 2.017 billion euros has been determined. When this amount is divided by the total area of the buildings (87.681 m²), the amount of 23.003 €/m² is obtained. This amount was not accompanied by an appropriate analysis of costs and benefits, and the question of the profitability of the renovation of these buildings remains open.</p> <p>The public fund is mentioned as one of the sources of financing. However, if the measure refers to the renovation of non-public buildings, the question arises of the justification of financing non-public buildings from the public budget. Additionally, if there is a large number of public buildings that have not been energy-renovated and that may not be renovated by 2030, the question arises as to why the public budget would finance non-public buildings.</p> <p>It is necessary to show the distribution of the determined funds according to the quantified objectives (32 ktoe for buildings and 60 ktoe for heat pumps).</p>	<p>Generally, the selection of the energy efficiency interventions is based on the identification of the least cost solution for the whole energy sector. Moreover, EED specify various targets irrespective of the cost-effectiveness performance of the promoted measures, such as in the case of public buildings (article 5).</p> <p>Finally, the INECP estimates the total amount of investment and map the potential funding sources. Obviously, the specialization of the funding sources can be done during the implementation of the INECP taking into account the specified targets and its main principles. It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m² and not to 87,681 thousand m².</p>

stakeholder	comment	explanation	response
BOS	Chapter 3.2, page 77: Measure PM_EE2 foresees renovation of 1,026 thousand m2 public buildings. This measure does not foresee installation of heat pumps, or at least it is not explicitly stated as in PM_EE1 and PM_EE3.	If this assumption is correct, it should be explained why installation of heat pumps is not foreseen on public buildings. The description of this measure states that the most cost-effective interventions will be supported, while for PM_EE1 and PM_EE3 this condition is not set.	The installation of heat pumps in public buildings is foreseen within PM_EE3. The contribution of the heat pumps in public buildings is distinguished and integrated into PM_EE2.
BOS	Chapter 3.2, page 77: Number of public buildings foreseen for renovation in Support financially the energy renovation of public buildings (PM_EE2)	Measure foresees renovation of 1,026 thousand m2 of public buildings, but the data about the number of buildings foreseen for renovation and their specific energy consumption is missing.	This data is not available.
BOS	Chapter 3.2, page 77: Final energy savings in Support financially the energy renovation of public buildings (PM_EE2)	Proposed policy measure states final energy saving of 5 ktoe, but it does not state using which measures or activities will the set goal be achieved and based on what was this estimation done.	The expected energy savings will be resulted by the energy upgrade of the building envelope. In regards the applied methodology, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings.
BOS	Chapter 3.2, page 77: Financing of measure implementation in Support financially the energy renovation of public buildings (PM_EE2)	€55 million has been allocated for this measure, which when divided by the total area, amounts to 53.606 €/m2. This amount (53.606 €/m2) cannot be considered sufficient for any serious energy renovation. The amount provided for the renovation of public buildings (€53.606/m2) is 40 times lower than the amount provided for the	The applied methodology has been added in Annex III. Moreover, the unitary costs for the energy upgrade of the building envelope is re-assessed.

stakeholder	comment	explanation	response
		<p>energy renovation of non-residential (non-public) buildings (€23,003/m²). The document does not provide a rationale for this distribution of funds.</p>	
BOS	<p>Chapter 3.2, page 81: Enhancing the role of the energy performance certificates (PM_EE7)</p> <p>It is needed to explain the term renovation passports.</p>	<p>According to the current regulations in the RS, a passport can still be issued for a renovated building, however, from the information in the document, it remains unclear what will the passports for buildings that are not renovated be turned into.</p> <p>Is this a special category of passport that is issued only for buildings that are being renovated?</p> <p>The document further states that a system of permanent monitoring and control of energy performance certificates will be established. Such a system already exists, and the Ministry of Construction, Transport and Infrastructure regularly checks and verifies energy passports.</p> <p>An additional explanation is needed for the establishment of the mentioned monitoring system.</p>	<p>The aim of the proposed measure is to improve the existing framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD. The renovation passports is a new element, which is promoted within the framework of the EPBD.</p> <p>The text is modified so as to include the existing system for monitoring the EPCs.</p>
BOS	<p>"Chapter 3.2, page 83: Description of policy and measures to promote energy services in the public sector and measures to remove regulatory and non-regulatory barriers that impede the uptake of energy performance contracting and other energy efficiency service models"</p>	<p>The text states that during the renovation of buildings owned or used by the state administration, the most economical approach will be applied, meaning that priority will be given to the most energy-intensive public buildings.</p> <p>However, the document does not state how</p>	<p>As it is stated the design and provision of the dedicated financial incentives will facilitate the deep energy upgrade of the residential and public buildings both attaining the optimum cost-effectiveness ratio and increasing</p>

stakeholder	comment	explanation	response
		<p>and in what way the priority list of buildings will be determined.</p> <p>It further states that standard contracts and guidelines will be developed to facilitate the design and implementation of energy efficiency projects through energy performance contracts.</p> <p>Contracts on energy performance do not regulate or determine the content and quality of project documentation, and design for the needs of PPP (Public Private Partnership) should not differ from design for other cases.</p> <p>The document does not provide precise information about who will carry out the rehabilitation of the most energy-intensive public buildings. Will those projects with potentially the largest investment return period be implemented through a public-private partnership, or will the state itself invest in the energy rehabilitation of those facilities and use budget funds in the most efficient way?</p> <p>Such an intention of the state cannot be seen from the budget it decided for the energy rehabilitation of public buildings (only €55 million until 2030).</p>	<p>the level of leverage. Therefore, the selection of the public buildings should be performed in accordance to their cost-effectiveness ratio.</p> <p>In regards the regulation of the projects through energy performance contracts, the framework for the public procurements includes various provisions for their effective implementation.</p> <p>Finally, the INECP should at least present the main principles for the implementation of the policy measures. In the case that more concrete information for the authority that will be responsible for the administration and implementation of the planned policy measures is available, it can be indisputably inserted.</p>

stakeholder	comment	explanation	response
BOS	Chapter 3.2, pages 76-78: There is an inconsistency in measurement units used for public and non-residential buildings.	In proposed measurements for Energy Efficiency, for public and non-residential buildings (not public) measurement unit is m ² , while for residential buildings measurement unit is “building”. It would be preferable that measurement unit for residential buildings are also expressed in m ² .	The inconsistency in the measurement units is resulted by the availability of the data, which were utilized in order to model the energy consumption of the building sector.
BOS	Chapter 3.2, page 76: Policy measure: PM_EE1, Title: Supporting financially the energy renovation of residential buildings.	<ul style="list-style-type: none"> • INECP 1 foresee 155,300 buildings and 44 ktoe of savings, while INECP 2 foresee 131,000 buildings and 35 ktoe of savings. • INECP 1 foresee 4.3 GW of heat pumps and 89 ktoe of savings, while INECP 2 foresee 2 GW of heat pumps and 34 ktoe of savings. • INECP 1: 2.691 billion euros and 17,327 €/building, while INECP 2: 1.311 billion euros and 10,007 €/building. <p>The question arises on the basis of which parameters and criteria the number of buildings was determined, and which buildings will be included in the financing program, how savings were calculated, what will be the status and treatment of buildings that are already connected to the district heating system, etc.</p>	Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps.
BOS	Chapter 3.2, page 77: Policy measure: PM_EE2, Title: Support financially the energy renovation of public buildings.	Although the square footage of buildings is reduced from 1,177,000 m ² to 1,026,000 m ² , as well as planned financial resources from 63 M€ to 55 M€, the average invested funds per square meter remain the same - 53 €/m ² .	It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m ² and not to 87,681 thousand m ² . Moreover,

stakeholder	comment	explanation	response
		<p>The document still does not provide an explanation for the allocation of financial resources, with the amount provided for the renovation of public buildings (53 €/m²) and which is 40 times lower than the amount provided for the energy renovation of non-residential (non-public) buildings (1381 €/m²).</p>	<p>the unitary costs for the energy upgrade of the building envelope are re-assessed.</p>
BOS	<p>Chapter 3.2, page 78: Policy measure: PM_EE3, Title: Financing programs for the renovation of non-residential buildings (not public).</p>	<p>Draft INECP October 2022:</p> <ul style="list-style-type: none"> • 2,624,000 m² and 11 ktoe savings • 3.625 billion € and 1,381 €/m² <p>Draft INECP June 2023:</p> <ul style="list-style-type: none"> • 87,681 m² and 32 ktoe savings • 2.017 billion € and 23,004 €/m² <p>In the modified version of the INECP, the biggest changes were for this EE measure with a drastic reduction in the number of buildings planned for renovation, and a corresponding increase in the amount of financing per square meter, which is according to this document is €23,004/m².</p> <p>The predicted calculation of savings is also not logical, which increases with the decrease in the number of renovated buildings?</p>	<p>It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m² and not to 87,681 thousand m². Moreover, the unitary costs for the energy upgrade of the building envelope are re-assessed.</p>
CEKOR	<p>Chapter 3.1, page 39: From the policy measure PM_D6 impression is that closing of all ore mines and repurpose of the land is planned even before all coal deposits</p>		<p>Most of the European countries are moving towards decarbonisation and are planning to be carbon neutral by 2050.</p>

stakeholder	comment	explanation	response
	<p>are exhausted. From the development and investment plans of EPS, and from reality of continuation of development projects of opening new ore mines, this is a fake impression that is far from reality.</p> <p>If the plan would really be in the direction of closing the ore mines, the question is, from where the coal for thermal power plants installed power of several GW would be coming in 2050 and after 2050. Is import of coal foreseen?</p>		<p>There is a number of EU member states that will continue to use coal/lignite in the process of energy transition, such as Poland and Bulgaria. PM_D6 aims at strengthening the decarbonisation process at some extent and does not propose a abrupt transition towards carbon neutrality. Any necessary amendments are made in the description of PM_D6.</p>
CEKOR	<p>Chapter 3.1, page 42:</p> <p>From the policy measure PM_D14 it is not clear how many facilities will be built. It is not clear why total emissions from untreated water are not discussed and how much emissions will be reduced if all wastewater is treated, and how much energy with how much investment could be obtained by using gas that would be obtained from water purification. There are many such incomplete and completely unclear measures.</p>	<p>Give an analysis of the energy potential of the collected sludge. How much emissions are saved if all water is collected and purified. Also give the exact savings, and how many projects will be done for 90 million euros, emissions that will be saved if these projects are done.</p>	<p>It is not the scope of the INECP to give an analysis of the energy potential of the collected sludge. The text is revised with number of plants.</p>
CEKOR	<p>Chapter 3.1, page 37:</p> <p>From the policy measure PM_D3 it is not clear how this goal relates to the plans to burn huge amounts of municipal waste in the Vinča incinerator. In addition, there are plans to build several more incinerators. This activity must therefore be cross-referenced with those plans, and it must be proven what savings in emissions are expected. It is clear from this that it is not entirely certain that the strategy makers and the</p>	<p>Show at the national level how much waste will remain after incineration in Vinča. State how many incinerator projects are still planned - How many and what kind of emissions are expected from that incineration, how many GHG emission savings are expected from the disposal of the total amount of waste. By when is expected full regulation of municipal waste in Serbia. How much money is needed for that.</p>	<p>It is not the scope of the INECP to provide such an indepth analysis of the waste management processes that need to be followed (including e.g. how many GHG emission savings are expected from the disposal of the total amount of waste).</p>

stakeholder	comment	explanation	response
	ministry clearly understood how much waste will be incinerated in Vinča, and that it will be practically impossible to fulfill the otherwise assumed obligation to establish a hierarchy of waste of which the majority should be recycled.		
CEKOR	Chapter 3.1, page 59: Although there is data on traffic and the number of electrified vehicles, it is completely clear that the analysis of the transition is completely abstract. It is necessary to give exactly how many batteries need to be produced to provide them for all the vehicles that are planned for electrification. For this reason, it is also necessary to give how much lithium and other rare minerals are needed for that. In addition, give in detail how much copper and other the type of metals and minerals needed to build the necessary additional network of transformers, large battery plants, and how many new power plants are needed to replace the energy now produced by fossil fuels. However, this is only the first step - then it is necessary to do a detailed assessment of the ecological footprint of providing several hundred thousand or even millions of tons of lithium and other rare minerals needed for the apparently abstract and unfounded electrification of the vehicle fleet in Serbia. This is all important because Serbia does not want to produce lithium on its territory.	Redefine the entire chapter on traffic - Give detailed assessments of the enumerated needs for minerals and new energy facilities. Also, do a detailed analysis of the conflict between biodiesel production and Serbia's needs for food production.	The aim of the INECP is to identify the evolution of the energy sector so as to achieve the various energy and climate targets with the least cost. For the case of the electric vehicles is estimated the number of the electric vehicles, which is required. The INECP cannot decide if these vehicles will be imported or be produced domestically.
CEKOR	Chapter 3.2, page 76: Energy efficiency measures related to individual housing are nowhere near ambitious enough.		The expected energy savings will be resulted both by the energy upgrade of the building envelope

stakeholder	comment	explanation	response
	<p>The model must show how much it will cost to bring all housing facilities below 60 (euros?) per square meter. EE measures must also foresee the installation of either heat pumps, or solar thermal, or new sources for the use of biomass. It can be estimated how many additional gigawatts of installed power that is and how much it saves in CO2 emissions.</p> <p>In our opinion, it is not acceptable to plan to isolate only a few dozen or a few hundred thousand objects. All facilities must be insulated by 2035 and only then will it be possible to clearly see how much missing energy is needed at the level of big energy.</p>		<p>and the installation of systems for the fulfilling the space heating, space cooling and DHW. The model estimates the required cost for delivering the expected energy savings. The calculation of the CO2 reduction will be performed within the framework of the governance and monitoring mechanism that will be established.</p> <p>The specification of the renovation targets must be simultaneously realistic and ambitious enough.</p>
CEKOR	<p>Chapter 3.1 and 3.2, pages 47 and 76: All measures show how much CO2 reduction is expected if implemented. Otherwise, the fact remains that these measures, all of which are listed, are a random choice of the creator and there is no proof that their application will achieve net carbon neutrality.</p> <p>Give realistic separate estimates of the cost of insulating residential, public, and multi-story residential buildings. Current estimates are misleading, and we believe incorrect, that is, the real cost is underestimated. This particularly applies to measures PM_EE1 and PM_EE3. In these measures, the effects, the way how these measures will be implemented, and how the</p>	<p>This, for example, specifically refers to measures PM_D7 where it is not clear why only 354 M€, why not 800 or 900, how many areas are reforested, based on which plans, how many sinks are expected (of sequestered CO2).</p> <p>Measures, effects, and price in measures MP_EE1, MP_EE3 are insufficiently described.</p>	<p>The calculation of the CO2 reduction will be performed within the framework of the governance and monitoring mechanism that will be established.</p> <p>it should be mentioned that the least cost solution is identified so as to ensure the pathway towards carbon neutrality. The unitary cost of the energy efficiency interventions in the building envelope will be re-assessed.</p> <p>In regards the implementation of the measures, the evolution of</p>

stakeholder	comment	explanation	response
	<p>prices are determined, are not clearly shown, because in some cases it is clear that there are large disproportions in the prices, as well as in the effects of the implementation of these measures. Perhaps the most important: it is not clear until when these measures will be implemented.</p> <p>In any case, we believe that this is the only place where the public budget, both national and local, should be absolutely directed.</p> <p>Eliminate the illogicality (double entry) of treating multi-story residential buildings as separate entities and increasing energy efficiency is seen as separate, even though, for example, those buildings are connected to central heating. In that case, the insulation must be attributed to an increase in the efficiency of the central heating. In this way, an artificial increase in the effects of measures is achieved because the same measure is practically recorded twice.</p>		the refurbishments of the residential and commercial buildings is presented graphically.
Ministry of Construction, Transport and Infrastructure	<p>Chapter 3.1, page 48, policy measure PM_D9:</p> <p>Supplement the title of the measure so it states: "Increase the tree-planted areas and greening of the roofs (groves / parks / green roofs)"</p>		Green roofs are already mentioned in the name of the PM.
Ministry of Construction, Transport and Infrastructure	Chapter 3.1, page 66, policy measure PM_D24: Relevant National Planning Document (Legal, Regulatory Acts etc): Add Law on Planning and Construction	Being that the Ministry of Construction, Transport and Infrastructure is Implementing Entity, Law on Planning and Construction will regulate part of this measure.	The proposed planning document is added
Ministry of Construction,	Chapter 3.2, page 76: "Finally, the role of the Energy Performance	Clarification is needed. In accordance with which Directive is passport transformation	The aim of the proposed measure is to improve the existing

stakeholder	comment	explanation	response
Transport and Infrastructure	Certificates will be enhanced aiming at their transformation into renovation passports so as to facilitate the implementation of the most cost-effective interventions.”	carried out? In which way is this transformation done?	framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD.
Ministry of Construction, Transport and Infrastructure	<p>Chapter 3.2, page 76: PM_EE1, Title: Supporting financially the energy renovation of residential buildings,</p> <p>Quantified objective: Supplement indicators: - "Renovated residential buildings" should be renamed "energy-renovated residential buildings"; - In addition to the number of energy-renovated residential buildings, add "m2 of energy-renovated residential buildings"; - Express energy savings through the energy renovation of residential buildings and the installation of heat pumps in kWh; - Add a timeline for quantified objectives (annually or cumulatively for the period 2025-2030?)</p> <p>Description: Second sentence of the description should be edited: “The design and provision of the dedicated financial incentives will facilitate the more extensive energy renovation of the residential buildings through the rehabilitation of the building envelope and technical systems attaining the optimum cost-effectiveness ratio and increasing the share of the own funds,</p>	<p>Quantified objective: If the translation "energy renovation" is adopted for "energy renovation" and "renovation", then it should be used consistently throughout the entire document. Due to compliance with the Long-term renovation strategies for mobilizing investment in the renovation of the national stock and monitoring the implementation of the measures defined by the Strategy, it is necessary to supplement the indicators, i.e. express them in additional units. For the sake of precision/clarity, define the timing of indicators.</p> <p>Description: Due to compliance with the Long-term strategy for mobilizing investment in the renovation of the national stock of buildings, subsidies must include not only measures related to the building envelope, but also to the improvement of the technical systems used by the building.</p> <p>Progress indicators: The document in English reads: "Energy Renovated buildings". For an additional area indicator, comment as</p>	The proposed changes are incorporated

stakeholder	comment	explanation	response
	<p>which will be utilized.”</p> <p>Progress indicators: Rename "renovated buildings" to "energy-renovated buildings" and add "total surface area of energy-renovated residential buildings".</p> <p>Implementation costs: The stated value is not in accordance with the one in Annex 1 - In the summary table of measures with implementation costs on page 286. Comment: if the total investment value is divided by the number of residential buildings that are energetically renovated according to measure EE1, an average value of about 10,000 euros (ten thousand euros) of investment per building is obtained. Given that this measure should include the energy rehabilitation of the building envelope, but also a certain percentage of the installation of heat pumps, this value seems to be small.</p> <p>Financial resources: Add "The possibility of applying the ESCO financing model"</p>	<p>in the quantified objective for this measure.</p> <p>Implementation costs: Need to check and correct to be compliant.</p> <p>Financial resources: Needs to be added for compliance with the Long-term strategy for mobilizing investment in the renovation of the national stock of buildings.</p>	
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 77: PM_EE2 Title: Support financially the energy renovation of public buildings</p> <p>Quantified objective: Add indicators:</p>	<p>Quantified objective: As a comment for the quantified objective of measure PM_EE1.</p> <p>Executive body: Needs to be added for compliance with the</p>	<p>The proposed changes are incorporated</p>

stakeholder	comment	explanation	response
	<p>- "m2 of renovated buildings" should be renamed to "m2 of energy renovated public buildings";</p> <p>- Express energy savings through energy renovation of public buildings in kWh;</p> <p>- Add a timeline for quantified objectives (annually or cumulatively for the period 2025-2030?)</p> <p>Executive body: Add the Ministry of Finance.</p> <p>Progress indicators: Rename "Renovated m2 of public buildings" to "total surface area of energy renovated public buildings"</p>	<p>Long-term strategy for mobilizing investment in the renovation of the national stock of buildings.</p> <p>Progress indicators: Comment as in the quantified objective for this measure.</p>	
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 78: PM_EE3, Title: Financing programs for the renovation of non-residential buildings (not public)</p> <p>Title: Needs to be renamed to: "Support financially the energy renovation of non-residential buildings (not public)"</p> <p>Quantified objective: Add indicators: - "m2 of renovated non-residential buildings" should be renamed to "m2 of energy renovated non-residential (non-public) buildings"; - Express energy savings through the energy</p>	<p>Title: Needs to be harmonized with measures EE1 and EE2 – If all three measures are "investments", then names and descriptions of measures should be consistently named/described.</p> <p>Quantified objective: As a comment for the quantified objective of measure PM_EE1.</p> <p>Description: The first sentence is not clear. The second sentence is not clear - needs to be reformulated and/or checked if it</p>	<p>The most of the proposed changes has been incorporated</p>

stakeholder	comment	explanation	response
	<p>renovation of non-residential buildings and the installation of heat pumps in kWh; - Add a timeline for quantified objectives (annually or cumulatively for the period 2025-2030?)</p> <p>Description: The first sentence needs to be reformulated and/or checked whether "with an emphasis on specific final consumption in the service sector" is translated from English in an adequate way? Amend the second sentence so that it reads: "The creation and allocation of dedicated financial incentives will enable more extensive energy rehabilitation of non-residential buildings through cost-optimal interventions to improve the energy efficiency of buildings and technical systems with the greatest potential for energy savings."</p> <p>Progress indicators: Rename "Total usable surface area of renovated buildings" to "Total area of energy renovated non-residential (non-public) buildings"</p> <p>Relevant national planning document (legal, regulatory acts, etc.): Omit the Law on Planning and Construction, Rulebook on Energy Efficiency in Buildings, Rulebook on Energy Certification</p> <p>Financial resources:</p>	<p>is translated from English adequately? Also, the beginning of the second sentence needs to be changed so that this investment measure (and not a regulatory one) is consistently described - a comment like for the name of the measure EE3.</p> <p>Progress indicators: Comment as in the quantified objective for this measure.</p> <p>Relevant national planning document (prior, regulatory acts, etc.): As the measure is an investment measure, it is necessary to omit the mentioned regulatory acts, considering that they do not regulate investment measures.</p> <p>Financial resources: Needs to be added for compliance with the Long-term strategy for mobilizing investment in the renovation of the national stock of buildings.</p>	

stakeholder	comment	explanation	response
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Add "The possibility of applying the ESCO financing model"</p> <p>Chapter 3.2, page 79:</p> <p>PM_EE4 Title: Completion of legislative framework in alignment with Directives 2010/31/EU and 2018/844/EU and regulatory measures to promote nearly-zero energy buildings (nZEBs)</p> <p>Relevant National Planning Document (Legal, Regulatory Acts etc): Add the Law on Planning and Construction, Rulebook on Energy Efficiency in Buildings, Rulebook on conditions, content and method of issuing certificates on energy properties of buildings</p>	<p>Relevant National Planning Document (Legal, Regulatory Acts etc): As the measure is regulatory, it is necessary to add the mentioned regulatory acts, considering that they directly regulate the area from the description of this measure.</p>	<p>The proposed planning document is added</p>
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 80:</p> <p>PM_EE5 Title: Programs for the renovation of buildings exceeding minimum energy requirements</p> <p>Does this measure apply only to energy renovation of existing buildings or also to constructions of new buildings?</p> <p>Title: Needs to be renamed to: "Support financially the energy renovation of buildings exceeding minimum energy requirements"</p>	<p>Title: Needs to be harmonized with measures EE1 and EE2 – If all four measures (EE1, EE2, EE3, EE5) are "investments", then names and descriptions of measures should be consistently named/described.</p> <p>Progress indicators: As a comment for the quantified objective of measure PM_EE1.</p> <p>If this measure also applies to new buildings, then the indicator should also include the surface area of newly constructed buildings.</p>	<p>The proposed changes are incorporated due to the fact the new buildings are covered also.</p>

stakeholder	comment	explanation	response
	<p>If this measure also applies to new buildings, then the title of the measure should be supplemented: "Financial support for the construction and energy renovation of buildings exceeding minimum energy requirements"</p> <p>Description: According to the description, this measure also includes new buildings - check and correct if the measure does not apply to new buildings</p> <p>Progress indicators: Rename "Total usable floor area of renovated buildings" to "Total surface area of energy renovated buildings exceeding minimum energy requirements"</p> <p>Add "Total surface area of new buildings exceeding minimum energy requirements"</p>		
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, pages 80-81:</p> <p>PM_EE6, Title: Mandatory installation of solar thermal systems in new buildings and in buildings undergoing major renovation</p> <p>Title: Supplement the title: "Mandatory installation of solar thermal systems in new buildings and in buildings undergoing major energy renovation"</p>	<p>Title: If the translation "energy renovation" is adopted for "energy renovation" and "renovation", then it should be used consistently throughout the entire document.</p> <p>Quantified objective: Due to compliance with the Long-term renovation strategies for mobilizing investment in the renovation of the national stock and monitoring the implementation of the measures defined by the Strategy, it is</p>	<p>Common terminology will be used for the energy renovation. Common metrics for the case of the calculated energy savings has been used. The other proposed changes are carried out.</p>

stakeholder	comment	explanation	response
	<p>Quantified objective: - Express energy savings through the installation of solar thermal systems in kWh; - Add a timeline for quantified objectives (annually or cumulatively for the period 2025-2030?)</p> <p>Implementing entity: Add Ministry of Mining and Energy and delete EE Directorate.</p>	<p>necessary to supplement the indicators, i.e. express them in additional units. For the sake of precision/clarity, define the timing of indicators.</p> <p>Implementing entity: As the measure is regulatory (and not investment), it is necessary to add the ministry responsible for regulating the issue of solar thermal systems</p>	
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 81: PM_EE7, Title: Enhancing the role of the energy performance certificates</p> <p>Relevant National Planning Document (Legal, Regulatory Acts etc): Supplement the title of Rulebook on Energy Certification: Rulebook on conditions, content and method of issuing certificates on energy properties of buildings</p>	<p>Clarification is needed. In accordance with which Directive is passport transformation carried out? In which way is this transformation done?</p> <p>Relevant National Planning Document (Legal, Regulatory Acts etc): Currently valid Rulebook regulating issue of energy certification has that title</p>	<p>The aim of the proposed measure is to improve the existing framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD. The proposed re-phrase is added.</p>
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 81: PM_EE8, Title: Overcoming split incentive barrier</p> <p>Progress indicators: Replace indicators with "Developed legislative and regulatory framework"</p> <p>Relevant National Planning Document (Legal,</p>	<p>Progress indicators: Being that this is a regulatory measure, indicators cannot be building surface area and heat pumps capacity</p>	<p>The most of the proposed changes has been incorporated</p>

stakeholder	comment	explanation	response
	Regulatory Acts etc): Delete Rulebook on Energy Efficiency in Buildings		
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, page 94: PM_EE21 Title: Support schemes for the promotion of energy efficiency in industrial sector Implementation cost: Stated value is not in line with the one from the Annex 1 - In the summary table of measures with implementation costs on page 286.	Implementation cost: Needs to be checked and corrected so it would be harmonized.	Comment is accepted and the INECP text is edited
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, page 100: PM_EE29 Title: Promotion of energy audits in SMEs and in households Description: Supplement the second sentence: "... in accordance with the provisions of EED and EPBD" Type of measure: Is this measure an "investment" or a "reform"?	Description: Needs to be added considering that the energy audit for the purposes of energy certification is done in accordance with the EPBD Type of measure: Check, considering that based on the description, it is concluded that it is an investment.	The planned policy measure is considered as investment measure. The current type is corrected. Energy audits are outside of the scope of EPBD.
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, page 105: PM_EE35, Title: Improvement and further development of a scheme for the qualification, accreditation and certification of energy efficiency professionals	Description: Experts in the field of energy efficiency of buildings - the responsible engineer for energy efficiency of buildings - are omitted. These engineers are responsible for the preparation of the EE elaborate in the design phase, perform the energy audit for the	The proposed changes are incorporated

stakeholder	comment	explanation	response
	<p>Description: The first sentence should be supplemented: "... for all energy efficiency professional (providers of energy services, energy advisors, energy managers, responsible engineers of the energy efficiency of buildings and installers of energy related budling elements that are related to the improvement of the energy performance of a building, developers of design and technical documentation)</p> <p>Executive body: Change "School of Mechanical Engineering, University of Belgrade" to "Competent Universities of the RS".</p> <p>Added "Regional Centers for Energy Efficiency".</p> <p>Relevant national planning document (legal, regulatory acts, etc.): Add the Law on Planning and Construction.</p>	<p>needs of the energy certification of buildings and preparing the Energy Passport. Also, it is not clear which persons are covered by the term: "developers of design and technical documentation"?</p> <p>Executive body: Given that this measure is a reform, it is necessary to include the issue of decentralization, that is, to enable education to be carried out at other faculties and universities in the RS, as well as regional centers for EE. This is particularly important due to the need to increase the number of experts in this field.</p> <p>Relevant national planning document (legal, regulatory acts, etc.): The Law on Planning and Construction regulates the issue of responsible engineers of all professions, responsible engineers for the energy efficiency of buildings, as well as the issue of organizations responsible for conducting energy audits for the purposes of energy certification of buildings and issuing energy passports.</p>	
<p>Ministry of Construction, Transport and Infrastructure</p>	<p>Chapter 3.2, page 107: PM_EE41, Title: Promotion of smart and carbon neutral cities</p> <p>Type of measure:</p>		<p>The planned policy measure is considered as investment measure.</p>

stakeholder	comment	explanation	response
	Check if this measure is "reform", "regulatory" or an "investment"?		
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, pages 112: PM_EE38, Title: Development of sustainable and innovative financing of energy efficiency projects Relevant national planning document (legal, regulatory acts, etc.): If Ministry of Construction, Transport and Infrastructure is implementing entity add Law on Planning and Construction.		The proposed planning document is added
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, pages 113: PM_EE39, Title: Improve the bankability of energy efficiency projects Implementing Entity: Add Ministry of Construction, Transport and Infrastructure		The proposed implementing entity is added
Ministry of Construction, Transport and Infrastructure	Chapter 3.1, page 39: In the policy measure PM_D6 on page 41, term "the conduction of spatial planning" replace with the term "creation of spatial plans and measures of remediation and recultivation"	The purpose of the land is determined through the development of spatial plans (spatial planning is a much broader discipline), and for a change of purpose in the zone of exploitation of mineral raw materials, it is necessary to foresee remediation and recultivation measures before realization of the new purpose.	The proposed change is applied
Ministry of Construction, Transport and Infrastructure	Chapter 3.1, pages 63-64: In the description of the policy measure PM_D40 on page 64, point 2, term "the	From the context, it can be guessed that this is also about permits. On the other hand, these assumptions are already fulfilled in the Law on Planning and Construction.	The proposed change is applied

stakeholder	comment	explanation	response
	provisions of the spatial planning framework” replace with the term “the provisions in planning and construction framework”		
Ministry of Construction, Transport and Infrastructure	Chapter 3.1, page 66: Delete the second paragraph on page 66.	The sentence is not clear. There is already a unified procedure for issuing a building permit, while the aspect of RES is processed during the development of spatial and urban plans.	The paragraph is deleted.
Ministry of Construction, Transport and Infrastructure	Chapter 3.1, page 67: Delete the policy measure PM_D25	The first two sentences in the description of the measure have no content. It is unclear what is considered a "spatial planning framework". Spatial planning by definition is simultaneously a scientific discipline, an administrative technique, and a policy. The Law on Planning and Construction (the most recent amendments adopted on 26.7.2023) already foresees a number of necessary assumptions, with the amendments e.g. gives the following solution: "In Article 35, after paragraph 2, a new paragraph 3 is added, which reads: "The spatial plan of special purpose areas for the construction of electric power facilities is adopted by the Government for areas where the construction of electric power infrastructure facilities is planned, which require a special regime of organization, arrangement, use and protection of the space, as well as for strategic energy projects and which can be developed simultaneously with the preparation of the conceptual project. Adoption of these plans is by	The role of the spatial planning framework is critical for the further deployment of RES. Despite the fact that the current framework seems to be effective and operational, it is essential to monitor its implementation. Therefore, it is suggested to retain the measure improving its description.

stakeholder	comment	explanation	response
		abbreviated procedure, with the possibility of phased construction, in accordance with the provisions of this law." In addition, all spatial plans are subject to a strategic environmental impact assessment. From our point of view, this measure has already been fulfilled, the implementation of the regulations will follow.	
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, page 92: In the policy measure PM_EE19, instead of the last sentence of the description, continue previous sentence in the following way "as well as existing planning documentation".	Sentence "The dimension of the spatial planning will be taken into consideration during the design of the planned measures, which will be implemented for the promotion of the modal shift" is not precise enough and should be replaced by referring to the application of the existing planning documentation.	The last sentence is modified appropriately.
Ministry of Construction, Transport and Infrastructure	Chapter 3.2, page 107: In the description of the policy measure PM_EE41, replace the word "urbanism" at the end of the second sentence with the word "urbanization".	In the context of the sentence it is clear that is about consequences of urbanization process, not urban planning.	The proposed change is applied.
EMS	On page 53 (Chap. 3.1), within the cell related to the quantified objective of measure PM_D19, the part of the text that reads: " ≈ 2.6 GW power " should be changed. After the correction, this part of the text should read: " at least 2.6 GW of power ". Otherwise, in our opinion, this value could be interpreted as an upper limit, which, we are sure, is against the intended target of this measure.		The proposed change is applied.
EMS	On page 57 (Chap. 3.1), the Law on Energy and the Law on Planning and Construction of the		The proposed change is applied.

stakeholder	comment	explanation	response
	Republic of Serbia should be added to the list of relevant national documents for the considered measure PM_D29 (Adaptation, improvement and expansion of networks ...).		
EMS	On page 68 (Chapter 3.1), measure PM_D26 should be deleted. This measure implies facilitating the process of connecting facilities in order to increase the share of RES in the total production of electricity. The process of connecting facilities to the system is regulated by the Law on Energy of the Republic of Serbia.		Holistic approach has been taken in that measure, to improve the legal framework, without prejudice to the existing regulations.
stanisavljevic.andjela@gmail.com	Chapter 3.2, page 76-78: There is an inconsistency in measurement units used for the public buildings and non-residential buildings. In the proposed EE policy measures for buildings in the public sector and non-residential (not public) the measurement unit is m2, while for the residential buildings measurement unit is "building".	It would be favorable if measurement unit is m2 also for the residential buildings.	The inconsistency in the measurement units is resulted by the availability of the data, which were utilized in order to model the energy consumption of the building sector.
beljic.vladimir1@gmail.com	Chapter 3.2, page 77 Description of policy measures to promote energy services in the public sector and measures to remove regulatory and non-regulatory barriers that interfere with the acceptance of energy performance contracting and other models of energy efficiency services.	The text states that during the renovation of buildings owned or used by the state administration, the most economical approach will be applied, i.e. that priority will be given to the most energy-intensive public buildings. However, the document does not state how and in what way the priority list of buildings will be determined? It further states that standard contracts and guidelines will be developed to facilitate the	The description of the policy measures within the INECP provides the general framework for their implementation. The proposed policy measures will be specialized during their design taking into consideration the main principles of the INECP. Nevertheless, it is added that the selection of the public building will be occurred taking into account at least the cost

stakeholder	comment	explanation	response
		<p>design and implementation of energy efficiency projects through energy performance contracts.</p> <p>Contracts on energy performance do not regulate or determine the content and quality of project documentation, so design for the needs of PPP (public-private partnership) should not differ from design for other cases.</p> <p>The document does not provide precise information about who will carry out the rehabilitation of the most energy-intensive public buildings. Will those projects with potentially the largest investment return period be implemented through a public-private partnership, or will the state itself invest in the energy rehabilitation of those facilities and use budget funds in the most efficient way?</p> <p>Such an intention of the state cannot be seen from the budget it intended for the energy rehabilitation of public buildings (only 63 million euros until 2030).</p>	effectiveness ratio based on the delivered energy savings.
Brankica Nedeljkovic	Chapter 3.2, page 76: Estimated final energy savings for residential buildings renovation financial program (PM_EE1)	<ul style="list-style-type: none"> • Within the proposed measure, final energy savings of 35 ktoe are stated, but measures or activities this will achieve the objective are not stated and based on what the was the assessment made 	It is mentioned that the estimated energy savings will be delivered by upgrading the building envelope.
tijana@mis.org.rs, dragan.sreckovic	Chapter 3.1, page 39: Referring to the still not adopted document	This measure is mentioned in the dimension “Decarbonisation”, with the title:	The INECP includes all the policy measures, which will be

stakeholder	comment	explanation	response
@gmail.com, jorizantvoort@g mail.com, Plavo i zeleno	“Just Transition Diagnostics”, makes this measure indetermined and subject to different interpretations.	“Implementation and monitoring of Just Transition and related Action Plan” (Policy measure code: PM_D6). Policy measure is referring to the document that is still in the preparation process and it is not public policy document – the document in question is “Just Transition Diagnostics”.	implemented for the achievement of the specified targets. To this direction, It is acceptable to include planned activities, such as the Just Transition Action Plan. The correct name of the action plan is utilized. The text is revised in order to be precise.
tijana@mis.org.rs, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com, Plavo i zeleno	Chapter 3.1, page 39: Include all Government sectors to monitor PM_D6	It is noticeable that the Ministry of Mining and Energy was appointed both as Implementing Entity and as Monitoring Entity for the implementation of this measure, while next to it only the Ministry of Environmental Protection was mentioned for the monitoring. If we are talking about the establishment of a just transition process at the national level, it is necessary to include practically all government sectors: Ministry of Labor, Employment, Veteran and Social Policy, the Ministry of Education, The Ministry of Economy, the Chamber of Commerce of Serbia and regional chambers of commerce, local self-government units, The Social and Economic Council etc.	All the mentioned governmental bodies are added.
tijana@mis.org.rs, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com, Plavo i zeleno	Chapter 3.1, page 39: The analytical basis of INECP should provide more detailed data about the economic and social structure of municipalities where the coal basins are located.	The analytical basis of INECP should provide more detailed data about the economic and social structure of municipalities where the coal basins are located and companies in the chain of production and supply of coal for energy production, as well as data on the number of potentially threatened jobs,	The requested information will be presented within the Study Diagnostic Just Transition Serbia. It should be noted that the INECP provides the general framework for the achievement of the energy and climate targets. The

stakeholder	comment	explanation	response
		retraining needs, additional training, severance pay, etc. then on the demographic and social structure of those areas, vulnerable and marginalized groups, and other data that comprehensively provide an overview of the just transition topic situation.	specialization of the required policy measures will be carried out afterwards taking into account the main principles of the INECP.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 39: Determine more closely indicator of just transition progress, in the way that it is not observing just GHG reduction.	The annual GHG reduction was set as a Quantified objective. Quantified objective should be focused on the success of just transition process, which is not reflected only in reduced emissions from energy sector, but rather in successful economic and social transformation of the regions, which are most economically depended on coal exploitation.	The objective and the progress indicators has been enhanced. Just transition plan has not been finalised yet. Action plan of Just transition plan will be finalised after the adoption of the INECP.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 39: Include European Commission recommendation, resulted from EU member's Integrated National Energy and Climate Plans evaluation.	European Commission recommendation, resulted from EU member's Integrated National Energy and Climate Plans evaluation, states that INECP must include following elements: - (1) detailed social impact, influence on employment and skills; (2) need for skills and incompatibility of skills; (4) planned goals, measures, schedules, mitigation measures; (5) number of households affected by energy poverty etc.	The vast majority of the mentioned elements have been already addressed. More specifically, the social impacts have been estimated in Section 5.2 including discussion about the skills, while energy poverty issues have been dealt within dimension about the energy market. Finally, information about the measures has been provided for almost all measures.
tijana@mis.org.rs, tamara.nikolic845@gmail.com, dragan.sreckovic@gmail.com,	Chapter 3.2, pages 74-75: In text presenting Energy Efficiency dimension (Chapter 3.2) energy savings scheme by implementing new and alternative measures in	In tables 3.1 and 3.2 at the beginning of the chapter, new and cumulative final energy savings in the period 2024 - 2030 are shown. However, the sums of the values are not correct, nor do the values in the tables align	The differences are justified by the rounding of the annual target (72.2496 ktoe). The used methodology is described: "The calculation of the energy saving

stakeholder	comment	explanation	response
jorizantvoort@gmail.com	the period 2021-2030 is presented, to contribute to Article 7 of Directive.	<p>with the text accompanying these tables.</p> <p>1. The cumulative savings in 2025 compared to 2023 is 144 ktoe. For 2026, according to this plan, it should be 216 ktoe, not 217 ktoe as stated in the table. Such mistakes were made for all other years.</p> <p>2. The document does not provide information on the methodology or criteria taken into account when estimating the annual final energy savings of 72 ktoe.</p> <p>When determining the necessary new and cumulative final energy savings, the trend of increasing energy use, especially electricity, the increase in the number of electrical devices, the tendency to switch to hybrid and electric vehicles, etc. should be considered.</p>	target was estimated taking into account the average final energy consumption of the period 2018-2020 (9,031 ktoe based on EUROSTAT's data) assuming energy saving factor equal to 0.8% in the period 2024-2030". The trend of increasing energy use is not taken into consideration for the determination of the specified target.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, pages 74-75: Table 3.2 presents alternative measures for reaching the goal from Article 7 of the Directive for the period 2024-2030.	The proposed measures (for example upgrade of building envelope, installation of heat pumps) have been implemented until now, so the questions arise, in what way are these measures labeled as "alternative"?	Article 7 of the Directive describes explicitly which measures entitled as alternative. Alternative measures are classified all these measures that are initiated by the State justifying the significant contribution to the implementation of the measure.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 75: Dimension "Energy Efficiency" envisages implementation of a long-term strategy for the renovation of the national stock of residential and commercial buildings (in the public and private sectors) and envisages the inclusion of	INECP, nor other documents that the consultants had access to, do not contain a review of experiences from previous practice that indicate a series of failures in the implementation of such programs, including, among other things, uneven distribution of	The long-term strategy for the renovation of the national stock of residential and commercial buildings is foreseen as a separate policy document taking into account the main principles

stakeholder	comment	explanation	response
	policies and incentive measures that enable cost-effective deep renovation and deep renovation in stages.	<p>existing funds, insufficient subsidies for poorer citizens, dependence on capability and financial state of local self-governments that participate in granting subsidies to citizens, etc.</p> <p>It would be desirable for the text to provide a realistic assessment of the effects achieved so far through the application of policy measures, financial, fiscal, and regulatory measures, as well as further elaboration of the proposed measures for the next period that take into account the removal of the failures identified so far in practice.</p>	<p>of the INECP.</p> <p>It should be noted that the INECP provides the general framework for the achievement of the energy and climate targets. The specialization of the required policy measures will be carried out afterwards taking into account the main principles of the INECP.</p>
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 76: Text further states that the role of the Energy Performance Certificates will be enhanced aiming at their transformation into renovation passports to facilitate the implementation of the most cost-effective interventions	If this certificate means a certificate on the energy performance of buildings, its role Refers to EU Directive 2012/27/EU as modified by Directive 2018/202/EE is fully determined by the "Rulebook on Conditions, Content and Manner of Issuing Energy Performance Certificate of Buildings" ("Official Gazette of the RS" No. 69/2012, 44/2018 and other Law and 11/2022) which certainly enables the issuance of energy passports for buildings that are being renovated. They do not prevent the implementation of the most cost-effective interventions.	The aim of the proposed measure is to improve the existing framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD. It should be noted that there is no obligation to identify the most cost-effective energy efficiency interventions in the current version of the energy performance certificates.
tijana@mis.org.rs, dimiczarko69@gmail.com, dragan.sreckovic	Chapter 3.2, page 76: Measure PM_EE1 envisages renovation of 131 thousand residential buildings. However, it is not elaborated enough, and it does not provide	<p>Number of residential buildings foreseen for renovation</p> <ul style="list-style-type: none"> • What is the average square footage of 	In regards the methodology, it is estimated firstly the demand for space heating after the implementation of energy

stakeholder	comment	explanation	response
@gmail.com, jorizantvoort@g mail.com	insight in ways of: implementation, effects, methodology and criteria for setting target indicators, or presented assessments.	these buildings and what is the percentage from the total fond? <ul style="list-style-type: none"> • How much is their specific energy consumption? 	efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. More data is provided.
tijana@mis.org.rs, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com	Chapter 3.2, page 76: Estimate of final energy savings in financial program for residential buildings renovation (PM_EE1)	Proposed policy measure states final energy saving of 35 ktoe, but it does not state using which measures or activities will the set goal be achieved and based on what was this estimation done.	It is added that the estimated energy savings will be delivered by upgrading the building envelope. The utilized methodology has been described in the previous comment.
tijana@mis.org.rs, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com	Chapter 3.2, page 76: Installation of heat pumps in financial program for residential buildings renovation (PM_EE1) Measure PM_EE1 also foresee installation of 2 GW heat pump capacity with estimated final energy savings of 34 ktoe.	<ul style="list-style-type: none"> • In what way and based on which parameters is the installed capacity and savings estimate determined? Is there a performance assessment of the buildings intended for the installation of heat pumps? • Will heat pumps be installed in all 131 thousand residential buildings foreseen for installation of heat pumps? • Is it planned to connect residential buildings planned for reconstruction to the district heating system and what percentage? • For buildings that are not connected to the 	Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to

stakeholder	comment	explanation	response
		<p>district heating system, it is necessary to show the trend of heat pumps installation in the last few years in order to be able to assess whether the plan of 2 GW by 2030 is achievable.</p> <p>In cases where the building is already connected to the district heating system, the heat pump will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating. In this way, the investment in the heat pump does not refer to financing the renovation of residential buildings, but rather the district heating system within which the heat pump should be integrated.</p>	<p>the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. In cases where the building is already connected to the district heating system, the heat pump will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating. It is not planned the installation of central heat pumps in the district heating network. The heat pumps can be installed either in the renovated buildings or in non-renovated buildings. Information is added in regards the penetration of heat pumps until 2030.</p>
<p>tijana@mis.org.rs, isidoratorbica@gmail.com, dragan.sreckovic@gmail.com, joriszantvoort@gmail.com</p>	<p>Chapter 3.2, page 77: Financing of policy measures implementation for residential buildings renovation (PM_EE1)</p>	<p>Implementation cost for measure PM_EE1 is 1,311 M€. When this number is divided by the number of residential buildings foreseen for renovation, it results in the amount of 10,007 euros per building. Considering that average square footage of the buildings foreseen for renovation is not given in the document, the amount of allocated funds defined in this way does not provide enough information.</p>	<p>Information about the average square footage of the residential buildings is added. The allocation of the funds to two different types of interventions is already provided.</p>

stakeholder	comment	explanation	response
		It is needed to show distribution of determined funds per Quantified objective (35 ktoe for buildings and 34 ktoe for heat pumps).	
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 78: Policy measure PM_EE3 foresee renovation of 87,681 thousand m2 non-residential buildings (not public). The measure does not provide a clear insight in implementation methods, effects, methodology, and criteria for setting the quantified objectives or presented assessment.	The measure states that subsidies are intended for the energy renovation of non-residential buildings with an emphasis on specific end uses of the service sector such as schools, the health sector, sports activities, or cultural buildings. • The measure itself refers to non-public buildings, while the description of the measure mentions public buildings, so a precise definition of what is meant by "not public non-residential buildings" is necessary, and clarification of whether these are private buildings.	Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps. It is stated more clearly that the policy measure do not refer to public buildings.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 78: Number of non-residential (not public) buildings foreseen for renovation in Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)	Data about the number of buildings and their specific energy consumption is missing?	This data is not available.
tijana@mis.org.rs, dragan.sreckovic@gmail.com,	Chapter 3.2, page 78: Assessment of final energy savings in Financing	Proposed policy measure states final energy saving of 32 ktoe, but it does not state using which measures or activities will the set goal	The expected energy savings will be resulted both by the energy upgrade of the building envelope

stakeholder	comment	explanation	response
<p>jorizantvoort@gmail.com, Pro.Tok21</p>	<p>programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>be achieved and based on what was this estimation done.</p>	<p>and the installation of heat pumps. In regards the applied methodology, it is estimated firstly the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps.</p>
<p>tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 3.2, page 78: Installation of heat pumps in Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>In what way are installed capacity and estimated savings determined? Will the heat pumps be installed on all 87.681 thousand m2?</p> <p>Measures PM_EE1 and PM_EE3 foresee installation of heat pumps. Measure PM_EE1 foresees that 2 GW installed capacity of heat pumps achieve savings of 34 ktoe, while in measure PM_EE3 foreseen installation of 5.7 GW installed capacity of heat pumps achieve estimated final energy savings of 60 ktoe. This disproportion should be explained.</p>	<p>Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy</p>

stakeholder	comment	explanation	response
			<p>savings are estimated by the installation of heat pumps. The heat pumps can be installed either in the renovated buildings or in non-renovated buildings. The disproportion is explained by the different energy saving potential of the two examined sectors (residential and non-residential buildings) due to the fact that the least cost solution is the driven for the selection of the energy efficient interventions.</p>
<p>tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 3.2, page 78: Financing of implementation of measure Financing programs for the renovation of non-residential buildings (not public) (PM_EE3)</p>	<p>For the implementation of the measure 2.017 billion euros has been determined. When this amount is divided by the total area of the buildings (87.681 m²), the amount of 23.003 €/m² is obtained. This amount was not accompanied by an appropriate analysis of costs and benefits, and the question of the profitability of the renovation of these buildings remains open.</p> <p>The public fund is mentioned as one of the sources of financing. However, if the measure refers to the renovation of non-public buildings, the question arises of the justification of financing non-public buildings from the public budget. Additionally, if there is a large number of public buildings that have not been energy-renovated and that may not be renovated by 2030, the question</p>	<p>Generally, the selection of the energy efficiency interventions is based on the identification of the least cost solution for the whole energy sector. Moreover, EED specify various targets irrespective of the cost-effectiveness performance of the promoted measures, such as in the case of public buildings (article 5). Finally, the INECP estimates the total amount of investment and map the potential funding sources. Obviously, the specialization of the funding sources can be done during the implementation of the INECP taking into account the specified</p>

stakeholder	comment	explanation	response
		<p>arises as to why the public budget would finance non-public buildings.</p> <p>It is necessary to show the distribution of the determined funds according to the quantified objectives (32 ktoe for buildings and 60 ktoe for heat pumps).</p>	<p>targets and its main principles. It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m2 and not to 87,681 thousand m2.</p>
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	<p>Chapter 3.2, page 77: Measure PM_EE2 foresees renovation of 1,026 thousand m2 public buildings.</p> <p>This measure does not foresee installation of heat pumps, or at least it is not explicitly stated as in PM_EE1 and PM_EE3.</p>	<p>If this assumption is correct, it should be explained why installation of heat pumps is not foreseen on public buildings.</p> <p>The description of this measure states that the most cost-effective interventions will be supported, while for PM_EE1 and PM_EE3 this condition is not set.</p>	<p>The installation of heat pumps in public buildings is foreseen within PM_EE3. The contribution of the heat pumps in public buildings is distinguished and integrated into PM_EE2.</p>
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	<p>Chapter 3.2, page 77: Number of public buildings foreseen for renovation in Support financially the energy renovation of public buildings (PM_EE2)</p>	<p>Measure foresees renovation of 1,026 thousand m2 of public buildings, but the data about the number of buildings foreseen for renovation and their specific energy consumption is missing.</p>	<p>This data is not available.</p>
tijana@mis.org.rs, nemanjastevanovic00@gmail.com, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	<p>Chapter 3.2, page 77: Final energy savings in Support financially the energy renovation of public buildings (PM_EE2)</p>	<p>Proposed policy measure states final energy saving of 5 ktoe, but it does not state using which measures or activities will the set goal be achieved and based on what was this estimation done.</p>	<p>The expected energy savings will be resulted by the energy upgrade of the building envelope. In regards the applied methodology, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings.</p>
tijana@mis.org.rs, dragan.sreckovic	<p>Chapter 3.2, page 77: Financing of measure implementation in</p>	<p>€55 million has been allocated for this measure, which when divided by the total</p>	<p>The applied methodology has been added in Annex III.</p>

stakeholder	comment	explanation	response
<p>@gmail.com, jorizantvoort@g mail.com</p>	<p>Support financially the energy renovation of public buildings (PM_EE2)</p>	<p>area, amounts to 53.606 €/m2. This amount (53.606 €/m2) cannot be considered sufficient for any serious energy renovation.</p> <p>The amount provided for the renovation of public buildings (€53.606/m2) is 40 times lower than the amount provided for the energy renovation of non-residential (non-public) buildings (€23,003/m2). The document does not provide a rationale for this distribution of funds.</p>	<p>Moreover, the unitary costs for the energy upgrade of the building envelope is re-assessed.</p>
<p>tijana@mis.org.rs, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com</p>	<p>Chapter 3.2, page 81: Enhancing the role of the energy performance certificates (PM_EE7)</p> <p>It is needed to explain the term renovation passports.</p>	<p>According to the current regulations in the RS, a passport can still be issued for a renovated building, however, from the information in the document, it remains unclear what will the passports for buildings that are not renovated be turned into.</p> <p>Is this a special category of passport that is issued only for buildings that are being renovated?</p> <p>The document further states that a system of permanent monitoring and control of energy performance certificates will be established. Such a system already exists, and the Ministry of Construction, Transport and Infrastructure regularly checks and verifies energy passports.</p> <p>An additional explanation is needed for the establishment of the mentioned monitoring system.</p>	<p>The aim of the proposed measure is to improve the existing framework of the energy performance certificate so as to fully aligned with the provisions of the amended EPBD. The renovation passports is a new element, which is promoted within the framework of the EPBD.</p> <p>The text is modified so as to include the existing system for monitoring the EPCs.</p>

stakeholder	comment	explanation	response
<p>tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 3.2, page 83: Description of policy and measures to promote energy services in the public sector and measures to remove regulatory and non-regulatory barriers that impede the uptake of energy performance contracting and other energy efficiency service models</p>	<p>The text states that during the renovation of buildings owned or used by the state administration, the most economical approach will be applied, meaning that priority will be given to the most energy-intensive public buildings. However, the document does not state how and in what way the priority list of buildings will be determined.</p> <p>It further states that standard contracts and guidelines will be developed to facilitate the design and implementation of energy efficiency projects through energy performance contracts.</p> <p>Contracts on energy performance do not regulate or determine the content and quality of project documentation, and design for the needs of PPP (Public Private Partnership) should not differ from design for other cases.</p> <p>The document does not provide precise information about who will carry out the rehabilitation of the most energy-intensive public buildings. Will those projects with potentially the largest investment return period be implemented through a public-private partnership, or will the state itself invest in the energy rehabilitation of those facilities and use budget funds in the most</p>	<p>As it is stated the design and provision of the dedicated financial incentives will facilitate the deep energy upgrade of the residential and public buildings both attaining the optimum cost-effectiveness ratio and increasing the level of leverage. Therefore, the selection of the public buildings should be performed in accordance to their cost-effectiveness ratio.</p> <p>In regards the regulation of the projects through energy performance contracts, the framework for the public procurements includes various provisions for their effective implementation.</p> <p>Finally, the INECP should at least present the main principles for the implementation of the policy measures. In the case that more concrete information for the authority that will be responsible for the administration and implementation of the planned policy measures is available, it can be indisputably inserted.</p>

stakeholder	comment	explanation	response
		<p>efficient way?</p> <p>Such an intention of the state cannot be seen from the budget it decided for the energy rehabilitation of public buildings (only €55 million until 2030).</p>	
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, pages 76-78: There is an inconsistency in measurement units used for public and non-residential buildings. In proposed measurements for Energy Efficiency, for public and non-residential buildings (not public) measurement unit is m2, while for residential buildings measurement unit is "building".	It would be preferable that measurement unit for residential buildings are also expressed in m2.	The inconsistency in the measurement units is resulted by the availability of the data, which were utilized in order to model the energy consumption of the building sector.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 76: Policy measure: PM_EE1, Title: Supporting financially the energy renovation of residential buildings.	<ul style="list-style-type: none"> • INECP 1 foresee 155,300 buildings and 44 ktoe of savings, while INECP 2 foresee 131,000 buildings and 35 ktoe of savings. • INECP 1 foresee 4.3 GW of heat pumps and 89 ktoe of savings, while INECP 2 foresee 2 GW of heat pumps and 34 ktoe of savings. • INECP 1: 2.691 billion euros and 17,327 €/building, while INECP 2: 1.311 billion euros and 10,007 €/building. <p>The question arises on the basis of which parameters and criteria the number of buildings was determined, and which buildings will be included in the financing program, how savings were calculated, what will be the status and treatment of buildings that are already connected to the district heating system, etc.</p>	Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the installation of heat pumps.

stakeholder	comment	explanation	response
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 77: Policy measure: PM_EE2, Title: Support financially the energy renovation of public buildings.	<p>Although the square footage of buildings is reduced from 1,177,000 m² to 1,026,000 m², as well as planned financial resources from 63 M€ to 55 M€, the average invested funds per square meter remain the same - 53 €/m².</p> <p>The document still does not provide an explanation for the allocation of financial resources, with the amount provided for the renovation of public buildings (53 €/m²) and which is 40 times lower than the amount provided for the energy renovation of non-residential (non-public) buildings (1381 €/m²).</p>	It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m ² and not to 87,681 thousand m ² . Moreover, the unitary costs for the energy upgrade of the building envelope are re-assessed.
tijana@mis.org.rs, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.2, page 78: Policy measure: PM_EE3, Title: Financing programs for the renovation of non-residential buildings (not public).	<p>Draft INECP October 2022:</p> <ul style="list-style-type: none"> • 2,624,000 m² and 11 ktoe savings • 3.625 billion € and 1,381 €/m² <p>Draft INECP June 2023:</p> <ul style="list-style-type: none"> • 87,681 m² and 32 ktoe savings • 2.017 billion € and 23,004 €/m² <p>In the modified version of the INECP, the biggest changes were for this EE measure with a drastic reduction in the number of buildings planned for renovation, and a corresponding increase in the amount of financing per square meter, which is according to this document is €23,004/m².</p> <p>The predicted calculation of savings is also</p>	It should be noted that the figure for the renovated area of the non-residential buildings is equal to 7,681 thousand m ² and not to 87,681 thousand m ² . Moreover, the unitary costs for the energy upgrade of the building envelope are re-assessed.

stakeholder	comment	explanation	response
		not logical, which increases with the decrease in the number of renovated buildings?	
andjj001@gmail.com	Chapter 3.2, page 77: Financing of policy measures implementation for residential buildings renovation (PM_EE1)	Implementation cost for measure PM_EE1 is 2,691 M€. When this number is divided by the number of residential buildings foreseen for renovation, it results in the amount of 17,327 euros per building. Considering that average square footage of the buildings foreseen for renovation is not given in the document, the amount of allocated funds defined in this way does not provide enough information. It is needed to show distribution of determined funds per Quantified objective (44 ktoe for buildings and 89 ktoe for heat pumps).	Information about the average square footage of the residential buildings is added. The allocation of the funds to two different types of interventions is already provided.
wltga18@gmail.com, MARKO MARJANOVIC	Chapter 3.2, page 76: Installation of heat pumps in financial program for residential buildings renovation (PM_EE1) Measure PM_EE1 also foresee installation of 4.3 GW heat pump capacity with estimated final energy savings of 89 ktoe.	<ul style="list-style-type: none"> • In what way and based on which parameters is the installed capacity and savings estimate determined? Is there a performance assessment of the buildings intended for the installation of heat pumps? • Will heat pumps be installed in all 155.3 thousand residential buildings foreseen for installation of heat pumps? • Is it planned to connect residential buildings planned for reconstruction to the district heating system and what percentage? • For buildings that are not connected to the district heating system, it is necessary to show the trend of heat pumps installation in the last few years in order to be able to 	Firstly, it is estimated the demand for space heating after the implementation of energy efficiency interventions in the building envelope and the delivered energy savings. Afterwards, it is identified the heating system (mainly heat pumps) that will replace the existing one as the least cost solution and it is calculated the installed capacity in relation to the demand for space heating. Finally, the delivered energy savings are estimated by the

stakeholder	comment	explanation	response
		<p>assess whether the plan of 4.3 GW by 2030 is achievable.</p> <p>In cases where the building is already connected to the district heating system, the heat pump will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating. In this way, the investment in the heat pump does not refer to financing the renovation of residential buildings, but rather the district heating system within which the heat pump should be integrated.</p>	<p>installation of heat pumps. In cases where the building is already connected to the district heating system, the heat pump will not be installed on the building (it will not be within its heating system), except in the event that the building is disconnected from the district heating.</p> <p>It is not planned the installation of central heat pumps in the district heating network. The heat pumps can be installed either in the renovated buildings or in non-renovated buildings. Information is added in regards the penetration of heat pumps until 2030.</p>
<p>Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno</p>	<p>Chapter 3.1, page 37: Chapter 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction, supplement with mining sector</p>	<p>Mining is a major emitter of GHG. In the process of exploitation of non-metallic and metallic mineral raw materials, explosives are used. During blasting, nitrogen oxide gases are produced, which are significant GHG. For drilling, digging, loading, transport, shredding, machines, equipment, and resources that emit large amounts of carbon oxides are used. In order to carry out surface mining, forests are cleared, as well as for waste dumps. In the Republic of Serbia, there are a large number of abandoned, uncultivated surface mines, and, according to</p>	<p>. Reduction of the GHG emissions emitted by the mining sector is reflected in PM_D5.</p>

stakeholder	comment	explanation	response
		<p>the cadaster, over 250 abandoned mining waste dumps (landfills and flotation tailings). These surfaces are a source of GHG. They should be recultivated and reforested in order to reduce emissions and turn them into sinks for these gases.</p> <p>The development strategy of the Republic of Serbia is based on the development of mining, and in the coming period the emission of GHG will be more and more significant, and uncultivated surface mines and landfills of waste and tailings will be in increasing number and their areas will be more spacious. It is necessary to plan measures to reduce emissions.</p>	
<p>Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, joriszantvoort@gmail.com, Plavo i zeleno</p>	<p>Chapter 3.1, page 36: Add new policy measure PM_D2a: Implementation and monitoring of the implementation of energy and climate action plans for industry and mining</p>	<p>Adopt a by-law (regulation or rulebook) that obliges metal and non-metal mines and industries covered by the CBAM mechanism to adopt and implement their energy and climate plans.</p> <p>In non-metal and metal mines, explosives are used for the exploitation of ore, and they are a source of nitrogen oxides and equipment and means of work with engines with internal combustion which are the source of carbon oxides. Mines are a large source of GHG, and it is necessary to determine the obligation to adopt and implement their plans for reducing GHG emissions. Abandoned surface mines, mining waste disposal sites (mining and flotation tailings) are areas that need to be recultivated to create a GHG sinks. This</p>	<p>The measure PM_D2, is revised in accordance with the comment.</p>

stakeholder	comment	explanation	response
		<p>would be a significant goal for the realization of INECP because the development of Serbia is planned to the great extent based on mining development plans.</p> <p>The same by-law should refer to the obligation to adopt plans for industries that are covered and will be covered by the CBAM mechanism. In our country, the world's major multinational companies are the owners of cement plants, iron plants, steel plants, aluminum production facilities, which have such plans in their home countries. Their daughter companies in Serbia do not have such plans, which will lead to a decrease in the competitiveness of their products, a decrease in the income of those companies and a decrease in the income of the national budget and the budget of local communities due to the reduction of compensation for the use of natural resources that they pay based on the amount of net income.</p> <p>The same act should cover the production of copper and artificial fertilizers.</p>	
<p>Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, joriszantvoort@gmail.com, Plavo i zeleno</p>	<p>Chapter 3.1, page 41: For industry sector add new policy measure PM_D6b: Using waste heat in industry and for heating local communities.</p>	<p>During numerous technological processes in the metallurgy, chemical and processing industry, waste heat is generated. It is emitted with waste gases, water, and solid waste into the environment. The use of this waste heat would lead to a reduction in GHG emissions, an increase in energy efficiency, and diversification of energy supply. This is especially important for local communities</p>	<p>The exploitation of waste heat is foreseen in PM_EE23, while the further construction of district heating systems is supported in PM_EE34. The linkage of these measures has been highlighted so as to facilitate the exploitation of the waste heat.</p>

stakeholder	comment	explanation	response
		where waste heat can be used for heating public and residential buildings. In this way, mixed utility companies for heating could be established, whereby industrial companies would show their willingness to contribute to the sustainable development of the local community, and local communities would have significant financial savings.	
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 37: In policy measure PM_D3: Promoting circular economy, add as Relevant National Planning Document and Circular Economy Development Program in the Republic of Serbia for the period 2022 to 2024	Although this program and its action plan refers to the period until 2024, it should be included in relevant national documents for implementation of this policy measure. Please check: https://www.cirkularnezajednice.rs/wp-content/uploads/2023/03/Program-for-development-of-circular-economy-in-the-Republic-of-Serbia-for-the-period-2022-2024.pdf	The mentioned planning document is added.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 40: In the policy measure PM_D5: Implementation of technological changes in production processes in specific industries, add the non-ferrous metallurgy industry to the description of industrial branches.	In the industry of copper and precious metals production, within the framework of the Zijin Cooper company, numerous activities have been started on the improvement of technological processes, the application of BAT technologies, etc. The company's energy and climate policy is not defined and publicly available.	The mentioned industrial activities are added.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.1, page 42: In policy measure PM_D14, Title: Improvement of wastewater treatment and discharge, add as Relevant National Planning Document and Water Management Plan on the territory of the Republic of Serbia until 2027	Please check: https://www.euzatebe.rs/en/news/two-day-workshop-on-reform-in-water-sector Official Gazette of the Republic of Serbia, no. 33/23	The mentioned planning document is added.

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno			
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 43: In following policy measures: PM_D15 Title: Improvement of waste management practices, including a decrease of biodegradable components of waste disposed on landfills and increased recycling, PM_D16 Title: Higher percentage of municipal solid waste treated by biological treatment options, and PM_D18 Title: Promotion of composting in both centralised and household perspectives, add as Relevant National Planning Document and The Waste Management Program in the Republic of Serbia for the period 2022 - 2031.	Please check: https://www.ekologija.gov.rs/sites/default/files/2022-03/program_upravljanja_otpadom_eng_-_adopted_version.pdf	The proposed changes / reference documents are inserted.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 46: In part (ii) Land Use, Land Use Change and Forestry, it is needed to add data on devastated land by mining activities (Cadaster of Mining Waste in Serbia) which are needed to be recultivated and foresee that with measures in this part, and as a relevant national document, next to The “Law on Mining and Geological Research”, “Regulation on the conditions and procedure for issuing waste management permits, as well as the criteria, characterization, classification and reporting on mining waste” should be stated.	Cadaster of Mining Waste (with devastated areas) can be found on the Ministry of Mining and Energy website with about 200 locations where the exploitation is finished. There are also over 200 active mines that need to successively recultivate the areas they devastated. Example: The company Zijin has started extensive recultivation of areas devastated by mine waste in Bor and Majdanpek. Reclamation is one of the key measures of adaptation to climate change. See the relevant regulations at “Official Gazette of the Republic of Serbia”, No. 101/15, 95/18 – other law and 40/21 “Official Gazette of the Republic of Serbia”, No. 53/2021	This level of detailed information is not subject of this document.

stakeholder	comment	explanation	response
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 48: In measure PM_D9, Title: Increase the tree-planted areas (groves / parks / green roofs), add as Relevant National Planning Document "Sustainable urban development Strategy"	Please check: Sustainable urban development Strategy of the Republic of Serbia until 2030 ("Official Gazette of the Republic of Serbia", No. 47/19)	The mentioned planning document is added.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 48: Measure PM_D9, Title: Increase the tree-planted areas (groves / parks / green roofs), should be supplemented with (groves / parks / green roofs, sanitary protection zones around mines and industrial buildings, wind protection belts and green zones next to highways)	The construction of sanitary and wind protection zones around mines, industrial facilities that are significant emitters of waste gases, along highways and traffic roads is an important measure for adapting to climate change. In the Timok Krajina, there used to be rows of planted walnut trees along the roads for every soldier from Timok who died in the Balkans and the First World War, which was the largest historical monument in Serbia. These rows of trees were destroyed by the expansion of roads, so it is necessary to restore them in order to adapt to climate changes, as well as to preserve the historical and cultural heritage.	The necessary additions have been made in PM_D9.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 51: Supplement with the new policy measure PM_D13a: Education of farmers for implementation of energy efficiency measures for reduction of GHG emissions	Education of residents is necessary to reduce CH4 emissions from animal enteric fermentation, use of fertilizers, management of emissions from fertilizers, and to reduce emissions of nitrogen oxides from the soil. It is necessary to educate farmers for the use of harvest residues and residues from forestry for heating and meeting other energy needs in agriculture.	Proposed is incorporated within PM_D4.

stakeholder	comment	explanation	response
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.1, page 77: In part v. Assessment of the necessity to build new infrastructure for district heating and cooling produced from renewable energy sources, add new measure PM_D33: Enabling the introduction of waste heat from energy and industrial facilities into district heating systems	A large amount of waste heat from energy and industrial facilities is emitted with waste gases, water, and solid waste. That heat can be used for the technological needs of the producers themselves and for heating public, communal and residential buildings of local communities. Planning of this measure would contribute to better energy efficiency of production, reduction of utility costs of the local community, public-private partnership, problems with heating of local communities would be solved and it would be contributed to the achievement of sustainable development goals.	The exploitation of waste heat is foreseen in PM_EE23, while the further construction of district heating systems is supported in PM_EE34. The linkage of these measures has been highlighted so as to facilitate the exploitation of the waste heat. The necessity to build new infrastructure for district heating and cooling has been assessed within the applied modeling exercise so as to identify the cost optimal solution for achieving the energy and climate targets.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.2, page 75: Supplement the Table 3.2: Selected alternative measures for the achievement of Article 7's target in the period 2024-2030, with the following alternative measures: Promotion of EE measures in mining sector (PM_EE1, PM_EE2 and PM_EE3, PM_EE6) and foresee savings	The Mining sector is a big emitter of GHG. Development of the Republic of Serbia in great measure relies on development of exploitation and processing of metallic and non-metallic raw material. It is crucial to foresee energy efficiency measures for this sector that will have great significance for realization of set objectives.	No information is available for the energy saving potential of the mining sector taking also into consideration the expected decline of its economic activity. A targeted study can be conducted for quantifying the energy saving potential.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.2, page 75: In part "ii. Long-term strategy for Encouraging Investment in the Renovation of the National Buildings Fund of the Republic of Serbia until 2050 including policies and measures to stimulate cost-effective deep and staged deep renovations" add the following paragraph: "Regulatory, financial, professional, personnel, organizational and educational support will be	The expansion of existing and the opening of new surface mines and pits, the formation of mining waste disposal sites and flotation tailings occupy large areas of land and villages and parts of urban settlements are or will be endangered. This is planned or hinted at by the mining development plans of large multinational mining companies that have their subsidiaries in Serbia or are strategic	This level of detailed information is not subject of this document. Potential synergies with the long-term strategy for the renovation of the building stock can be explored also in other relevant documents.

stakeholder	comment	explanation	response
	<p>provided when settlements are relocated due to the expansion of mining (opening of surface mines and pits, formation of mining waste disposal sites and flotation tailings) and formation of new settlements with high energy efficiency objects and zero net carbon emissions ."</p>	<p>partners of domestic companies. Special purpose plans for the expansion of mines are also being prepared, strategic impact assessments are being made, and urban plans are being developed in the local community. When building new settlements, it is necessary to use the most modern materials for the construction of buildings, to install devices and installations for the use of renewable energy sources, and to plan settlements with zero net carbon emissions. The Republic of Serbia should actively encourage the construction of such settlements with financial, professional, organizational, and educational support of all actors participating in the relocation and construction of new settlements and not only for the rehabilitation of existing buildings.</p>	
<p>Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno</p>	<p>Chapter 3.2, page 76: Policy measure PM_EE1, Title: Supporting financially the energy renovation of residential buildings should be supplemented with:</p> <ul style="list-style-type: none"> • Quantified objective with the number of newly built objects in new settlements build because of relocation of villages and settlements due to the expansion of mining, • Description of the measure should be supplemented: PM_EE2 will provide subsidies for energy efficiency of new objects in new settlements. 	<p>Supplements of policy measure PM_EE1 follows explanation from the previous point.</p>	<p>This level of detailed information is not subject of this document.</p>

stakeholder	comment	explanation	response
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.2, page 77: Policy measure PM_EE2, Title: Support financially the energy renovation of public buildings should be supplemented with: <ul style="list-style-type: none"> Quantified objective with the surface area of newly built public buildings in new settlements build because of relocation of villages and settlements due to the expansion of mining, Description of the measure should be supplemented: PM_EE2 will promote the energy-efficient rehabilitation of public buildings, emphasizing the role of the public sector, which should serve as an example. 	Supplements of policy measure PM_EE2 follows explanations from the previous points.	This level of detailed information is not subject of this document.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.2, page 78: Policy measure PM_EE3, Title: Financing programs for the renovation of non-residential buildings (not public) should be supplemented with: <ul style="list-style-type: none"> Quantified objective with the surface area of newly built non-residential buildings in new settlements build because of relocation of villages and settlements due to the expansion of mining, Description of the measure should be supplemented: PM_EE3 will provide subsidies for the energy-efficient rehabilitation of non-residential buildings in these settlements. 	Supplements of policy measure PM_EE3 follows explanations from the previous points.	This level of detailed information is not subject of this document.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com,	Chapter 3.2, page 78: Quantified objective of policy measure PM_EE6, Title: Mandatory installation of solar thermal systems in new buildings and in buildings undergoing major renovation, should be	Harmonization with the previous proposals.	This level of detailed information is not subject of this document.

stakeholder	comment	explanation	response
jorizantvoort@gmail.com, Plavo izeleno	supplemented with savings that will be achieved by building new settlements that will result from the relocation of old ones due to the development of mining.		
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno	Chapter 3.2, page 83: Supplement part “iii. Description of policy and measures to promote energy services in the public sector and measures to remove regulatory and non-regulatory barriers that impede the uptake of energy performance contracting and other energy efficiency service models” with the following paragraph: “Dedicated pilot projects will be imagined for building of energy efficient residential, non-residential, and public buildings that will use geothermal, solar, and other sources of renewable energy and have zero net emissions of carbon oxides.”	It is necessary to create a pilot project that will help planners, local authorities and citizens who have to move, to show the readiness of the state to engage in the implementation of measures and policies. It will provide professional assistance to designers and help local communities in spatial and urban planning, designing, and building of infrastructure.	The promotion of RES for heating and cooling will be carried out through PM_D30 and PM_D31. The main objective of the measures for promoting energy services will be the implementation of energy efficiency interventions in conjunction with the RES.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno	Chapter 3.2, page 85: Add new policy measure PM_EE27a: promotion of newly built settlements with zero net emissions of carbon oxides.	PM_EE27 will develop a holistic framework for promotion of energy services, removing potential obstacles. Use of efficient energy supply will be promoted. Conducting of technical training programs and providing technical assistance will enable the parties involved and lead to successful case studies.	The proposed measure is covered by PM_EE4.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno	Chapter 3.2, page 93: Part “iv. Other planned policies, measures and programmes to achieve the indicative national energy efficiency target for 2030 as well as other objectives presented in 2.2”, Industrial sector, supplement with new paragraph:	There are numerous industries in whose technological areas heat is generated, which is emitted with waste gases, water, and solid waste. There are studies and experiences that this heat can be used, or has been used, for heating cities and settlements. Prescribing	The exploitation of waste heat is foreseen in PM_EE23, while the further construction of district heating systems will be supported in PM_EE34. The linkage of these measures has

stakeholder	comment	explanation	response
mail.com, Plavo izeleno	"Appropriate legislation will support the use of waste heat from energy sector and industry for heating of cities and settlements and the formation of public-private partnerships of utility companies in local communities."	the legal obligation to use this heat would be a contribution to increasing the energy efficiency of the industry, reducing GHG emissions, diversifying the energy supply in the local community, reducing heating costs, improving the quality of life of the citizens of the local community, the integration of large companies into the local environment and sustainable development, in accordance with the national strategy and the achievement of sustainable development goals.	been highlighted so as to facilitate the exploitation of the waste heat.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno	Chapter 3.2, page 96: Define new policy measure PM_EE23a: Promotion of waste heat use from the industry for heating of settlements and cities.	Explanation given in the previous point.	The exploitation of waste heat is foreseen in PM_EE23, while the further construction of district heating systems will be supported in PM_EE34. The linkage of these measures has been highlighted so as to facilitate the exploitation of the waste heat.
Media & Reform Center Niš	Chapter 3.1, page 37: In subchapter 3.1.1 GHG emissions and reduction - Regulatory Measures, it is needed to foresee following measure: "Adopting a planning and analytical basis for planning adaptation measures to changed climate conditions at the local level, which includes Local energy climate plan and Adaptation plan to changed climatic conditions with vulnerability assessment."	All activities envisaged for implementation at the state level must be planned and implemented at the local level. Good planning and implementation of measures at the local level is the key to the success of all policies and measures at the state level. Also, this measure should be harmonized with other planning and strategic documents at the local level, for example the Local Development Plan and the Environmental Protection Program.	The necessary additions have been made in PM_D2.

stakeholder	comment	explanation	response
		Therefore, it is necessary to state local documents as in the proposal.	
Media & Reform Center Niš	Chapter 3.1, page 37: In subchapter 3.1.1 GHG emissions and reduction - Regulatory Measures, it is needed to foresee following measure: "Establishment of local climate councils".	In addition to the National Council, Local Councils for Climate Change (of city/municipality) should be formed in local communities that will monitor the implementation of plans and that should be an important institute for achieving social consensus on climate change issues within the powers and responsibilities of local self-government. With the new proposal of the Climate Change Adaptation Program with Action Plan at the national level, the formation of such a Council at the national level is already foreseen, and civil society organizations, through consultations and comments on the working version of the Program, proposed the formation of local Councils for the reasons stated in the explanation. Especially when we bear in mind that Adaptation Plans to the changed climatic conditions will also be adopted at the local level (3 LGUs have already adopted them, including the city of Belgrade).	The necessary additions have been made in PM_D2
RERI	Chapter 3.1, page 35: It is stated that the policies and measures are established on the basis of Regulation (EU) 2018/842 and Regulation (EU) 2018/841, covering all key emitting sectors and sectors for the enhancement of removals. Does this mean that the policies and measures provided for by INECP do not include the ETS sector, that is, the	In this part, the Proponent explains that the policies and measures are established on the basis of Regulation (EU) 2018/842, and the policies and measures in accordance with Regulation (EU) 2018/841, covering all key emitting sectors and sectors for the enhancement of removals. However, these two Regulations do not cover the ETS sector,	Necessary additions have been made in the description of the PM_D1 and in its Union policy section.

stakeholder	comment	explanation	response
	<p>categories of activities determined by Annex I of Directive 2003/87/EC (last amended in accordance with Directive 2023/959/EU)?</p>	<p>which includes the energy sector, which contributes about 80% to GHG emissions in Serbia. On the other hand, the Proposer further states that INECP foresees a series of policy measures related to the dimension of decarbonization, i.e., GHG emissions from the energy sector and non-energy sources. Namely, Article 2 of Regulation (EU) 2018/842 establishes that the application refers to GHG emissions from source categories according to the IPCC, which include energy, industrial processes and product use, agriculture, and waste, as determined on the basis of the Regulation (EU) no. 525/2013, except for GHG emissions from activities listed in Annex I of Directive 2003/87/EC. Therefore, it is clear that this Regulation does not include the ETS sector. EU Regulation 2018/841 refers to emissions from the land use, land conversion and forestry sectors. If this is not a mistake (if it really is a mistake, it should be explained who wrote this document and who allowed it to be presented in a public debate), then it is necessary to redefine the entire document in order to completely exclude the ETS sector, and to redefine the objectives because the policies and the measures do not include the reduction of emissions from the energy sector, so it is unclear how the goal of 33.3% (or 33%) reduction of GHG emissions is achieved!? If it is not the intention to exclude</p>	

stakeholder	comment	explanation	response
		<p>the ETS sector from INECP, it is necessary to remove errors in the description of policy measures, in the part that refers to EU policies related to the implementation of a certain measure.</p> <p>However, that would not be enough, because this is about essential omissions in the preparation of the INECP, and it should be withdrawn, and a fundamental revision of the entire document should be carried out. It is necessary to explain what exactly the Proposer means when states a long-term vision and goal with a perspective of 50 years to achieve an economy with a low level of carbon emissions and achieve a balance between emissions and emission reduction in accordance with the Paris Agreement? Today is the year 2023, and in 50 years it will be 2073. The perspectives of the Paris Agreement do not reach this timeframe, so it is not clear which perspectives the Proposer is referring to?</p>	
RERI	<p>Chapter 3.1, page 35, policy measure PM_D1: It is not clear what preparations for the introduction of the carbon tax are meant; goals and indicators are imprecisely determined; it is not clear what type of preparatory period is included in the period 2023-2030 (now is 2023); EU policies are incorrectly stated; the authorities in charge of implementation and monitoring are incompletely specified; the national regulation is not clear and is incorrectly stated.</p>	<p>It is completely unclear what type of CO2 tax the Proposer is referring to. Is it a matter of preparation for the introduction of cross-border emission taxes (CBAM) or some other mechanism or preparation for entry into the emissions trading system. In the description of the measure, there is no description of how the measure will be implemented, but that it will enable the introduction of a CO2 tax. Who will charge this fee and to whom?</p>	PM_D1 is described more clearly.

stakeholder	comment	explanation	response
		<p>Which sectors are covered by this measure, if we concluded that the ETS sector is not covered by the measures? If it is about the CBAM mechanism, what kind of preparations are being discussed here if the application of the mechanism (first phase without tax collection) starts in 2023? What will happen in the period between 2023 and 2026? The quantified goal of a 40% reduction in GHG emissions is a vague and, apparently, imprecisely interpreted key goal of INECP. How will CO2 taxes contribute to reducing emissions from sectors outside the ETS and LULUCF? If the measure was precisely determined, in relation to the ETS sector, it could be proposed that the quantified objective be determined in relation to the sectors covered by CBAM, and presented in relation to 2010, with precise data on the reduction of emissions. The indicator is imprecise and unmeasurable because it does not contain starting values by sector. We have already stated that Regulation 2018/842 does not apply to the ETS sector, and it is not clear what the EU Strategy on Adaptation to Climate Change has to do with carbon taxes? How does the Law on Climate Change enable the introduction of carbon taxes, in which article of the law is this foreseen? How is it possible that the Proposer did not see the role of the Ministry of Finance in the</p>	

stakeholder	comment	explanation	response
RERI	Chapter 3.1, page 35, policy measure PM_D2: Here, the Proposer mentions the Low Carbon Development Strategy for the first time. The quantified goal is imprecise, it is a policy measure that should have a concrete and measurable goal; concrete and measurable indicators with starting values.	implementation and monitoring of this measure? Like the previous measure, this measure is imprecise and unclear. As most of the policy measures are determined in a similar way, there is no need to repeat the comment that it is necessary to give clear, precise, and measurable quantified goals, with equally clear and measurable indicators that contain starting values. Only such indicators could serve as an instrument for monitoring the implementation of INECP. It is not clear why the implementation timeframe is 2024-2029 when the Strategy has already been adopted. Does this mean that the Strategy will not be implemented in 2023? It is extremely important to check the sources of funding since the EU has already provided funds for the Strategy development project for this measure.	This is horizontal measure, that will contribute to GHG emission reduction, therefore it is not possible to quantify individual contribution of each policy measure to overall GHG emission target.
RERI	Chapter 3.1, page 37, policy measure PM_D3: The measure is unclear and is not based on an analysis of the waste management sector because it does not contain quantitative indicators. The main goal is superficial, the quantified objective is not related to the indicator. The link with the national planning document is wrong.	If the quantified goal is to recycle 60% of communal waste by 2030 and reduce food waste by 50% by 2030, then the indicators should be related to communal waste recycling. The quantified objective should refer to GHG emissions from the waste sector. We have already talked about the fact that this is possible because there is data on GHG emissions from this sector. It is necessary to present and determine the starting values of the indicators and the annual target values.	The quantified objective is re-examined to take into consideration your comments. (whichever the case, as it is mention, the Roadmap for Circular Economy is for the period 2022-2024 ONLY).

stakeholder	comment	explanation	response
		<p>It is necessary for the Proposer to explain the place of the Roadmap for Circular Economy (study) in the system of public policies. Does the Proposer know that the Circular Economy Development Programme for the period 2022-2024 has been adopted?</p> <p>In this measure, as in other measures, it is completely unclear how the implementation costs were determined. How will 60% recycling of municipal waste be achieved with 4.5 million euros?</p>	
RERI	Chapter 3.1, page 38, policy measure PM_D5: This policy measure should be removed from INECP.	<p>The National Climate Change Council was established, and the Rules of Procedure 2021 were adopted. This non-transparent body held only two meetings (if we can believe that the Ministry of Environmental Protection regularly publishes the minutes of the meetings). The role of this council in the creation and implementation of public policies is unclear. Regardless, it is unacceptable that INECP envisages the establishment of a body that has already been established.</p> <p>What is the purpose of the Observatory? There are available methodologies for calculating the carbon footprint that are available to operators and the establishment of this instrument is completely unjustified.</p> <p>Is it possible that in 2023 it is proposed to create a National GHG Inventory System? Does Serbia have a GHG inventory or not? Is</p>	This is revised and this PM is deleted.

stakeholder	comment	explanation	response
		there an institution in charge of creating the GHG inventory or there is not?	
RERI	Chapter 3.1, page 40, policy measure PM_D5: Second National Communication is not a public policy document, but the report.		PM_D5 is revised and this report is deleted.
RERI	Chapter 3.1, page 42, policy measure PM_D14: The quantified goal is imprecise, as is the indicator. The Second National Communication is not a public policy document but a report, and it is not even clear what connection it has with this measure? What does the National Communication predict in this sector?	The quantified target should be precise and show a reduction in emissions from wastewater treatment plants. The indicator is also imprecise, unmeasurable and does not contain a starting value.	Quantified objective and Progress indicator have been changed in PM_D14.
RERI	Chapter 3.1, page 43, policy measure PM_D15: Policy measure is not precise, the same as main and quantified objectives and indicator.	We have already stated that it is possible to monitor GHG emissions from the waste sector. It is not clear why the Proposer did not offer a description of the situation in the waste sector and based on that situation, define appropriate objectives and indicators.	The quantification of the respective GHG emissions objective is explored. On the other hand, it is not the scope of the INECP to provide description of the situation of the waste sector.
RERI	Chapter 3.1, page 44, policy measure PM_D17: The quantified goal is not precise, the indicator does not contain starting values.	The Second National Communication contains data on CH4 emissions, so it was possible to establish a quantified objective and initial indicator values.	There is no official quantified target about CH4 emissions. However, based on data from the Second National Communication, a quantified objective has been set. A reduction of CH4 emissions in the waste sector by 30% by 2030 compared to 1990, i.e. 103.593 Gg, as 147.99 Gg were the CH4 emissions in the waste sector in 1990. Moreover, the correct indicator has been added.

stakeholder	comment	explanation	response
RERI	Chapter 3.1, page 56, policy measure PM_D29: Adaptation, enhancement and expansion of the grid networks for avoiding congestions and enabling the optimal penetration of RES	Was the influence of congestions in transmission and distribution power grid network been analyzed during drafting of INECP and in what way, because it can't be seen in this measure?	The main objective of the proposed policy measures is to ensure that the electricity grid network will not create additional barriers to the further penetration of RES. None analysis was implemented for quantifying the impacts of the potential congestions.
RERI	Chapter 3.1, page 52: Policies and measures related to renewable energy sources	-Not a single measure in the field of RES has the monitoring entity specified; -How are the necessary financial amounts calculated for the implementation of certain PMs (for example PM_D19 and PM_D21) when in INECP there is no way to estimate the reduced costs of energy production (Levelized Costs of Energy - LCOE), for certain technologies, which is a prerequisite for the organization of public bidding procedure?	Information about the monitoring entity is added. Generally, the calculation of the planned RES stations takes into account the potential reductions.
KFW	A few policy measures seem to be outdated under the current circumstances	Referring to the following policy measures under the Decarbonization dimension: <ul style="list-style-type: none"> • PM_D2 partially outdated as Low-Carbon Strategy has been adopted in June 2023 (before publishing draft NECP). • Measure PM_D3 is focused only on the Roadmap for Circular Economy in Serbia as a relevant planning document (which is actually a study), but it does not consider two major national planning documents at all - Circular Economy Program until 2024 and Waste Management Program of the Republic of Serbia for the period 2022-2031 (both 	The policy measures are revised and updated accordingly. It should be mentioned that the implementation period of the INECP is restricted in the period 2025-2030.

stakeholder	comment	explanation	response
		<p>adopted during 2022).</p> <ul style="list-style-type: none"> • Measure PM_D5 should be updated since the National Climate Change Council has been formed in 2021 and two annual meetings have been held already (in September 2021 and September 2022). • Measure PM_D19 seems to have inconsistent implementation timeframe with the latest development in the country. Implementation timeframe is 2025-2030 while the RES auctions are already launched in June 2023. Measure should be updated and based on the Three-Year Plan for auctions, adopted at the beginning of June 2023. <p>Recommendation: Policy measures should be revised and updated accordingly.</p>	
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 52:</p> <p>In subchapter 3.1.2 Renewable energy, under following point it is stated: i. Policies and measures to achieve the national contribution to the binding EU level 2030 target for renewable energy and trajectories as presented in 2.1.2 including sector- and technology-specific measures</p> <p>Notation that subchapter 2.1.2 does not exist in the document.</p>		<p>The heading is corrected.</p>
<p>The Environment Improvement Center; Climate</p>	<p>Chapter 3.1, page 52, 3.1.2 Renewable energy: The Law on the Use of Renewable Energy</p>		<p>Directive 2018/2001/EE foresees that the support shall be granted in the form of a market premium,</p>

stakeholder	comment	explanation	response
<p>Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damjanović, Coalition 27</p>	<p>Sources (hereinafter: the RES Law) foresees the development of a new system of incentives for the production of electricity from RES in the form of a limited feed-in tariff, through special quotas and auctions (the right to incentives is acquired in the auction process). Thus, a regulatory framework was established that creates an incentive for investments in small capacities (projects with installed capacities below 3 MW of wind power plants and below 0.5 MW of power plants using other RES). This type of investment in RES is particularly suitable for citizens and the economy of the Republic of Serbia because it enables the democratization of the energy sector and enables the investment of own resources. Why the draft INECP does not foresee a single policy measure that will enable the allocation of feed-in tariffs, through specific quotas and auctions, but only provides the allocation of incentives in the form of market premiums (PM_D19 - for as much as 2.6 GW of wind power plants and solar power plants) - which is intended for projects of high investment value, whose owners are mostly foreign investors?</p>		<p>which could be, inter alia, sliding or fixed. Therefore, the market premium have been selected for the case of the most mature RES technologies and feed-in-tariff for the remaining.</p>
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 3.1, page 53: Policy measure PM_D20, title: Application of the legislative framework for the participation Quantified objective: Contribution to the smooth and efficient operation - Smooth</p>		<p>Harmonizing balancing capacity and demand and reduction of the respective costs - quantified objective is changed.</p>

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>operation of who/what?</p> <p>Progress indicators: Development of legislative and regulatory framework</p> <p>The policy measure defined in this way, the quantified objective (?!), as well as the indicator are of a very general character, without any specific meaning, and they need to be defined more clearly.</p>		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, pages 54 and 70:</p> <p>PM_D21, Title: Support RES technologies that will not participate into the tendering procedures</p> <p>Quantified objective of this policy measure is to install 0.5 GW of photovoltaic systems. Additionally, in PM_37 (Title: Promotion of renewable energy communities) it is stated that renewable energy communities will be fiscally and economically encouraged to invest in photovoltaic systems. We believe that within PM_D21 it is necessary to quantify the objectives for the installation of photovoltaic systems in the categories of household, residential community, economy, and RES communities in order to ensure the clarity of the goals and the predictability of the investment framework.</p>		It is not possible to specify disaggregated targets due to the fact that the foreseen measures rely on the consumers that will participate into them. The planned measures will provide an attractive framework for their participation.
The Environment Improvement Center; Climate Forum,	<p>Chapter 3.1, page 54:</p> <p>In relation to the quantified objective of installing 0.5 GW (500 MW) of photovoltaic</p>		The INECP sets the general framework for the achievement of the energy and climate targets. Obviously, all the implemented

stakeholder	comment	explanation	response
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damjanović, Coalition 27	systems within PM_D21, we note that in March of this year, the Government of the Republic of Serbia introduced restrictions for the installed power of photovoltaic systems for households to a maximum of 10.8 kW and for the economy to 150 kW by amending the Law on the Use of RES - stating that their action threatens the security of the power system. In what way will the goal of 500 MW be achieved, if at the installed capacity of prosumers of 15 MW a limit was urgently introduced, due to the threatened stability of the power system?		policy measures will be assessed so as to become more effective and to contribute to the attainment of the different targets.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damjanović, Coalition 27	Chapter 3.1, page 55: For PM_D22 (Provision of economic support to innovative and demonstration pilot RES projects), it is stated that the quantified objective is "contribution to measure PM_D21". The title PM_D22 suggests that support should be given to innovative and demonstrative pilot projects (e.g. floating photovoltaic power plants) rather than commercially mature technologies (e.g. photovoltaic systems) which will be supported through the measure PM_D21. Therefore, it is necessary to determine separately the quantified objective and implementation costs for PM_D22.		It is not feasible to quantify the required investments for pilot projects. Nevertheless, it is crucial to implement a measure for their support.
The Environment Improvement Center; Climate Forum, dragan.sreckovic	Chapter 3.1, page 56: PM_D23, Title "Fostering the further utilization of guarantees of origin for energy from RES" according to our understanding would be an		The expansion of the GoOs scheme to all sectors is already described. Therefore, the specified sectors covered/affected are corrected

stakeholder	comment	explanation	response
<p>@gmail.com, jorizantvoort@g mail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>objective and an adequate policy measure would be - EXTENSION OF LEGAL REGULATIONS FOR ISSUING WARRANTIES OF ORIGIN - TO THE FIELD OF HEATING AND COOLING. In addition, it is written that this measure only applies to the electricity sector, which is not true because it also applies to the RES heating and cooling sector.</p> <p>As a quantified objective, it is stated - Provision of additional profit (!) - without any clarity on what profit, whose profit, and in what way? Since it is necessary to quantify the objective, it is also necessary to determine how much that profit will increase.</p> <p>Also, it is necessary to exclude transport from this measure, given that there are no guarantees of origin for biofuels in traffic.</p>		<p>so as to be aligned with the description.</p> <p>The quantification of the profits is not feasible due to the fact it will be the outcome of an auction procedure.</p>
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic @gmail.com, jorizantvoort@g mail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 56:</p> <p>PM_D29, Title: Adaptation, enhancement and expansion of the grid networks for avoiding congestions and enabling the optimal penetration of RES, as one of the most important measure for increased use of RES is not clearly defined.</p> <p>The quantified objective is not adequately determined ("contribution to smooth and efficient operation" is not a quantified objective), the indicators are of a general nature - without any possibility of monitoring, and the implementation costs are stated as "Under examination". Also, it was stated that the type of</p>		<p>None analysis was implemented for quantifying the required investments so as to specify the respective objective.</p> <p>The measure foresees mainly the adoption of the legislative framework for determining the principles for the adaptation, enhancement and expansion of the grid networks. Obviously, the proposed reform will lead to significant investments.</p>

stakeholder	comment	explanation	response
	<p>measure is "reform", and it should be "investment". This policy measure, as one of the most important for the further use of RES in Serbia, must be clearly and unambiguously specified in all aspects, including the costs for the implementation of this policy measure. What does the development of the legislative and regulatory framework mean in the case of network expansion, given that this framework has already been developed and is in force?</p>		
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 57:</p> <p>For PM_D30, the quantified objective should show what amount of RES for heating and cooling should be produced in new and renovated buildings, not as stated - to "Maximize synergies with energy efficiency dimension". In accordance with the incorrectly set quantified objective, the indicators have no purpose either, because any amount of energy produced from RES for heating and cooling - even the smallest, would be a success.</p>		<p>Quantified objective of this policy measure should contribute to the implementation of policy measure <i>Provision of fiscal and economic incentives to foster RES in heating and cooling.</i></p>
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica</p>	<p>Chapter 3.1, page 58:</p> <p>In PM_D31, Title: Provision of fiscal and economic incentives to foster RES in heating and cooling, it is stated that quantified objective is "1476 ktoe of biomass, 4 ktoe of geothermal energy, 25 ktoe of solar thermal energy and 145 ktoe of ambient heat". What represents this quantified objective? Will the incentives be</p>		<p>The quantified objective represent the RES production for heating and cooling as result based on the provided fiscal and economic incentives by the State.</p>

stakeholder	comment	explanation	response
Damnjanović, Coalition 27	provided for these amounts of energy produced from stated sources?		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 59: For PM_D33, Title: Fostering the production of biofuels for use in transport sector, quantified objective is “49 ktoe of biofuels”. Quantified objective should be “Production of biofuels in Serbia should reach 49 ktoe”. In addition, this objective should be expressed in liters/tons, which are adequate units of measurement for biofuels, and the indicators should indicate the annual quantities that needs to be produced.		The proposed objective refers to the consumption of biofuels. It is expressed also in liters.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 60: For PM_D34 Title: Fostering the consumption of biofuels in transport sector, quantified objective is “Achieving a satisfactory blending obligation”. Satisfactory is not a quantified rating, and it is unclear what would be satisfactory or unsatisfactory. It is necessary to precisely determine the quantified goal.		The narrative description of the objective is edited.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 60: For PM_D35, Title: Development of the required infrastructure for recharging electric vehicles, quantified objective should show how many electric vehicle chargers need to be installed – not how many electric vehicles there will be, as currently stated. It is necessary to determine an		An estimation of the minimum chargers that should be installed by the planned measure is provided.

stakeholder	comment	explanation	response
zeleno, Milica Damnjanović, Coalition 27	adequate quantified objective, as well as adequate indicators in the form of the number of installed chargers.		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 62: For PM_D38, Title: Development of the legislative framework for the promotion of energy storage technologies – quantified objective is not defined. In addition, it is stated that the type of measure is investment. This measure is exclusively of regulatory character because it is referring to development legislative framework.		The proposed measure is both reform and investment.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 63: For PM_D39 (Supporting demonstration projects for the promotion of biomethane and renewable hydrogen) the quantified objective is not clearly specified. What does “conduction of specific projects” mean?		The narrative description of the objective is removed.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 63: For PM_D40 (Development of the required legislative framework and the required infrastructure for the deployment of biomethane and renewable hydrogen) the quantified objective is not precise. What does		Due to the fact that it is not easy to estimate the exact number of the legislative acts, the linkage with the PM_D39 is retained.

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>“conduction of specific projects” mean?</p> <p>Considering that it is a regulatory measure, the objective should be the adoption of legal and by-law regulations, and that within a shorter period than 2030 - in order to enable its application - biomethane production of 87 ktoe (PM_D39).</p>		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, page 72:</p> <p>For PM_D41 (Development of effective supply chains for the exploitation of the available potential of biofuels, bioliquids and biomass) progress indicator should be produced amount of biofuels, bioliquids, and biomass for production of energy.</p>		It is not feasible to estimate the exact quantities of the produced biofuels due to the fact that it is a supplementary policy measure.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, page 64:</p> <p>For PM_D44 (Promotion of RES through public procurement procedures) the quantified objective is not adequately determined, because it should show what amount of energy from RES will be obtained through public procurement procedures.</p> <p>Also, the indicators are not clearly defined: the indicator "Installed capacity, produced RES electricity, heating and cooling and promoted biofuels and electric vehicles" should be deleted because it is not related to the area of public procurement, while the second indicator "Percentage of the green public procurements in</p>		The proposed indicator is utilized.

stakeholder	comment	explanation	response
	<p>the total volume of public procurements" does not define what green public procurements are. An adequate indicator would be the share of RES energy in the total amount of energy procured through the public procurement procedure.</p>		
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 66:</p> <p>In the description of PM_D24 (Updating, simplifying and optimizing the authorization, certification, permit-granting and licensing procedures - Establishment of One stop shop) it is stated that "the potential establishment of a one-stop shop will be examined". Considering the title of the measure, will the implementation of this model be EXAMINED or ADOPTED?</p> <p>Additionally, the quantified objective is "Contribution to the smooth and efficient operation". Smooth operation of who/what?</p>		<p>The main objective is to examine firstly the benefits triggered by the establishment of the one-stop shop and then to decide its adoption for the case that surpass the imposed costs. The aim is to ensure the smooth and efficient operation of the RES power plants removing any barrier.</p>
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 67:</p> <p>For PM_D25 the quantified objective is "Contribution to the smooth and efficient operation". Smooth operation of who/what?</p>		<p>The aim is to ensure the smooth and efficient operation of the RES power plants removing any barrier.</p>
<p>The Environment Improvement</p>	<p>Chapter 3.1, page 68:</p>		<p>The aim is to ensure the smooth and efficient operation of the RES</p>

stakeholder	comment	explanation	response
Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	For PM_D26 the quantified objective is “Contribution to the smooth and efficient operation”. Smooth operation of who/what?		power plants removing any barrier.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 70: PM_D37 (Promotion of renewable energy communities), foresee dedicated fiscal and economic incentives, in relation to PM_D21. Considering that quantified objective of PM_D21 is installing 500 MW of photovoltaic systems, and that its fund is foreseen for PM_D27, it is unclear if participation of RES energy communities already included in 500 MW objective and in what extent – or will additional objective be determined for energy communities?		It is not possible to specify disaggregated targets due to the fact that the foreseen measures rely on the consumers that will participate into them. The planned measures will provide an attractive framework for their participation.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica	Chapter 3.1, page 43: In PM_D43 we consider that the development of a certification scheme for RES professionals should be separate policy measure, with clear indicator – established certification schemes.		A separate policy measure is added with the aim of inclusion experts in the field of RES.

stakeholder	comment	explanation	response
Damnjanović, Coalition 27			
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, page 71:</p> <p>For PM_D32 in quantified objective part it is not precisely stated if it is about forest of agriculture biomass. Also, the quantified objective should be expressed in m3 or tons to be clear to participants that need to implement it. Additionally, it is not clear in quantitative sense what does quantified objective “Maximize synergies with energy efficiency dimension” means?</p> <p>From the description of the measure it is needed to delete waste, being that waste is not part of RES.</p>		It does not provided information about the different types of biomass so as to allow the level playing field among them. The linkage with the energy efficiency dimension is mentioned because the construction of district heating systems is foreseen also along with the RES dimension. For this reason it is stated that the use of waste heat can be promoted also.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, page 72:</p> <p>For PM_41, implementing and monitoring entities are not specified. Additionally, the quantified objective is not clearly specified. What does “conduction of specific projects” mean?</p>		It is not feasible to estimate the exact quantifies of the produced biofuels due to the fact that it is a supplementary policy measure. Information about the implementing entities is provided.
The Environment Improvement Center; Climate Forum,	<p>Chapter 3.1, page 52:</p> <p>In all policy measures, related to the decarbonization dimension - increased use of</p>		According to the respective regulation, the implementation period of the INECP is restricted in the period 2025-2030.

stakeholder	comment	explanation	response
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović, Coalition 27</p>	<p>RES, it is unambiguously stated that the implementation timeframe is 2025-2030. years. Why implementation of these measures hasn't already started, that is, why is implementation of all mentioned measures only foreseen from 2025?</p>		
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović, Coalition 27</p>	<p>Chapter 3.1, page 52:</p> <p>In accordance with the Recommendation on preparing for the development of integrated national energy and climate plans (Recommendation of the Ministerial Council of the Energy Community 2018/1/MC -EnC) by the contracting parties of the Energy Community, as well as the guidelines for the preparation of integrated energy and climate plans (POLICY GUIDELINES by the Energy Community Secretariat on the development of National Energy and Climate Plans under Recommendation 2018/01/MC-EnC), The Integrated National Energy and Climate Plan should enable transparency and predictability for investment - among others, in the field of RES .</p> <p>Decarbonization policy measures related to the area of RES do not provide transparency and predictability of the framework for investing in this area until 2030, as is the case with e.g. policy measures defined for the Internal Energy Market dimension.</p>		<p>Information about the total RES investments is provided. Due to the fact that different horizontal and supplementary policy measures are foreseen, it is not possible to distinguish among them such as in the case of the Internal Energy Market Dimension where the vast majority of them is specific projects.</p>

stakeholder	comment	explanation	response
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, page 52:</p> <p>General comment on Policy measures related to the dimension of decarbonization - i.e. the use of RES is that they are of a general nature, imprecise, without clearly quantified goals (measurable), without clearly set indicators - which allow monitoring of progress, and without clear deadlines for implementation - considering that the implementation period for all the mentioned measures is 2025-2030. The measures defined in this way do not create a transparent and predictable framework for investment, which is one of the basic goals of creating the INECP. Due to all of the above, the proposed measures do not contribute to building trust that the above will be implemented.</p>		Information about the total RES investments and goals is provided. Due to the fact that different horizontal and supplementary policy measures are foreseen, it is not possible to distinguish among them.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	<p>Chapter 3.1, pages 35-39:</p> <p>In accordance with measures PM_D1, PM_D2, PM_D4, PM_D6. It is necessary to harmonize the quantified objectives of 40% reduction of GHG emissions, with the target stated as the central target for reducing GHG emissions within the framework of INECP: " A central target has been set for reducing the GHG emissions by 40.4% in 2030 compared to 1990 including agriculture, waste and LULUCF", that is, in accordance with the commitments undertaken within the Energy Community, a reduction of GHG by 40.3%.</p>		The GHG emission reduction target will be harmonized within the document.

stakeholder	comment	explanation	response
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 3.1, page 35: In accordance with measure PM_D1, it is needed to align name of the measure in INECP (Preparation for Introduction of carbon tax) and Strategic Environmental Assessment (Preparation for and Introduction of carbon tax).		The title of the PM_D1 is modified.
ilija.batas@gmail.com	Chapter 3.1, page 37, 40: If there is a will for substantial changes to the plan, qualitative (context, motives, criteria, priorities, goals, policies, and regulatory solutions...) and quantitative (measure modeling, data...) improvement can be discussed with the wider involvement of competent stakeholders.	There is no ambition here to fundamentally change something in the time of major energy disruptions starting in 2020, but rather waiting for the situation to return to its previous state, and then, let's say, in 2030, start the transition. Reading the text, one gets the impression that there are too many measures, which are good in principle, but it is not clear exactly what these measures are and how these measures will be implemented (details)? Who will apply 150 measures? How will the Ministry implement measures that are not in its department? Where will wind power plants be built, where will large photovoltaic power plants be built, how many photovoltaic power plants on roofs, etc. For example. measure D3 (the third proposed measure) mandates that waste be considered as an important measure to reduce emissions in the energy sector. What is the annual	Generally, the achievement of the different energy and climate targets requires a holistic framework with the initiation of a combination of different policy measures within the framework of the five dimensions. Obviously, we acknowledge the difficulty to design and implement the measures and as a result the establishment of a monitoring and governance structure is imperative for the achievement of the specified targets. The Monitoring process of INECP will provide reevaluation of measures and results.

stakeholder	comment	explanation	response
		<p>emission from the waste sector? How much is 60% of the emission that is planned to be saved by 4.5 million euros? What is the average cost of saving one ton of emissions? Is this the lowest price (or is it below the marginal cost of mitigating emissions)? Why is this measure proposed and not another one? If these measures do not contribute to the reduction of emissions more than some other energy measures, why are they proposed and to what extent?</p> <p>For example. measure D5 ... technological changes ... in industry ... leads to savings of 7% (energy efficiency). How was this measure implemented, what fuels are consumed in the industry? To what extent are they spent? Does the investment of 29 million euros permanently reduce fuel consumption for the same production performance?</p> <p>The operation mode of the simulation model and the decision-making (optimization) model must be modified, because, for example, citizens of Serbia are not interested in whether income will be generated based on the trading of electricity from coal on the regional market, but the essential questions, whether we have an answer to the climate change problems that we are creating for agriculture and the citizens health due to excessive pollution.</p> <p>It is therefore necessary to approach the revision of this document with the</p>	

stakeholder	comment	explanation	response
		imperatives of energy independence and a healthy environment for the citizens of the Republic of Serbia by applying currently (commercially) available technologies. This should be based on willing, ethical, and emotional reasons that require a stronger involvement of the citizens of the Republic of Serbia in its preparation.	
UNEKOOP, Extinction Rebellion Serbia	Chapter 3.1, page 35: Dimension Decarbonisation. It is necessary to consider the creation of preconditions for the increased use of low-carbon construction materials during the construction of new buildings and the adaptation of existing ones.	As the plan has a perspective for the year 2050, it is necessary to timely foresee measures related to the reduction of the share of incorporated CO2 (arising from the process of production and installation of construction materials).	The proposed measure is assessed so as to be taken into account.
UNEKOOP, Extinction Rebellion Serbia	Chapter 3.1, page 40: In the policy measure PM_D5, Title: Implementation of technological changes in production processes in specific industries, in the description of industrial branches, next to cement, add “and other construction materials”.	Statistics show that out of 39% of GHG gas emissions from buildings, 11% are emissions from embodied CO2, so it is necessary to apply BAT technologies to reduce the carbon footprint in the production process, primarily of insulation materials, brick products...	The necessary addition in PM_D5 has been made.
UNEKOOP, Extinction Rebellion Serbia	Chapter 3.1, page 35: To envisage a new policy measure that would imply the obligation to label construction materials with an environmental product declaration (EPD) (Environmental Product Declaration).	Please check: https://www.iso.org/standard/38131.html	The necessary addition in PM_D5 has been made.
UNEKOOP, Extinction Rebellion Serbia	Chapter 3.1, page 46: Under point (ii) Land Use, Land Use Change and	Serbia has certain amounts of marginalized land on which it is possible to grow fast-growing energy plants (Miscanthus, energy	The necessary changes have been made in PM_D33.

stakeholder	comment	explanation	response
	Forestry, it is necessary to add data on the possibilities of using marginal land for the cultivation of fast-growing energy plants.	willow...). In this way, it is possible to ensure the sustainable availability of biomass for the purpose of energy security and to diversify agriculture. On the basis of positive international experiences, it is possible to use these plantations for the purpose of phytoremediation of soil and wastewater treatment.	
UNEKOOP, Extinction Rebellion Serbia	Chapter 3.1, page 46: Add a new measure to encourage planting of fast-growing energy plants.	Please check: https://knowledge4policy.ec.europa.eu/glossary-item/energy-crops_en	The necessary changes have been made in PM_D33.
EPS Scientific Council	Chapter 3.2, page 86: PM_EE10, Title: Promotion of energy efficient passenger and light-heavy duty vehicles For the expected savings of only 54 ktoe, INECP foresees the investment of its own funds in the amount of €1.713 billion. It is not clear what "own funds" mean in this case, i.e. whether they come from private individuals who will buy cars or whether they are budget funds. If they come from private individuals, it is enough for about 120,000 new cars, so if it is an incentive measure, all current car owners in Serbia could receive at least €1,000 in incentives for the planned amount. This in itself would not be so controversial, as it is controversial that for such a large investment the negligible energy saving effect (54 ktoe) is achieved, less than 0.25% of		PM_EE10 foresees the purchase of 102.1 thousand gasoline & hybrid passenger vehicles. The total cost amounts to 3.8 billion €, which will be covered by the final consumers without the provision of economic support.

stakeholder	comment	explanation	response
	<p>the current final energy consumption in the country. Such irrationally high estimates of the required funds also occur in the case of other foreseen measures, but there are also very underestimated ones (€0.2-0.5 million) for a large number of measures that require incomparably larger investments.</p>		
<p>EPS Scientific Council</p>	<p>Chapter 3.2, page 87:</p> <p>PM_EE12 Title: Financing programs for the promotion of energy efficiency passenger vehicles</p> <p>For the measure PM_EE12, an investment of €570 million is planned, and the expected energy savings is only 9 ktoe. To make the confusion even greater, the quantified goal of this measure envisages the import of 20,500 electric vehicles, and the explanation that subsidies, in case they are not sufficient to meet the goal (9 ktoe), will be redirected for the purchase of vehicles that consume alternative fuels. The text itself is difficult to understand due to a sentence error, which testifies to the missing, but otherwise necessary, control of the text created by the translation from English.</p>		<p>PM_EE12 will provide subsidies for the purchase of energy efficient passenger vehicles so as to replace conventional ones in the case that the fiscal measures are not sufficient to the fulfilment of the established targets.</p> <p>PM_EE12 foresees the purchase of 20.5 thousand electric vehicles. The total cost amounts to 570 million €, which will be covered both by the final consumers (75%) and the provided economic support (25%).</p> <p>It is mentioned also that the provided subsidies will consider as eligible the vehicles that consume alternative fuels so as to increase the synergies with the measures of the RES dimension. It should be highlighted that the promotion of the electromobility</p>

stakeholder	comment	explanation	response
EPS Scientific Council	<p>Chapter 3.2, page 88:</p> <p>PM_EE14, Title: Promotion of energy efficiency of the freight transport</p> <p>For savings of 23 ktoe, investing €1.596 billion is not reasonable. The comment is similar to PM_EE10, except that the effects are twice as small. That the above is not a mistake as far as the effects are concerned, can also be seen in figure 4.27, where there are no effects of the proposed measures.</p>		<p>contributes also to the achievement of RES targets.</p> <p>PM_EE14 foresees the purchase of 18.9 thousand light duty electric vehicles. The total cost amounts to 596 million €, which will be covered both by the final consumers (75%) and the provided economic support (25%).</p> <p>It should be highlighted that the promotion of the electromobility contributes also to the achievement of RES targets.</p>
EPS Scientific Council	<p>Chapter 3.2, page 89:</p> <p>PM_EE15, Title: Promotion of modal shift both for passenger and freight transport - Enabling 'Mobility as a Service' (MaaS)</p> <p>Enabling "Mobility as a service" (MAAS) does not have the effects stated in the Plan, and it is not known how much it is financed with, nor what it specifically refers to. Since a large number of measures are said to have required cost amounts included in the total costs provided for in other measures, verification is practically impossible.</p>		<p>The INECP provides the general framework for achieving the energy and climate targets. Due to the fact that various measures are horizontal and supplementary, their detailed specification will be occurred after the initiation of the planned policies.</p> <p>Therefore, the establishment of a monitoring and governance structure is imperative for the achievement of the specified targets.</p> <p>In any case the conventional measures are not sufficient to fulfil the energy and climate targets.</p>

stakeholder	comment	explanation	response
<p>EPS Scientific Council</p>	<p>Chapter 3.1, page 54:</p> <p>PM_D21, Title: Support RES technologies that will not participate into the tendering procedures</p> <p>This measure is presented in such a confusing way that it can be understood as a plan for the state to invest €0.7 billion in avoiding public procurement, because the explanation shows that "The economic support will be differentiated for each renewable energy source separately according to their operational characteristics in order to ensure that a fair and transparent profitability will be given to the investors".</p>		<p>The estimated budget is required for supporting the preparation of the regulatory measures. The main objective of the measure is to provide economic support to less mature RES technologies with coherent and transparent way.</p> <p>More clarifications are provided.</p>
<p>EPS Scientific Council</p>	<p>Chapter 3.2, pages 94, 272:</p> <p>PM_EE21, Title: Support schemes for the promotion of energy efficiency in industrial sector</p> <p>The plan to invest €43.366 billion in the period from 2025 to 2030 to save 282 ktoe (slightly more than 1% of final consumption) would be absurd, if from the check from Annex 1 could not be concluded that it was a mistake and that investments are an order of magnitude smaller (€4.366 billion). This error is also in the document on English submitted to the Energy Community and must be corrected in it as well. A similar error is found in Table 5.5 on page 272</p>		<p>PM_EE21 foresees investments equal to 3.4 billion €.</p> <p>The appropriate refinement and corrections are implemented.</p>

stakeholder	comment	explanation	response
	<p>(\\$ 1,200,00.00), which is not even clear what it means. From this comes the need to return the document for serious refinement and corrections, all the more so because it is a very important document that is being worked on for a long time and chaotically in the absence of a serious quality management system, which both the consultant and the MRE should have.</p>		
<p>EPS Scientific Council</p>	<p>Chapter 3.2, page 96:</p> <p>PM_EE24, Title: Support schemes for the promotion of energy efficiency in agricultural sector</p> <p>Similar to PM_EE14, for a saving effect of only 8 ktoe the planned investment of €2.678 billion is not reasonable. Bearing that in mind, many of the items contained in the INECP would have to be subjected to a detailed expert control, which is mandatory according to the Law on Planning and Construction for all projects and documents of incomparably less importance, so it should also be mandatory for state administration bodies, especially for strategic important documents, whether they are adopted by the Government or sent to the Assembly for adoption.</p>		<p>The operation of the monitoring and governance mechanism will be in compliance with the provisions of the national legislation, including the detailed expert control.</p>
<p>EPS Scientific Council</p>	<p>Chapter 3.1, page 35:</p> <p>PM_D1, Title: Preparation for and Introduction of carbon tax</p>		<p>PM_D1 is modified appropriately (and according to the available information).</p>

stakeholder	comment	explanation	response
	<p>According to its importance for INECP, this should be understood as a key measure, and it has not been elaborated on at all, so it is not clear how much its implementation will cost, nor what effects it will bring. Truth be told, something is included in the calculations related to the development scenarios, but in several variants and with a lot of assumptions, so it can be hardly discerned. Because of its great importance, this measure requires a very serious revision.</p>		
<p>EPS Scientific Council</p>	<p>Chapter 3.2, page 92: PM_EE19, Title: Development of sustainable regional or municipal mobility plans</p> <p>Measure state that will “facilitate the development of sustainable regional or municipal mobility plans leading to the completion of the holistic framework for the implementation of the above-mentioned measures at local and regional level taking into consideration the local peculiarities and design elements from all the above-mentioned measures” and “dimension of the spatial planning will be taken into consideration during the design of the planned measures, which will be implemented for the promotion of the modal shift”. Formulated in this way, the measure itself is so vaguely presented that it has no place in INECP, especially since it does not provide the amount of costs or the sources from which it is</p>		<p>The INECP provides the general framework for achieving the energy and climate targets. Due to the fact that various measures are horizontal and supplementary, their detailed specification will be occurred after the initiation of the planned policies. Therefore, the establishment of a monitoring and governance structure is imperative for the achievement of the specified targets. In any case the conventional measures are not sufficient to fulfil the energy and climate targets.</p>

stakeholder	comment	explanation	response
	financed, but rather its financing falls within the planned budget foreseen in all measures of final energy consumption.		
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo</p>	<p>Chapter 3.1, page 35: 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction, gives poor description of the dimension of decarbonization and greenhouse gas emissions and measures to reduce them.</p>	<p>INECP in 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction, foresees a series of policy measures related to the dimension of decarbonization, that is, GHG emissions from the energy and non-energy sectors. The existing INECP measures for decarbonization will be extended until 2030 and will be supplemented by measures supporting the transformation of the RES sector and other EU dimensions, including energy efficiency, the internal energy market and energy security. INECP does not state which are the existing measures of the decarbonization policy, which measures will continue to be implemented and which may not. In this part, there are no quantified effects of implemented measures and the degree of their realization.</p> <p>The text states that the work on improving the GHG inventory and updating Nationally Determined Contributions (NDCs) of the Republic of Serbia with the Paris Agreement is progressing. No reasons are given why we do not have a fully established and updated GHG inventory of Nationally Determined Contributions.</p> <p>RECOMMENDATION: For the sake of better understanding and getting a more realistic</p>	<p>The aim of the INECP is to outline the existing and planned policy measures for the achievement of the specified energy and climate targets. Moreover, the provide template has been utilized in order to facilitate its assessment. In the monitoring Report results of measure will be reevaluated</p>

stakeholder	comment	explanation	response
		<p>picture, the recommendation would be that the text should provide a realistic picture and assessment of the until now reached effects of the applied decarbonization measures, financial, fiscal, regulatory, and organizational measures, as well as a way to improve them in the coming period.</p>	
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo</p>	<p>Chapter 3.1, page 35, 239: 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction Policy measure code: PM_D1, Title: Preparation for and Introduction of carbon tax, Implementing Entity should be supplemented, Progress indicators should be specified, Implementation cost and Financing source(s) should be stated</p>	<p>In INECP, in 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction, Policy measure code: PM_D1, Title: Preparation for and Introduction of carbon tax, maybe should consider expanding the implementing entity to other entities that would concern the introduction of the carbon tax, quantify the progress indicator, define the implementation costs, as well as the financing sources.</p> <p>RECOMMENDATION: The policy measure PM_D1 Preparation for and the Introduction of the carbon tax, in the section Implementing Entity should be supplemented with public companies and public utility companies of local self-government, the indicator of progress should be quantified by the annual reduction of emissions in GHG CO2-eq, the value of the implementation costs should be given, and the mentioned financing sources should be moved from the row Implementation cost to the line Financing source(s).</p>	<p>PM_D1 is modified appropriately (depending on the available information)</p>

stakeholder	comment	explanation	response
		<p>Error in policy measure code, instead of MP1_D1 should be MP_D1.</p> <p>The description does not say how the preparation for the introduction of the carbon tax will enable the introduction of the tax.</p> <p>The implementation timeframe of the Preparation for and the introduction of the carbon tax is planned for 2023-2030, which is a very long period for Preparation. It is obvious that the error is in the wording and that it should be corrected both in the policy title of the measure and in the description of the measure. In Chapter 5 Impact assessment of planned policies and measures, on page 239, when considering the S and S-N scenarios, the CO2 tax in 2027 is assumed at a low rate of 4 euros/ton, and in 2030 the assumed tax is increased to 40 euros/ton. The assumed CO2 taxes should be reconsidered because the existing CO2 tax prices ranged from 50-100 euros/ton. In its scenarios, INECP should consider the impact of the introduction of the carbon tax on the export of goods and services and its impact on the increase of other levies and the denial of financing of public goods and services, as well as the negative impact on jobs and tax revenues. The question for INECP is how</p>	

stakeholder	comment	explanation	response
		exactly the carbon balance of a product can be calculated.	
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	<p>Chapter 3.1, page 36:</p> <p>3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction</p> <p>PM_D2 Title: Adoption, Implementation and monitoring of the Low-carbon Development Strategy and Action Plan for its implementation and developing an Adaptation Plan to Climate Change</p> <p>Technical error in the description, specify progress indicator, reconsider implementation cost, progress indicator in this and all other policy measures should be broken down into individual activities that are carried out within the framework of the policy measure.</p>	<p>RECOMMENDATION: In the policy measure PM_D2, Progress indicator to be quantified by the annual reduction of GHG CO2-eq emissions, and the Monitoring Entity should be extended to other ministries, such as health, agriculture, forestry...</p> <p>In the description, PM_D2 should be stated instead of PM_D1.</p> <p>The mentioned implementation costs are insufficient if the measure also refers to the implementation as stated in the name and description of the measure. The indicator of progress should be quantified and thus quantified broken down into the activities of adopting, implementing, and monitoring the strategy and action plan.</p>	PM_D2 is modified appropriately according to the various proposals.
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	<p>Chapter 3.1, page 37:</p> <p>3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction</p> <p>PM_D3 Title: Promoting circular economy</p> <p>Technical error in the description</p>	In the description, PM_D3 should be stated instead of PM_D2.	The error is corrected.
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	<p>Chapter 3.1, page 35:</p> <p>3.1 Dimension Decarbonisation</p>	It is noticeable that this dimension envisaged raising awareness and providing alternative opportunities, along with incentives, but did not consider the improvement of legal penalties regulations when it comes to air	The proposed policy measure is assessed so as to be taken into account to the extent possible at this stage.

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Lokalni odgovor Valjevo		<p>pollution and inspection control. For example. inspection control of pollutants on private property.</p> <p>RECOMMENDATION: Enter as a policy measure within the dimension of decarbonization the improvement of legal penalties inspection regulations that will provide the possibility of inspection control of air pollution sources on private property. Also, the ban on burning raw firewood.</p>	
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	<p>Chapter 3.1, page 35:</p> <p>Progress indicator for all decarbonization policy measures should be precisely specified</p>	<p>Recommendation: Progress indicator for all decarbonization policy measures should be quantified and as such split into individual activities for every policy measure.</p>	<p>The missing information for the progress indicators is completed where this is feasible.</p>
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	<p>Chapter 3.1, page 35:</p> <p>Within the timeframes of all decarbonization policy measures, timeframes should be given for individual activities within the given policy measure and the timeframes thus defined should be mutually harmonized with other policy measures.</p>	<p>The reason for the remark is because it has been observed that certain policy measures are in conflict with regard to timeframes. For example, timeframes of policy measures PM_D2 and PM_D4.</p> <p>RECOMMENDATION: Within the timeframes of all decarbonization policy measures, timeframes should be given for individual activities within the given policy measure and the timeframes thus defined should be mutually harmonized with other policy measures.</p>	<p>The implementation timeframe of the various policy measures is fully aligned with the respective timeframe of the INECP (2025-2030).</p>

stakeholder	comment	explanation	response
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo</p>	<p>Chapter 3.2, page 76:</p> <p>3.2 Dimension Energy Efficiency PM_EE1, Title: Supporting financially the energy renovation of residential buildings - questionable existing mechanism of subsidizing energy rehabilitation measures of residential buildings and households (Administration for Financing and Encouraging Energy Efficiency - Local Self-Government - Citizens). With such a mechanism, the current Law on Planning and Construction, The Rulebook governing the energy efficiency in building, Rulebook on Conditions, Content and Manner of Issuing Energy Performance Certificate of Buildings, Rulebook on technical requirements for fire safety of the exterior walls of buildings, were not respected.</p> <p>Also, the mechanism does not recognize vulnerable groups, families and households that are affected by energy poverty. Beneficiaries of the energy efficiency program at the local level are mostly individuals who would be able to invest in their housing facilities even without the help of the community.</p>	<p>Because this mechanism proved to be slow, complicated and requires time and a great deal of involvement from both ministries and local self-governments, it is necessary to switch to other and more efficient mechanisms. Given that valid regulations and laws dealing with the field of energy efficiency and building construction were not respected with this mechanism, it was not possible to achieve the prescribed results of the implemented energy efficiency measures.</p> <p>RECOMMENDATION: For the aforementioned reasons, the mechanism should be based on tax incentives, lines of credit and low-interest loans, with simplified regulations that will comply with the norms established in the regulations on the energy efficiency of buildings. The mechanism should ensure the taking of loans to persons above a certain age limit. In addition to establishing a more effective support mechanism, it is necessary to ensure the focus of support on social groups that cannot make a change without the support of the community (poorer families, single households, people with disabilities, Roma families).</p>	<p>The proposed measures have already been described, while the measures for the alleviation of energy poverty are presented in the Internal Energy Market Dimension. PM_EE1 is adapted incorporating various elements of the proposals.</p>
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@g</p>	<p>Chapter 3.1, page 38:</p> <p>3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction</p>	<p>In the description, PM_D5 should be stated instead of PM_D4.</p>	<p>This policy measure is deleted.</p>

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Lokalni odgovor Valjevo	PM_D5, Title: Establishment and operation of the National Climate Change Council, a Carbon Footprint Observatory for all sectors, and a National GHG inventory system Technical error in the description		
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	Chapter 3.1, page 39: 3.1 Dimension Decarbonisation, 3.1.1 GHG emissions and reduction PM_D6, Title: Implementation and monitoring of Just Transition and related Action Plan Technical error in the description	RECOMMENDATION: Given that PM_D6 will be focused on the recovery of the local economy, securing and creation of new jobs, by means of a flexible transformation of the covered areas, the monitoring entity of this policy measure should be extended to other ministries, such as the economy and labor and social affairs. The costs of implementation should be reconsidered, considering that the measure also refers to implementation, which is also stated in the description.	The monitoring entities are redefined. The implementation cost will be estimated within the framework of the Just Transition Action Plan.
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	Chapter 3.1, page 42: In INECP document, section Waste Management Sector, second paragraph, on page 42, an unfounded claim is stated.	The claim is unfounded and unrealistic because it is said that by 2025, the measures of the New Waste Management Strategy will bring the level of waste management in Serbia to the European standard. RECOMMENDATION: The claim should be corrected, in the sense of being realistic.	The existing claim is corrected.
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i	Chapter 3.1, page 35: 3.1 Dimension Decarbonisation, only EU funds and other funds, budget funds, appear in the sources of financing, and not some other sources such as loans.	In 3.1 Dimension of decarbonization in financing sources, only EU funds and other funds, budget funds, and not some other sources appear, although for some policy measures we recognize interstate loans as sources of financing.	The information about the interstate loans are added in the cases that this information is available.

stakeholder	comment	explanation	response
zeleno, Lokalni odgovor Valjevo		RECOMMENDATION: For the sake of accuracy of the document, where the planned source of financing is an interstate loan, that information should be entered as such. For example. Policy Measure Code PM_D14.	
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	Chapter 3.2, page 74: 3.2 Dimension Energy Efficiency - Subsidizing manufacturers for certification and attestation of equipment and materials that are installed in the energy rehabilitation of buildings.	The reason is that the attestation and certification of products for small and domestic manufacturers is expensive, and it is very important in order to meet the requirements of the regulations on energy efficiency. RECOMMENDATION: Include in the appropriate document policy and the activity of subsidizing manufacturers in the certification and attestation of equipment and materials that are installed in the energy rehabilitation of buildings.	The proposal is added.
Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo	Chapter 3.2, page 77: 3.2 Dimension Energy Efficiency PM_EE2, Title: Support financially the energy renovation of public buildings 3% of renovated public buildings per year is an ambitious goal, considering the current dynamics of energy rehabilitation of them. The status of municipal energy managers is unregulated and is not mentioned in the document.	Considering the current dynamics of energy rehabilitation of public buildings and the method of financing, it is obvious that 3% of renovated public buildings per year is an ambitious goal. Municipal energy managers are an important segment of the Energy Management System. Their work and status are not adequately regulated. With their work and knowledge, Energy Management System and energy managers directly influence the reduction of GHG emissions. Municipal energy managers must be technical persons and as such with this status	The defined renovation target for the public buildings is defined by the EED. The appointment of energy managers in public and municipal buildings is integrated in measure PM_EE28.

stakeholder	comment	explanation	response
		<p>they will certainly not work in city administrations. Without them, there is no Energy Management System, and without Energy Management System there are no proclaimed goals of INECP.</p> <p>RECOMMENDATION: The planned percentage of rehabilitated buildings should be realistically assessed and corrected. In the appropriate dimensions and policies of the document, include the municipal manager as an important element of Energy Management System and the activity of legislative resolution of his status.</p>	
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Lokalni odgovor Valjevo</p>	<p>Chapter 3.2, page 77: 3.2 Dimension Energy Efficiency PM_EE2, Title: Support financially the energy renovation of public buildings Possibility of savings in public buildings is significant.</p>	<p>Savings measures in public buildings can be significant. The same can be achieved through non-financial measures, behavioral measures, education, setting an example and control from the level of municipal and city administrations. In this way, a certain contribution to decarbonization can be made.</p> <p>RECOMMENDATION: In the appropriate dimensions and policies of the document, add savings in public buildings that will be implemented through non-financial measures, behavioral measures, education, setting an example and control from the level of city administrations.</p>	<p>The cross-cutting measures within the energy efficiency dimension refer also and on public sector.</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@g</p>	<p>Chapter 3.1, page 37: It is stated: Apart from proposed policy</p>	<p>With the proposed measures PM_D1, PM_D2, as the main objective, it is stated Carbon emissions reduction, and for</p>	<p>The additional GHG emission reduction will be resulted by the additional measures that are</p>

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Milica Damnjanović	measures regarding energy and non-energy related GHG emission reduction targets, 6 policy measures are also proposed in order to improve the existing regulatory framework and aware the public for the environmental impact of energy consumption with the aim of motivating, stimulating and informing them to change their behaviour and continue to engage.	measures PM_D4 and PM_D5 GHG emissions reduction and quantified objectives for these measures Reduction of GHG emissions by 40% (with LULUCF) by 2030 compared to 1990 levels. Based on the proposed measures and given descriptions, it is concluded that the given effects are difficult to quantify and therefore it is wrong and unnecessary to state that each of these measures will lead to a 40% reduction in GHG emissions by 2030 compared to 1990 levels. These measures may eventually help achieve the set objective, but not by themselves lead to the realization of the same. However, the fact that they are included in the WEM scenario (ANNEX I), for which it is shown in chapter 4 (Current situation and projections with existing policies and measures), in figure 4.7 that there will be an increase in CO2 emissions.	planned within the framework of WAM scenario for the further penetration of RES and the promotion of energy efficiency.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.1, page 49: It is stated: According to UNECE, Serbia has 2,252,400 ha of forest, with a forest cover of 29.1%. More than half (53%) is state-owned and the rest is owned privately (individual owners, religious communities, and private enterprises).	According to the data of the Statistical Office, 2,261,386 hectares are under forests according to data from 2020, while the ownership share in 2020 is 43% (state ownership) and 57% (private ownership). Why are the data of the Republic Institute of Statistics and UNECE different and why data from Statistical Office are not shown in INECP?	Data from UNECE has been replaced by these from the Statistical Office.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com	Chapter 3.1, page 47: PM_D7, Title: Sustainable forest management	A measure aimed at compensating for the loss of forest cover has been proposed, however, it is not clear what loss of forest	The proposed measure is expanded so as to foresee also

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Milica Damnjanović	(forest land remaining forest land) Quantified objective: Increase the carbon sink in the Serbian Forest by 17% by 2030, compared to 2010 Description: PM_D7 aims to reverse the loss of forest cover through sustainable forest management, including protection, restoration, afforestation and reforestation, and increase efforts to prevent forest degradation.	does it cover. According to the Statistical Office, the territory under forest ranged from 1,962,335 hectares in 2011 and 2,168,764 hectares in 2014, over 2,237,511 hectares in 2017 to 2,261,386. hectares in 2020, which represents a slight increase in the territory covered by forest. In the mentioned period, this represents a growth of 15.2%. What is meant by the increase of the carbon sink in the forests of Serbia by 17% by 2030 and how is the dependence with the increase of the area under forests defined? Is there a real reduction in forest cover in Serbia that is not recorded in statistical data, and if yes, why it exists?	the collection of robust and accurate statistical data.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.1, page 47: PM_D8, Title: Land conversion to cropland Quantified objective: Increase the carbon sink in the Serbian Forest by 17% by 2030, compared to 2010 Description: PM_D8 will facilitate conversion of lands on inclined terrains into perennial grassland (pastures, meadows), which will significantly decrease intensity of soil organic matter depletion and emission of soil carbon, and will lead to carbon sink. This conversion supposes land use change and change of the production system, which might influence the net annual income of primary producers. Due to this, its implementation should be supported with incentives, especially in the first years of	The name of the measure, the quantified objective and the description are completely inconsistent. How will the conversion of land into cropland contribute to the increase of the sinks in the forests of Serbia by 17% by 2030 compared to 2010? What type of soil is being converted to perennial grassland on sloping land? The description states: "PM_D8 will facilitate conversion of lands on inclined terrains into perennial grassland (pastures, meadows), which will significantly decrease intensity of soil organic matter depletion and emission of soil carbon, and will lead to carbon sink". What is the amount of carbon contained in the soil and what are the estimated emissions if no conversion occurs?	PM_D8 has been modified accordingly. The conversion of the waste land into cropland will contribute at some extent to the increase of the carbon sink of Serbia.

stakeholder	comment	explanation	response
	conversion, in order to bridge possible loss of incomes in farm holds.	How to "bridge" the possible loss of farm income?	
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 3.1, page 47-49: Quantified objective of PM_D8, PM_D9 and PM_D10 states: Increase the carbon sink in the Serbian Forest by 17% by 2030, compared to 2010.	Does this mean that each of these measures will contribute to increasing the sinks of carbon in forests by 17% or will all measures cumulatively contribute or help achieve an increase in the sinks by 17%?	All measures cumulatively contribute or help achieve an increase in the sinks by 17%.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 3.2, page 74: Table 3.1: New and cumulative final energy savings in the period 2024-2030	Table 3.1 shows estimates of annual final energy savings starting in 2024. Although, in accordance with the Decision of the Ministerial Council of the Energy Community No. D/2021/14/MC-EnC, on the basis of Article 7, savings in the specified period, which are the result of measures implemented in the period from 2021 to 2024, can be considered, the savings achieved in the previous years were not shown. In addition to the predicted savings, the presentation of the realized savings in the period 2021 - 2024 would present the dynamics of changes that have begun.	Table 3.1 presents the expected energy savings, which will be delivered by measures initiated in the period 2024-2030. The energy savings by measures in the period 2021-2024 are eligible and must be calculated according to the provisions of the EED about the monitoring, control and verification of the energy savings. Therefore, the specific energy savings will be calculated and added during the accomplishment of the reporting requirements.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 3.2, page 75: It is stated: Emphasis will be given on measures for the further penetration of solar thermal systems such as the mandatory installation in new buildings and in buildings undergoing major renovation.	Plan doesn't precisely specify what is considered under major renovation.	The definition of the major renovation is added.
dragan.sreckovic@gmail.com,	Chapter 3.2, page 80:	What does it mean to increase the permitted construction areas with energy properties	The proposed measure will allow the potential increase of the

stakeholder	comment	explanation	response
jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Description: PM_EE5 will foster the conduction of energy efficiency interventions providing incentives so as to exceed energy requirements beyond the minimum ones both for new buildings and energy renovated residential and non residential buildings through the initiation of regulatory measures (such as the increase of the allowed building area with higher energy performance than the minimum ones and the obligation to examine at the stage of preparing a building permit design the use of high-efficiency alternative energy and heat supply systems) and additional fiscal and financial measures.	greater than the minimum? In addition to the fact that the measure can make existing laws in the field of construction and urban planning meaningless, it is also a fact that the designed energy class of the building can only be confirmed after the construction is completed. The latter allows the measure to be abused by investors. Such a measure may take away more than contribute to efforts to create a sustainable society. In the field for relevant national planning documents, measure PM_EE5 does not refer to the planning and construction rulebook, but to "Lack of national definition of nearly zero energy buildings (NZEBs)" and "Exemplary role of public bodies' buildings".	building area, which will be constructed, under the prerequisite that the achieved energy performance of the building will be higher than the minimum one. The existing legislation should be adapted according to the provisions of the INECP.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.2, page 85: It is stated: "The promotion of energy efficient vehicles through the provision of specific tax advantages for mobilizing the purchase of energy efficient vehicles will be the main instrument."	Plan doesn't precisely specify what is considered under energy efficient nor what are the indicators of their efficiency.	The minimum energy efficiency levels have been taken into account for petrol (Euro 4 and above) and diesel (Euro 5 and above). It should be noted that vehicles with higher energy efficiency (Euro 6 and future more improved vehicles according to the projections of the European Commission scenarios) are available to be selected in the case that they are most cost-effective during the simulation.
dragan.sreckovic@gmail.com,	Chapter 3.2, page 107:	The plan does not specify what is meant by the most economical investment within the	The time plan is corrected so as to be consistent with the other

stakeholder	comment	explanation	response
jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Although all policy measures in Energy Efficiency dimension have implementation timeframe 2025-2030, measure PM_EE41, Title: Promotion of smart and carbon neutral cities, have implementation timeframe starting from 2026. Why is it foreseen that start of implementation of this measure is delayed when compared with the start of other measures?	system of energy management of public buildings. Is it a financial investment with the shortest repayment period, an investment that will result in the greatest savings, or something else? As a rule, the most economical investment is neither sustainable nor ecologically or socially justified.	measures. The selection of measures is proposed to be implemented according to the cost-effectiveness ratios taking into account different impacts.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.2, page 88: PM_EE14 Title: Promotion of energy efficiency of the freight transport	In the quantified objective, an order-of-magnitude error was made. In addition, the measure with implementation costs of approximately 1.6 billion euros refers to road transport assets based on the description. For encouraging energy efficiency in railway traffic, on the other hand, 6 times less is intended, i.e. 256 million euros.	The economic performance of the different measures is not equivalent so as to attain the energy and climate targets. Therefore, the measures for the optimal cost solution have been selected finally.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.2, page 99: PM_EE9, Title: Promotion of energy efficient appliances in households Description: PM_EE9 will promote the substitution of inefficient appliances and technologies with new energy efficient ones in the case that the application of the Energy Labelling and Eco-Design Directives is not adequate through measures, such as the provision of subsidies of the existing inefficient electric appliances with new more efficient.	Electrical devices in households cannot be declared as (in)efficient, but as more or less efficient than, or their efficiency can be quantified by energy class. The plan does not specify devices of which energy class should be replaced with more efficient ones. In addition, is the replacement of functional devices justified by the fact that the new device will potentially consume less energy? It should be considered that the process of production of new ones and depositing, i.e. recycling of obsolete devices also requires energy (Embodied Energy).	The INECP provides the general framework for achieving the energy and climate targets. The detailed specification of the measures will be occurred during the design of the planned policies taking into account the provisions of the INECP.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com,	Chapter 3.1, page 47: PM_D7, Title: Sustainable forest management, is	Republic of Serbia is according to its own Constitution responsible to provide for “sustainable development; system of	Noted

stakeholder	comment	explanation	response
mail.com, Plavo i zeleno, Milica Damnjanović	from the investment aspect one of the most demanding measures proposed in the dimension of decarbonization. Financing from, first of all, EU funds was proposed. Constitution of Republic of Serbia in Article 97, paragraph 9, says: “The Republic of Serbia shall organise and provide for sustainable development; system of protection and improvement of environment; protection and improvement of flora and fauna; production, trade and transport of arms, poisonous, inflammable, explosive, radioactive and other hazardous substances”.	protection and improvement of environment; protection and improvement of flora and fauna”. It is not possible to finance this measure from the budget of other states or groups of states as the EU, because that would mean that compliance or non-compliance with the Constitution of Republic of Serbia depends on the current will or affection of other countries or groups of states like the EU.	
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 3.2, page 86: PM_EE10, Title: Promotion of energy efficient passenger and light-heavy duty vehicles	This measure is not suitable for a country where the average age of a vehicle is 17 years, because it is in contradiction with the principles of the fight against energy poverty. Such approaches, as a rule, further stratify the population, relieve citizens who are not exposed to energy poverty, and neglect citizens who are exposed to it. The latter are not only unable to switch to an "energy-efficient vehicle" but are gradually left without the means to maintain their existing vehicle, thereby impairing the performance of the entire country's vehicle fleet. Furthermore, applying this measure will not reduce the average age of the fleet, but only the most efficient part of the fleet will become even more efficient. In the case of Republic of Serbia focus should be on the group of citizens who are exposed or threatened to be exposed to energy	The calculation of the required investments takes into consideration that the existing vehicles have to be replaced due to the fact that the operational lifetime will be completed. Moreover, the autonomous actions have been estimated taking into account the end-users to buy the new vehicles. Therefore, the end-users who are not able to buy new vehicles have to be supported. In any case the estimations must be reassessed according to the economic conditions.

stakeholder	comment	explanation	response
		poverty in order to reduce the average age and improve the indicators of the vehicle fleet.	
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović</p>	<p>Chapter 3.2, page 99: PM_EE9, Title: Promotion of energy efficient appliances in households</p>	<p>In Serbia, according to the latest census, there are about one million households with three or more members. More than 4 million inhabitants live in them. With the budget for this measure of 1.5 billion euros, it is possible to buy and give each of those households a brand-new refrigerator, dishwasher and washing machine. What kind of subsidies are we talking about?</p>	<p>The calculation of the required investments takes into consideration that the existing equipment has to be replaced due to the fact that the operational lifetime will be completed. Moreover, the autonomous actions have been estimated taking into account the end-users to buy the new equipment. Therefore, the end-users who are not able to buy new equipment have to be supported. In any case the estimations must be reassessed according to the economic conditions.</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović</p>	<p>Chapter 3.2, page 37: In what ways is it quantified that the measure to promote the circular economy (measure PM_D3) can contribute to reducing food waste by 50%? The promotion measure can have a favorable effect on reducing the amount of generated waste, but it cannot be claimed that it will result in a defined goal.</p>		<p>The INECP provides the various objectives for achieving the energy and climate targets. In specific cases the specialization/quantification of the various objectives can be carried out in a subsequent stage taking into account the provisions of the INECP perhaps through the initiation of additional activities (such as the</p>

stakeholder	comment	explanation	response
			compilation of a targeted action plan).
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 3.1, page 39: Why is in the measure PM_D6, Title: Implementation and monitoring of Just Transition and related Action Plan, as only progress indicator stating annual emissions reduction? Reducing emissions is the target for the energy transition, while the Just transition should also encompass social criteria.		Additional social objectives are added.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 3.1, pages 42-43: Check progress indicators in measures PM_D14 and PM_D16.	Does these measures result (only) in CO2 reduction?	Dimitris: The necessary amendments have been made
MIVUS	Chapter 3.1, page 40: Obligation to insulate the HVAC facilities and infrastructure is not mentioned.	The obligation to insulate the HVAC facilities and infrastructure significantly contributes to energy savings.	The energy efficiency interventions are analyzed in the respective dimension (chapter 3.2).
MIVUS	Chapter 3.1, page 75: Many times conclusions from outdated Long-term strategy for Encouraging Investment in the Renovation of the National Buildings Fund are cited.	Edit Long-term strategy for Encouraging Investment in the Renovation of the National Buildings Fund according to the changes in the world.	The Long-term strategy for Encouraging Investment in the Renovation of the National Buildings Fund should be updated according to the provisions of the INECP.
MIVUS	Chapter 3.2, pages 76-77: For policy measure PM_EE1, ESCO models of financing are not foreseen. Ministry of	Foresee ESCO models of financing as most useful based on experience and include Ministry of Construction, Transport, and Infrastructure.	Generally, ESCO models are not considered effective business model for the residential sector. Implementing entity is supplemented.

stakeholder	comment	explanation	response
	Construction, Transport, and Infrastructure is not implementing entity.		
MIVUS	Chapter 3.2, pages 77-78: For policy measure PM_EE2, Ministry of Construction, Transport, and Infrastructure is not foreseen as implementing entity.	Include Ministry of Construction, Transport, and Infrastructure in measure implementation.	Implementing entity is supplemented.
mayacvetinovic@gmail.com	Chapter 3.1, pages 47 and 48: PM_D7, Title: Sustainable forest management (forest land remaining forest land) PM_D9, Title: Increase the tree-planted areas (groves / parks / green roofs)	It is well known to every citizen of this country that our forests are excessively cut down, and that timber is even exported. How do you plan afforestation in such a system? Allegedly, the implementation of the plan started last year. In the cities, the situation is even more alarming. Reforestation of urban areas is not done with trees in pots. You have probably noticed yourself that in the cities of Europe there are many more trees that regulate the air temperature better.	Noted.
mayacvetinovic@gmail.com	Chapter 3.1, pages 56 and 57: On these pages promotion of RES for heating and cooling in new and renovated buildings is mentioned.	You are probably familiar with the fact that materials for thermal insulation of buildings became significantly more expensive when subsidies were introduced for that area. The majority of the population therefore cannot afford such efficiency, which then creates new problems related to ecology. We can only imagine how accessible RES will be to the common citizen.	The evolution of the installation cost is taken into consideration for the examined period. Generally, it is expected that the installation cost in the period 2025-2030 will remain constant compared to the respective levels before the energy crisis.
Organization for Political Ecology "Polekol"	Chapter 3.1, page 48: Policy measure PM_D9, Title: Increase the tree-planted areas (groves / parks / green roofs) should be supplemented with "agricultural	Large parts of Republic of Serbia, and especially AP Vojvodina, are threatened by aeolian erosion. The wind carries away the most valuable, most fertile layer of soil. Erosion by wind is particularly expressed in	The proposed modification of the policy measure will be assessed so as to be taken into account.

stakeholder	comment	explanation	response
	<p>protection belts, protective belts of greenery along watercourses/ emission protective forest belts/ tree rows”, so it should read: Policy measure PM_D9, Title: Increase the tree-planted areas (groves / parks / agricultural protection belts / protective belts of greenery along watercourses/ emission protective forest belts/ tree rows / green roofs) Description of the measure should be supplemented, so it should read: PM_D9 will promote the increase of tree-planted areas in the country, including groves, parks, agricultural protection belts, protective belts of greenery along watercourses, emission protective forest belts, tree rows, and green roofs. This can be done through numerous related initiatives and information campaigns for citizens, explaining the environmental benefits in terms of the reduction of CO2 emissions, as well as through the provision of financial incentives. It is necessary, in accordance with existing projects or newly developed ones, to determine the means and carry out the administrative transfer and expropriation of land, especially in AP Vojvodina, in order to establish an effective network of field protection belts in order to reduce the negative effects of aeolian erosion, desertification and drought as much as possible, with positive effects on biodiversity and the achievement other general useful functions. It is necessary to define measures for restoration and protection of</p>	<p>the plain area, which is devoid of vegetation, and its intensity depends in particular on the strength, duration, and direction of the wind. In addition to the removal of soil particles, aeolian erosion also causes the removal of seeds, NPK materials, the filling of fertile areas with sterile material (sand), damage from the filling of water reservoirs, canal and road networks, settlements, and other facilities. The presence of strong winds in spring and autumn period, the deficit of moisture in the soil, high temperatures and the lack of protection of agricultural areas by plant cover inevitably lead to this phenomenon, which is aggravated by the application of modern agricultural techniques. In addition to carrying away fine soil particles, the wind, especially if it is stronger, damages the plants mechanically, which can cause plant diseases in the places of damage or crop laying. Protection of agricultural land and increase of its productivity. Belts of trees or bushes planted in the form of a network in order to protect arable land from the wind and improve climatic conditions have a multifunctional importance, which is reflected in: reducing aeolian erosion, increasing soil moisture (which is especially significant when you consider that AP Vojvodina is among the driest regions of our countries, as well as the</p>	

stakeholder	comment	explanation	response
	<p>riparian vegetation more broadly than before. Using spatial and urban planning measures prescribe and establish protective emission forest belts and the formation of tree rows in settlements and in the road belts.</p>	<p>effects of climate change), snow accumulation, by reducing evaporation and evapotranspiration, increasing crop yields, reducing wind damage, improving traffic safety, reducing the costs of removing snow from roads, beautifying the landscape, improving ecological conditions as a whole, while introducing honey species encourages the development of beekeeping. These advantages can be realized by the correct selection of species for the establishment of forest field protection belts, their optimal mutual representation and spatial arrangement, as well as regular maintenance.</p> <p>Livestock protection Reducing wind speed in winter reduces animal stress, improves animal health, and increases feed efficiency. At temperatures below 18 °C, the animal suffers stress and requires additional feeding. Exposure to winter winds increases the need for additional feeding. Under extreme stress conditions, animals require significantly more food, are less efficient at converting all food into energy, and are more susceptible to latent (hidden) diseases or other health problems. Field protection belts improve the working environment around feedlots, stables, and pasture areas, and contain noise and odors that accompany livestock farming. They provide shade, and direct summer</p>	

stakeholder	comment	explanation	response
		<p>winds to reduce heat stress. In winter, field protection belts reduce heat loss from the barn and stop cold winds.</p> <p>Protection against pollution</p> <p>Field protective belts can also provide adequate protection when it comes to problems arising as a result of soil pollution with pesticides and other organic and inorganic pollutants.</p> <p>In order to reduce the negative effects of industrialization and urbanization in the "radiation circle" of the emission source, it is necessary to erect emission protective forest belts, the diameter of which will depend on the strength of the emission source.</p> <p>Increasing the degree of forest cover</p> <p>Increasing the degree of forest cover in the city's territory permanently ensures the needs for water and clean air, as well as preserve and increase biodiversity. By raising suburban forests, utilizing, and recultivating free space on the edge of urban and industrial zones, the greatest contribution would be the protection of water and the protection of soil from erosion and the protection of the population from emissions. Also, for this purpose, the area suitable for afforestation of shallow and erodible arable land of the VI rating class and low-productivity pastures of the VI and VII rating classes is significant. The owners of the cadastral parcels in question should first of all</p>	

stakeholder	comment	explanation	response
		<p>be informed and familiarized with the privately owned forest management programs and stimulate them to take a greater part in planting new forests (distribution of seedlings, contacting experts, etc.).</p> <p>Protection of roads and protection of the population from emissions</p> <p>The development of transport infrastructure, as an important prerequisite for development, from an ecological point of view has clearly measurable negative effects that manifest themselves in multiple ways on the environment (strong emission effect on the near border area, emission of exhaust gases, emission of noise), whereby the stability of the natural ecosystem as a whole is disturbed.</p> <p>In order to reduce the negative effects of the existence of the traffic network, in the specific area, it is necessary to raise protective forest belts immediately next to the traffic roads. And in order to reduce the effects of the heat island in urban areas, it is necessary to establish rows of trees in the streets, in addition to other greening.</p>	
<p>Organization for Political Ecology “Polekol“</p>	<p>Chapter 3.1, page 47: PM_D7, Title: Sustainable forest management (forest land remaining forest land) Description: PM_D7 aims to reverse the loss of</p>	<p>The ban of forest cuts in protected natural resources Excessive deforestation is one of the biggest problems in the management of natural resources and protected areas as well as economic units outside of them in Serbia. The</p>	<p>The proposed modification of the policy measure is assessed so as to be taken into account.</p>

stakeholder	comment	explanation	response
	<p>forest cover through sustainable forest management, including protection, restoration, afforestation and reforestation, and increase efforts to prevent forest degradation.</p> <p>The description should be supplemented so it state: PM_D7 aims to reverse the loss of forest cover through sustainable forest management, including a ban on forest cut in all protected natural resources, protection, restoration, afforestation and reforestation and increase efforts to prevent forest degradation, convert coppice forests to tall forests, control invasive species and afforestation with autochthonous species, restoration of moist habitats of lowland forests and expansion of riparian zones along watercourses</p>	<p>trend of timber cutting has been increasing in relation to afforestation in the last 15 or more years. Sustainable forestry and forest management represent one of the potentials for the economic development of the area. However, cutting down forests and cutting new forest roads in protected natural areas is unacceptable, so it should be excluded in all protection zones, not only in the first (I) and the narrowest protection zone; all the more so because protected areas and their values, as well as landscapes, are determined by forests and forest biocenosis with associated rare and protected species (relics and endemics).</p> <p>Conversion of coppice forests into tall forests Converting part of coppice forests to tall forests, of different composition, is a very big economic and ecological problem in Serbia, because coppice forests occupy 38.8% of the entire forest area in Serbia. Large areas of this type mean a significant weakness in our forest stock. That is why it is necessary to try to gradually convert the coppice forests as much as possible into tall forests of different composition. Converting coppice forests to tall forests is a particularly pronounced, acute and contemporary problem here.</p> <p>Gradual and systematic removal of non-native and invasive species from the forest fund</p> <p>The history of erecting artificial stands of</p>	

stakeholder	comment	explanation	response
		<p>conifers in the habitats of autochthonous deciduous species (oak and beech coppice forests) dates back to the 60s and 70s of the last century. One of the segments of coniferization in Serbia was the introduction of fast-growing species of conifers from North America. In addition to native pines and spruce, Douglas fir and Weymouth pine are the two main non-native conifer species introduced to Serbia. Douglas fir and Weymouth pine build pure stands that are artificially raised within the first generation of introduced species. Stands of Douglas fir and Weymouth pine represent one of the most productive tree species in our forest ecosystems. Both species build clear stands. Most of the stands are between 40 and 60 years old. Stands of Douglas fir and Weymouth pine can be found at an altitude of 150 to 200 m on the Vidojevica mountain in Western Serbia up to over 1000 meters on Goč, Boranja, Jastrebac, Željina and others. Replenishment of thinned parts of stands of Douglas fir and Weymouth pine, considering the dominance of beech and oak in the forest fund of Serbia, should be done, as a priority, with fir and, if possible, suitable noble deciduous trees (maple, ash, elm). Increasing the mixed stands of this with noble deciduous trees and fir significantly increases the ecological stability of these forests and reduces the risks of drying out and fires.</p>	

stakeholder	comment	explanation	response
<p>Organization for Political Ecology “Polekol”</p>	<p>Chapter 3.1, page 56:</p> <p>The description of the policy measure PM_D19, Title: Support scheme based on tendering procedures (auction scheme) for commercially cost-effective RES technologies, should be supplemented with two sentences at the end, so it state:</p> <p>PM_D19 will continue the implementation of a support scheme for the production of electricity from renewable energy sources according to the provisions of the Law on the use of renewable energy sources. Operational aid will be provided through the developed support scheme in the form of a market premium, so as to foster the electricity production from the most cost competitive renewable technologies. The conduction of auctions will ensure that the operational aid will be provided with an open, transparent, competitive, non-discriminatory and cost-effective manner avoiding unnecessary distortions of electricity markets as well as taking into account possible system integration costs and the required grid stability. Moreover, the sustainability of the financial support will be ensured, while the publication of a long-term schedule of auctions and quotas will provide the required stability for the investors, who are willing to participate into the planned auctions. Feed-in tariffs are terminated as a form of incentive. Fees for the use of public goods are increasing.</p>	<p>Feed-in tariffs have proven to be completely counterproductive and harmful in practice so far, while at the same time the amounts of fees for the use of public goods are unrealistically low, which makes them very stimulating for investors in small hydro power plants, and being that the purpose of the fees is to valorize the use of natural resources and compensate for potential damage that can be caused by the use of natural resources, it is necessary, through the amendment of the Law on Charges on Usage of Public Goods, to increase multiple times the amount of the water fee for the use of water for the production of electricity from the existing small HPPs in order to at least partially rehabilitate the social damage that will be caused by their further use. According to the latest report of the Energy Agency, at the end of 2021, 149 small HPPs participated in the production of electricity, with a total annual production of only 1.36%. Despite this negligible participation in the supply of Serbia's energy system, thanks to the incentive system from which framework they receive the status of a privileged producer and a guaranteed profit for a period of 12 years, the owners of small HPPs were paid more than 21 million euros in 2021 alone. Electricity producers from small HPPs in Serbia paid a total of 28,882,049 RSD, i.e.</p>	<p>The provision of the feed-in tariff is foreseen in Directive 2018/2001/EE and it has been integrated within the Law on the use of renewable energy sources. The aim of the measure is to improve it so as to focus on the RES technologies, which will not participate into the auction scheme.</p>

stakeholder	comment	explanation	response
		only 245,700 euros, in 2021 based on the fee for using water as a public good.	
Organization for Political Ecology "Polekol"	<p>Chapter 3.1, page 57:</p> <p>The description of the policy measure PM_D29, Title: Adaptation, enhancement and expansion of the grid networks for avoiding congestions and enabling the optimal penetration of RES, should be supplemented with one sentence at the end, so it state: PM_D29 will facilitate the adaptation, enhancement and expansion of the grid networks in order to avoid congestions and to enable the optimal penetration of the planned renewable energy stations taking into consideration their variability according to the respective forecasts. Moreover, the operators of the electricity grid will continue to take into account the planned integration of new renewable energy stations during their decisions for the adaptation, enhancement and expansion of the electricity grid networks, while the cost of the required investments will be recovered through the electricity tariffs. Immediate treatment of losses on the transmission and distribution network will be carried out.</p>	<p>It is necessary to urgently reduce the losses on the network that in 2021 amounted to as much as 3,636 GWh, i.e. 11.73% of electricity consumed into the distribution system, which is a very high value compared to the technically justified. One of the biggest costs is high losses of electricity in the distribution network. Intensification of investments in the electrical distribution network, takeover of measuring devices and connecting lines and more efficient replacement of measuring devices is also necessary. Statistics indicate that the activities of distribution system operator in reducing losses are not intensive enough. The higher level of losses, compared to EU countries, can only be partially justified by inevitable technical losses due to the higher share of consumption at low voltage compared to most EU countries. However, high losses were also caused by a large number of unauthorized connections to the distribution network and unauthorized consumption (theft) of electricity. In addition, losses are high due to long-term underinvestment in the distribution network. A special problem is the long delay in replacing worn-out measuring devices and takeover of measuring points and connecting lines. This is confirmed by the data on the minimal activities on the control and</p>	<p>The treatment of losses on the transmission and distribution network is already foreseen in PM_EE42 and PM_EE43.</p>

stakeholder	comment	explanation	response
		takeover of measuring devices and connecting lines and equipment, which is a prerequisite for bringing them to a technically correct state and eliminating the theft of electricity. Given that in question is large amount of electricity lost, the value of which is measured in hundreds of millions of euros (300 million euros at the time of drafting the Energy Security document, before a series of price increases), these activities must be intensified in the coming period.	
Organization for Political Ecology “Polekol“	Chapter 3.1, page 58: The description of the policy measure PM_D31, Title: Provision of fiscal and economic incentives to foster RES in heating and cooling, should be supplemented with one sentence at the end, so it state: PM_D31 will provide fiscal and economic incentives for the cost-effective support of renewable energy technologies for heating and cooling according to the provisions of Articles 71 and 74 of the Law on the use of renewable energy sources. The selection of the most effective technologies will be performed taking into account the available technical and economic potential and the technical peculiarities of each end-use sector separately. The role of the local self-governments, which are also responsible for the implementation of incentive measures, will be enabled. The State	Thermal and thermal mineral waters are still used to an insufficient extent in Serbia. The greatest importance for Serbia in the near future will be the use of geothermal resources of thermal and thermal mineral waters for the needs of recreation, heating of rural and urban populations and aquaculture. Based on previous hydro geothermal research, the most promising site of geothermal energy is located in Mačva and represents an energy resource that could be used to significantly replace imported oil and coal (for example for the heating of Šabac and Bogatić). The use of geothermal energy for heating and other energy purposes is in its starting phase and very modest in terms of potential and resources. The results of the research carried out so far show that the usage of geothermal energy in Serbia for energy purposes can be significant in its	The proposed addition can be omitted due to the fact that the planned measure will support all the available RES technologies without distinction.

stakeholder	comment	explanation	response
	<p>will especially take care of providing material and technical assistance and support to local self-governments and Public Utilities companies for the use of geothermal energy for heating in accordance with the previously stated principles of technical and economic justification.</p>	<p>energy balance. Based on the hydro geothermal model, it is estimated that the thermal potential of Mačva is about 500 MW; In the Niška basin east of Niš towards Sićevo, the area of the site is about 65 km². The reserves of thermal water and geothermal energy have not been determined exactly, but according to the first preliminary assessment, they amount to about 60 MW of thermal power. The heating of the eastern part of the city of Niš can be done with thermal waters from the mentioned site. At least 25 MW can be provided for these needs at the usage locations. Vranje area: Geothermal energy from the location of Vranjska Banja can be used very successfully for heating the settlements of Vranjska Banja and Vranje. The thermal waters that emerge in Vranjska Banja from natural springs and drilled boreholes have a thermal power of about 30 MW. There is a high probability that new geothermal research can yield significantly larger amounts of geothermal energy.</p> <p>A geothermal deposit of thermal waters with a temperature of 55°C was discovered in Debrč. According to existing knowledge, this site covers the entire area of Posavo-Tamnava and southern Srem. In the area of Debrac, they are estimated at around 50 MW of thermal power. Banja Vrujci is located within the geothermal site of thermal waters</p>	

stakeholder	comment	explanation	response
		<p>that stretches between Valjevo and Ljig. Thermal water reserves in the Vrujci spa are 60 l/s with a temperature of 26°C. They can be used to expand the capacity of sports-recreational facilities, as well as to heat the entire settlement with the use of heat pumps with a heat output of 27 MW, including thermal waters that flow from natural springs in an amount of up to 400 l/s. The area of Ljig: Ljig is located on the eastern part of the large thermal water site mentioned above, which stretches across Vrujac and Mionica all the way to Valjevo. The discovered quantities of thermal waters in Ljig are used for balneological and sports-recreational purposes. The results of the initiated research indicate that around 25 MW of thermal power can be used for heating the entire Ljig and for the multiple increase of the current balneological and sports-recreational capacities. Belgrade area: It is estimated that beneath Belgrade there are deposits of thermal and thermal mineral waters with a temperature higher than 80°C. The potential of Serbia's hydro geothermal resources is extremely large. The use of the potential so far is minor compared to the possibilities. In most cases, geothermal energy is used for balneotherapeutic purposes. Industrial use and use of geothermal energy for heating purposes is very small. Considering only the explored and proven hydrothermal</p>	

stakeholder	comment	explanation	response
		resources, it is possible to produce about 1000 MW. Geothermal energy is a clean and renewable energy that is used stepwise and multipurpose. Research and exploitation costs are prohibitive for local self-governments and APs, and therefore it is necessary for the Republic to be the bearer of these activities.	
Organization for Political Ecology “Polekol“	Chapter 3.1, page 58: The description of the policy measure PM_D24, Title: Updating, simplifying and optimizing the authorization, certification, permit-granting and licensing procedures - Establishment of One stop shop, should be supplemented at the end of the first sentence, so it states: PM_D24 will examine the update, simplification and optimization of the existing authorization, certification, permit-granting and licensing procedures so as to become more operational and to lead to the implementation of the required renewable energy stations for achieving the national target, public participation, protection of public interest, integration into higher order systems and networks, and determination of its acceptability. Moreover, the different entrepreneurial, environmental and social parameters will be combined and integrated in a fair and transparent framework. The main objective of the measure is to accelerate the completion and commercialization of the planned investments	Now there are high incentives through feed-in tariffs and an illogical sequence of permits issuing, so the energy permit is obtained first, instead of last, after obtaining all other conditions/ permits/ consents. It is a technically, ecologically, socially, and energy very sensitive issue that has been approached so far without adequate preparation and analysis, especially obviously and dramatically in the case of small HPPs. There was a lack of control by state authorities from the point of view of assessing the fit of such small HPPs into higher-order hydrotechnical system projects, into higher-order spatial planning documents, as well as from the point of view of the environment impact. So, for example, small HPP Jelašnica was built on the area planned by the Spatial Plan of the Republic of Serbia for the Jelašnica reservoir with the primary purpose of water supply. In the previous period, studies on the impact assessment of small HPPs built so far did not include either individual or cumulative and	The proposed modification of the policy measure is taken into account.

stakeholder	comment	explanation	response
	<p>and to create reliable conditions for the potential investors in order to mobilize new investments. Finally, the potential establishment of a one-stop shop will be examined so as to provide the required information and technical guidance to the interested investors facilitating the realization of the planned investments.</p>	<p>synergistic effects. This also highlights one big systemic problem: The impact study is not done when the installed power is less than 2MW. The investor submits a request for a decision. The municipality says look, it has less than 2MW, the procedure is suspended, that is, the study is not done. It is an omission at the level of laws and regulations, in which EU law (Annex III of Directive 2011/92/EU dated 13.12.2011) has not been adequately, completely and in the spirit of the intention of the legislator transposed. And that's how we came to the fact that 31 km of Vlasina river are in the pipes of 10 derivation electric power plants, in the Pčinja river basin, which is a protected natural asset for both Serbia and North Macedonia, and also on the Rupska river where Dadince is located (2 built + 1 issued by building permit) we have a situation that there is no assessment of the impact, because all the installed power plants are less than 2MW, so there is no assessment of the cumulative and synergistic effects either. In that way, we lose the most valuable mountain watercourses with class I watercourses, habitats of protected and strictly protected species, perspectives for local communities, protection becomes meaningless when a part of the stream enters the protected area and is built on the</p>	

stakeholder	comment	explanation	response
		<p>part that is outside it, i.e. on the rim. SEA should be done regardless of the installed capacity of small HPPs, and not only for higher than 2MW; which requires the amendment of by-laws.</p> <p>There was never even a feasibility assessment, even though it is the most logical first step in considering sites for small HPPs or any other project; while obtaining the energy permit had to be the last in line.</p>	
<p>Organization for Political Ecology "Polekol"</p>	<p>Chapter 3.1, pages 71-72:</p> <p>v. Assessment of the necessity to build new infrastructure for district heating and cooling produced from renewable energy sources</p> <p>The further penetration of renewable energy technologies into the existing and planned district heating networks will be supported through the provision of specific financial aid for the required investment cost.</p> <p>The description of the policy measure PM_D32, Title: Facilitating the penetration of RES into district heating networks, should be supplemented with one sentence at the end, so it state: PM_D32 will support the further penetration of renewable energy technologies into the existing and planned district heating networks through the provision of specific economic incentives. Moreover, the potential imposition of a</p>		<p>The proposal about the modern low-temperature district heating systems so as to connect the local demand with renewable and waste energy sources, as well as the wider electric and gas grid is examined. All renewable energy sources have been included (including geothermal).</p>

stakeholder	comment	explanation	response
	<p>mandatory quota in the utilization of renewable energy sources as fuel in the district heating networks will be scrutinized. Finally, the initiation of modern low-temperature district heating systems will be examined promoted connecting local demand with renewable and waste energy sources, as well as the wider electric and gas grid contributing to the optimisation of supply and demand across energy carriers. The same for geothermal energy sources.</p>		
<p>Organization for Political Ecology “Polekol“</p>	<p>Chapter 3.1, pages 72-73: The description of the policy measure PM_D41, Title: Development of effective supply chains for the exploitation of the available potential of biofuels, bioliquids and biomass, should be supplemented at the end of the last sentence, so it states: PM_D41 will apply specialized support programs both for the development of efficient supply chains of residual biomass and biodegradable material and the support of the most effective and environmental-friendly bioenergy applications. More specifically, the required equipment and infrastructure will be supported economically in different stages of the supply chain, such as indicatively the feedstock production and the felling/processing, transportation, collection and storage of the collected residual biomass. Moreover, the potential imposition for collecting the biomass in</p>	<p>With only 30% of the area, Serbia is deficient in forests, so the trend of trees cutting for firewood and the production of pellets and briquettes creates additional damage. Biomass heating in the winter period, during temperature inversion intervals, creates very high concentrations of suspended particles, which greatly endangers the health of people in populated areas. As a temporary solution, the use of pellets and briquettes for heating is an improvement over waste incineration or the widespread burning of car tires. However, the burning of pellets should only be allowed for users whose fireplaces have an emission of suspended particles less than 2 mg/m³. The burning of agricultural waste should be limited to burning sites where it is possible to limit the emission of harmful combustion products into the atmosphere in an economically acceptable manner. The burning of agricultural waste in small</p>	<p>The proposed modification of the policy measure is taken into account.</p>

stakeholder	comment	explanation	response
	<p>the form of gate-fee levy will be examined in order to increase the quantities of biomass, which will be utilized for energy production, with the fact that the forest fund is not used for this increase, but other sources of biomass.</p>	<p>incinerators and low-power installations is especially harmful, where it is technically and by the nature of things much more difficult to install and maintain ecological equipment that removes emissions. In terms of biomass collection, it is necessary to ensure that producers procure raw materials without endangering the forest fund, with exploitation limited to a carefully prescribed part of the increment. In the same way, the collection of agricultural waste as well as the cultivation of crops for energy needs should be organized in a way that does not endanger the composition of the soil. Putting aside the usual use of wood as fuel in small fireplaces, the previous efforts and projects of using biomass in Serbia have not produced the expected results. In many cases, the results were below expectations due to logistical problems in collection and storage, as well as due to the fact that the approach of burning primary biomass prevailed, accompanied by the emission of suspended particles and products of incomplete combustion in small combustion plants, which further threatens the air quality in Serbia, and it is against the goals of environmental protection and the health of the population.</p>	
<p>Organization for Political Ecology “Polekol”</p>	<p>Chapter 3.2, pages 88-89: The description of the policy measure PM_EE14, Title: Promotion of energy efficiency of the</p>	<p>The positive features of rail transport are realized through the electrification of train traction on the railways, the introduction of intermodal (combined) transport</p>	<p>The proposed reference to the railway infrastructure is added in PM_EE17.</p>

stakeholder	comment	explanation	response
	<p>freight transport, should be supplemented in the middle of the first sentence, so it states: PM_EE14 will foster the promotion of energy efficiency of the freight transport with various initiatives such as the reconstruction, construction, electrification, and improvement of the railway network, the replacement of the conventional light-duty and heavy-duty vehicles with new more energy efficient and the facilitation of the freight transport through specialized taxation measures. A specialized action plan will be prepared identifying the most effective activities, while special focus will be given on how the logistics sector will become more sustainable.</p>	<p>technologies, taking measures to reduce noise in the railway belt, as well as other measures specific to each locality (drainage, protective greenery, fire protection and other). Its main function is the transportation of mass industrial and agricultural cargo over long distances, which derives to its characteristic features - mass transport, greater safety, regularity of movement and less dependence on natural conditions, weather and season compared to other types of traffic. From these features comes the unquestionable economy and efficiency of this type of transport, which reduces the share of transport costs in the product, and by realizing the energy efficiency of transport in this way, the competitiveness of the economy increases.</p>	
<p>Organization for Political Ecology "Polekol"</p>	<p>Chapter 3.2, page 89: The description of the policy measure PM_EE15 Title: Promotion of modal shift both for passenger and freight transport - Enabling 'Mobility as a Service' (MaaS), should be supplemented with one sentence at the end, so it state: PM_EE15 will foresee the development of a holistic framework for the promotion of modal shift both for passenger and freight transport. A dedicated action plan will be compiled facilitating the implementation of integrated modal shift measures and enabling 'Mobility as a</p>	<p>Urban-suburban railways can exist in the area of the largest cities in the territory of the Republic of Serbia, where the existing railway networks pass through a large number of urban settlements, and therefore there are opportunities for the inclusion of railways in public urban and suburban passenger transport, as has already been done in large numbers European cities. This primarily applies to Belgrade, Novi Sad, Subotica, Pančevo, Kragujevac, Čačak, Kraljevo and Niš, where there is an acceptable network of railway tracks. Increasing the participation of railways in the public urban and suburban</p>	<p>The proposed reference to the railway infrastructure is added in PM_EE17.</p>

stakeholder	comment	explanation	response
	<p>Service' (MaaS) with the exploitation of the available data, the information and communication technologies and artificial intelligence for smarter mobility. Moreover, measures will be implemented for increasing significantly the proportion of cyclists and improving the conditions for walking including the development of the required infrastructure. Finally, the provision of carpooling and car sharing services will be also promoted. In particular, the use of forms of mass transport by railway will be developed and encouraged, both in intercity and in the area of centers and their metropolitan areas, by developing the city-suburban railway system, in such a way that work, business and mixed zones are accommodated in the planning documents near the railway, and that the railway traffic synchronizes and integrates with other types of traffic into the public transport system.</p>	<p>traffic of the mentioned cities requires engineering and economic research, the development of appropriate plans, defining the common interests of the local self-government and the railway carrier, sufficient capacity for the traffic of urban-suburban passenger trains on the existing railway infrastructure, ensuring the participation of interested partners of all ownership forms, in which cities and municipalities through whose territory the railways pass can participate. In the initial phase, it is possible to use the existing railways for public urban and suburban rail passenger transport. With the development of this system, it will be necessary to separate these tracks from the public railway network on certain routes or parts of the tracks in the node.</p>	
<p>Organization for Political Ecology "Polekol"</p>	<p>Chapter 3.2, page 91: The description of the policy measure PM_EE17, Title: Promotion of energy efficiency in rail transport, should be supplemented with the second sentence, so it states: PM_EE17 will target to the modernization and extension of the existing railway infrastructure through the provision of either financial, fiscal or regulatory measures. Reconstruction and construction of new railways will be carried out, together with electrification of parts of railway</p>	<p>By its operation, railway transport is predisposed to a reduced impact on the environment. The positive features of rail transport are planned to be improved through the electrification of traction trains on railway tracks, the introduction of intermodal (combined) transport technology, taking measures to reduce noise in the railway belt, as well as other measures specific to each locality (drainage, protective greenery, fire protection, etc.). Its main function is the transportation of mass</p>	<p>The proposed modification of the policy measure is taken into account.</p>

stakeholder	comment	explanation	response
	network as much as possible. New energy efficient trains will be purchased substituting the conventional ones. Moreover, the rail network will be connected to production centres and ports, while smart digital systems for rail traffic management will be installed.	industrial and agricultural cargo over long distances, which gives rise to its characteristic features - mass transport, greater safety, regularity of movement and less dependence on natural conditions, weather and season compared to other types of traffic. Greater economy, speed and environmental friendliness are achieved by the electrification of the railway network.	

v. Chapter 3.3

stakeholder	comment	explanation	response
EPS	3 POLICIES AND MEASURES, chapter 3.3 Dimension Energy Security PM_ES3 - Building capacities for electricity storage – edit in a technical-legal way (pages 116/117).	Specify precisely directives and regulations referred in the description of this policy measure.	Comment is accepted and the INECP text is edited.
EPS	PM_ES3.1 - Banatski dvor, natural gas storage expansion – correct the name of the Ministry (page 117).	Ministry of Construction, Transport and Infrastructure IN THE ENTIRE TEXT OF THE INECP CORRECT THE NAME OF THIS MINISTRY!	Comment is accepted and the INECP text is edited.
EPS	PM_ES6 - Electricity Risk Preparedness plan - Main objective and Quantified objective are missing (page 120).	Provide both Main objective and Quantified objective	Main objective: The goal of the Risk Preparedness Plan for the electricity sector is to identify the possible risks related to security of electricity supply and to investigate whether the existing and planned measures sufficiently cover said risks. The plan will give an overview of the national electricity crisis

stakeholder	comment	explanation	response
			<p>scenarios, as well as the relevant regional electricity crisis scenarios.</p> <p>Quantified objective: These electricity crisis scenarios serve as a starting point for the identification of existing and planned preventive, preparedness, and emergency response measures in order to prevent, prepare for and manage electricity crises, both on a national and on a regional level.</p>
EPS	PM_ES9 Title: Development of a pumped storage project in Bistrica – Defined progress indicator is “Pipeline capacity by product, pipeline length, terminals” (page 123).	Proposed indicator does not match this policy indicator, so it is needed to define the new progress indicator.	Comment is accepted and the INECP text is edited.
Transnafta	In NECP (sr) in 3.3. Dimension Energy Security, in policies and measures table with code PM_ES9 and title Development of a pumped storage project in Bistrica in part Progress indicators on page 134 there is a text that refers to oil product pipelines: „Pipeline capacity by product, pipeline length, terminals“. Need to be corrected.		Comment is accepted and the INECP text is edited.
EMS	PM_ES3: Building capacities for electricity storage Disproportionate grid infrastructure should not be built where other options, including storage, provide a better economic option.	Delete the first sentence, because TSO in the Development plan consider reported projects of energy storage systems connection and based on these analyses adopt decisions about the investment in transmission network. It is not in the	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
	This has to be assessed by means of an adequacy study by the relevant system operators. (page 116)	jurisdiction of a TSO to candidate energy storages projects. Different adequacy studies exist, so it is needed to specify details about the type of the assessment or delete the sentence.	
AERS	From the following policy measures delete AERS as a Monitoring Entity: Chapter 3.3: PM_ES1 Title: Gas interconnector Serbia Bulgaria, (page 114) PM_ES2 Title: Enhancement of regional electricity and gas interconnections, (page 116) PM_ES3 Title: Building capacities for electricity storage, (page 116) PM_ES6 Title: Electricity Risk Preparedness plan, (page 120) PM_ES9 Title: Development of a pumped storage project in Bistrica, (page 122) PM_ES10 Title: Development of additional dispatchable generation from natural gas, (page 123)	According to the current regulations, there is no legal basis for the implementation of this jurisdiction of the Energy Agency of the Republic of Serbia.	Comment is accepted. Energy Agency of the Republic of Serbia is deleted as a Monitoring Entity.
AERS	Chapter 3 "POLICIES AND MEASURES", Subchapters 3.3 "Dimension Energy Security" and 3.4.2 Energy transmission infrastructure are not listing all current projects or measures. Pages 114 and 130	Next to already mentioned, policy measures should be supplemented with projects listed in the document from the Ministry of Mining and Energy "Plan for the development of energy infrastructure and energy efficiency measures for the period up to 2028 with projections up to 2030", which foresee construction of: • Construction of oil pipeline Hungary –	Refer to the additional section added under Chapter 5 that references the "Basic Principles of Energy Infrastructure Development Plan and Energy Efficiency Measures for the period until 2028 with projections until 2030" (Government's Conclusion on

stakeholder	comment	explanation	response
		Serbia; <ul style="list-style-type: none"> • Reconstruction of product pipeline Pančevo (HIP Petrohemija) – Timisoara; • Construction of storage, i.e. reservoir for crude oil and oil derivatives in Pančevo; • Construction of storage, i.e. reservoir for oil derivatives in Batajnica; • Construction of storage, i.e. reservoir for oil derivatives in Donji Ledinci; • Construction of storage, i.e. reservoir for oil derivatives in Kovin; 	adoption 05 no. 312-5262/2023-1 from 15/6/2023).
AERS	Chapter 3.3, page 114 Policy measure code: PM_ES3.2 Title: Creating mandatory reserves of oil and petroleum products	EU funds are not financing sources for creating mandatory reserves of oil and petroleum products. Financing of mandatory reserves is from the purchase at the retail price of motor fuels, which is recorded as an item in the budget.	Comment is accepted and the INECP text is edited.
NIS	Chapter 3.3, page 118: In the policy measure PM_ES3.2, in “Quantified objective”, it is needed for “Indicators of Progress” to be added.	The policy measure should not only refer to the provision of storage space for mandatory reserves, but it is also necessary to provide oil and derivatives.	Comment is accepted and the INECP text is edited.
NIS	Chapter 3.3, page 119: In the policy measure PM_ES3.2, Number defined for Implementation cost should be checked.	The figure is too small for the reserves that need to be provided, even if it is only about securing storage capacities.	Comment is accepted and the INECP text is edited.
NIS	Chapter 3.3, page 119: In the policy measure PM_ES4, Relevant National Planning Document part should be supplemented.	Add: Decree on Operational reserves of Oil, Coal and Other Energy Derivatives (2021)	Comment is accepted and the INECP text is edited.
NIS	Chapter 3.3, page 122: In the policy measure PM_ES8, Implementation Timeframe should be corrected.	Stated timeframe is unrealistic, being that besides the project, nothing has been done yet.	Implementation timeline is updated.

stakeholder	comment	explanation	response
EBRD	PM_ES10 – has any consideration been given to location of the 350MW additional gas-fired capacity (please consider expending/ providing information to that effect in the draft NECP)	Subject to analysis, conversion of existing lignite TPP units could help utilize existing infrastructure and preserve jobs	INECP is aligned with the document “Basic Principles of Energy Infrastructure Development Plan and Energy Efficiency Measures for the period until 2028 with projections until 2030“ (Government's Conclusion on adoption 05 no. 312-5262/2023-1 from 15/6/2023).
EBRD	PM_ES11 Please specify in the document what ‘modernization of coal mining industry’ entails	Given Serbia’s climate neutrality trajectory and emissions reduction ambition, investment of EUR 1.3 bn in coal mining does not seem coherent and should be explained in more detail.	<p>The modernisation of coal mining is coupled with a modernisation of the older power plants, so that they can be compatible with the Large Combustion Plant Directive requirements. This will lead to less emissions from older plants in the short term and a gradual reduction of their use in the medium to long term.</p> <p>In this context, the modernisation of the coal mining industry to reduce emissions and investments in gas infrastructure to ensure a smooth energy transition in Serbia are considered key and significant transitional measures.</p> <p>More specifically, the</p>

stakeholder	comment	explanation	response
			<p>modernisation of the coal mining industry includes investments in systems that lead to the reduction of harmful emissions and their associated negative impact on the environment due to more efficient and increased productivity. These investments will help with better product quality because of selective mining, homogenization and the introduction of an integral coal quality management system. These actions will ensure that the operation of the coal mining industry complies with the highest environmental standards, and facilitate the reduction of dust emissions, particulate matter, etc, during the process of energy transition.</p>
KFW	<p>Chapter 3.3, page 114: Lack of quantifying impact of certain policy measures</p>	<p>Referring to the policy measures under the Energy Security dimension:</p> <ul style="list-style-type: none"> • Only PM_ES9 and PM_ES10 have some sort of quantitative objectives, while all other do not have any. <p>Recommendation: Policy measures should be revised accordingly and should include clear quantitative objectives as prescribed in the relevant legislative framework on NECP's content.</p>	<p>Quantitative objectives in the Energy Security dimension have been revised to extent possible.</p>

stakeholder	comment	explanation	response
KFW	<p>Chapter 3.3, page 114: Energy Security dimension not fully covered</p>	<p>Within the Energy Security dimension, the cyber security aspect is fully missing. Along with the increased digitalization and introduction of smart systems in the energy sector, the NECP should recognize the improvement of the cybersecurity as an important objective in ensuring energy security.</p> <p>Recommendation: To set objective(s) and define measurable target(s) for improving cybersecurity and resilience in the energy sector in the final NECP, as well as cybersecurity-specific policies and measures.</p>	<p>Noted - it is added under PM_IEM9 that relates to digitalization.</p>
EPS Scientific Council	<p>Chapter 3.3, page 122: PM_ES9, Title: Development of a pumped storage project in Bistricea</p> <p>For this measure/project under the item "Progress Indicators" the text that reads "Capacity of product pipeline by product, length of product pipeline, terminals" was entered by mistake, while in the English version of INECP this item on page 123 correctly reads "Volume of pumped storage capacity in the system". In this example too, it is clear that a close control of the document put up for public consultation was not carried out, which may also indicate the relationship that the applicant of the INECP proposal has towards the domestic professional public.</p>		<p>Comment is accepted and the INECP text is edited.</p>

stakeholder	comment	explanation	response
EPS Scientific Council	<p>Chapter 3.3, page 118:</p> <p>PM_ES3.2, Title: Creating mandatory reserves of oil and petroleum products</p> <p>INECP states that in the form of mandatory reserves "It is necessary to hold an additional 435,000 metric tons of oil products (216,000 tons privately owned) and 75,000 metric tons of crude oil", although mandatory reserves, according to the Law on Commodity Reserves, cannot be privately owned. With this measure, as part of the legal framework, the "Law on Mandatory Reserves of Oil and Oil Derivatives" is mentioned, which does not exist, but is regulated by the Law on Commodity Reserves. In addition, if it is not a mistake, the amount of the budget is drastically underestimated: only 0.5 million € is foreseen, and the real value of these reserves is around 500 million € (1000 times higher).</p>		Thanks for the comment. The description of the measure has been corrected, so that additional clarification has been provided.
EPS Scientific Council	<p>Chapter 3.3, page 119:</p> <p>PM_ES5, Title: Creating mandatory natural gas reserves</p> <p>For this measure, INECP foresees the same budget of only 0.5 million €, and it costs incomparably more (about 100-150 million €), so it is necessary to clarify this, as well as for the case of oil reserves and oil derivatives under PM_ES3.2.</p>		Thanks for the comment. The description of the measure has been corrected, so that additional clarification has been provided.

stakeholder	comment	explanation	response
Organization for Political Ecology “Polekol”	Chapter 3.3, page 123: DELETE the policy measure PM_ES10, Title: Development of additional dispatchable generation from natural gas, with the following description: In order to achieve the objectives of the INECP in the most cost-efficient manner and facilitate the penetration of RES, there is a need for additional dispatchable generation to be built. More specifically, based on the performed studies and modelling results, the SEMS model considers that a new gas power plant will be integrated in the system by 2028. This asset will also support the operation of the system since it will increase the volume of available regulation capacities in the system.	The construction of a gas power plant is not justified either from the economic or from the security aspect in terms of energy security, given that it is an expensive energy source that can only be obtained from imports, because Serbia only meets up to 1/6 of its domestic gas needs from its gas fields.	Natural gas is acceptable as a transitional solution, since it is as a lower emission fuel compared with lignite, necessary to balance large amounts of renewables. Hence, such investments support the objectives of the INECP on one hand, while facilitating the penetration of RES and the safe and reliable operation of the energy system.

vi. Chapter 3.4

stakeholder	comment	explanation	response
EPS	PM_IEM12 - Studies for gas in smart meters roll out in natural gas distribution – it doesn't include Quantified objective (page 139).	Instead of Quantified objective, adoption of Decision to proceed with gas smart meters is stated.	Quantified objective and title of this policy measure are updated.
EPS	PM_IEM16 - Appointment of the Nominated Electricity Market Operator (Article 183a in accordance to the amendments of the Energy Law) – correct the name of this measure and harmonize the description, considering that NEMO was appointed, which is mentioned in the text of INECP, as well as that by-laws have been adopted.	Regulation on the market coupling of organized day-ahead and intraday electricity markets ("Official Gazette of RS", No. 10/22) is harmonized with Regulation (EU) 2015/1222, which adopts the Guidelines for Capacity Allocation and Congestion Management (CACM).	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
EPS	PM_IEM17 - Development of the regulatory framework for the operation of the “producer-consumer” (prosumer) – correct the description of this policy measure considering adopted by-laws (pages 143/144).	Decree on criteria, conditions and manner of calculation of receivables and liabilities between prosumers and suppliers ("Official Gazette of RS", No. 83/21 and 74/22) Rulebook on calculation of the RES share ("Official Gazette of the RS", No. 2/23) Rulebook on the Method of Calculation and Showing all shares of energy sources in sold electricity ("Official Gazette of RS", No. 2/23).	Comment is accepted and the INECP text is edited.
EPS	PM_IEM21 - Implementation of EU Network Codes and Guidelines on electricity through appropriate amendments of the secondary legislation and adoption of additional rules, decisions and acts, where applicable – the fact that Network Codes were adopted was not considered in the description of this policy measure (page 147).	Regulation on Network Code on High Voltage Direct Current connections (HVDC) ("Official Gazette of RS" No. 104/22) Regulation on Network Code on Customer connections ("Official Gazette of RS" No. 104/22) Regulation on Network Code on production connections ("Official Gazette of RS" No. 95/22)	Comment is accepted and the INECP text is edited.
EPS	PM_IEM31 - Market coupling to the Single Day Ahead Market (SDAC) and PM_IEM32 - Market coupling to the Single Intra Day Market (SIDC) – correct the text and replace the term cross-zonal electricity market (међузонско тржиште) with the appropriate term (pages 155/156) (in RS version pages 166/167).	The translation is not adequate – it is Regional Market Coupling (регионално повезивање тржишта)	Comment is accepted and the INECP text is edited.
EMS	PM_IEM1 Implementation of Transbalkan Corridor: OHL SS Kragujevac (RS) - Kraljevo (RS)	Needs to be deleted, because the project has been finished in June 2022.	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
	(page 125)		
EMS	PM_IEM6 Central Balkan Corridor Implementation Timeframe 2021 – 2030 (pages 128/129)	Realization of the project is expected after 2030 according to the current Transmission System Development Plan. If the horizon up to 2030 should be considered, it should be emphasized that that it is about the first section of this project, meaning OHL 2x400kV SS Jagodina 4 – SS Požarevac 3, with building of SS 400kV Požarevac 3, which will represent the first phase of building of the new SS 400/110kV Požarevac 3.	Comment is accepted and the INECP text is edited.
EMS	PM_IEM7 RES integration cluster of projects - North Continental South East (CSE) Corridor Implementation cost: 200 M€ (page 129)	The project PM_IEM10 Cluster of network infrastructure projects in the wider area of Belgrade (BEOGRID) is already contained within the project PM_IEM7. It is necessary to delete project PM_IEM10 and implement its description in the project PM_IEM7. Delete the part with 120 million euros investment in RES construction, because these are not TSO projects. 84 million euros are the EMS costs of the North Continental South-East (CSE) Corridor project.	Comment is accepted and the INECP text is edited.
EMS	PM_IEM10 Cluster of network infrastructure projects in the wider area of Belgrade (BEOGRID) (page 138)	This project is already included in North Continental South East (CSE) Corridor project.	Comment is accepted and the INECP text is edited.
EMS	“Interconnection between Resita (RO) and Pancevo (RS)” (page 127)	This project should maybe be removed, considering that is finished on the Serbian	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
		side. In any case implementation timeframe should not be 2026-2030.	
AERS	<p>From the following policy measures delete AERS as a Monitoring Entity:</p> <p>Chapter 3.4: PM_IEM8 Title: Regional gas connection through the implementation of interconnection projects, (page 130) PM_IEM8.1 Title: Implementation of the Serbia-Bulgaria gas interconnection project, (page 131) PM_IEM8.2 Title: Project for Serbia-Romania gas interconnection, (page 132) PM_IEM8.3 Title: Project for Serbia-Croatia gas interconnection, (page 132) PM_IEM8.4 Title: Project for Serbia-BiH gas interconnection, (page 133) PM_IEM8.5 Title: Main gas pipeline RG 11-02 Leskovac-Vladicin Han-Vranje, (page 134) PM_IEM8.6 Title: Gas pipeline - interconnection with Montenegro, (page 135) PM_IEM8.7 Title: Project for Serbia-Macedonia gas interconnection, (page 136) PM_IEM8.8 Title: Project for Nis-Pristina gas pipeline construction, (page 136)</p>	According to the current regulations, there is no legal basis for the implementation of this jurisdiction of the Energy Agency of the Republic of Serbia.	Comment is accepted. Energy Agency of the Republic of Serbia is deleted as a Monitoring Entity.
AERS	<p>In the following policy measure PM_IEM11 Title: Smart meters roll out in electricity DSO next to AERS as a Monitoring Entity add Government of RS</p>	The Government of the RS approves the business plans of energy entities responsible for the introduction of advanced measuring devices.	Comment is accepted and the INECP text is edited.
AERS	<p>From the following policy measures delete AERS as Implementing and Monitoring Entity:</p>	According to the current regulations, there is no legal basis for the implementation of this	Comment is accepted. Energy Agency of the Republic of Serbia

stakeholder	comment	explanation	response
	<p>Chapter 3.4:</p> <p>PM_IEM13 Title: Design and implement market and network data management model, (page 140)</p> <p>PM_IEM14 Title: Promotion of demand response for the end-users by use of the dynamic tariff system, (page 141)</p> <p>PM_IEM17 Title: Development of the regulatory framework for the operation of the “producer-consumer”, (page 144)</p> <p>PM_IEM18 Title: Development of the regulatory framework for the operation of the “electricity storage”, (page 145)</p> <p>PM_IEM31 Title: Market coupling to the Single Day Ahead Market (SDAC), (page 155)</p> <p>PM_IEM32 Title: Market coupling to the Single Intra Day Market (SIDC), (page 156)</p>	jurisdiction of the Energy Agency of the Republic of Serbia.	is deleted as a Monitoring Entity.
AERS	PM_IEM4 Title: Interconnection between Resita (RO) and Pancevo (RS), (Chapter 3.4, page 127)	Is there a need to state this measure, being that the project was completed in 2017?	Comment is accepted and the INECP text is edited.
AERS	<p>Chapter 3.4:</p> <p>PM_IEM5 Title: Pannonian corridor</p> <p>PM_IEM6 Title: Central Balkan Corridor</p> <p>PM_IEM7 Title: RES integration cluster of projects - North Continental South East (CSE) Corridor, (page 128-129)</p>	For all mentioned measures years are not in line with Transmission System Development Plan	Comment is accepted and the INECP text is edited.
AERS	<p>Chapter 3.4:</p> <p>PM_IEM13 Title: Design and implement market and network data management model, (page 140)</p>	Please clarify the basis on which you designate the Agency as the Implementing and Monitoring Entity of the project realization.	Comment is accepted. Energy Agency of the Republic of Serbia is deleted as a Monitoring Entity.
AERS	<p>Chapter 3.4:</p> <p>PM_IEM17 Title: Development of the regulatory</p>	Based on Law on Energy and Law on the use of renewable energy sources, AERS has no authority to monitor any of these activities.	Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
	framework for the operation of the “producer-consumer”, (page 144)	These issues are within the jurisdiction of the Ministry of Mining and Energy.	
AERS	Chapter 3.4: PM_IEM18 Title: Development of the regulatory framework for the operation of the “electricity storage”, (page 145)	Based on Law on Energy and Law on the use of renewable energy sources, AERS has no authority to monitor these activities.	Comment is accepted. Energy Agency of the Republic of Serbia is deleted as a Monitoring Entity.
AERS	Chapter 3.4: PM_IEM31 Title: Market coupling to the Single Day Ahead Market (SDAC), (page 155) PM_IEM32 Title: Market coupling to the Single Intra Day Market (SIDC), (page 156)	AERS has no authority to monitor these activities, and it is not an executive body.	Comment is accepted. Energy Agency of the Republic of Serbia is deleted as a Monitoring Entity.
AERS	Chapter 3.4, page 151 PM_IEM26 Title: Reform of the Wholesale market to foster competition	To encourage competition, access to the wholesale market in Serbia should be enabled for a greater number of traders – i.e. enable them to access the transport system so that they can participate in the Serbian market.	Comment is accepted and the INECP text is edited.
AERS	Chapter 3.4, page 151 PM_IEM26 Title: Reform of the Wholesale market to foster competition Quantified objective: Reduction in the spread between TTF and the import price of natural gas to Serbia	Change the objective, because this would mean that the import prices of natural gas in Serbia should increase (from mid-2021, the price at the TTF is higher than the price of natural gas according to the petroleum formula). Suggestion for the Quantified objective: Import prices of natural gas not to be higher than TTF.	Comment is accepted and the INECP text is edited.
AERS	Chapter 3.4, page 135 PM_IEM8.7 Title: Project for Serbia-Macedonia gas interconnection	The diameter of this pipeline should be given.	Noted.

stakeholder	comment	explanation	response
EBRD	Is there a quantitative objective for the rollout of grid-scale storage solutions (p. 144)?	Page 144 mentions the operational restrictions on batteries (cannot be run by TSOs in the EU, barring exceptional circumstances), but makes no mention of country-specific targets of Battery Energy Storage System, heat energy shortages and other energy storage solutions listed in the Commission Recommendation of 14 March 2023 on Energy Storage – Underpinning a decarbonised and secure EU energy system 2023/C 103/01 C/2023/1729. Recommendation No2 envisages “Member States identify the flexibility needs of their energy systems in the short, medium and long term, and in their updates of the national energy and climate plans strengthen the objectives and related policies and measures that aim to cost effectively promote the deployment of energy storage, both utility-scale and behind-the-meter storage, demand response and flexibility.”	Storage options considered in the analysis (batteries and pump storage) are given in Annex.
EMS	On pages 125 to 130 (Chap. 3.4) for all projects of EMS a.d. (measures from PM_IET2 to PM_IEM7, without PM_IEM4, since the line is completed on the EMS side, so it would be good to delete it) and as the main target to state the following: "Maintaining and achieving the interconnectivity targets; planning and implementation of electricity and gas transmission infrastructure projects (and, where relevant, modernization projects); ensuring the reliability of the		Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
	customers's power supply; creation of conditions for further industrial development of the areas where the project is located; integration of the desired level of RES; providing the necessary level of flexibility of the power system". Progress indicators for each of these projects should include the following: The possibility of connecting additional RES capacities . In the case of projects where the integration of additional variable RES is included as an indicator , it should be replaced by the wording specified here.		
EMS	On page 126 (Chap . 3.4) the year of commissioning of the OHL B Bašta (RS) - Višegrad (BH) - Pljevlja (MG) should be changed: " by 2026, provided that the necessary level of investment grants for is approved in 2022 " to: " by 2027 (according to the current planning documents) " .		Comment is accepted and the INECP text is edited.
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 3.4, page 153: Quantified objective of policy measure PM_IEM29, Title: Intensify gasification efforts in Serbia, should be supplemented with the following: gasification of south-east, that is, east part of Serbia.	Spatial plan of the special-purpose area of the network of main and branch gas pipelines in eastern Serbia has been prepared: https://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/odluka/2022/84/3	Comment is accepted and the INECP text is edited.
Media & Reform Center Niš	Chapter 3.4, page 156: In subchapter 3.4.4 Energy poverty following policy measure should be foreseen: "Drafting and adoption of Local action plan (of city/municipality) for reducing energy poverty."	Drafting and adoption of Local action plan (of city/municipality) for reducing energy poverty is a key for successful planning and implementation of policy in this field on a local level including local regulative and measures for increasing of awareness and information with the purpose energy poverty	Noted - no action needed.

stakeholder	comment	explanation	response
		reduction (that also exist as standalone measure on a national level). On a local level that could be one integral document with well defined measures.	
KFW	A few policy measures seem to be outdated under the current circumstances	Referring to the following policy measure under the Internal Energy Market dimension: <ul style="list-style-type: none"> • Measure PM_IEM16 is an outdated as the Nominated Market Operator (NEMO) has been appointed a year ago (in June 2022). Recommendation: Policy measures should be revised and updated accordingly. 	Comment is accepted and the INECP text is edited.
KFW	Chapter 3.4, page 125: Lack of quantifying impact of certain policy measures	Referring to the policy measures under the Internal Energy Market dimension: <ul style="list-style-type: none"> • None of policy measures has quantified objective, but qualitative only. Additionally, for numerous measures there is even a complete lack of objective, either qualitative or quantitative. <p>Recommendation: Policy measures should be revised accordingly and should include clear quantitative objectives as prescribed in the relevant legislative framework on NECP's content.</p>	Some measures are qualitative and some are quantified, because it is not possible to quantify all measures the same way. The format defined by INECP enables the monitoring of their implementation, in order to achieve the fulfillment of nationally defined goals.
EPS Scientific Council	Chapter 3.4, page 119: PM_IEM29, Title: Intensify gasification efforts in Serbia: This is a very important measure that is impossible to implement for a budget of 0.2 million €, which, as in the previous two		Comment is accepted and the INECP text is edited.

stakeholder	comment	explanation	response
	<p>observations, to avoid confusion, requires a precise formulation of what the costs stated in this way refer to. It is not clear whether this measure, no matter how it is formulated, covers all the planned interconnections and local gasification networks. It is also worrying that the expected effects of the implementation of this measure were not specified.</p>		
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović</p>	<p>Chapter 3.4, page 156: Subchapter 3.4.4 Energy poverty</p> <p>Of the six measures aimed at combating energy poverty, a set of reform and investment measures related to energy poverty (PM_IEM34, PM_IEM35, PM_IEM36) has no defined budget. The total expected costs of the implementation of the remaining three measures (PM_IEM33, PM_IEM37 and PM_IEM38) are only 2.4 million euros. For example, for the measure PM_D4, Title: Organizing awareness campaigns for better information dissemination, more funds are provided - 3 million euros.</p>	<p>Is the bigger problem of the citizens of the Republic of Serbia energy poverty or lack of campaign and consultation?</p>	<p>The alleviation of the energy poverty will be achieved with the initiation of different policy measures (e.g. regulatory for the protection of the energy poor households, financing for the energy upgrade of the energy poor households' buildings and awareness raising). Due to the fact that the energy poverty has not been defined officially, it is not feasible to calculate the number of the energy poor households and to estimate the cost of the measures with the exception of the awareness-raising ones. The estimation of the foreseen investment cost will be carried out within the Action Plan for the alleviation of Energy Poverty, which is described.</p>
<p>dragan.sreckovic@gmail.com,</p>	<p>Chapter 3.4, pages 158-160:</p>	<p>We are of the opinion that some of the measures that define the prerequisites for</p>	<p>Noted. In any case, INECP focus is on energy efficiency</p>

stakeholder	comment	explanation	response
jorizantvoort@gmail.com, Plavo i zeleno, Ekoaktivizam, The United Branch Trade Unions "Independence"	A specific problem when defining a set of measures related to the reduction of energy poverty is the timeframe for which they are intended. Namely, all measures are planned for implementation by 2030, although the Draft Plan indicates alarming data regarding energy poverty in Serbia.	undertaking specific activities in the field of reducing the impact of energy poverty (above all measures PM_IEM35 and PM_IEM36) should be planned for implementation in the first two years of the implementation of the plan, in order to enable the earliest possible implementation programs that will be defined within the measure PM_IEM37 — Preparation of special programs for the application of energy efficiency measures and the promotion of RES among energy vulnerable customers for the long-term confrontation of the energy poverty.	measures, which are demanding in financial terms, so we draw attention to the fact that the implementation of policy measures depends on the availability and access of financial resources for the implementation of policy measures.

vii. Chapter 3.5

stakeholder	comment	explanation	response
EPS	3 POLICIES AND MEASURES, chapter 3.5 Dimension Research, Innovation and Competitiveness – from the name of the Implementing Entity : “Привредна и индустријска комора”, delete the word “индустријска” (page 167).	“ПРИВРЕДНА КОМОРА СРБИЈЕ” should be corrected in the entire text of INECP.	Comment is accepted.
NIS	CCS technology has not been considered enough in INECP	- The INECP outlines the policy measure "Development of innovative decarbonization technologies, with an emphasis on RES for electricity generation, heating/cooling, hydrogen production, emission detection, capture, storage and use of carbon (CCUS) - CCS technology, as a reduction measure has not been analyzed in detail in INECP although the current worldwide	Mentioned technologies have been considered as option, but were too expensive to include in the scenario for observed period, and also, storage options were not studied in details in Serbia.

stakeholder	comment	explanation	response
		consideration of the technology is that is the best solution, especially for larger combustion plants (e.g. in electricity generation, refineries ...).	
NIS	<p>Chapter 3.5, page 169:</p> <p>For the policy measure PM_RIC11, we suggest separating measures for RES (solar, wind, geothermal), measures for hydrogen and measures for CCUS.</p> <p>Additionally, for CCUS, it must be clearly defined which ministry should be in charge (Ministry of Mining and Energy or Ministry of Environmental Protection) and what needs to be done first in order to implement this measure in practice (for example Create a study of the geological possibilities of CO2 storage, with an assessment of the storage capacity). It is also necessary to transpose the Directive on geological storage into the RS legislation. Only after that it will be possible to assess the possibility of CO2 emissions reduction in the coming period and implementation this measure until 2030.</p>	These are completely different technologies and innovative approaches, that are besides that very complex.	Noted. We are of the opinion that at this moment these technologies are in an early initial phase and it is necessary to intensify research and possibilities, on the basis of which we would get clearer information about the possibilities and methods of application in Serbia, and based on this, a more specific understanding and information about the roles of institutions in application of these technologies.

viii. Chapter 4

stakeholder	comment	explanation	response
EPS	4 CURRENT SITUATION AND PROJECTIONS WITH EXISTING POLICIES AND MEASURES, chapter 4.1, subchapter i. Macroeconomic forecasts (GDP and population growth), in paragraph 3, it is wrongly	Industrial Policy Strategy of The Republic of Serbia from 2021 to 2030 ("Official Gazette of RS", No. 35/20).	Thank you for the comment. Text is rephrased to read "there are no quantitative projections for the industrial sectoral value added".

stakeholder	comment	explanation	response
	stated that strategy for the development of the industrial sector doesn't exist (page 182).		
EPS	4 CURRENT SITUATION AND PROJECTIONS WITH EXISTING POLICIES AND MEASURES, chapter 4.6 , subchapter iv. "Projections of developments in i. to iii. with existing policies and measures at least until 2040 (including for the year 2030)" – in paragraph 1 add regulation that regulates balance responsibility (pages 237/238).	Regulation on assuming balance responsibility and contract model on assuming balance responsibility ("Official Gazette of RS", No. 45/23).	In provided comment this point is 4.1, but in the document subchapter in question is under 4.6. Comment is accepted and the INECP text is edited.
EPS	4 CURRENT SITUATION AND PROJECTIONS WITH EXISTING POLICIES AND MEASURES, chapter 4.6 , subchapter iv. "Projections of developments in i. to iii. with existing policies and measures at least until 2040 (including for the year 2030)" – in paragraph 3, the Decree that ceased to be valid is wrongly referred to, so the entire paragraph needs to be corrected in accordance with the Decree in force (page 238).	Decree on the conditions and method of implementing the subsidized purchase of new electric and hybrid vehicles ("Official Gazette of RS", No. 18/23).	In provided comment this point is 4.1, but in the document subchapter in question is under 4.6. Comment is accepted and the INECP text is edited.
UTOPS	In the text of INECP the wrong data is stated in picture 4.21. (page 199).	The source of data about the participation of 92% natural gas is not known. The starting number for 2020 is not correct, and the data up to 2050 is not in line with SDG development plans in the Republic of Serbia.	The comment has been considered. All available data was used according to the data on the basis of which reporting on the statistics of heating plants is done for the EUROSTAT and IEA. One should have in mind that INECP document is focused on and defines targets for 2030, while the period up to 2050 represents the vision and the projections beyond 2030 are not binding. For the district heating systems, based on the

stakeholder	comment	explanation	response
			available information, there is a study that proposes the possible development of district heating systems and it has been taken into consideration. Please note that heat energy is within the responsibility of local self-government units and that a large number of local self-government units do not have development plans.
UTOPS	In the text of INECP the wrong data is stated in picture 5.15. (page 254).	Figure 5.15 title states: "Installed capacity per technology in the district heating sector" and in the diagram values are in Ktoe which actually represents unit for energy and not capacity. From the given diagram it cannot be clearly deducted what was meant to be shown.	It is a typo. It has been corrected.
EMS	Table 4.4: Overnight investment costs projection for renewable energy technologies (page 186)	It is necessary to add costs of building additional balancing capacities for the level of integration of RES which is above the level defined in the adequacy analysis contained in Transmission System Development Plan for period 2023-2032. Law on use of RES foresee that the RES capacities above the already mentioned limit, will be obliged to obtain additional balancing capacities which would obtain 20% of the regulatory capacity range of the new RES.	It has been considered. It should be taken into consideration that investments in balancing and storage technologies are not implicitly included in the price of renewable energy technologies, but they are calculated explicitly per kW of balancing or storage technology included in the system.
EMS	i. Current interconnection level and main interconnectors (page 222)	Add the following sentence: EMS in the Transmission System Development Plan for period 2023-2032	The text is updated.

stakeholder	comment	explanation	response
		(chapter Adequacy analysis of generation) states that according to the submitted connection requests has 19.3 GW of RES until 2032 (1.9 GW on distribution system and 17.4 on transmission system), of which 0.8 GW (EDS) and 4.5 GW (EMS) entered in contractual relationship with system operators.	
EMS	Figure 4.52: Cross-border capacities increases by 2025 (source: ENTSO-E) (page 224)	Transmission system capacity with Bulgaria will not increase until 2025. Rename XK area to “KiM” (Kosovo and Metohija) (general comment) Update the map according to 2023.	Figures are updated from https://eepublicdownloads.blob.core.windows.net/public-cdn-container/tyndp-documents/TYNDP2022/public/system-needs-report.pdf (page 14).
EMS	Figure 4.53: Electricity transmission network project corridors (source: EMS) (page 225)	In the meantime the scope of Panonian Corridor project (building of OHL 400kV Subotica 3 – Sandorfalva (HU), OHL 400kV Sombor – Novi Sad 3 and OHL 2x400kV Belgrade 50 – Sremska Mitrovica 2) and of Central Balkan Corridor project (building of OHL 400kV Leskovac 2 – Bobov Dol (BG), OHL 400kV Niš 2 – Kruševac – Kraljevo – Požega – Vardište and OHL 400kV Požarevac 3 – Jagodina 4) has changed.	Figures are updated from https://www.aers.rs/FILES/JavnaKonsultacija/Nacrt%20Plana%20razvoja%20pren.%20sistema%202023-2032.pdf (pages 124-127).
EMS	ii. Projections of network expansion requirements at least until 2040 (including for the year 2030) -Implementation of Transbalkan Corridor: OHL SS Kragujevac (RS) - Kraljevo (RS) -Implementation of Transbalkan Corridor: OHL Obrenovac (RS) - Bajina Basta (RS) -Cluster of network infrastructure projects in the	Add: Panonian Corridor project: OHL 400kV Sombor – Novi Sad 3 and OHL 2x400kV Belgrade 50 – Sremska Mitrovica 2 Central Balkan Corridor project: OHL 400kV Niš 2 – Kruševac – Kraljevo – Požega –	It is added in the revised report.

stakeholder	comment	explanation	response
	wider area of Belgrade (BEOGRID) (page 228)	Vardište and OHL 400kV Požarevac 3 – Jagodina 4	
EMS	“Serbia plans 4 corridors of power interconnections with neighbouring countries: - Transbalkan Corridor (phase 1 and 2), - Pannonian Corridor, - North CSE Corridor, and - Central Balkan Corridor” (page 225)	“Phase 1 and 2” next to the Transbalkan Corridor should be removed, considering that the second phase has outgrow into other standalone projects. Also, the new interconnection line between Serbia and Croatia should be added.	It is added in the revised report.
AERS	Picture 4.49, (Chapter 4, page 221 in English and 235 in Serbian version)	Losses in 2020 are not correct. Total losses in 2020 were 13%, with 11.23% for DSO.	Data was checked and correction was made.
AERS	Page 222, Chapter 4.5.1, second paragraph: “EMS is also responsible for balancing the system and organizing the provision of ancillary services for frequency and voltage regulation...”	Bold part of the sentence is incorrect.	This comment is not clear, being that there are no bold parts of the sentence in the plan. Comment is accepted and the INECP text is edited.
AERS	Chapter 4, page 228	Three electrical energy projects are listed in the gas section of the text.	This comment is not clear, being that the first two lists are listing electrical energy projects and the third list is listing gas projects. INECP text is revised.
EBRD	The buildout of RES capacity (p. 193-195), in particular that of solar capacity, seems to be strongly backloaded (most change is projected to happen between 2045 and 2050). It would be better to smoothen the buildout path.	In terms of cumulative CO2 emissions, frontloading would make the RES assets more effective. Also, the notion that almost everything will happen towards the very end of the time horizon makes the 2050 target prone to failure	The key reason for this backloading is the consideration of exploring first the wind potential which seems to be more cost effective and then explore the solar potential as the investment costs are projected to decrease considerably in the longer term.

stakeholder	comment	explanation	response
			It should be underline that the projection after 2030 represents a vision.
EBRD	Section 4.1 does the evolution of industrial subsectors factor in changes related to CBAM - please consider expending/ providing information to that effect in the draft NECP?	The graphs show growth of outputs for energy intensive subsectors. However, given higher carbon intensity of these in Serbia than many other producers in the EU/other markets, substantive investments for emissions reduction would be needed to make exports costcompetitive	The long-term effect of CBAM is not included in the analysis because this regulation was adopted in May 2023 at the EU level, and the Republic of Serbia has yet to determine how this regulation will be implemented in Serbia. It is a special analysis that should include all industries that are subject to CBAM.
EBRD	Page 199 – For district heating systems it is envisaged to decrease total production capacity from 7.4 to 6.3GW and keep the share of natural gas at the level of 92% by 2050.	This is extremely unusual and not aligned with EU regulation that demands at least 50% of RES and or waste heat share or 75% of CHP in DH systems by 2030. It is also not aligned with Serbia committed to a course for 2050 climate neutrality per Sofia and Berlin Declarations.	The comment has been considered. All available data was used according to the data on the basis of which reporting on heating plants is done for the EUROSTAT and IEA. One should have in mind that INECP document is focused on and defines targets for 2030, while the period up to 2050 represents the vision and these targets are not binding. When it comes to district heating systems, based on the available information, there is a study that proposes the possible development of district heating systems and it has been taken into consideration. Please note

stakeholder	comment	explanation	response
			that heat energy is within the responsibility of local self-government units and that a large number of local self-government units do not have development plans.
CEKOR	<p>Chapter 4, page 183: The unacceptability of such planning, where it is confirmed that it is impossible to do a separate strategy in a valid and acceptable way, even with such a wide territorial scope as the INECP, is especially expressed in table 4.2 on page 183, where we do not know from which source and with what right dramatic increase in the production of minerals such as copper is foreseen and introduces from 2030, despite wide national opposition, a significant amount of lithium and borate. It is completely clear and obvious to everyone that the production of copper in the Bor region is carried out without a spatial plan of the Republic of Serbia, which leaves it up to the corporate policy of a private company to decide how, how much and where to mine copper. We have to mention that while we are writing this, huge parts of Zijin's business are not regulated by the spatial plan, mining and other projects are being developed without a spatial plan, impact assessment, project. In this context, a dramatic multiple increase in production (not a few percent but several times) must be considered unacceptable. Zijin's private interest must not be above the interest of decarbonization or the</p>	<p>Indicate clearly and unambiguously what are the purpose and goal of these plans, and clearly state whether all mines are to be closed or whether they are only going to recultivate the exhausted ones, that is, to use ashpit cassettes that have already been filled. It should also be made clear whether the INECP prevents the mining of coal after 2050 and if not, what quantities of coal are expected to be mined by years from 2024 to 2050 and after that.</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. They are projections of industrial</p>

stakeholder	comment	explanation	response
	<p>ecological sustainability of life in Eastern Serbia. Regarding Lithium and Borate, it is completely clear that there are spatial plans for the mines of those dimensions that are planned there; that it would be necessary to provide at least several hundred megawatts of new production facilities for them, and since the citizens of Serbia have made it clear that they are against lithium and borate mining, then this item must be completely removed from INECP. The energy consumption tables must also be changed, as well as the estimated GDP, because without these few mines the balances are completely different.</p>		<p>development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>
CEKOR	<p>Chapter 4, page 202: The level of ambition in shutdown of coal facilities is unacceptable. It is not clear why the document dealing with decarbonization of energy sector is leaving a scenario even with the increase of installed power of coal power plants. From the list of facilities, it is clear that construction of additional facilities is planned.</p>	<p>Completely eliminate the scenario according to which Serbia will practically continue to emit even more CO2 in 2050 than today.</p>	<p>The comment refers to the Scenario with high emissions in the Scenario "with existing measures (WEM)" without any foreseen emission reduction measures. It is used for comparison with scenario S where measures are applied to reduce emissions by fostering RES and energy efficiency. The only reason for the presentation of this scenario is to show that there is a commitment to the change of the current trends in the S scenario.</p>
EMS	<p>On page 223 (Chapter 4.5), we ask that footnote no. 85 is corrected so that, instead of: " ... Ten-year network development plan of the Republic of Serbia 2021-2030." ", it says: " ... Plan for the</p>		<p>Comment is accepted and the INECP text is edited.</p>

stakeholder	comment	explanation	response
	development of the transmission system of the Republic of Serbia for the period from 2021 to 2030 ". The change is required so that the reference is in line with the official title of the referenced document.		
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 4, page 183: In initial documentation basis the data on energy intensive industry production is not correct	<p>In table 4.2: Evolution of physical output of energy intensive industrial subsectors until 2050, data on copper production is given. It is not clear whether it is metallurgical production of cathode copper or total metallurgical and mining production.</p> <p>If it is the production of cathode copper, these data are also incorrect. The production of cathode copper in 2021 reached almost 80,000 tons according to the report of Serbia Zijin copper doo. In 2022, a new copper smelter with a capacity of 200,000 tons of cathode copper was built. In 2023, until the new plant is established, production will surely be over 100,000 tons. In 2024, it will probably achieve a production of 200,000 tons. The data on production are not correct, especially that in 2050 production will amount to 188,000 tons, because next year it will be higher, 200,000 tons.</p> <p>In addition to the metallurgical production of cathode copper, copper ore is produced and exported. The total production of copper in mines and the final production of</p>	These were projections of industrial development in the context of possible energy needs analysis. The document has been corrected.

stakeholder	comment	explanation	response
		cathode copper is already almost several times higher than the data given in the table.	
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 4, page 188: Graph 4.7: CO2 emissions by sector over 2020-2050, based on documentation, gives no data on CO2 emissions for the mining sector.	The mining of metals and non-metals is carried out by machines and vehicles with internal combustion engines and is a sector with high CO2 emissions. Failure to consider these emissions is unjustified, and without calculating these values, it is not possible to create an appropriate program.	Mining activities are reported under Industry following the international conventions for energy and emissions reporting. These include emissions from energy use in the mining sector for all uses (including operation of mobile and stationary equipment)
Green List of Serbia, Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno	Chapter 4, page 190: Graph 4.9: N2O emissions by sector over 2020-2050, gives no data on N2O emissions for the mining sector and incorrect data of the Industrial sector.	Mining uses explosives in metal and non-metal mines. The use of these explosives creates N2O, which is emitted into the atmosphere. These are significant quantities that haven't been considered. The construction of a new smelting plant in Bor will increase the emission of N2O in 2024 by 6 times compared to 2022, according to the data of The Mining and Metallurgy Institute, which are given in the Air Quality Plan for the Bor Agglomeration.	The mining sector is included in the emissions reports as part of the industrial sector according to the reporting methodology. The N2O emissions shown are from energy use only. The remaining emissions are presented as CO2eq according to data from the National Determined Contribution (NDC) and Low Carbon Development Strategy documents.
Arbajter Dušan svabonezi@gmail.com	Chapter 4, page 183: Exploratory mining drill holes of lithium & boron in Lukavac.	In 2022 after the damage caused to the properties, further research was banned! What a disaster would it be if the Mines started!	Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP,

stakeholder	comment	explanation	response
			<p>there is not a single measure, policy, or target that refer to the plans related to lithium. They are projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>
<p>Arbajter Dušan svabonezi@gmail.com</p>	<p>Chapter 4, page 183: The lithium & boron mine, either surface or deep, will not pass in the Valjevo region!</p>	<p>For Serbia and its people, the only sustainable investment for the future is in agriculture - wheat, corn, raspberries, blueberries, etc.</p>	<p>Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>
<p>RERI</p>	<p>Chapter 4, page 183: Industry modeling inputs are not reliable or accurate</p>	<p>The sources of the data used as input for the modeling tools used in the projections for the development of energy-intensive</p>	<p>The analysis of the scenario, and in that sense, the definition of the input data for the modeling</p>

stakeholder	comment	explanation	response
		<p>industries are not clear. Table 4.2: Evolution of physical output of energy intensive industrial subsectors until 2050, which states a significant increase in physical production of steel, copper, lithium, boron and cement, does not indicate the source of the data. During the public consultations on the scenarios, it was stated that these data were obtained from relevant stakeholders. The applicant, first of all, points out that every assumption must have a clear source of data, and that data collection based on investors' expectations cannot be considered reliable. The aforementioned is easily proven – for example the data related to the physical production of copper is not correct. Namely, the table states that in 2050, 180,000 tons of copper is expected per year, and a simple look at the central register for issuing building permits and the website of the Ministry of Environmental Protection shows that only the company Zijin Bor Copper has already implemented the project to increase capacity of the copper smelter in Bor to 200,000 tons. Furthermore, by simply looking at the web presentation of the title authority responsible for drafting the plan, it can be concluded that the said information was known to them, bearing in mind that the Minister of Mining and Energy ceremoniously put the illegally built copper</p>	<p>has been done actively since April 2021. The Ministry already responded to these comments to RERI in February 2022, and the response was posted on the Ministry's website.</p>

stakeholder	comment	explanation	response
		<p>smelter into trial operation. Further, bearing in mind that the Regulation, which repealed the regulation establishing the spatial plan of the special purpose area for the implementation of the "Jadar" project, is in force. Therefore, it is not clear how the exploitation of 600,000 t of lithium in 2030 was estimated? On the basis of consultations with which actors did the relevant ministry obtain this data? It is necessary to conduct realistic calculations based on verified data. Without the aforementioned data, it is impossible to make a realistic analysis of the expected increase in production from the industry and, consequently, an estimate of the expected increase in GHG emissions from the industry. Without adequate assessments, it is impossible to predict adequate measures and activities that will contribute to the reduction of GHG emissions originating from industry.</p>	
RERI	<p>Chapter 4, page 185, table 4.3: Based on which input data has the Proposer foreseen increase in hard coal prices in the period after 2030?</p>		<p>As it is mentioned in the text the INECP analysis was performed using the projections of international prices according to the document "Recommended parameters for reporting on GHG projections in 2023, EC DG Climate Action" which was provided by the EU in order to support Member States and</p>

stakeholder	comment	explanation	response
			other bodies in the EU (e.g. the EnC Secretariat) to revise their INECPs. Therefore the increase in the prices of coal, gas and oil are coming from the EU proposed values.
RERI	Chapter 4, pages 198-199, graph 4.21: The proposer foresees the share of natural gas in the installed capacity of heating plants which will remain stable at the level of 92% in 2020, 2030 and until 2050.	It is stated that it is "expected" that the share of natural gas in the installed capacity of heating plants will remain stable at the level of 92% in 2020, 2030 and until 2050. Therefore, the share of RES in district heating is not expected to increase. Hence, it is unclear what is the purpose of the mentioned INECP policy measures related to district heating. Namely, the policy measure PM_D32 is entitled "Facilitating the penetration of RES into district heating networks" whose goal is to increase the share of RES in heating and cooling, although the share of natural gas is expected to remain stable? This measure envisages an additional increase in renewable energy technologies in existing and planned district heating systems in the period from 2025 to 2030. However, we would like to draw your attention to the fact that a symbolic 8 million euros have been marked as implementation costs for this measure. It is also unclear what are the effects of policy measures related to heating and cooling, "encouraging an increase in the number of nearly zero-energy buildings by	The comment has been considered. All available data was used according to the information reported on heating plants for the EUROSTAT and IEA. One should have in mind that INECP document is focused on and defines targets for 2030, while the period up to 2050 represents the vision and the projections after 2030 are not binding. Please note that heat energy is within the responsibility of local self-government units and that a large number of local self-government units do not have development plans.

stakeholder	comment	explanation	response
		<p>applying cost-effective packages of measures", if the share of gas in district heating is stable? Measure PM_D30 entitled "Promotion of RES for heating and cooling in new and renovated buildings" refers to enabling the application of RES technologies in the field of heating and cooling. Here is important to mention the Law on Amendments to the Law on Planning and Construction, which was recently adopted. Namely, following amendments to Article 91 are foreseen:</p> <p>"All owners of buildings in the territory, or part of the territory of the local self-government unit, which is communally equipped for construction and use, and especially which has the existing infrastructure of water supply, sewerage, gas pipelines and district heating, are obliged are to be connected to the existing infrastructure."</p> <p>If these provisions of the law are applied and following the estimates from the draft INECP on the stable level of the share of natural gas in district heating systems, we conclude that all buildings will be connected to natural gas, so the purpose of measures enabling the introduction of RES in district heating systems or measures to encourage RES for heating and cooling in new and renovated buildings is unclear.</p>	

stakeholder	comment	explanation	response
RERI	Chapter 4, page 221, graph 4.49: Which measures will lead to reduced total losses of electricity network until 2025?		A gradual reduction of network losses was considered, consistent with the inputs EMS and EPS. Chapter 3 presents the measures in detail.
EPS Scientific Council	Chapter 4, page 213: Energy scenarios: There is an inconsistency regarding the choice of reference energy scenario. Scenarios WAM, WEM, scenario S, scenario SN are mentioned, and the text on page 213 also mentions scenarios 4 and 5 in a very unclear context. As the scenarios are not clearly presented, it is difficult to judge the choice made of the reference scenario WAM, because for unknown reasons it was combined with the abandoned scenario WEM, so in order to understand the choice as a whole, one must rely on intuition and the context in which they were used for defining the measures and projects needed to implement the transition.		Thank you for the comment. The Scenarios 4 and 5 on page 213 refer to the Long Term Renovation Strategy published by the Min. of Construction. The scenario With Additional Measures (WAM) is Scenario S with one variation SN after 2035. The scenario With Existing Measures (WEM) must be presented in the INECP for comparison reasons according to the guidelines. The text is revised accordingly to clarify these points.
EPS Scientific Council	Chapter 4, pages 193, 206: Energy mix for electricity production: In general, it can be concluded that the capacities, like last time, are adjusted to obtain the predetermined output. INECP predicts that the installed capacity of lignite power plants will increase from 3.6 GW in 2020 to 4.5 GW in 2050, showing the largest contribution in the total installed capacity for electricity (page 193). It is illogical that the capacity of what should be		The comment refers to the chapter which presents the results of the reference scenario and not the scenario on the basis of which the targets for 2030 are defined. The text is supplemented with tables with a clear overview of the results per scenario.

stakeholder	comment	explanation	response
	<p>reduced increases (and not "a low" as it is written in the text) but by 25%, and it may seem that this contradicts the set goals if it is not assumed that the shutdown of power plants remains as a security reserve and/or inertial support for the growing share of variable production from RES. From figure 4.16, it can be guessed that a minor closure of some capacities is predicted, and, in order to adjust the results from 2045 to 2050, a sharp jump in RES production capacities is predicted from 4.7 GW to 7.3 GW, and so the share of coal in the production mix of electricity falls from 41-42% to 33%. Similar can be seen in figure 4.29.</p>		
<p>EPS Scientific Council</p>	<p>Chapter 4, page 199:</p> <p>Oil, derivatives, and natural gas: It is unclear why the share of oil and oil derivatives in the district heating sector remains constant (6%) until 2050 (Figure 4.21), when there are already numerous projects of gasification, introduction of heat pumps and similar solutions for these needs, while gas consumption is predicted to fall, which should not be the goal if gas is an "acceptable fuel", and the share of oil and oil derivatives remains constant.</p>		<p>The comment refers to the chapter which presents the results of the reference scenario and not the scenario on the basis of which the targets for 2030 are defined. The text is supplemented with tables with a clear overview of the results per scenario.</p>
<p>EPS Scientific Council</p>	<p>Chapter 4, page 215:</p> <p>Import dependence: One of the major objections to the INECP proposal is that there is no parallel presentation</p>		<p>The text is supplemented with tables with a clear overview of the results per scenario. A multicriteria analysis was applied in the steps preceding</p>

stakeholder	comment	explanation	response
	<p>of the results for all considered scenarios so that they could be compared from the important point of view of energy dependence. For example, results were given according to which energy dependence will increase from the current 33-34% to 45% in 2050, mainly due to the increase in oil and natural gas imports, and it is not clear whether this is according to the WAM scenario or the S scenario, i.e. SN with nuclear energy, which shows the best results on those graphs where it is shown (it is not shown on all graphs as stated) thanks to Eurostat's provision that uranium is not included in imports because spent fuel is recycled. The assessment of the choice of the most favorable variant was not performed using any of the multi-criteria decision-making methods, as it was done before.</p>		<p>the selection of scenario S in order to filter it from a large set of scenarios analyzed during the last two years. This cannot be included in the INECP in accordance with the reporting guidelines.</p>
<p>dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović</p>	<p>Chapter 4, page 187:</p> <p>It is stated: As presented in Figure 4.7, the CO2 emissions from energy use are projected to increase by 17.7% at 60.44 Mt CO2 in 2030, and by 32.3% at 67.9 Mt CO2 in 2040, compared to 2020 levels.</p> <p>An upward trend is foreseen between 2025 and 2045 mainly due to the economic development as demonstrated by the increase of the various parameters such as GDP, sectoral GVA and GDP per capita and the continuation of the use of lignite fired power plants. The decline of CO2 emissions from 2045 to 2050 is explained by the</p>	<p>Projections predict the growth of CO2 emissions until 2030 and 2040, which is justified by economic development. However, indicators from the previous period indicate that the growth of GDP and sectoral GDP has no impact on CO2 emissions, that is, that the emission was on a similar level. How do you justify the growth of emissions according to the projections made, especially if you consider that there is no medium- and long-term economic development plan? Why wait until 2045 to implement improved and advanced technologies? What will happen significantly</p>	<p>The graph presents the projection for the scenario With Existing Measures (WEM) which does not include additional measures and includes the continuation of the use of lignite for electricity generation and a slow penetration of efficient technologies and EE measures. WEM is presented in the document as required by the guidelines for the INECP.</p>

stakeholder	comment	explanation	response
	considerable deployment of improved and advanced technologies and energy carriers that are less or no carbon-intensive, such as renewables and natural gas as part of the overall technological replacement. Finally, the CO2 emissions are projected to be stabilised at the level of 66.9 Mt CO2 in 2050.	then, which could not happen, for example. 2040 or earlier?	
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 4, page 188: GHG emissions are according to "current situation and projections with existing policies and measures" scenario rising until 2045. The result is that in 2045 we have 37 percent more emissions than in 2020. At the same time, emissions in the electricity production sector increases by as much as 33%. Does this "current scenario" negate reality since there does not seem to be a realistic possibility that, considering all the circumstances, such a scenario could play out in Republic of Serbia even without the implementation of INECP, especially if you take into account the trend of falling RES prices, the existing desire of the population and industry to invest in RES, as well as the introduction of a tax on CO2 emissions?	For example, for the period from 2020 to 2040, while INECP of Republic of Serbia predicts growth of 32%, INECP of Republic of Croatia predicts a drop in emissions by around 13% under the same "current situation" scenario. The scenario of the current situation should not be the worst possible scenario, but the most likely scenario that is realistic and will take place without implementing such a plan.	The graph presents the projection for the WEM scenario which does not include any additional measures therefore no-carbon pricing is included. It is used as a reference to measure the achievements of the Scenario-S where measures are implemented for carbon pricing, RES penetration, EE investments etc.
mayacvetinovic@gmail.com	Chapter 4, pages 182-183: Request for deletion of lithium/boron and related products from pages 182 and 183 and from the whole document.	Since the Decree of the Government of the Republic of Serbia on January 20, 2021, the "Jadar" project was canceled and that the conclusion of Serbian Academy of Sciences and Arts was that this project, like any other lithium exploitation project, would be harmful with irreversible consequences.	The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of

stakeholder	comment	explanation	response
		<p>Mining, and especially the exploitation of raw materials whose extraction requires aggressive chemical processes, is not green, nor it can ever be. At the beginning of the document, you refer, among other things, to the Paris Agreement, with which this project is in direct conflict. The exploitation of lithium/boron and other related products is in direct opposition to the Paris Agreement and Climate Justice. You also talk about afforestation (which is positive), but you need to think a little about reducing forest cutting, especially in areas that are abundant with healthy forests and nature as well as clean water and that represent habitats of protected plant and animal species, such as in the case of Rađevina and Jadar. For the purpose of preserving the habitats of protected species in Rađevina and Jadar, the association "Let's Protect Jadar and Rađevina" is conducting the procedure as the applicant of the Complaint at the Secretariat of the Berne Convention, which the Republic of Serbia has signed, ratified, and is obliged to apply, and this procedure is still ongoing. We would like to remind you that the Republic of Serbia has stated decisively and unequivocally in every statement regarding that Complaint to the Secretariat of the Berne Convention that the "Jadar" project has been permanently canceled and that the Government of the</p>	<p>the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>Republic of Serbia remains committed to maintaining its decision.</p> <p>You may not be aware, but parts of Cer (mountain) were recently placed under the protection of the Republic of Serbia, even though they were already under international protection as an IBA (Important Bird Areas) area, and parts of Cer were in the disputed and now canceled Spatial plan of the special purpose area for the "Jadar" project. Of the 1,830 hectares of the landscape of exceptional features Tršić-Tronoša (first category of protection), 1,010 hectares were in the area of the aforementioned Spatial plan of the special purpose. This could only happen once because the institutions of the state were occupied, and the people were not aware of these criminal intentions. We assure you that such a thing cannot and will not happen again.</p> <p>When we are on the subject of public awareness, the public is not sufficiently, or rather not at all, familiar with the INECP or the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050. You are talking about the exploitation of lithium/boron and other related products without even thinking of informing the people whose properties, lives and futures are at stake, and thus you are again violating</p>	

stakeholder	comment	explanation	response
		<p>the Aarhus Convention, to which the Republic of Serbia is a signatory. The local self-government did not inform the local community in any way, and therefore if it is planned to keep this INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050, written in this way, lithium/boron and other related products must be removed from it because informing the public about the work of all government bodies is a principle confirmed by all relevant international and domestic legal documents - the European Charter on Local Self-Government of the Council of Europe, the Constitution of the RS, the Law on Local Self-Government, which in our country prescribes informing the public about the things that are important for the local community. The fact that you have listed a couple of non-governmental organizations in the document is for us who live in Jadar and Rađevina nothing more than pretending to be transparent. A really rough violation. To make matters worse, you first conducted public consultations (obviously with a selected audience) and we as the general public were not informed about it and now you have left us only the option to write these comments.</p> <p>We sincerely hope that the decision-makers</p>	

stakeholder	comment	explanation	response
		will have enough sense and will to do the right thing this time, in terms of Law and Justice, and delete lithium/boron and related products from INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030 including the projections until 2050, because Jadar and Rađevina have another purpose, and we will not allow any document or intention that suggests the extraction of lithium/boron and other related products.	
Let's Protect Jadar and Rađevina, nikorade1918@gmail.com, rakicmarinko4@gmail.com, tomicko2000@gmail.com, jadranka.bramwell@gmail.com	Chapter 4, pages 182-183, 51: Request for deletion of lithium/boron and related products from pages 182 and 183 and from the whole document.	Since the Decree of the Government of the Republic of Serbia on January 20, 2021, the "Jadar" project was canceled and that the conclusion of Serbian Academy of Sciences and Arts was that this project, like any other lithium exploitation project, would be harmful with irreversible consequences. Apart from the fact that the lithium and boron exploitation project does not exist in Serbia, and we, as a local association and members of the local community, assure you that there would not ever be one, it is now widely known that mining, and especially the exploitation of raw materials whose extraction requires aggressive chemical processes, is not green, nor it can ever be. At the beginning of the document, you refer, among other things, to the Paris Agreement, with which this project is in direct conflict. The exploitation of	The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining

stakeholder	comment	explanation	response
		<p>lithium/boron and other related products is in direct opposition to the Paris Agreement and Climate Justice. You also talk about afforestation (which is positive), but you need to think a little about reducing forest cutting, especially in areas that are abundant with healthy forests and nature as well as clean water and that represent habitats of protected plant and animal species, such as in the case of Rađevina and Jadar. For the purpose of preserving the habitats of protected species in Rađevina and Jadar, the association "Let's Protect Jadar and Rađevina" is conducting the procedure as the applicant of the Complaint at the Secretariat of the Berne Convention, which the Republic of Serbia has signed, ratified, and is obliged to apply, and this procedure is still ongoing. We would like to remind you that the Republic of Serbia has stated decisively and unequivocally in every statement regarding our Complaint to the Secretariat of the Berne Convention that the "Jadar" project has been permanently canceled and that the Government of the Republic of Serbia remains committed to maintaining its decision.</p> <p>You may not be aware, but parts of Cer (mountain) were recently placed under the protection of the Republic of Serbia, even though they were already under international protection as an IBA</p>	<p>activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised withre projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>(Important Bird Areas) area, and parts of Cer were in the disputed and now canceled Spatial plan of the special purpose area for the "Jadar" project. Of the 1,830 hectares of the landscape of exceptional features Tršić-Tronoša (first category of protection), 1,010 hectares were in the area of the aforementioned Spatial plan of the special purpose. This could only happen once because the institutions of the state were occupied, and the people were not aware of these criminal intentions. We assure you that such a thing cannot and will not happen again.</p> <p>When we are on the subject of public awareness, the public is not sufficiently, or rather not at all, familiar with the INECP or the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050. You are talking about the exploitation of lithium/boron and other related products without even thinking of informing the people whose properties, lives and futures are at stake, and thus you are again violating the Aarhus Convention, to which the Republic of Serbia is a signatory. The local self-government did not inform the local community in any way, and therefore if it is planned to keep this INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to</p>	

stakeholder	comment	explanation	response
		<p>2030, including the projections up to 2050, written in this way, lithium/boron and other related products must be removed from it because informing the public about the work of all government bodies is a principle confirmed by all relevant international and domestic legal documents - the European Charter on Local Self-Government of the Council of Europe, the Constitution of the RS, the Law on Local Self-Government, which in our country prescribes informing the public about the things that are important for the local community. The fact that you have listed a couple of non-governmental organizations in the document is for us who live in Jadar and Rađevina nothing more than pretending to be transparent, what we claim as an association of citizens and as residents of the mentioned areas and as owners of the estates about which you tried to make a decision without consulting us. A really rough violation.</p> <p>To make matters worse, you first conducted public consultations (obviously with a selected audience) and we, as an association, as well as the general public, were not informed about it and now you have left us only the option to write these comments.</p> <p>From all the aforementioned reasons, INECP, i.e. the Integrated National Energy</p>	

stakeholder	comment	explanation	response
		<p>and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050, in the current form is not legitimate and it is not even legal for the reason that it decisively states the so-called "Kosovo" as a state of the Western Balkans on page 51, where the asterisk in the footnote does not erase the fact that this act is considered a violation of the Constitution, and is also found in the Criminal Code of the Republic of Serbia, which treats such "outbursts" as Endangering the territorial integrity and Attack on constitutional arrangement or popularly said as treason. Are you, knowingly or unknowingly, introducing "Kosovo" through the back door where it does not belong? Kosovo and Metohija are constituent and integral part of the Republic of Serbia and cannot be mentioned otherwise.</p> <p>We sincerely hope that the decision-makers will have enough sense and will to do the right thing this time, in terms of Law and Justice, and delete lithium/boron and related products from INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030 including the projections until 2050, because Jadar and Rađevina have another purpose, and we will not allow any document or intention that suggests the</p>	

stakeholder	comment	explanation	response
<p>Čuvari Petruške krajine</p>	<p>Chapter 4, pages 182-183, 51: Request for deletion of lithium/boron and related products from pages 182 and 183 and from the whole document.</p>	<p>extraction of lithium/boron and other related products.</p> <p>Since the Decree of the Government of the Republic of Serbia on January 20, 2021, the "Jadar" project was canceled and that the conclusion of Serbian Academy of Sciences and Arts was that this project, like any other lithium exploitation project, would be harmful with irreversible consequences. Apart from the fact that the lithium and boron exploitation project does not exist in Serbia, and we, as a local association and members of the local community, assure you that there would not ever be one, it is now widely known that mining, and especially the exploitation of raw materials whose extraction requires aggressive chemical processes, is not green, nor it can ever be. At the beginning of the document, you refer, among other things, to the Paris Agreement, with which this project is in direct conflict. The exploitation of lithium/boron and other related products is in direct opposition to the Paris Agreement and Climate Justice. You also talk about afforestation (which is positive), but you need to think a little about reducing forest cutting, especially in areas that are abundant with healthy forests and nature as well as clean water and that represent habitats of protected plant and animal species, such as in the case of Rađevina and Jadar. For the</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected.</p>

stakeholder	comment	explanation	response
		<p>purpose of preserving the habitats of protected species in Rađevina and Jadar, the association "Let's Protect Jadar and Rađevina" is conducting the procedure as the applicant of the Complaint at the Secretariat of the Berne Convention, which the Republic of Serbia has signed, ratified, and is obliged to apply, and this procedure is still ongoing. We would like to remind you that the Republic of Serbia has stated decisively and unequivocally in every statement regarding our Complaint to the Secretariat of the Berne Convention that the "Jadar" project has been permanently canceled and that the Government of the Republic of Serbia remains committed to maintaining its decision.</p> <p>You may not be aware, but parts of Cer (mountain) were recently placed under the protection of the Republic of Serbia, even though they were already under international protection as an IBA (Important Bird Areas) area, and parts of Cer were in the disputed and now canceled Spatial plan of the special purpose area for the "Jadar" project. Of the 1,830 hectares of the landscape of exceptional features Tršić-Tronoša (first category of protection), 1,010 hectares were in the area of the aforementioned Spatial plan of the special purpose. This could only happen once because the institutions of the state were</p>	<p>Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>occupied, and the people were not aware of these criminal intentions. We assure you that such a thing cannot and will not happen again.</p> <p>When we are on the subject of public awareness, the public is not sufficiently, or rather not at all, familiar with the INECP or the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050. You are talking about the exploitation of lithium/boron and other related products without even thinking of informing the people whose properties, lives and futures are at stake, and thus you are again violating the Aarhus Convention, to which the Republic of Serbia is a signatory. The local self-government did not inform the local community in any way, and therefore if it is planned to keep this INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050, written in this way, lithium/boron and other related products must be removed from it because informing the public about the work of all government bodies is a principle confirmed by all relevant international and domestic legal documents - the European Charter on Local Self-Government of the Council of Europe, the Constitution of the RS, the Law on Local Self-Government,</p>	

stakeholder	comment	explanation	response
		<p>which in our country prescribes informing the public about the things that are important for the local community. The fact that you have listed a couple of non-governmental organizations in the document is for us who live in Municipality of Paraćin nothing more than pretending to be transparent, what we claim as an association of citizens and as residents of the mentioned area and as owners of the estates about which you tried to make a decision without consulting us. A really rough violation.</p> <p>To make matters worse, you first conducted public consultations (obviously with a selected audience) and we, as an association, as well as the general public, were not informed about it and now you have left us only the option to write these comments.</p> <p>From all the aforementioned reasons, INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030, including the projections up to 2050, in the current form is not legitimate and it is not even legal for the reason that it decisively states the so-called "Kosovo" as a state of the Western Balkans on page 51, where the asterisk in the footnote does not erase the fact that this act is considered a violation of the Constitution, and is also found in the</p>	

stakeholder	comment	explanation	response
		<p>Criminal Code of the Republic of Serbia, which treats such "outbursts" as Endangering the territorial integrity and Attack on constitutional arrangement or popularly said as treason. Are you, knowingly or unknowingly, introducing "Kosovo" through the back door where it does not belong? Kosovo and Metohija are constituent and integral part of the Republic of Serbia and cannot be mentioned otherwise.</p> <p>We sincerely hope that the decision-makers will have enough sense and will to do the right thing this time, in terms of Law and Justice, and delete lithium/boron and related products from INECP, i.e. the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030 including the projections until 2050, because Jadar and Rađevina have another purpose, and we will not allow any document or intention that suggests the extraction of lithium/boron and other related products.</p>	
<p>dusicalekic@gmail.com, dmagroteka@gmail.com</p>	<p>Chapter 4, pages 182-183, 51: Request for deletion of lithium/boron and related products from pages 182 and 183 and from the whole document.</p>	<p>By the Decree of the Government of the Republic of Serbia dated January 20, 2021. The "Jadar" project was canceled. The Government of RS recognized the disagreement of the local community with the possibility of opening a mine in that area. Despite the "assurances" of the company itself in the "safety" of the</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants</p>

stakeholder	comment	explanation	response
		<p>technology that would be used in the exploitation of ore, not a single study was in favor of it. Serbian Academy of Sciences and Arts itself concluded that the project would be harmful with long-term consequences. In fact, everything within a radius of 200 km from the mine would be exposed to the influence of the mine, including Belgrade and Novi Sad as our two largest cities. The representatives of the company Rio Sava, which would do ore exploitation, cannot give an assessment of the consequences that, for example, sulfuric acid alone would leave in the watercourses of the Jadar and Drina rivers, and to what extent the biodiversity of the rivers would be threatened, as well as the water supply of the cities in the Drina basin.</p> <p>I would like to mention that the Spatial plan of the special purpose area includes an area that is mostly a protected area as a landscape of exceptional features or includes protected cultural and historical monuments, such as the Tronoša monastery, the village of Tršić, the area of Mountain Cer.</p> <p>Given that the Government of the Republic of Serbia has stated several times before international institutions that the lithium mine project in Jadar and Rađevina has been canceled, I think there is no point in having a debate on that topic. In this connection, the</p>	<p>operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050.</p> <p>Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected.</p> <p>Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>question of the legitimacy of INECP itself is also raised because on page 51 you clearly state Kosovo as a country of the Western Balkans, which is contrary to the Constitution of the Republic of Serbia, which unequivocally states that Kosovo is part of the Republic of Serbia. In this way, you are in collision with the Constitution of your own country, about whose climate/energy plan you are debating.</p>	
<p>Marš sa Drine, UDRUŽENJE ZA ZAŠTITU ŽIVOTNE SREDINE - AEP</p>	<p>Chapter 4, page 183: In INECP of the Republic of Serbia for the period until 2030, on page 183 is table 4.2 The table shows the projection of the production of lithium/boron and related products of 600 kt, starting from 2030. What is the projection based on, considering that there is no production of boron and lithium in Serbia and that during 2022 all relevant political subjects in Serbia declared that they are against mining/production of boron and lithium?</p>	<p>1) the mining of boron and lithium is extremely harmful and dangerous for the environment and human health, as stated by scientists from Serbian Academy of Sciences and Arts. 2) in Serbia, the Spatial Plan of the Special Purpose Area for the purpose of the "Jadar" Project had already been adopted, which ceased to be valid, as well as the entire Project. (Regulation on terminating the Regulation on establishing the Spatial Plan of the special purpose area for the realization of the "Jadar" project of exploitation and processing of jadarite mineral (Official Gazette No. 8 of January 20, 2022). This project has been suspended for the reason that all relevant political factors in Serbia saw the harmful effects of boron and lithium mining on the environment and human health. On that occasion, both the residents of the region where the mining</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP,</p>

stakeholder	comment	explanation	response
		was planned and the environmental associations clearly expressed a negative attitude towards the mining of boron and lithium;	there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.
Marš sa Drine, UDRUŽENJE ZA ZAŠTITU ŽIVOTNE SREDINE - AEP	Chapter 4, page 183: Which deposits of boron and lithium and in which parts of Serbia were considered while making this projection?	3) in Serbia, there is not a single valid license for the mining of lithium, boron and related products; 4) In 2022, a people initiative was submitted to the National Assembly of the Republic of Serbia, signed by over 30,000 citizens of Serbia, requesting a ban on boron and lithium mining. With this projection, the decision of the National Assembly is completely unfounded prejudicial.	The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject

stakeholder	comment	explanation	response
			of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. They are projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.
PRVI PRVI NA SKALI, Alliance of Environmental Organizations of Serbia (SEOS)	Chapter 4, page 182: On figure 4.4 “Evolution of physical output of energy intensive industrial subsectors until 2050 (Sources: projections based on the SSP scenarios)” it is shown that from 2030 there will be production of lithium/boron and related products.	Explanation is unified. In addition to the above picture and table, in the text of the INECP Proposal, there is no "origin" of the production of lithium/boron and related products - neither where it will be produced in Serbia, nor who will produce it. Lithium production should not be included in the Proposal due to several facts. 1) In January 2021, the Government of Serbia revoked the Regulation on establishing the Spatial Plan of the special purpose area for the realization of the “Jadar” project of exploitation and processing of jadarite mineral, from February 13, 2020. Accordingly, the Prime Minister of Serbia said at the press conference after the Government session that the Spatial Plan for	The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject

stakeholder	comment	explanation	response
		<p>Jadar no longer exists and that all administrative acts related to Rio Tinto - all permits, solutions, and decisions - have been annulled.</p> <p>2) In 2021, the Basic court in Valjevo banned all mining works of the Euro Lithium Balkan company, due to borehole for the exploration of lithium reserves in the Kolubara valley. Both the soil and the wells are contaminated with pine, and not only the surface wells of the Jovanović family in Lukavac and Tadić in the village of Šuševka, but it has been laboratory confirmed that the water is also contaminated in the 120-meter-deep arterial well in the Arbajter family farm, which produces blueberries on four hectares in Lukavac. In their well, two and a half times higher concentration of boron than the maximum allowed was found, which jeopardizes every agricultural production.</p>	<p>of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>
<p>PRVI PRVI NA SKALI, Alliance of Environmental Organizations of Serbia (SEOS)</p>	<p>Chapter 4, page 183:</p> <p>In table 4.2 “Evolution of physical output of energy intensive industrial subsectors until 2050” it is stated that production of lithium/boron and related products in 2020 and 2025 doesn’t exist (zero kilotons), but for 2030 it states 600 kt, with the same amount for 2035, 2040, 2045 and 2050.</p>	<p>3) Water sampling of the Jadar River from 2021 showed that the concentration of boron was 17 times higher 20 kilometers downstream from the mining zone, where the boreholes of the Rio Tinto company are located, while the concentration of arsenic increased 9 times, and lithium three times, the results showed. of the scientific research "Influence of the investigation phase in the jadarite deposit area on the change in the content of arsenic, boron and lithium in the</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of the thermal power plants operation and electricity generation, which, in accordance with the target of</p>

stakeholder	comment	explanation	response
		<p>Jadar River" presented in The Serbian Academy of Sciences and Arts. The results were alarming, very toxic arsenic increased several times, but also lithium and boron. What was particularly worrisome was that these samples were taken from a site that was tens of kilometers downstream from the ore zone itself, where Rio Tinto/Rio Sava Exploration was exploring.</p> <p>The increased concentrations of lithium, boron, and arsenic in the Jadar River, as well as the opening of the issue of the quality of underground water from which the locals get their drinking water were discussed by the toxicologist Prof. Dr. Petar Bulat and biologist Prof. Dr. Predrag Simonović, who pointed out that there is a risk of the presence of these elements in well water - when lithium and boron enter the soil and water, they cannot be neutralized by natural purification alone, but remain in the ecosystem and permanently endanger it. As an example of devastation, Borska Reka, which became a "dead river, turned into wastewater", was mentioned.</p> <p>4) In the Conclusion of the Proceedings of The Serbian Academy of Sciences and Arts, published after the scientific-expert meeting "Project Jadar - what is known?" in 2021, among other things it says:</p>	<p>GHG emissions reduction, will decrease and stop the production by 2050. Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>"Implementation of the Jadar project would lead to massive devastation of space, a permanent change in the character of the landscape, degradation of biodiversity, soil, forests, surface and groundwater, displacement of the local population, cessation of sustainable and profitable agricultural activities and the establishment of a scenario of permanent risk to the health of residents of nearby villages and city of Loznica".</p> <p>"In the conditions of the widespread struggle for resources, visible climate changes and the reduction of the population of Serbia, the priority interest of Serbian society is the suppression of pollution and dirty technologies and the sustainable use of natural resources in a way that does not endanger the environment, does not lead to displacement and does not deprive future generations of life space, drinking water, healthy food, fertile land and preserved, clean and diverse nature".</p>	
PRVI PRVI NA SKALI, Alliance of Environmental Organizations of Serbia (SEOS)	<p>Chapter 4, page 182:</p> <p>On figure 4.4 "Evolution of physical output of energy intensive industrial subsectors until 2050 (Sources: projections based on the SSP scenarios)" it is shown that from 2030 there will</p>	<p>5) The people's initiative to amend the Law on Mining and Geological Research in order to ban exploration, exploitation and processing of boron and lithium on the territory of the Republic of Serbia was submitted to the National Assembly by the Alliance of Environmental Organizations of</p>	<p>The document Integrated National Energy and Climate Plan is not a document that defines the policy related to mining. Projections of coal production are related exclusively to the projection of</p>

stakeholder	comment	explanation	response
	<p>be production of lithium/boron and related products.</p>	<p>Serbia (SEOS) and “Kreni-promeni”, with the collected citizens' signatures.</p> <p>The addition of Article 4a to The law reads: "Applied geological research, exploitation and processing of boron and lithium ore are prohibited in the Republic of Serbia. The prohibition from paragraph 1 of this article applies on the day this law enters into force. Approvals for the performance of applied geological research, exploitation and processing of boron and lithium ore, valid on the date of entry into force of this law, cannot be extended".</p> <p>It is expected that the people's representatives will declare about the Initiative.</p> <p>5) Exploration and exploitation of lithium within the scope of the Spatial Plan of Rekovac is prohibited - it is written in the Draft which was open for public inspection. The procedure is ongoing. At the session held in 2021, the Rekovac Municipal Assembly passed a Conclusion on the initiation of the procedure for making amendments to the Spatial Plan of the Municipality of Rekovac with the aim of banning the exploration and exploitation of lithium, boron, and the accompanying association of elements.</p>	<p>the thermal power plants operation and electricity generation, which, in accordance with the target of GHG emissions reduction, will decrease and stop the production by 2050.</p> <p>Lithium and Borate are not the subject of this document because this document does not plan or prescribe both the development of the industry and the projections of mining activities which are the subject of the Mining Strategy. In INECP, there is not a single measure, policy, or target that refer to the plans related to lithium. The text is revised with projections of industrial development in the context of possible energy needs analysis. In this sense, the document has been corrected. Please note that all this was explained at the meetings of the Working Group.</p>

stakeholder	comment	explanation	response
		<p>6) In order to obtain more precise data on the quantity and quality of ores in the area of the city of Kragujevac, only basic geological explorations are allowed, which are prescribed by Article 19 in connection with Article 18, paragraphs 1 and 2 of the Law on Mining and Geological Explorations. Possible re-explorations of lithium, boron and accompanying raw minerals are excluded from basic geological research, says the Environmental Protection Program in Kragujevac from 2023-2033. years.</p> <p>The program does not allow applied geological research because their holders are economic companies, and the purpose and immediate goal is the future exploitation of mineral resources and the opening of surface mines (Article 3, paragraph 1, items 16 and 30, as well as Article 21 of this law).</p> <p>Applied geological research can directly cause damage to individuals and the environment. For this reason, they are environmentally unacceptable. As such, they are part of the Environmental Protection Program.</p> <p>This strategic document entered into force with its publication in the Official Gazette of</p>	

stakeholder	comment	explanation	response
		<p>June 16 (year XXXIII, number 14a).</p> <p>The exploitation of raw minerals is neither foreseen in the area of the General Urban Plan "Kragujevac 2030".</p> <p>In light of the above facts, we believe that the production of lithium/boron and related products should not be included in the Proposal of INECP, and thus neither in Figure 4.4 nor in Table 4.2.</p>	

ix. Chapter 5

stakeholder	comment	explanation	response
EPS	5 IMPACT ASSESSMENT OF PLANNED POLICIES AND MEASURES, 5.3 Overview of investment needs – in paragraph below the table 5.5 correct the text stating the current status of Just Transition Action Plan (page 281).	Precisely state in which stage of preparation is this document, considering its implementation importance for EPS JSC	It is expected to be finalised and adopted during 2024. The INECP text is revised.
EMS	5 IMPACT ASSESSMENT OF PLANNED POLICIES AND MEASURES (page 239)	Add in this chapter the table with installed capacities (in MW) of thermal, gas, hydro, wind and solar power plants and PSHPP, in all scenarios for the period 2030-2050.	Comment is accepted. Quantitative data is added in tables in an Annex V for all scenarios.
AERS	Chapter 5, page 278 The following is stated: “The remaining almost 63.4% shall come from own funds investments including the projects promoted by the Transmission and Distribution System Operators that will be eventually socialized through the tariffs. Particularly, large scale transmission projects will be further assessed with respect to	This part needs additional clarifications. Investment costs will affect tariffs, so these costs must be clearly shown separately for the electricity sector and separately for the natural gas sector. Everything that will have an impact on tariffs must be considered in all calculations, has this been done in that way?	Own funds doesn't mean the private funds. Policy measure on Just transition has details.

stakeholder	comment	explanation	response
	<p>the financial capacity of the project promoters to implement them, as well as with respect to their stress on the transmission and distribution tariffs.”</p>	<p>Clarify the sentence “...own funds investments including the projects promoted by the Transmission and Distribution System Operators”, because it is not logical, operators are not part of private sector.</p>	
<p>AERS</p>	<p>Chapter 5, page 239: A variation of scenario S is denoted as Scenario S-N and considers the introduction of Nuclear Power Plans of 1,000 MW capacity after 2040 in the Serbian power system, to support the decarbonization pathway towards 2050.</p>	<p>Given that the introduction of 4 modular nuclear reactors was previously foreseen, starting from 2032 with 400 MW, reaching 800 MW in 2035 and finally 1600 MW by 2042, it remains unclear in which way and in what dynamics the introduction of, as stated - 1000 MW starting from 2040, is foreseen, because the report no longer mentions modular reactors but only "nuclear power plants", or modular nuclear reactors were abandoned.</p>	<p>Since there is high uncertainty on the evolution of the SMR technology we have considered a generic nuclear plant technology of 1GW. This could be achieved either by a combination of SMRs or by a combination of larger units.</p>
<p>EBRD</p>	<p>The current presentation of Scenario S in chapter 5 doesn't provide necessary details to understand and assess the scenario results. Hence, it creates confusion. Chapter 5 should clearly indicate Scenario S & S-N total emissions (with and without LULUCF), electricity generation capacities per source, share of renewable energy in Gross Final Energy Consumption (GFEC), share of RES in heating and cooling & transport, energy balance, energy demand, etc. Comparing the results of Scenario S & S-N to WEM is an</p>		<p>Comment is accepted. Quantitative data is added in tables in an Annex V for all scenarios.</p>

stakeholder	comment	explanation	response
	additional information for the readers. Therefore, it is important either to substitute all the graphs in chapter 5 that present results of Scenario S (or S-N) vs WEM with graphs that contain absolute numbers or just to add graphs with absolute values.		
EBRD	Graph on p. 239 shows presence of gas in the system in 2050, contrary to the statement that 'fossil fuel TPPs are expected to completely stop generation of electricity by 2050'. Would this be abated? Please consider expending/ providing information to that effect in the draft NECP		The statement is rephrased since it should refer to the lignite fired power plants. There is an operation of gas fired plants until 2050. Tables are included in a Annex V with numerical data.
EBRD	P. 273 implies job reductions in the electricity sector due to transition. Has this been verified?	While job losses in fossil fuel sectors are expected, new jobs will be created in renewables supply chains, energy efficiency etc. For example, figures in table 5.3 are very conservative compared to the studies of c. 1 job/MW in in O&M coming from European Wind Association.	In the process of scenario results analysis, a macroeconomic model was used. The study Just Transition Diagnostics in Serbia with the Action Plan should analyze and present the aspect of the just transition in detail.
EBRD	Figure 5.42 - What is included under 'decarbonization'? E.g. does it cover decommissioning, land remediations, social implications etc. Please consider expending/ providing information to that effect in the draft NECP.	In general, the document does not envision costs for lignite power plant decommissioning. Is there a reason behind it?	The study Just Transition Diagnostics in Serbia with the Action Plan should analyze and present the aspect of the just transition in detail.

stakeholder	comment	explanation	response
EBRD	Figure 5.35 Total electricity network losses presents low transmission and distribution loss reduction targets in all scenarios (WEM, S & S-N), while measures are targeting reduction of losses (PM_EE42, PM_EE43)	It would be useful to quantify loss reduction targets as per measures defined and transpose clearly in the remaining of the document.	In the structure of losses, transmission losses are in line with the level of losses in the EU, and the goals actually refer to losses in the distribution network, because they are significantly higher than in comparable countries. It should have in mind that the percentage of losses must inevitably be higher than in most other countries, as long as a very high share of electricity consumption is at low voltage, primarily in households. It is not possible now to quantify the individual measures related to the reduction of losses because that will be the subject of a separate Study.
EBRD	PAGE 246. It is hard to understand by looking at Figure 5.7 that necessary methane reduction is taking place or not.	Serbia as a participant joining the Methane Pledge agreed to take voluntary actions to contribute to a collective effort to reduce global methane emissions at least 30 percent from 2020 levels by 2030. According to the CH4 projection given in the document, the levels are not aligned with the Pledge.	The CH4 reduction levels which are presented in the graph are related to the energy related emissions, fugitive and IPP emissions. We are not presenting here methane emissions from other sources. This is stated clearly in the text.
EBRD	Page 239/302 Section 5 mentions that “fuel thermal power plants are expected to	Figure: Structure of electricity production gives the TWh values whereas WEM scenario results are given in GW-capacity. It is hard to compare the change in the	Tables in an Annex V with quantitative information (this was shared in the form of excel files with the WG members)

stakeholder	comment	explanation	response
	completely stop generation of electricity by 2050.	generation capacity in WEM and Scenario S. Although solid fuels-based generation is gradually decreasing and reaching zero, the pace of phase out is slow	have been added. The text is edited to state that lignite thermal power plants stop operate by 2050, while gas fired plants continue to generate. Please note however that the main focus of the INECP is 2030 and the targets for 2030. Projections for 2050 should and will be revised in the revision process of the INECP.
EBRD	Page 239. Low building renovation rates	It is not clear what “renovation” refers to. Numerical information should be provided (e.g., insulation impact on space heating). Considering the average age and high heat loss nature of the building stock, renovation rates are not sufficient	Renovation refers to building envelope refurbishments with a package of interventions (windows, wall insulation, roof insulation) which leads to a percentage reduction of energy demand for heating depending on the age and typology of the building, utilizing the outcomes of the TABULA project. The renovation rates are those considered in the Long Term Renovation Strategy published by the Ministry of Construction.
EBRD	Chapter 5 Impact Assessment of planned policies and measures.	In general, this section does not provide sufficient information to support the policy impacts. The figures that are given in this section fail to inform the reader about the actual impact and underlying calculations of the policy and investment plans. After giving only one short paragraph about building	The impacts of policies and measures are presented in Chapter 3.

stakeholder	comment	explanation	response
		renovation, the topic is followed by the coupling of heating and transport with an increased share of RES in the power sector.	
EBRD	Table 5.1 Carbon pricing projections	European Union Emission Trading System (EU-ETS) carbon pricing has already reached a record high of 100.34EURO/tCO ₂ in February 2023. According to the table, the analysis for the NECP preparations assumes that carbon price will reach 40EURO/tCO ₂ . The justification for low CO ₂ price values should be provided.	"The table presents the carbon prices applied in Serbia in accordance with the explanation: The basic assumption is that the carbon tax is €40/ton in 2030, which corresponds to half of the EU-ETS price projected in the document "Recommended parameters for reporting on GHG projections in 2023" by the Directorate-General for Climate Action of the EC, and reaching the full projected price of the EU-ETS, by 2045." The Republic of Serbia is not part of the EU ETS, and the manner and time of the CO ₂ tax introduction is the subject of analyzes that have yet to be done. It is not possible to specify the CO ₂ price projections in the case of Serbia, bearing in mind the above, but the projections that have an impact on the decarbonization process are shown so that they correspond to a moderate energy transition, which is

stakeholder	comment	explanation	response
			especially important from the aspect of security of supply.
EBRD	Page- 4 The objective for reducing the share of lignite in electricity production is given as i.e. lignite phase-out, by up to 25% in 2030 compared to 2019. On Page 239 there is only one graph showing the electricity production and solid fuels seem to constitute almost 50% of the total generation	In its current format the figures create confusion. They should be updated	We will include an annex with tables including all the relevant data for the three scenarios.
EBRD	Page 250 – According to the Figure 5.11 there is no change between S and WEM till the end of 2030.	Necessary explanation should be added why RES share in transport is expected to be the same regardless of other decarbonization efforts	The penetration of RES in transportation was extensively discussed with the stakeholders and the key issue of the availability of second generation biofuels and the restriction for first generation biofuels, together with the cost of deploying EVs were considered in order to reach the shares presented in the analysis.
EBRD	Page 250 – Figure 5.12 indicated that the RES share in the heating is not satisfactory. The share of renewables should be increased especially before 2030. Plus the impact of energy efficiency measures should also be included.	Figure 5.19 doesn't show the absolute impact of building renovation	The share of RES in heating/cooling was extensively discussed with interested parties. The level of biomass sustainability certainly has an impact on the possibility of the value increase of this indicator. However, it should be borne in

stakeholder	comment	explanation	response
			<p>mind that heat pumps were included. In addition, the share of RES in the production of heat energy is very small, and realistic possibilities of increasing this share until 2030 have been considered. Energy savings for building renovations are presented in Chapter 3 where the impact of each measure is presented.</p>
EBRD	<p>Page 262 – Figure 5.25 the rate of building renovation is quite low. Also considering the timing, before 2030, the rate should be increased.</p>		<p>Renovation rates are in line with the Long-Term Building Renovation Strategy. It should be borne in mind that all the proposed measures related to energy efficiency are very financially demanding and represent the majority of projected costs for the accomplishment of the proposed targets in 2030.</p>
EBRD	<p>Page 263- According to the Figure 5.26, rate of refurbishment in the commercial buildings is the same irrespectively of the building type.</p>	<p>e.g., How realistic is this to assume the same renovation rate for hospitals and private sector offices?</p>	<p>Renovation rates are in line with the Long-Term Building Renovation Strategy. It should be borne in mind that all the proposed measures related to energy efficiency are very financially demanding and represent the majority of projected costs for the</p>

stakeholder	comment	explanation	response
			accomplishment of the proposed targets in 2030.
EBRD	Page 265 – Figure 5.28 energy import dependency gets higher in Scenario S and Scenario S-N compared to no action is taken	On page 3, energy security dimension is explained as “the purpose of reducing the energy import dependency”. However, according to the Figure 5.28, energy import dependency is increasing up to 2045.	In WEM scenario the main reason of low energy import dependency is the use of local lignite instead of imported gas which leads to significant increase of emissions. In the Scenarios S the transitional role of gas leads to an increase on import dependency until the local RES resources are fully utilized which leads to a stabilization and slight reduction towards 2050.
EBRD	Page 242, Figure 5.2b total GHG reduction	The graph depicts that the mitigation is only 21% in 2030 and 66% in 2050 compared to 1990 level. Considering the IPCC 6th assessment report, to keep within the 1.5°C limit, emissions need to be reduced by at least 43% by 2030 compared to 2019 levels, and at least 60% by 2035. Current mitigation ambition is not sufficient.	The target of GHG emissions reduction is in accordance with the target from the documents National Determined Contribution (NDC) and Low Carbon Development Strategy. These documents were adopted by the Government of RS. The target is also in agreement with the Decision of the Ministerial Council from 2022. Please note that according to the EU Governance Regulation 2018/1999, the targets in INECP, NDC and Low Carbon Development Strategy must be the same.

stakeholder	comment	explanation	response
BOS	Chapter 5, page 239: To reach climate neutrality in accordance with The Paris Agreement, Serbia has to reconsider and increase ambitions for 2030 (Scenario S).	<ul style="list-style-type: none"> • In 2021, Climate Action Network (CAN) Europe presented an option for a linear reduction of 80% of emissions for the entire Western Balkans region, compared to the current level of emissions, attributing a generous 20% reduction to the LULUCF sector. Applying that calculation, according to your updated data on the current level of emissions (2019), Serbia would have to reduce its emissions by 28.38% by 2030, leaving the level of emissions at 44.05 MtCO₂e. • In the Report of Air Pollution & Climate Secretariat from 2022 (https://www.airclim.org/sites/default/files/documents/policy-implications-of-europes-dwindling-carbon-budget-2.pdf) on the remaining "carbon budget", meaning total CO₂ emissions that can be emitted, it is projected that Serbia's proportional share in that budget from 2020 to 2050 is 291 MtCO₂e, to keep the temperature, rise below 1.5 degrees. This in turn would mean an average CO₂ reduction compared to 1990 of 43% from 2021 to 2025 and 66% from 2026 to 2030. • A specialized website dealing with the assessment of the fairness of the global fight against climate change "The Paris Equity Check" (https://paris-equity-check.org/) evaluates the contributions of countries to the reduction of emissions in accordance 	The target of GHG emissions reduction is in accordance with the target from the documents National Determined Contribution (NDC) and Low Carbon Development Strategy. These documents were adopted by the Government of RS. The target is also in agreement with the Decision of the Ministerial Council from 2022. Please note that according to the EU Governance Regulation 2018/1999, the targets in INECP, NDC and Low Carbon Development Strategy must be the same.

stakeholder	comment	explanation	response
		with their intended nationally determined contributions, and their equity principles are quantified in order to obtain an estimate of how much emissions contained in the intended contributions of each country contribute to global warming. The current intended nationally determined contributions of Serbia for the year 2030, whose ambition is reflected in the INECP, actually contribute to an increase in the global temperature by 3.1 degrees Celsius in the year 2100.	
BOS	Chapter 5, page 243: Foreseen reduction of GHG emissions in 2030 from the energy sector is only 21.98%, but the ambition should be much higher (Scenario S).	Approximately 50% of all GHG emissions in Serbia are the CO2 emissions from the coal thermal power plants. Emissions reduction in the energy sector foreseen with this document shows limited ambition in using the opportunity of leaving coal. Apart from the amount of emissions reduction, this is also reflected in projected change of primary energy consumption in 2030 compared with 2020, which is lower only by 2.3%. Regardless of installed production capacities on solid fossil fuels reduction by 24.43% it is predicted that energy production in TWh from solid fossil fuels will be reduced only 15% by 2030.	The projected reduction of GHG emissions from the energy sector is considered including the aspect of security of supply. We point out that after 2030, the decarbonization process is faster.
CEKOR	Chapter 5, page 239: It is needed to draft an additional scenario with zero net emissions from energy sector in 2050. This is necessary to see how and in what way it is possible, that is, what costs and benefits it would		This scenario was discussed and the results presented to the Working Group (CEKOR is a member of the Working Group). INECP is a document that

stakeholder	comment	explanation	response
	<p>have for the public interest, the health system, the economy, what costs and benefits it would have on mining, water flows, forestation, etc. Although there is a declarative interest of the Ministry to strive towards such a scenario, it is completely clear that, although this scenario was considered during the work of the working group for the development of this strategy, this scenario MUST be processed as one of the scenarios in the INECP and discussed with other scenarios in terms of costs/benefits. It is completely clear that the huge number of measures that are mentioned in the INECP document must be shown in a provable way how they contribute to the fulfillment of the specific goals.</p>		<p>defines the targets for 2030 and these targets are binding.</p>
CEKOR	<p>Chapter 5, page 239: Provide a detailed analysis of energy consumption in the context that all residential buildings are completely insulated, and reduction of industrial electricity consumption in the normal scenario of copper production (maintenance of today's production levels and not an increase of 4 to 6 times), because the proposed levels are unrealistic.</p>	<p>Provide a detailed analysis of how much is the cost of insulating all residential buildings. Provide realistic electricity needs if the same level of copper production is maintained.</p>	<p>The aspect of energy efficiency has been considered in detail, and the building renovation rates are in accordance with the Long-Term Building Renovation Strategy. The projected increase in energy demand for new industrial installations is in accordance with the analysis of the required electricity supply.</p>
CEKOR	<p>Chapter 5, page 239: The question of the nuclear scenario. Although it looks like a simple solution with a huge potential base energy in a practically unlimited period from 2040 and 2100, the issue of nuclear energy is much more complicated.</p>	<p>Delete the nuclear scenario altogether.</p>	<p>Taking into account the need for base energy as well as the possibility of using coal in this sense until 2050, this scenario was considered as a possible response of the Republic of</p>

stakeholder	comment	explanation	response
	<p>This measure will most certainly push out the activities of many small and medium-sized companies in the field of new renewable energy sources, will exhaust a huge part of budget funds and will make serious interventions in the field of energy efficiency impossible. In addition, this measure will dramatically increase the dependence on imports, because everything related to nuclear energy is directly and unequivocally an import.</p>		<p>Serbia for its contribution to the Green Agenda.</p>
RERI	<p>Chapter 5, page 239: Contrary to the Law banning the construction of nuclear power plants, the Ministry through INECP is introducing a scenario of energy development with nuclear energy</p>	<p>The current Law banning the construction of nuclear power plants prohibits the construction of nuclear power plants, but also the making of investment decisions, the development of investment programs and technical documentation for the construction of nuclear power plants. It is unclear on the basis of which legal assumptions the competent ministry considers the scenario with and without nuclear energy and exposes it to the public? Bearing in mind that there is a ban on making investment decisions, which appears to be INECP, it is not clear how energy development scenarios with nuclear energy are introduced in this way into the decision-making process?</p> <p>In order to consider the presented scenario at all, it is necessary to conduct the widest public discussion and change the current legal framework, ensure social consensus, and provide economic, legal, and public</p>	<p>It should be borne in mind that in the current Energy Development Strategy of the RS until 2025 with projections until 2030 ("Official Gazette of the RS", No. 101 of December 8, 2015) in chapter 7. Energy Development of the Republic of Serbia after 2030 the following is stated: "For the reduction of greenhouse gas emissions at the level of the announcement "Energy Roadmap to 2050", according to currently commercially available technologies, beside more intensive level of application of energy efficiency measures and the introduction of RES, it would be necessary to introduce nuclear plants into the energy</p>

stakeholder	comment	explanation	response
		<p>policy prerequisites for considering any scenario involving nuclear energy. It is particularly worrying that in this way the discussion about the possibilities of using nuclear energy, with all the risks that accompany the development of this technology and its use (which is often not limited to energy production) is being initiated in a country that shows that it does not have the capacity to respect self-signed international agreements.</p> <p>When planning and introducing nuclear energy into the energy mix, if the legal barriers are removed, one should be very careful and detailed and consider the need to fulfill the requirements regarding informing the public and the necessary staff. Finally, it should be borne in mind that most of the international community does not consider nuclear energy as an alternative to coal energy.</p>	<p>sector of the Republic of Serbia ."</p> <p>The existing Law on the Prohibition of the Construction of Nuclear Power Plants does not prohibit the creation of scenarios that analyze the justification of nuclear energy use. Such an analysis, if shows that nuclear power plants can be a justified option and if they can be acceptable according to all relevant criteria, could be the basis for reviewing the justification of the Law on the Prohibition of the Construction of Nuclear Power Plants. Only if that Law were to be abolished, it would be possible to enter into a further procedure, which is elaborated in great detail by international practice and acts, and which could lead to making investment decisions. A prerequisite is the building of professional capacities, relevant national institutions and the adoption of the necessary regulations. Please note that we answered this question in the previous period (2022) and that the ministry's answer was</p>

stakeholder	comment	explanation	response
			posted on the ministry's website.
RERI	Chapter 5, page 239: What does it mean that “Fossil fuel thermal power plants are expected to completely stop generation of electricity by 2050”?	In the draft of INECP, there is no provision for the shutdown of thermal power plants. On the contrary, policy measures in the decarbonization dimension exclude the ETS sector. How is this expected when INECP did not provide precise measures related to the shutdown of thermal power plants, with a list of facilities and a detailed time frame for their shutdown. Without measures related to the closure of thermal energy facilities, with a precise time frame for their shutdown, an explanation of which facilities remain on grid, and what measures will be taken to keep those facilities on grid, the objectives related to decarbonization, and not even these symbolic and unambitious ones envisaged by the draft INECP, are not achievable.	The text is complemented with the information in accordance with the comment.
RERI	Chapter 5, page 240: In table 5.1 the proposer predicted a price of 40 euros per ton of CO2 in 2030. On the basis of which input data and findings?	However, in table II.1 on page 291 the price of a ton of CO2 is predicted to be 70 euros in 2030. How did the different predictions happened, that is, how did the Proposer come up with these projections in the first place?	Table 5.1 presents carbon price which are applied in Serbia in accordance with the explanation: The basic assumption is that the carbon tax is €40/ton in 2030, which corresponds to half of the EU-ETS price projected in the document "Recommended parameters for reporting on GHG projections in 2023" by the Directorate-General for Climate

stakeholder	comment	explanation	response
			<p>Action of the EC, and reaching the full projected price of the EU-ETS, by 2045." The Republic of Serbia is not part of the EU ETS, and the manner and time of the CO2 tax introduction is the subject of analyzes that have yet to be done. It is not possible to specify the CO2 price projections in the case of Serbia, bearing in mind the above, but the projections that have an impact on the decarbonization process are shown so that they correspond to a moderate energy transition, which is especially important from the aspect of security of supply. Table II.0.1.70 presents the price of 70 euros/ton included in the Annex was used in the regional power system model (including all neighboring EU countries) to check the operation of the power system with this RES penetration according to the ENTSO-E scenarios.</p>
<p>The Environment Improvement Center; Climate Forum, dragan.sreckovic@</p>	<p>Chapter 5, pages 276-278: In subchapter 5.3 Overview of investment needs, in the first paragraph it is stated: "The overall investment needs (referring both to public and</p>		<p>There was a typo. Text is reviewed and revised.</p>

stakeholder	comment	explanation	response
gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović, Coalition 27	own fund CAPEX needs) included under the WAM scenario amount to approximately 10.72 billion EUR until 2030." That is not in line with the data from the table 5.4, where it is stated that they amount to 11.86 billion euros.		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović, Coalition 27	Chapter 5, pages 277-278: In subchapter 5.3 Overview of investment needs, in the third paragraph it is stated that an overview of the individual measures listed under the five dimensions alongside their implementation costs is summarized in Figure 5.23. The costs are summarized in Figure 5.43, so that should be corrected. Also, in the same paragraph, in the last sentence it is stated "It can be obtained that in the WEM scenario approximately 16.68 billion EUR of investments are included, while under the WAM scenario 10.72 billion EUR", which is not correct and needs to be corrected. The amounts listed in table 5.4 are 15.55 and 11.86 billion euros.		Thank you for the comment. We is reviewed and revised.
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica	Chapter 5, page 278: Table 5.4 does not adequately show the costs of implementing the WEM and WAM scenarios, considering that the implementation of the WAM scenario also includes the implementation of the WEM scenario. Therefore, it is necessary to show the real costs of implementing the WAM scenario in the table, that is, the amount of 27.41 billion		The approach is to show the extra effort in terms of investments which is required for the WAM scenario compared to the existing measures scenario (WEM). We clarified further in the text.

stakeholder	comment	explanation	response
Damnjanović, Coalition 27	euros, and not just the amount of the difference of 11.86 billion euros.		
The Environment Improvement Center; Climate Forum, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović, Coalition 27	Chapter 5, page 278: In subchapter 5.3 Overview of investment needs, in the sixth paragraph it is stated “Part of the investment needs related to green transition can be covered by the earmarking of public revenues from the imposition of the CBAM tax.” Explain how the revenue from the introduction of the CBAM tax, as a mechanism introduced by the European Union (EU) on the territory of the member states, and whose revenue goes to the EU budget, will become part of Serbia's public revenue, which will cover part of the investment needs for the green transition?		There is a typo. It should read carbon tax. The text is revised accordingly.
EPS Scientific Council	Chapter 5, page 239: Nuclear energy: In the SN scenario, only the possibility of alternative construction of a 1000 MW nuclear power plant after 2040 was announced, which means that the earlier idea of possible participation in the capacities of large nuclear power plants that are being built in the neighborhood or own construction of small modular reactors has been abandoned. The justification for the construction of nuclear power plants in Serbia was confirmed at two expert meetings held in Serbian Academy of Sciences and Arts in 2020 and 2022, and such a need was also announced in EPS. In INECP, there was no		INECP is a document that defines the targets for 2030, while the period after 2030 represents a vision of possible development. Taking into account the need for basic energy as well as the possibility of using coal in this sense until 2050, this scenario was considered as a possible response of the Republic of Serbia for its contribution to the Green Agenda. In case this scenario use as foundation for analysis of the justification of the Law on the Prohibition of

stakeholder	comment	explanation	response
	<p>explanation of that idea from the point of view of the timely preparation of personnel and the formation of the necessary institutions, the selection of the construction model, research for the selection of the location and type of nuclear reactor, and other actions that precede such delicate undertakings, and which, judging by the world experiences of their duration, should have already been in the Plan.</p>		<p>the Construction of Nuclear Power Plants and only in case that this Law is abolished it would be possible to enter into a further procedure, which is elaborated in great detail by international practice and acts, and which could lead to making investment decisions. A prerequisite is the building of professional capacities, relevant national institutions and the adoption of the necessary regulations which was considered in detail within the process of this scenario analysis.</p>
<p>EPS Scientific Council</p>	<p>Chapter 5, pages 277-279:</p> <p>Implementation costs: The projected investment of €27.41 billion until 2030 (for 7 years) is almost half of the total investment that foresees the reference (M2) climate scenario in the Low Carbon Development Strategy until 2050 (for 27 years) in the amount of €60 billion. It was not possible to check the connection between the total costs of the implementation of the measures foreseen by INECP and the corresponding costs given in table 5.4 (the estimated amount is slightly lower than €55 billion), while from table 5.5 it is not possible to conclude what the total amount of investment is. INECP counts on as much as €43.7 billion in aid</p>		<p>Text is revised and more details are given for 5.4 and 5.5 to present more clear the investments. A full list of investment cost per measure exists in Annex 1.</p>

stakeholder	comment	explanation	response
	<p>and investments from the EU, which is an uncertain and optimistic estimate. Figure 5.42 shows that the estimated costs of research and innovation are only 0.38% of all costs, which is almost three times less than the usual investments (about 1%) required for these purposes.</p>		
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com, jorizantvoort@gmail.com</p>	<p>Chapter 5, page 239: To reach climate neutrality in accordance with The Paris Agreement, Serbia has to reconsider and increase ambitions for 2030 (Scenario S).</p>	<ul style="list-style-type: none"> • In 2021, Climate Action Network (CAN) (https://caneurope.org/) Europe presented an option for a linear reduction of 80% of emissions for the entire Western Balkans region, compared to the current level of emissions, attributing a generous 20% reduction to the LULUCF sector. Applying that calculation, according to your updated data on the current level of emissions (2019), Serbia would have to reduce its emissions by 28.38% by 2030, leaving the level of emissions at 44.05 MtCO₂e. • In the Report of Air Pollution & Climate Secretariat from 2022 (https://www.airclim.org/sites/default/files/documents/policy-implications-of-europes-dwindling-carbon-budget-2.pdf) on the remaining "carbon budget", meaning total CO₂ emissions that can be emitted, it is projected that Serbia's proportional share in that budget from 2020 to 2050 is 291 MtCO₂e, to keep the temperature, rise below 1.5 degrees. This in turn would mean an average CO₂ reduction compared to 1990 of 43% from 2021 to 2025 and 66% from 	<p>The target of GHG emissions reduction is in accordance with the target from the documents National Determined Contribution (NDC) and Low Carbon Development Strategy. These documents were adopted by the Government of RS. The target is also in agreement with the Decision of the Ministerial Council from 2022. The objective related to RES derives from this objective. At the same time, the proposed goals represent a minimum that needs to be achieved by 2030, which means that it is possible to achieve more than that. After 2030, the proposed decarbonization process is faster.</p>

stakeholder	comment	explanation	response
		<p>2026 to 2030.</p> <ul style="list-style-type: none"> • A specialized website dealing with the assessment of the fairness of the global fight against climate change "The Paris Equity Check" (https://paris-equity-check.org/) evaluates the contributions of countries to the reduction of emissions in accordance with their intended nationally determined contributions, and their equity principles are quantified in order to obtain an estimate of how much emissions contained in the intended contributions of each country contribute to global warming. The current intended nationally determined contributions of Serbia for the year 2030, whose ambition is reflected in the INECP, actually contribute to an increase in the global temperature by 3.1 degrees Celsius in the year 2100. 	
<p>Extinction Rebellion Serbia, dragan.sreckovic@gmail.com</p>	<p>Chapter 5, page 243: Foreseen reduction of GHG emissions in 2030 from the energy sector is only 21.98%, but the ambition should be much higher (Scenario S).</p>	<p>Approximately 50% of all GHG emissions in Serbia are the CO2 emissions from the coal thermal power plants. Emissions reduction in the energy sector foreseen with this document shows limited ambition in using the opportunity of leaving coal. Apart from the amount of emissions reduction, this is also reflected in projected change of primary energy consumption in 2030 compared with 2020, which is lower only by 2.3%. Regardless of installed production capacities on solid fossil fuels reduction by 24.43% it is predicted that energy</p>	<p>Suggested answer: The projected reduction of GHG emissions from the energy sector is considered including the aspect of security of supply. We point out that after 2030, the decarbonization process is faster.</p>

stakeholder	comment	explanation	response
		production in TWh from solid fossil fuels will be reduced only 15% by 2030.	
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 5, page 239: Why is biofuel missing from the electricity production structure in 2025, while it is present in other years, including 2019?		Graph is corrected and detailed data is included in Annex V
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo izeleno, Milica Damnjanović	Chapter 5, page 239: Following information is given for the table 5.1: "The background assumption is that carbon tax is first introduced in 2027 at a low rate of 4€/ton and is subsequently increased to 40€/ton in 2030, corresponding to half of the EU-ETS price projected in the document".	Today, the EU-ETS price reaches 100 €/ton, in the previous three years it was increased 5 times, while our plan predicts that the initial price will be 4 €/ton in 2027, and that in 2030 we will reach 40 €/tons. On the basis of which assumptions the values of 4€/ton and 40€/ton were assessed, and do they correspond to the expected "half of the EU-ETS price"?	The table presents the carbon prices applied in Serbia in accordance with the explanation: The basic assumption is that the carbon tax is €40/ton in 2030, which corresponds to half of the EU-ETS price projected in the document "Recommended parameters for reporting on GHG projections in 2023" by the Directorate-General for Climate Action of the EC, and reaching the full projected price of the EU-ETS, by 2045." The Republic of Serbia is not part of the EU ETS, and the manner and time of the CO2 tax introduction is the subject of analyzes that have yet to be done. It is not possible to specify the CO2 price projections in the case of Serbia, bearing in mind the above, but the projections that have an

stakeholder	comment	explanation	response
			impact on the decarbonization process are shown so that they correspond to a moderate energy transition, which is especially important from the aspect of security of supply.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 5, page 239: It is not clear if the diagram shows S-N or S scenario, why the diagram doesn't show both scenarios? Although the color is assigned to nuclear energy – it is not shown on the diagram.		Correct according to the comment.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 5, page 239: Scenario S-N is not defined, information like needed steps of financial resources are not given.	It is not clear if the statement “Scenario S-N and considers the introduction of Nuclear Power Plans of 1,000 MW capacity after 2040 in the Serbian power system” refers to many power plants with the total capacity of 1000 MW or many power plants with the individual capacity not exceeding 1000MW?	Correct according to the comment.
dragan.sreckovic@gmail.com, jorizantvoort@gmail.com, Plavo i zeleno, Milica Damnjanović	Chapter 5, page 239: Knowing what countries that have been using nuclear energy for decades are going through (a shortage of qualified labor on the market, budgets exceeded multiple times during the construction of plants, deadlines exceeded), the question arises whether the citizens of the Republic of Serbia should be exposed to the risks that investment in nuclear energy in the Republic of Serbia entails? How will the construction of nuclear plants for at least 15 years reduce the energy poverty to which citizens are exposed?		INECP is a document that defines the targets for 2030, while the period after 2030 represents a vision of possible development. Taking into account the need for basic energy as well as the possibility of using coal in this sense until 2050, this scenario was considered as a possible response of the Republic of Serbia for its contribution to the Green Agenda. In case this

stakeholder	comment	explanation	response
			<p>scenario use as foundation for analysis of the justification of the Law on the Prohibition of the Construction of Nuclear Power Plants and only in case that this Law is abolished it would be possible to enter into a further procedure, which is elaborated in great detail by international practice and acts, and which could lead to making investment decisions. A prerequisite is the building of professional capacities, relevant national institutions and the adoption of the necessary regulations which was considered in detail within the process of this scenario analysis.</p>
MIVUS	<p>Chapter 5, page 278: In Table 5.4 the amount of financial assistance for energy efficiency until 2030 is stated, with the statement that 60% of the costs are paid by the users. Should be changed to 40%.</p>	<p>EE measures cannot be implemented without a larger amount of subsidies - minimum 60%</p>	<p>The calculated percentage represents the weighted percentage of the private funds, which are required so as to ensure the implementation of the planned energy efficiency measures in all final end-use sectors. Different indicative percentages were assumed for the main policy measures taking into consideration the targeted end-users (e.g. households, companies, farmers) and the</p>

stakeholder	comment	explanation	response
			sectors (e.g. buildings, transport, industry, agriculture). It should be noted that the proposed policy measures consist of different measures (e.g. subsidies, tax reduction, low interest loans), which may require different levels of leverage during their implementation. Finally, the assumed percentages will be reconsidered during the actual design of the policy measures taking into account the actual conditions, while they can be revised based on the evaluation of the resources' absorption efficiency and the capital availability.
nikorade1918@gmail.com	Chapter 5, page 239: Deletion of nuclear energy from the planned energy sources for Serbia.	A moratorium on nuclear energy is in force in Serbia and will remain so forever.	INECP is a document that defines the targets for 2030, while the period after 2030 represents a vision of possible development. Taking into account the need for basic energy as well as the possibility of using coal in this sense until 2050, this scenario was considered as a possible response of the Republic of Serbia for its contribution to the Green Agenda. In case this

stakeholder	comment	explanation	response
			scenario use as foundation for analysis of the justification of the Law on the Prohibition of the Construction of Nuclear Power Plants and only in case that this Law is abolished it would be possible to enter into a further procedure, which is elaborated in great detail by international practice and acts, and which could lead to making investment decisions. A prerequisite is the building of professional capacities, relevant national institutions and the adoption of the necessary regulations which was considered in detail within the process of this scenario analysis.

x. Annexes

stakeholder	comment	explanation	response
RERI	Annex II, page 291: The proposer does consider the input parameters that imply a reduction in the capacity of thermal energy plants, but it is not clear by using which policy measures this is achieved?	In table II.1 on page 291 it is stated that, according to scenario S, in 2030 the net capacity of lignite plants is 2.76 GW, which is significantly less than in 2022 when the capacity was 4.43 GW (Energy Agency Report for 2022). However, it is not clear which policy measures lead to a 62.3% capacity reduction? In the same table, the net annual	The installed capacities are input to Antares from the results of SEMS. Table with the detailed results is included in an Annex V. The 9.5TWh refer to 2040 in Table II.4.

stakeholder	comment	explanation	response
		production of lignite plants is stated to be 9.5 TWh?	
RERI	Annex II, page 292: Data on the utilization factor data of thermal power plants in table II.3 is unclear.	Namely, the utilization factor of thermal power plants ranges between 66% and 73%. It is not clear what is the justification for operating the plant with this utilization factor? It is especially incomprehensible that the Kostolac B3 thermal power plant, which is yet to be put into operation, is expected to operate with a utilization factor of 66%? How will this thermal power plant cover the investment costs if it operates with this utilization factor just 7 years after its start-up?	The reported utilization factors are not justified because they are the results of the simulations of the Unit Commitment and Economic Dispatch (UCED) problem with an 1-hour time step for a period of one year (with Antares software). In the UCED problem, it is the system operational cost that is minimized for a given set of generators fleet.
EMS	i. Scenario-S analysis for 2030 Based on the RES capacities and the recent study on RES integration in Serbia , the value of the hourly day-ahead reserves requirements provided to the model was 1250 MW. (page 291)	The study didn't consider withdrawal of thermal capacities, that are announced in INECP, so the value of 1250 MW can be mentioned with informal purpose, and not with the purpose of commenting of INECP results. Input data from the mentioned study are not the same as the input data used for the creation of the S scenario.	The withdrawal of thermal capacities mostly affects who will provide the reserves, rather than the sizing of the reserve requirements. However, the value of 1250 MW is indeed indicative. In any case, as stated in the Analysis Report: "The results with reserves constraints have been considered mainly for evaluating the scenario feasibility (always at the DAM level), because they are more conservative with respect to spilled energy (in the specific

stakeholder	comment	explanation	response
			<p>scenario, variable RES capacities are very low, therefore there is no spilled energy in both cases). This does not mean that further analysis of the balancing market is not required.”</p> <p>Also, in the simulations run with ANTARES for the INECP, the exact value of this reserves requirements has been shown not to be crucial for the results.</p>
EBRD	<p>Table II.6 on dispatch assumes that gas power plants would be dispatched less than coalfired ones after 2040. Has this been checked?</p>	<p>Given carbon intensities of fuels, and associated implications (emissions, carbon tax exposure, etc.), we would expect the opposite. Share of coal in electricity generation dispatch remains very high in 2040.</p>	<p>The first two gas plants are CHP plants, therefore their output is defined by their thermal load. The third plant is a combined-cycle plant which is indeed more economical comparing to the lignite units, (with the exception of the now Kostolac B3 unit).</p> <p>This counter-intuitive result is due to the inflexibility of the lignite units (high Tech. minimum, long min. up and min. down times) comparing to gas-fired CC plant, while at the same time there are not many options available in order to satisfy the load at all times.</p>
EMS	<p>On page 291 (Annex II), the values of the installed power of wind power plants and solar</p>		<p>The INECP text is revised. It is added in Chapter 5.1.</p>

stakeholder	comment	explanation	response
	power plants used in Scenario S are given . According to this scenario, the installed capacity of these capacities should amount to 3.5 GW in 2030 . We believe that, if this is treated as an official target of the Republic of Serbia for that period, it should be emphasized that it is a minimum value. This addition is necessary to avoid the interpretation that this capacity is an upper limit.		

xi. Data comments

stakeholder	comment	explanation	response
NIS	What is a source of the data that there are 2nd generation biofuels in transport in Serbia (0,4% in energy)?	2nd generation biofuels are still extremely rare and very expensive + there is no mandatory biofuels content in Serbia so far and there is no economy for any oil company to blend such fuels into the gasoline& diesel for the Serbian market.	If the comment refers to the results for 2022 and 2023 then these are model results which will have to be updated once the official balances are available. After 2024 there are bounds put in place related to blending on biofuels in order to reach a level of share of RES in transportation by 2030 (taking into account the limitations for the first generation biofuels and the limitations to the introduction of EVs).
NIS	What is a source of the data that there are 1st generation biofuels in transport in Serbia (0,4% in energy)?	There might be some very low % of first generation biofuels because some volumes of imported diesel and gasoline contain biofuels (FAME, ETBE), but since there is no mandatory	If the comment refers to the results for 2022 and 2023 then these are model results which will have to be updated once

stakeholder	comment	explanation	response
		minimum volumes, bio components contents aren't recorded in the laboratory reports that are following diesel and gasoline sold on the Serbian market.	the official balances are available. After 2024 there are bounds put in place related to blending on biofuels in order to reach a level of share of RES in transportation by 2030 (taking into account the limitations for the first generation biofuels and the limitations to the introduction of EVs).
NIS	Methodology for the calculations not clear	Excel table for Res Scenario S, Sheet 8. "GHG Emissions from energy use per Sector", provides emissions for the exploration and production of oil and gas and for oil refining. It is not clear which emissions are included in this calculation (only from energy use or both process and fugitive as stated in INECP)	For the line Oil&Gas extraction and treatment we are using the fugitive emissions plus the energy related emissions. Details of the coefficients used are shared in a file.
NIS	Methodology for the calculations not clear	<ul style="list-style-type: none"> - Calculations of the above emissions by years aren't clear as well as the database used (amounts of energy consumed, process emissions in the Pančevo refinery, emissions from torches, etc...) - Why there is a ~ 17% jump in the RNP emissions between 2021. and 2018.? Refining volumes were almost the same - What is the reason for a drastic decline in CO2 and CH4 emissions 	Detailed breakdown of the emissions per source is shared in order to clarify these points. The decline in emissions from refineries after 2040 is connected with the reduction of the refining activity after this period. The reduction in the emissions from oil&gas extraction after 2035 is connected with the reduction of the emissions
NIS	CHP (TE-TO) Pančevo emission levels are not correct	- CO2 emissions of TE-TO Pančevo were ~620kt/y in the previous INECP versions. In the	The comment is considered.

stakeholder	comment	explanation	response
		<p>materials, we've received, there is no detailed data on emissions</p> <p>- As per data we've already provided, TE_TO Pančevo emissions are only about 330kt CO2 on 8300 working hours yearly. Please align data with our estimations</p>	
NIS	Clarification needed	<p>In the Res Scenario S, Sheet 8. GHG Emissions from energy use per Sector is not clear what the CO2 capture and Storage line refers to</p>	<p>This line is included in the reporting tables for the case when CCS appears in the model solution (for example when we were analysing the net zero scenarios, CCS options were part of the solution for the industrial and power sector).</p>

ANNEX II: SEA PC COMMENTS

i. General comments

stakeholder	comment	explanation	answer	response
MEP	Chapter 1. of the Report SEA, which covers the chapter "Non-technical summary" should be the last chapter, i.e. it should be part of chapter 10, which includes the chapter "Strategic assessment conclusions" .		Adopted	Text is updated
SEPA	In list of abbreviations add SEPA	SEPA was used but it is not listed in list of abbreviations	Adopted	Text is updated
SEPA	abbreviations GHG means greenhouse gases	It is necessary to complete the entire expression for GHG. It cannot stand only "greenhouses"	Adopted	Text is reviewed
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris Zantvort Damnjanović, Dragan Srećković	The report on the SEA of INECP is full of spelling and terminological mistakes, to the extent that it prevents proper understanding of the report, and it needs extensive revision.		Adopted	Text is reviewed
Ministry of Agriculture, Forestry and Water Management, Republic	under each figure and map it is necessary to have a data source		Adopted	Text is updated

stakeholder	comment	explanation	answer	response
Directorate for Water				
RERI	The text of the report is illegible and inconsistent	It is necessary to review the text of SEA Report and update in accordance with Serbian norms and standards language. If the same was translated from English it had to be done in the spirit of the Serbian language in order to the public could understand it. Among that, numerous expressions appear and terms that are not in accordance with in legal terms that are accepted within the national framework legal order, and it is not always clear which legal institutes the Report maker thoughts. Finally, in the whole document was noticed and inconsistency reflected in different terms used for the same terms (e.g. the same scenarios they are called differently in different parts of the Report), as well as the use of terms and abbreviations which are not aligned with the official one, but accepted in the existing legal regulations	Adopted	Text is reviewed
RERI	"The public hearing was conducted in a period that makes it impossible effective public participation in regulations preparation procedures"	Article 8, paragraph 1 (a) of the Law on ratification of the Convention on availability of information, participation public in decision-making and law to legal protection in matters environmental protection ("Official Gazette of RS - international agreements" no. 39/09), it was stated that it is necessary to determine sufficient time frames for effective public participation. With that in connection, for the purpose of clarifying certain provisions of the	Not adopted	Comment is not accepted. Ministry of Mining and Energy is preparing this document from 2021. For the purpose of preparation document,

stakeholder	comment	explanation	answer	response
		<p>"Aarhus Convention" and works easier application of the same, Economic United Nations Commission for Europe was made in November 2015 "Recommendations from Maastricht for promoting effective participation the public in making decisions about issues related to life", and is in recommendation 77. stated that the legal framework should be clarify the calculation of deadlines, which would should be clearly defined terms, so it is in the same article, u point e) stated that "whenever it is possible, the main ones should be avoided holiday season (e.g. summer, end December), as maintenance time procedure of public participation".</p> <p>Despite the aforementioned recommendations, the title authority continues with the harmful by the practice of maintaining public consultation and discussion in the summer the period thus preventing effective public participation in proceedings preparation of regulations. This especially should be kept in mind, since it is a document of exceptional importance for citizens of the Republic of Serbia, and one of the most important documents in the field of energy and climate change which represents the basis of energy policy of each country to which this public accepted the political document.</p>		<p>multisectoral working group were established. The representatives of European Commission, Energy Community Secretariat were included and informed about all results and Reports. During the process of the preparation NECP there were many meetings with relevant stakeholders and consultations with faculties and institutes in Belgrade, Nis, Novi Sad and Kragujevac. Public consultations and transborder consultations were organized in accordance with the Law on</p>

stakeholder	comment	explanation	answer	response
				<p>Strategic Environmental Impact Assessment ("Official Gazette of the RS", no. 135/04 and 88/10 and Rules of Procedure of the Government ("Official Gazette of RS", number 61/06, 69/08, 88/09, 33/10, 69/10, 20/11, 37/11, 30/13, 76/14 and 8/19). MoME were During the process of preparation NECP, RERI organized public hearings in November 2021, March 2022, and July 2023. MoME participated in the mentioned public consultations. MoME was in constant communication</p>

stakeholder	comment	explanation	answer	response
				<p>with the Ministry of Environmental Protection in order to include comments and updates after the deadline of August 5, 2023. Therefore, the period of consultation was not so strict and comments have been accepted even long after the deadline of the Consultation period.</p> <p>For example, we have received comments from the Romanian Ministry of Environment, Waters and Forests on the Strategic Environmental Impact Assessment for the INECP by 11th October 2023</p>

stakeholder	comment	explanation	answer	response
				which will be responded accordingly. Please note that until today, 13th November 2023, MoME received comments only from Romania.
RERI	"The holder of the plan is unjustifiably separated the public the discussion on INEKP and the report on strategic impact assessment INEKP"	"Article 19, paragraph 2 of the Law on Strategic environmental impact assessment it is prescribed that public hearing and public discussion is organized as a rule in within the presentation of the plan and program at public inspection and public discussion in accordance with the law governing it procedure for adopting the plan and program. The applicant indicates that they are not clear the reasons for which it is the holder of the plan separated these two procedures."	Not adopted	Comment is not accepted. The process was parallel.
RERI	The report on the SEA that was presented on public inspection formally and content does not meet the standards and requirements of the Law on Strategic environmental impact assessment, nor regulations at the level of the Energy Department communities related to the making INECP and strategic impact assessments. This one is poorly translated the document should		Not adopted	There is no specific comment with relevant explanation what should be revised.

stakeholder	comment	explanation	answer	response
	never have appeared on public inspection because the comments and remarks cannot fix the thread to promote. It is necessary to EU delegation without delay review the responsibility of the Ministry of mining and energy and editor of Report on SEA, due to non-purpose spending of EU funds.			
RERI	There are no cross-border consultations conducted in accordance with the Protocol on strategic impact assessment on environment ESPOO Convention	According to Article 10.1. of the Law on confirmation of the Protocol on strategic environmental impact assessment with the convention on impact assessment on environment in cross-border context ("Official Gazette of the RS -International agreements", No. 1/10) ("Protocol Confirmation Act") when the Party of origin considers that implementation of the plan or program likely to have significant cross-border implications environmental consequences and health, or if the Party that will likely to be significantly affected by it request, the country of origin will what is earlier possible before the adoption of the plan or program to notify the affected Party. A similar wording is used by maker of the Report in the subchapter 1.5 Indicative mitigation measures and monitoring, however it is in bad translation from English (which is present throughout the document which is the subject of these consultations) and the public cannot with propriety	Not adopted	Comment is not accepted. Ministry of Mining and Energy is preparing this document from 2021. For the purpose of preparation document, multisectoral working group were established. The representatives of European Commission , Energy Community Secretariat were included and informed about all results and

stakeholder	comment	explanation	answer	response
		<p>determine the true meaning of the so-called measures.</p> <p>Therefore, the Republic of Serbia was obliged to notify and deliver all relevant documentation countries that are potentially affected by the activities envisaged INECP so that they could expose it to public insight in their countries at the latest at the time it is specified presented the draft plan to the public in Republic of Serbia.</p> <p>What is particularly worrying is the fact that in the notifications which were sent to neighboring countries from 05.July 2023 (Bosnia and Herzegovina, Croatia, Montenegro, Albania, Bulgaria, Romania, Hungary) stated that from affected parties expect a response that would contain comments and suggestions in within 30 days from the date of receipt of the letter diplomatically (?!?). It seems that acting authorities are not familiar with by the cross-border procedure consultation, and the fact that the deadline for public participation begins to flow when relevant documents become available to the interested public and the public in the affected country be informed of that fact, not when they make available the country of origin affected side (if affected party expresses interest in participating in cross-border consultations). So, left behind a deadline of 30 days for delivery comments (not notification if he wants to start</p>		<p>Reports. During the process of the preparation NECP there were many meetings with relevant stakeholders and consultations with faculties and institutes in Belgrade, Nis, Novi Sad and Kragujevac. Public consultations and transborder consultations were organized in accordance with the Law on Strategic Environmental Impact Assessment ("Official Gazette of the RS", no. 135/04 and 88/10 and Rules of Procedure of the Government ("Official Gazette of RS", number 61/06, 69/08,</p>

stakeholder	comment	explanation	answer	response
		<p>consultations) is not in any sense cannot be considered "reasonable within the meaning of Article 10, paragraph 2 (b) Protocol. Recommendations for good practice in terms of public participation in strategic assessment of the impact on environment that are approved on The meeting of the parties to the Convention which represents the Meeting of the Parties in Additional to the Protocol in Decision II/8 clarify that the deadlines for participation public which includes cross-border element can last at least as long how long are the deadlines for participation public without that element in order to took cultural issues into account and communication problems. Further, in the recommendations indicate that when it comes to environmental impact assessment for projects, notification deadlines they generally last from two to three weeks or month, and on average one month, whereas the comment period lasts from three weeks to three months, and on average about two months. For strategic assessment impact on the environment should similar deadlines apply. Around that, when determining deadlines for different stages of the participation procedure public, it should be kept in mind that plans, as opposed to decisions to which refers to Article 6 of the Aarhus Convention, prepared by public authorities solely in the public interest and</p>		<p>88/09, 33/10, 69/10, 20/11, 37/11, 30/13, 76/14 and 8/19) . MoME were During the process of preparation NECP, RERI organized public hearings in November 2021, march 2022, and July 2023. MoME participated in the mentioned public consultations. MoME was in constant communication with the Ministry of Environmental Protection in order to include comments and updates after the deadline of August 5, 2023. Therefore, the period of consultation was not so strict and comments have</p>

stakeholder	comment	explanation	answer	response
		<p>therefore providing sufficient deadlines for the public to prepare effectively participate may be more important than other factors</p>		<p>been accepted even long after the deadline of the Consultation period. For example, we have received comments from the Romanian Ministry of Environment, Waters and Forests on the Strategic Environmental Impact Assessment for the INECP by 11th October 2023 which will be responded accordingly. Please note that until today, 13th November 2023, MoME received comments only from Romania.</p>
<p>International Organization for Migration (IOM)</p>	<p>While reading this very comprehensive document, we were unable to spot any connection between</p>	<p>Environmental change and natural disasters have always been major drivers of migration. Climate change predictions for the next decades indicate that even more people are</p>	<p>Not adopted</p>	<p>To enable the inclusion of information that may reasonably</p>

stakeholder	comment	explanation	answer	response
	<p>migration/movement of people on one side and climate change, environment, energy efficiency, and green energy solutions on the other. It is now widely recognized that the movement of people is and certainly will continue to be affected by natural disasters and environmental degradation. Serbia has already been exposed to severe flooding in the past decade, affecting vast number of people who suffered great material losses, and uprooting several communities obliged to search for an alternative shelter. On top of this, climate change projections foresee a probability of Serbia being exposed to more serious natural hazards in the recent future, which we are already starting to experience. Therefore, the migration, environment, climate change and energy nexus should be considered and addressed in all its complexity, so that we could foresee and prevent its accompanying challenges, but also explore the possibility it offers to advance the green agenda and explore alternative sources of energy. Environmental migration should</p>	<p>expected to be on the move as weather-related disasters such as extreme precipitations and temperatures become more frequent and intense (IPCC, 2014), and changes to climate conditions impact livelihoods. Environmental migration may take many complex forms: forced and voluntary, temporary and permanent, internal and international.</p> <p>The concept of “vulnerability” needs to be put at the center of current and future responses to environmental migration, bearing in mind that the most vulnerable may be those who are unable to or do not move (trapped populations).</p> <p>Taking all the above into consideration, there is an urgent need to include migration into efforts to develop a green and sustainable development agenda. Managing energy and climate planning together with migration policy would help build resilience of affected populations and those with highest likelihood of being affected in the upcoming future, address the economic and environmental drivers of migration, facilitating environmentally sustainable socio-economic opportunities for migrants.</p>		<p>be required, taking into account the contents of the strategy and available information, and to allow a functional analysis and assessment of potential environmental impacts, environmental areas and objectives of the SEA are defined based on the requirements and objectives related to environmental protection in other plans and programs, the environmental protection objectives determined at national level and environmental protection objectives of</p>

stakeholder	comment	explanation	answer	response
	<p>not be understood as an entirely negative or positive phenomenon, as it can both amplify existing vulnerabilities but also allow people to become more resilient.</p>			<p>relevant sector documents. While we recognize, as rightly pointed out, the connection between migration/movement of people and climate change, there is no dedicated environmental objective for climate change-related migration. Potential impacts on the environmental areas of climate change, human health and quality of life, natural and other disasters and socioeconomic aspects are assessed and may contribute to the discussion and further analysis on this specific</p>

stakeholder	comment	explanation	answer	response
				<p>climate-change-related topic. Comments on the need to include migration aspects into the INECP could be reviewed within the public consultation framework for the strategy itself rather than the SEA.</p>
<p>Marija Tasić</p>	<p>It is not true, and it is economically and environmentally harmful, to generalize that all sources of energy from nature produce renewable energy and do not produce GHG</p>	<p>By looking at the Report, it can be concluded that INECP's efforts for decarbonization in order to achieve climate neutrality have no scientific and financial basis. Thus, they do not deserve to be promoted or subsidized.</p>	<p>Not adopted</p>	<p>It is not clear where it is stated. Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme, or variation to a plan or programme so that these likely effects may be addressed</p>

stakeholder	comment	explanation	answer	response
				appropriately and does not examine financing aspects.
Marija Tasić	The major problem of the Strategy is the methodological lack of foundation, which increases the alleged possible production of energy from renewable energy sources compared to the real one.	An increased share of energy from renewable energy sources would lead to a strategically dangerous overestimation of the available renewable energy potential. If the index of the strategic priority of energy sources during the entire life cycle is taken into account during the calculation, it can be concluded that more primary energy is spent on construction (including the energy used for the production of all used materials), collection, transport and maintenance of those devices, than is obtained by their work. That is why it can be said that these devices are consumers, not producers of energy.	Not adopted	Noted.
Marija Tasić	There is no mention anywhere of economy and ecological depletion of resources in cases where there are no sources of energy from nature.	If it is taken into account that renewable energy sources are very variable in time, then their operation must rely on the operation of already existing power plants (hydroelectric power plants, thermal power plants), which further increases the pressure on the work of EPS.	Not adopted	Noted. Please have in mind that SEA is report for INECP which defines the measures for the period up to 2030. Period up to 2050 is vision.
УГ Полекол	Considering the socio-economic losses and irreversible ecological damage to the total biodiversity caused by MHPs, as well as the fact that the positive effects of their construction are negligible from an	According to the Cadastre of Small Hydropower Plants of Serbia, out of a total of 856, 149 of which have already been built. Small hydropower plants of the derivation type, without question, have a disastrous effect on the flora and fauna, that is, on the	Not adopted	The text is revised The information regarding small hydropower plants in the SEA is revised since the

stakeholder	comment	explanation	answer	response
	<p>energy and economic point of view, it is necessary to prohibit the construction of these hydropower facilities not only on watercourses in protected areas, but and on everything else in Serbia.</p>	<p>amount of water in watercourses, which also has a direct negative effect on the local population and the environment. Data on the negative impacts of the small hydropower plants built so far on the territory of the Republic of Serbia are contained in the Draft Spatial Plan of the Republic of Serbia from 2021 to 2035, which states that "...spontaneous construction of MHE on smaller watercourses and in protected areas is somewhere devastated watercourses, prevented the construction of certain necessary planned water facilities and threatened the natural values and needs of the local community". The said act also contains the following statement: "...the status of privileged producers was also granted to 125 MHEs (about 110 built) whose total power is about 91 MW, and the total production shown by the projects is about 368 GWh, which is only about 1% of consumption; MHPs have long pipeline derivations, which causes major social and environmental problems", from which he concludes that the draft of the highest planning act of the Republic of Serbia clearly defines the relationship between the insignificant amount of energy obtained from the derivation MHPs, on the one hand, and the enormous negative impacts caused by the operation of MHPs on the citizens and the environment, on the other hand. The stated factual situation is all the</p>		<p>capacities regarding hydropower plants should be increased through the modernization and revitalization if existing capacities.</p>

stakeholder	comment	explanation	answer	response
		<p>more critical if you take into account the information, also stated, in the Draft Spatial Plan of the Republic of Serbia from 2021 to 2035, which states that Serbia is a water-poor country, with very unfavorable and uneven water regimes. In the territory of the Republic of Serbia, it is expected that by the end of this century the temperature will continue to rise to values that are on average 3-5 degrees higher than the temperatures from the middle of the last century. Such changes will inevitably cause destabilization of the climate system and a progressive change in climate conditions, which will create the conditions for the occurrence of extreme heat waves and severe droughts.</p> <p>Therefore, there is no ratio for the planning and construction of small hydropower plants on watercourses whose capacities are already scarce and forecasts are negative.</p> <p>The obligation to consider all expected consequences in advance is in accordance with the principles of sustainable development, prevention, precaution and integrity, which are prescribed by positive law. The Constitution of the Republic of Serbia guarantees everyone's right to live in a healthy environment and prescribes the responsibility of everyone, and especially of the Republic of Serbia, for environmental protection. Everyone is obliged to preserve and improve the environment.</p>		

stakeholder	comment	explanation	answer	response
		<p>Given that such a decision in the Republic of Serbia has already been made in the cities of Užice and Pirot, Bor, the municipalities of Arilje, Ćićevac, Brus, Vlasotince, Dimitrovgrad, Svrlijig, etc. and implemented through the planning acts of these local self-governments or procedures are in progress, the Republic of Serbia should, like the listed local self-governments, also recognize the best interest for nature, people and development perspectives opened by environmental protection and landscape preservation, which is realized and through the ban on the construction of MHE.</p> <p>Given that MHPs are built on relatively small or small watercourses, the torrential character of watercourses and the excessive erosion present in the area of Trgovište municipality, the construction of small reservoirs is unacceptable because their lifetime would be very short and they would quickly be filled with sediment and lose their function, and in addition, they are subject to eutrophication and significantly change water bodies, which are unique ecosystems in Serbia and as such are valorized by the Institute and recognized in scientific circles and the general public.</p> <p>All watercourses on which MHEs are realized or planned are actually mountain rivers that, as a rule, represent the only habitats of protected, strictly protected and unique species of ichthyofauna and other aquatic</p>		

stakeholder	comment	explanation	answer	response
		<p>organisms whose habitats have been devastated and fragmented by previous construction, and further changes in habitat, morphology, water temperature and water regimes would lead to their complete destruction. The presence of the mentioned species is well documented by the Institute for Nature Protection of Serbia. However, regardless of all that, 8 HPPs were built in the Pčinja basin, and only 4 in a row at Tripušnica, 10 in a row at Vlasina, at Poblacnica in the municipality of Priboj, which is the breeding ground of the sapling, HPP Nova Varoš was built, water intakes were built at the very the perimeter of protected natural assets, so many rivers, such as the Brezansa, remained protected in their upper course, and dried up in their lower course, which practically renders protection and valorization values meaningless - by cutting the flow, feeding and migratory routes and disrupting the landscape. SANU expressed its opinion regarding the negative impacts of MHE as follows:</p> <ol style="list-style-type: none"> 1. Negative impacts of the MHE location (unusability and/or long-term conversion of fertile land, short-term usurpation of forest land, risks of erosion and silt deposition, protection from torrential flows, etc.). 2. Short-term negative impacts during the construction of the HPP (soil erosion at the construction site, waste generation, transport 		

stakeholder	comment	explanation	answer	response
		of waste and construction materials, deforestation, water quality		
Damir Bećirbašić	Mitigation measures are not possible on the watercourses where derivation MHEs were constructed.	<p>"The key planning goal, in this case, should be the protection of water assets and other factors of the environment and nature while creating conditions for sustainable socio-economic development of the area, and it is incompatible with planning and permitting the construction of MHE.</p> <p>According to the above, I propose to change in the Draft INEKP as follows: INECP does not predict potential locations for the construction of mini, micro and small hydropower plants. The construction of mini, micro and small hydropower plants on the territory of the Republic of Serbia is prohibited. The decision on the ban will also be implemented in the Spatial Plan of the Republic of Serbia."</p>	Adopted	NECP does not contain projects of small hydro power plants. The information regarding small hydropower plants in the SEA is revised since the capacities regarding hydropower plants should be increased through the modernization and revitalization of existing capacities.
Damir Bećirbašić	I would like to submit an objection to the report on the strategic impact assessment of INECP. Due to the length of the remark, I have not been able to publish it in tabular form	<p>It contains the following information:</p> <ul style="list-style-type: none"> - The average MHE (500kw) produces only 0.005% of the total electricity in Serbia - So far, ~150 MHE have been built in Serbia, whose annual production is only 0.89% - network losses in the territory of the Republic of Serbia amount to 11.72% - The municipality of Prijepolje receives an average of €182 per year according to the MHE - MHEs generally have no employees because production takes place remotely <p>All in all, there is little or no benefit for the</p>	Not adopted	

stakeholder	comment	explanation	answer	response
		<p>Republic of Serbia, little or no benefit for the municipality, while the investor receives €250,000 per year from the electricity sold. I note that all data are official, obtained from the municipality of Prijepolje, EPS, the Ministry of Mining and Energy and similar institutions. On the following link you can find a detailed author's text that deals with the ban on the construction of MHE, specifically, in Prijepolje:</p> <p>https://foruminfo.rs/da-li-opstina-prijepolje-i-republika-srbija-imaju-koristi-od-minihidroelektrana-mhe/</p>		

ii. Chapter 1

stakeholder	comment	explanation	answer	response
RERI	"Non-technical summary contains unintelligible and lumpy statements that shouldn't even to be found in the report on SEA."	<p>Given the context of the provided chapter, the Submitter notes that it's unclear what the overall objective of this chapter is and its connection to the remaining parts of the Report. In subsection 1.3, "Description and Evaluation of Alternatives," it's mentioned that the "business as usual" scenario will be analyzed. However, there are also references to the Scenario with Existing Measures (WEM) and the Scenario with Additional Measures (WAM), which are proposed by the INCEP. The "business as usual" scenario is described as a scenario of "non-implementation of strategies, programs, and plans." Which serious and legitimate state, intending to</p>	Partially Adopted.	<p>The previous intention was to give detailed information as much as possible. The text of SEA is revised in order to be clear and precise. However some comments such as the draft INCEP itself significantly damages the reputation of the</p>

stakeholder	comment	explanation	answer	response
		<p>seriously analyze future planning documents it intends to adopt, considers a scenario where strategies and plans are not implemented? Does this mean that the drafter of the SEA doesn't see any problem with this, but rather includes it as one of the scenarios, envisioning the possibility of not implementing strategies and plans? Even when this is the case, as is unfortunately true in Serbia, it involves the irresponsibility of relevant institutions, holders of public functions, and public servants, and such a scenario is not considered among the available alternatives for implementing the planning document. Although the draft INCEP itself significantly damages the reputation of the Republic of Serbia, it should not have been published or submitted to the Secretariat of the Energy Community in the first place. However, further in the elaboration of this chapter, as well as throughout the entire text of the SEA draft, the drafter of the report addresses two scenarios: the Scenario with Existing Measures (WEM) and the scenario with Additional Measures (WAM).The WEM scenario is described as a scenario that "favors a situation that does not meet the goals in the field of energy and climate change (European Green Deal) and does not promote sustainable development." It is further stated that this scenario includes only policies and measures in effect until 2020. Primarily, the goals in the field of energy and climate change in Serbia</p>		<p>Republic of Serbia, it should not have been published or submitted to the Secretariat of the Energy Community in the first place, can not be considered as comments and do not provide any relevant explanation except subject opinion.</p>

stakeholder	comment	explanation	answer	response
		<p>are not determined by the European Green Deal, as the Republic of Serbia is not an EU member. By signing the Sofia Declaration on the Green Agenda for the Western Balkans, the Republic of Serbia recognized the European Green Deal as a new growth strategy for the EU towards a modern, climate-neutral, resource-efficient, and competitive economy. It committed to working together with the EU to achieve carbon neutrality for the European continent by 2050. This includes introducing strict climate policies and reforming the energy and transportation sectors, particularly by aligning with the European Climate Regulatory Framework (EU Climate Law), which establishes climate neutrality for the continent by 2050 and reducing greenhouse gas (GHG) emissions by 55% by 2030 compared to 2050. As stated in the Sofia Declaration signed by the Republic of Serbia, considering a scenario in which Serbia does not accept the commitments from the Sofia Declaration sends a message to the EU, Serbia's international partner, that Serbia is contemplating not applying the accepted obligations. If this is the case, then it should have been presented to the European Union at the moment when Serbia requested financial support for the development of the INCEP and the SEA report. Furthermore, it's important to note that the European Green</p>		

stakeholder	comment	explanation	answer	response
		<p>Deal, or the Sofia Declaration, is not the only document determining energy and climate policy goals. Serbia ratified the Paris Agreement in 2017 and committed to fulfilling the obligations outlined in this agreement. As part of meeting the commitments of the Paris Agreement, Serbia adopted a Nationally Determined Contribution (NDC) for reducing GHG emissions and submitted this document to the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC). In this document, a goal is established: "economy-wide target - reduction of GHG emissions by 2030: - 13.2 % compared to 2010 - 33.3% compared to 1990." In the INCEP draft , this goal is ambiguously and methodologically incorrectly listed as one of the key objectives of the INCEP.</p> <p>Does considering a scenario in which this goal is not achieved fall within the reasonable alternatives that should be considered in the SEA report, according to the opinion of the drafter of the report? Serbia recently adopted a Low Carbon Development Strategy, which also confirms the goal already established in the NDC. Does the drafter of the report believe that failing to achieve the objectives of this strategy is a reasonable alternative worth considering? We cannot know this, as neither the drafter of the report nor the drafters of the INCEP seem to acknowledge this strategy. Additionally, does the drafter of the report</p>		

stakeholder	comment	explanation	answer	response
		<p>also believe that the 2030 targets that Serbia accepted within the Energy Community might not be binding, since they are considering a scenario without achieving these energy and climate objectives as a reasonable scenario? It's important for the drafter to explain why they believe the WEM scenario includes only policies and measures until 2020. Where was 2020 established as the base year? Or is it not known to them that even after 2020, the Republic of Serbia continued to adopt strategic, planning, and normative documents, the non-implementation of which could also be considered within the realm of "reasonable scenarios" by the drafter of the report?</p> <p>In Table 0.1, comparative analysis results of scenarios related exclusively to the aspects of the INCEP pillars are listed (reduction of GHG emissions, share of renewable energy sources, import dependency, installed capacities, overall planned investment needs for state aid until 2030 in NCEP, change in unemployment compared to WEM in 2030, and change in GDP compared to WEM in 2030). The drafter of the report further concludes that, when comparing the two alternative scenarios within the Strategic Impact Assessment Report (SIAR), the WEM scenario is evidently less favorable environmentally and socioeconomically compared to the WAM scenario. Hence, the desirable option is considered to be WAM.</p>		

stakeholder	comment	explanation	answer	response
		<p>This conclusion becomes even more puzzling when looking at Table 3.11, where none of the measures contributing to decarbonization are included in the WAM scenario. Additionally, the drafter should explain where they considered all the environmental and sustainable development-related results in Table 0.1. from an expected outcomes perspective. In subsection 1.4 - Overview of Environmental Impact Assessment and Key Findings, it's not clear what the drafter of the report means by "impacts" and what they mean by the "consequences of those impacts." In several instances, the drafter explicitly expresses a viewpoint and "concludes" that something has a positive impact (based on the presented data). The Submitter points out that based on the presented data in the report, it's not possible to reach such a (or any) conclusion.</p> <p>Moreover, in this subsection, the S scenario is mentioned for the first time, and while its nature can be inferred from the INCEP, it's not explicitly clarified in the report itself.</p> <p>In Table 0.2, Specific Environmental Objectives of the SEA are listed, including the reduction of air emissions (reducing greenhouse gas emissions by 40.4% in 2030 compared to 1990). This leads to the conclusion that the drafter of the report doesn't understand the basic principles of GHG emissions, particularly the requirements of international, EU, and</p>		

stakeholder	comment	explanation	answer	response
		<p>national legislation. GHG emissions are not emissions into the air but into the atmosphere. Simultaneously, these objectives seem to be under-analyzed elsewhere. The Submitter also points out that Table 0.3 is unclear, and it's not evident why the Environmental Objectives(?!), listed in column 2 and labeled from 1 to 21, are mentioned or how they relate to Table 0.2.</p> <p>Lastly, the conclusions presented in subsection 1.5 Indicative Mitigation and Monitoring Measures have no connection with the previously presented data, information, or national needs (e.g., the creation of a register of pollutants and GHG inventories – both obligations have existed for more than 10 years, as well as the register and inventory themselves). They even less correspond to the needs relevant to INCEP. The stated conclusions have the least connection to the monitoring and reduction of potential environmental impacts.</p> <p>Furthermore, the drafter of the report on the SEA suggests that prioritization should be given to creating a register and inventory. Most of the measures listed in subsection 1.5 are related to obligations derived from existing regulations and international commitments that are accepted and binding. It's not clear why the drafter presents them as indicative measures proposed by them. After reading the non-technical summary, the relevant Ministry</p>		

stakeholder	comment	explanation	answer	response
		of Mining and Energy could have concluded that the drafter of the report on the SIAR is not capable of fulfilling the expected task. However, it not only seems to have not noticed this but also made such a draft report available for public scrutiny, effectively sharing responsibility for deficiencies and omissions that constitute a significant portion of this report on the SIAR with the drafter of the report.		

iii. Chapter 2

stakeholder	comment	explanation	answer	response
Ministry of Agriculture, Forestry, and Water Management, Republic Directorate for Water	"To proceed with water resource management at the river basin level, ..." should be corrected to: "To proceed with water resource management at the watershed level, ..."	"In accordance with the Water Law"	Adopted	Corrected.
Ministry of Agriculture, Forestry, and Water Management, Republic Directorate for Water	"Plans for water district management" should be corrected to: "Plans for water watershed management."	"In accordance with the Water Law"	Adopted	Corrected.
Ministry of Agriculture,	In the explanation of the Water Law, "protection from harmful impact of	"In accordance with the Water Law"	Adopted	Corrected.

<p>Forestry, and Water Management, Republic Directorate for Water</p>	<p>waters" should be corrected to: "protection from harmful actions of waters."</p>			
<p>RERI</p>	<p>Chapter 2.2 - Legal and Regulatory Framework; 2.3. Scope of the Strategic Impact Assessment; 3.3 - Relationship to Other Programs</p>	<p>In Chapter 2.2 - Legal and Regulatory Framework, and Chapter 3.3 - Relationship to Other Programs, there is no mention of policies related to climate change. The report's author does not consider it necessary to analyze the alignment of the INECP with, for example, the Low Carbon Development Strategy (regarding GHG emissions reduction, increased share of RES, strategic assessment goals, etc.).</p> <p>The report's author seems to be unaware that the Fourth Revised National Program for the Adoption of the Acquis Communautaire of the European Union was adopted on July 21, 2022, as it is not mentioned.</p> <p>The report's author does not recognize, and possibly does not even know about, the existence of the National Plan for the Reduction of Emissions of Major Air Pollutants originating from Large Combustion Plants (NERP), the implementation of which is crucial for the implementation of the INECP and assessing the impact of this plan on the environment.</p>	<p>Partially adopted</p>	<p>The previous intention was to give detailed information as much as possible. The text of SEA is revised in order to be clear and precise</p>

		<p>The purpose and reason for including this chapter in the SEA report are not clear, except for formal compliance with the content requirements of the report.</p> <p>Regarding the scope of the SEA report's author provides basic information about the geographical location of the Republic of Serbia and its neighboring countries. However, the author does not acknowledge that the INECP does not include measures and policies to be implemented in the territory of AP Kosovo and Metohija.</p> <p>Although Chapter 2.2.2 - International, EU, and National Objectives refers to the United Nations 2030 Agenda for Sustainable Development (UN Agenda 2030), it fails to mention the goals of the New Urban Agenda (UN Habitat III) within the same chapter, as well as within the draft INECP and the SEA report as a whole. The New Urban Agenda addresses the 11th Sustainable Development Goal of Agenda 2030, "Inclusive, Safe, Resilient, and Sustainable Cities and Human Settlements."</p> <p>The Republic of Serbia has fulfilled the precondition for the implementation of the New Urban Agenda by adopting the Sustainable Urban Development Strategy of the Republic of Serbia until 2030 ("Official Gazette of RS," no. 47/19) (SUDSRS). SUDSRS</p>		
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		<p>recognizes the vulnerability of urban areas to climate change as one of the most significant problems and defines high levels of adaptability to climate change as special objectives.</p> <p>Considering that urban areas are particularly vulnerable to climate change, the submitter points out the need for a more detailed elaboration of general and specific goals, as well as measures related to urban areas.</p>		
RHMZ	<p>"The draft SEA Report of the Integrated National Energy and Climate Plan of the Republic of Serbia for the period up to 2030 with a vision up to 2050 does not contain a reference to the Law on Meteorological and Hydrological Activity, which regulates issues directly related to climate change. In connection with the above, it is suggested that the text of the Draft Report in chapter "2.2.3. National legislation" will be supplemented by adding the following text after the text on the Law on Climate Change, i.e. after the sentence: "There are numerous other regulations of the Republic of Serbia that are directly or indirectly related to climate change, and the most important are:"</p> <p>The Law on Meteorological and</p>	<p>In accordance with the provisions of Art. 5, 9, 16, 18, 19, 24, 25, 28 of the Law on Meteorological and Hydrological Activity, which was adopted in 2010, and by-laws adopted on its basis, the Republic Hydrometeorological Institute (RHMZ) ensures the implementation of the national program of systematic observations of the climate system and the functioning of the hydrometeorological early warning system in order to more effectively implement measures of adaptation to changed climate conditions, performs the tasks of monitoring and researching climate changes, developing reference scenarios and providing climate services in the field of adaptation to climate changes. By performing these tasks, the obligations established by the provisions of Article 5 of the UN Framework Convention on Climate Change and the provisions of Articles 7 and 8 of the Paris Agreement are also fulfilled. Also, in accordance with the</p>	Adopted	The text of SEA is revised .

	<p>Hydrological Activities (Official Gazette of RS, No. 88/2010), which regulates meteorological and hydrological affairs of interest to the Republic of Serbia, which, among other things, include: systematic meteorological and hydrological measurements and observations; development and maintenance of climate data bases; establishment and operational functioning of a multifunctional hydrometeorological system of early announcements and warnings about the occurrence of extreme weather, climatic and hydrological phenomena, disasters and disasters on the territory of the Republic of Serbia, including analysis and mapping of the risk of meteorological and climatic elemental disasters and disasters for the needs of the Disaster Risk Assessment in the Republic Serbia; monitoring and research of climate changes and multidisciplinary research of their impact, provision of climate services in the function of vulnerability assessment and implementation of adaptation measures to changed climate conditions; fulfillment of international obligations in the field of meteorology, hydrology,</p>	<p>provisions of this Law, the Republic Hydrometeorological Institute, as the National Hydrometeorological Service of the Republic of Serbia , also performs the functions of the Subregional Center for Climate Change for Southeast Europe within the European Network of Regional Climate Centers of the World Meteorological Organization.</p>		
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	monitoring and research of climate change."			
RERI	2.1. Purpose of the study	"In this part of the report, the drafter provides inaccurate information as it states that the SEA contains a description and assessment of potential environmental impacts, as well as considered alternatives. However, the SEA merely contains a superficial description and generic assessment of the INCEP's environmental impacts, particularly not related to specific policy measures. It also lacks an analysis of reasonable and feasible alternatives, especially concerning policy measures."	Not adopted	SEA is a document used to identify the environmental and social impacts of a proposed plan and facilitate the integration of environmental and social issues in the decision-making process. The object of the SEA generates different methodological requirements related to the scale of assessment than an EIA, which is a technical tool assessment that relates to planned projects and activities with specific geographic and technical specifications. At the time of implementation of specific technical measures, then an

				EIA will need to be elaborated in accordance with national legislation for the specific measures (e.g. district heating, electricity transmission and distribution infrastructure, natural gas, coal infrastructure, energy efficiency measures in housing, construction, industry, traffic, etc.).
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iv. Chapter 3

stakeholder	comment	explanation	answer	response
SEPA	Is it necessary to list data on GHG emissions from the Second National communication, if they werent used to issue this document?		Adopted	Text is updated
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris	The policy measures listed in Section 3.1 – specifically in tables 3.1, 3.2, 3.3, 3.4, and 3.5 – do not correspond to the policy measures outlined in the document "INTEGRATED NATIONAL ENERGY		Adopted	Text is corrected

stakeholder	comment	explanation	answer	response
Zantvort Damnjanović, Dragan Srečković	AND CLIMATE PLAN OF THE REPUBLIC OF SERBIA FOR THE PERIOD UNTIL 2030 WITH PROJECTIONS UNTIL 2050." Therefore, it is necessary to align them.			
Ministry of Agriculture, Forestry, and Water Management, Republic Directorate for Water	In the section below the subsection "Water," in front of the phrase "Using existing mines..." should be added "Inadequate use of existing mines..."	Only inadequate usage leads to detrimental impact on surface and groundwater, not every usage.	Adopted	Text is corrected
	"In the conclusion regarding water treatment facilities, it can be emphasized that the Republic of Serbia lacks sufficient quality drinking water."	The devices for purification should be specified. From the context, it can be inferred that it refers to facilities for water treatment for drinking purposes. If this is not the case, then a connection between wastewater treatment facilities and drinking water needs to be mentioned.	Adopted	Text is updated
RERI	Chapter 3.3 - Relationship to Other Programs	We have already drawn attention to shortcomings of the description of legal and regulatory framework and omission descriptions of important planning documents. However, in this part of the Report on SEA once again, according to state plans, programs and strategies, some of which have expired and they are no longer in any way relevant for strategic assessment influence. All these plans and programs Producer of the SEA	Partially adopted	The relevant programmes that were in force throughout the drafting the SEA was performed. Given the length of the preparation, a review of what was in force at the time of submission is

stakeholder	comment	explanation	answer	response
		<p>Report it simply lists, without explanation their significance for strategic assessment influence. Let's look at some examples. Energy development strategy of the Republic of Serbia for the period until 2025. year with projections until 2030.was described superficially, without any information about his relationship with INECP and strategic assessment influence. Goals and measures from this strategy and INECP, they were obviously not done consultation with the working group for development of a new strategy. The spatial plan of the Republic of Serbia is expired and a new plan is being developed. The public does not know how far it has come by creating a new Spatial Plan but the SEA Maker could, and was obliged to, to consult with the ministry responsible for drafting Spatial plan. Especially if you has in mind the content of the Spatial Draft of the plan and the opinion on that draft given by the Ministry of Mining and of energy. If the Report Maker does not know about this exchange of opinions two ministries, and we have no doubt that not know, he could have done the consultation so to find out. Although the draft spatial plan of the Republic of Serbia from 2021 to 2035. passed the stage of public inspection which ended with the adoption of the report on the public inspection carried out in October 2021, draft of INECP and a strategic assessment report they do not</p>		<p>performed. As the National Parliament adopted amendments to Law on Spatial Planning and Construction in late July, after the submission of the SEA. Plans that were not in force were not mentioned. Based on the SEA legislation, what is required is "The short outline of the content and objectives of plans and programmes. The new plan is added in the final version. and relationship with other plans and programmes;" it is therefore not an exhaustively detailed description of related programmes, especially considering the length of the report</p>

stakeholder	comment	explanation	answer	response
		<p>indicate any impact on the environment to any relationship with the development of the new Spatial plan. Taking into account the importance of the aforementioned planning act, as well as the fact that on the basis of the same in defined within INECP indicators that represent integral part of the information system environmental management, The applicant indicates the need consideration of more up-to-date data from of those who are represented Spatial plan of the Republic of Serbia whose time horizon has expired in 2020. Agriculture and rural strategy of development has expired because it was adopted for the period up to 2020, the Cleaner Production Strategy no exists. There was a Strategy introduction of cleaner production ("Official Gazette of RS", number 17/09) which was inherited by the Introduction Program cleaner production from 2018. That, obviously, the Maker of the Report does not know. How is it possible for that the question did not interest him seeing that is the strategy incorrectly referred to adopted in 2009? That he is the Maker Consulted on the report on SEA with the Ministry of Life Protection in the middle he might reach some information that would help him not to makes inaccurate, incomplete and misleading statements information in the SEA</p>		<p>which needs to remain functional.</p>

stakeholder	comment	explanation	answer	response
		<p>Report.</p> <p>National approximation strategy in the field of environment for Republic of Serbia ("Official Gazette RS", 80/11) was adopted before than Serbia has surrendered negotiating positions for chapters 27 and chapter 15. In addition, in the meantime, others have been adopted strategies and planning documents and so on this strategy completely outmoded and outdated. It is particularly worrying that SEA report maker apparently he does not know that he was obliged to evaluate the influence of INECP, that is of planned policy measures, made in relation to their contribution achieving the goals of Paris agreement and in relation to the goals long-term strategies in the field climate change (for whose the existence of the Report Maker does not know). That is clearly established document REGULATION (EU) 2018/1999 adopted by Energy community (Article 3.2.f). Chapter 3.3. is inaccurate and incomplete, strategic impact assessment relationship with mentioned programs and strategies it is not described in this part either. The report on the SEA is not satisfactory formal requirements in terms of content Report on SEA.</p>		
RERI	Chapter 3.4 - Evaluation of Alternatives; 3.4.1 - Rationale for	"The Law on Strategic Environmental Assessment (Article 13, Paragraph 1, Point 5) establishes that the baseline of the SEA shall	Partially adopted	There is a legal requirement for including the zero

stakeholder	comment	explanation	answer	response
	<p>Developing Alternatives; 3.4.2 - Description of Considered Alternatives</p>	<p>include: a presentation of prepared alternative solutions related to environmental protection in the plan and program, including the alternative solution of non-implementation of the plan and program and the most favorable alternative solution from the perspective of environmental protection. Article 15 of the Law on SEA provides a more detailed description of the requirements regarding impact assessment and the presentation of alternative solutions.</p> <p>Directive 2001/42/EC in Article 5.1 stipulates that the SEA Report should contain the identification, description, and evaluation of reasonable alternatives, taking into account the objectives and geographical scope of the plan. The guidance for the application of Directive 2001/42/EC, to which the Author of the SEA Report refers, provides a more detailed description of how the presentation of alternatives should be approached. However, the Author of the SEA Report does not adhere to the law and provisions of the mentioned directive.</p> <p>Firstly, the Author of the SEA Report did not present all reasonable alternatives. There is no consideration of scenarios that were discussed during the public consultations in September 2022, when five scenarios were presented, including Scenario 6 - Fit for 55. The Ministry</p>		<p>alternative solution for plans and programmes and the most favourable solution from the aspect of environmental protection. The non-execution scenario is considered a self-standing part of the environmental report, and not necessarily linked to the reasonable alternatives, but rather to the baseline information. The WEM scenario, considers the impacts of implementation of existing measures in places. The WAM scenario is evaluated as the most favorable solution. There is no requirement with regards to a specific</p>

stakeholder	comment	explanation	answer	response
		<p>of Mining and Energy rejected this scenario without appropriate explanation. The Author of the SEA Report states that alternatives that are politically difficult or undesirable should not necessarily be considered unreasonable. However, the Author still decides not to consider this alternative from the perspective of its impact on the environment. Moreover, although supposedly two alternatives were chosen, the Author of the SEA Report does not consider alternative solutions for policy implementation, nor does it provide a description of measures to prevent and limit negative impacts or enhance positive impacts on the environment related to policy measures.</p> <p>The Author of the SEA Report outlines two scenarios. Of these, at least one scenario should be the zero option scenario, without implementing the plan. This scenario certainly cannot be the WEM scenario (with existing measures). This scenario cannot be acceptable because it favors a situation that does not meet the objectives in the field of energy and climate change (European Green Deal) and does not promote sustainable development. It includes only policies and measures in force until 2020, without any additional interventions. Firstly, this scenario is not reasonable, as it is unreasonable for a country to consider a scenario of public policies that</p>		<p>number of additional alternatives. Nevertheless a section is added to give an overview of additional scenarios discussed during the preparation of the INECP, and a comparative evaluation as far as the level of detail on these alternatives allow. Locational alternatives are excluded as the strategy is national.</p>

stakeholder	comment	explanation	answer	response
		<p>implies non-application of regulations and non-fulfillment of accepted international obligations. Even in this scenario, which is unreasonable, the Author of the SEA Report does not evaluate possible environmental impacts. "In Table 3.7, the results related to the environment are not presented. The impacts of electricity production through lignite incineration have been superficially and insufficiently clear. Similarly, the impacts on other environmental factors, especially on the population and human health, have been assessed superficially and insufficiently precisely. The Protocol on Strategic Environmental Assessment (SEA) under the Convention on Environmental Impact Assessment in a Transboundary Context requires the consideration and improvement of human health as an integral part of the strategic environmental assessment. The assessment of the impacts of alternative solutions on health, as well as the assessment of the impacts on human health in general, has not been considered in this SEA Report.</p> <p>During the analysis of the WAM scenario (with additional measures), the Author of the SEA Report does not provide a critical analysis from the perspective of environmental impact assessment. Instead, as is customary in Serbia, the Author defends and praises this scenario, even though it is not their task to do so.</p>		

stakeholder	comment	explanation	answer	response
		<p>In the analysis of this scenario, the Author of the SEA Report provides inaccurate data. Specifically, they claim that the National Plan for Energy and Climate (NPEC) determined a reduction in electricity production from thermal power plants by 2030, which is not accurate and is nowhere stated in the Draft NPEC. The stated goal is "up to 25%" rather than 25%. Instead of considering a range of options from retaining existing coal-fired thermal power plant capacities to the complete closure of all thermal energy facilities by 2030, along with analyzing the environmental impacts of these alternative solutions, the Author praises the existing goal, which they misinterpret.</p> <p>Even if the Author considered this goal justified from the perspective of environmental protection and sustainable development objectives, they did not present an analysis of the impacts of achieving this goal on the environment and human health.</p> <p>The Author of the SEA Report does not present an impact assessment of the operation of thermal power facilities that will remain in use until 2030, 2040, and 2050, even though the Draft INPEC contains data on facilities that will remain operational after 2030.</p> <p>Furthermore, the Author of the SEA Report incorrectly states that the NPEC aims for</p>		

stakeholder	comment	explanation	answer	response
		<p>lignite-fired thermal power plants to completely cease electricity production by 2050. However, the Draft NPEC states that this is an expectation, not a definitive outcome. In no way does the Author of the SEA Report provide an impact assessment of the construction, operation, and decommissioning of nuclear power plants on the environment, even though they claim to consider scenarios involving nuclear energy.</p> <p>The consideration of building structures whose construction is prohibited by law does not seem unreasonable to the Author of the SEA Report. Additionally, the Author of the SEA Report does not address the environmental impacts arising from the use of natural gas as a substitute for coal, but instead, generally asserts that positive effects will occur. Similar to the previous analysis of the so-called WAM scenario, the Author of the SEA Report fails to provide an overview of the estimated impacts of this favorable alternative solution from an environmental protection standpoint, with a description of measures to prevent and limit negative impacts or enhance positive impacts on the environment. This is done superficially and without any justification for their conclusions.</p> <p>The SEA Report does not include an analysis of alternative solutions as required by the Law on Strategic Environmental Assessment.</p>		

stakeholder	comment	explanation	answer	response
		Consequently, it does not formally satisfy the content stipulated by the law.		
EMS	<p>3.5.9.8 ENERGY</p> <p>The total installed capacity for electricity production in the Republic of Serbia is 12.40 GW.</p>	<p>"It is necessary to state the exact current installed production capacity in the Republic of Serbia.</p> <p>Sources can be the Report of the Energy Agency of the Republic of Serbia."</p>	Adopted	Text is updated
EMS	<p>The INECP envisions the construction of new capacities: TPP Kostolac B3 350 MW, new wind farms 3000 MW by 2030, new solar facilities 1.240 MW by 2030, hydrogen production 0.114 Mtoe by 2030, including the interconnections Serbia - Bulgaria (2023), Serbia - North Macedonia, Serbia - Romania (2025 TS DV Pančevo, - TS Rešica and 2029 RP Đerdap 1, - TS Portile De Fier), Serbia - Bosnia and Herzegovina, Serbia (2027) - Montenegro (2024) and interconnection Serbia - Croatia in 2027, and interconnection with Hungary (2028).</p>	<p>Firstly, the SEA report's author did not present all reasonable alternatives. It did not address scenarios that were part of the public consultations in September 2022, where 5 scenarios were presented, including scenario 6 - Fit for 55. The Ministry of Mining and Energy dismissed this scenario without providing appropriate explanation. The SEA report's author, on the other hand, states that politically challenging or undesirable alternatives should not necessarily be considered unreasonable. However, it still decides not to consider this alternative from the perspective of its environmental impacts.</p>	Partially adopted	<p>There is no requirement with regards to presenting all discussed alternatives or a specific number of additional alternatives. Nevertheless a section is added to give an overview of additional scenarios discussed during the preparation of the INECP, and a comparative evaluation as far as the level of detail on these alternatives allow. Locational alternatives are excluded as the strategy is national.</p>

stakeholder	comment	explanation	answer	response
				Scenarios that were assessed as non-realistic will not be presented.
EMS	3.5.9.8.1 ENERGY RESOURCES POTENTIAL Wind Energy This means that within the installed capacities, it is possible to have 500 MW with the current size of tertiary reserve capacity, which can be provided by thermal power plants and pumped hydroelectric power plants.	This data is not in accordance with the adequacy analysis made within the Transmission System Development Plan of Serbia 2023-2032, whose verification in AERS is ongoing.	Adopted	Text is updated
EMS	3.5.9.8.1 POTENTIAL OF ENERGY RESOURCES Solar energy Based on the currently available capacities of the power system of the Republic of Serbia for providing tertiary reserves, it was adopted that the maximum technically usable capacity of solar power plants is 450 MW, that is, their technically usable potential is 540 GWh/year (0.046 Mtoe/year).	This data is not in accordance with the adequacy analysis made within the Transmission System Development Plan of Serbia 2023-2032, whose verification in AERS is ongoing.	Adopted	Text is updated
Transnafta	In table 3.3 with code PM_ES3 in column Name of policy or measure there is a text:“ Building capacities for energy storage“. It is necessary to replace the word energy with electricity. Do the same in tables 3.11 p.94 and		Adopted	Text is corrected

stakeholder	comment	explanation	answer	response
	3.23 p.180 (this also applies to tables 3.3, 3.11 and 3.23 in English version).			
Transnafta	In table 3.3 with code PM_ES3.2 in column Covered sectors there is a word oil needs to be replaced with oil.		Adopted	Text is corrected
RERI	Chapter 3; Subsection 3.1.1 - Key Objectives of the National Energy and Climate Plan for 2030 with Projections for 2050	<p>In subsection 3.1.1 Key Objectives of the National Energy and Climate Plan for the year 2030 with projections for the year 2050, the report's author states that increasing the share of renewable energy sources (RES) is a key goal of the INECP. However, it's surprising that this goal has been modified compared to the goal set by the Decision of the Ministerial Council of the Energy Community on December 15, 2022, where the RES target was decreased by 7.1%. Despite this change, the targets related to greenhouse gas (GHG) emissions reductions remain roughly the same. It's unclear how the achieved targets of 40.7% RES in GFCM (as stated in the Energy Community Decision) and 33.6% RES in GFCM (as stated in the draft NECP) result in approximately the same GHG emissions reduction (40.3% - including LULUCF by 2030 compared to 1990).</p> <p>Additionally, the report's author indicates that the second key objective within the INECP is a very ambitious yet realistic program to reduce the contribution of lignite in electricity production, aiming for a 25% reduction in</p>	Comment related to INECP (not SEA) - Not adopted	

stakeholder	comment	explanation	answer	response
		<p>2030 compared to 2019. The submitter points out that this statement isn't aligned with the INECP, which outlines an imprecise and immeasurable target.</p> <p>Furthermore, the report mentions that all the INECP goals contribute significantly to reducing GHG emissions by 2030. However, the submitter highlights that it's not clear which specific goals are being referred to (two are mentioned in the text). Lastly, the report describes qualitative goals including improving interconnectivity and energy supply security, liberalizing energy markets, promoting competitiveness, and encouraging research and innovation in the environment and energy sector. The submitter questions how the report's author arrived at these goals and whether they all contribute to GHG emissions reduction or only those related to decarbonization, as shown in Table 3.1. The relationship between these goals and the previous two goals remains unclear.</p> <p>In this section of the report, the environmental characteristics of areas that may be significantly impacted are not described as expected. Contrary to this, the report states that precise locations for implementing certain policy measures have not been determined, with the author not identifying any deficiency in this regard, which the submitter finds to be inaccurate.</p>		

stakeholder	comment	explanation	answer	response
RERI	3.1.3.2 Decarbonization Table 3.1: Decarbonization measures	Table 3.1: Measures for the decarbonization dimension, within the section of the table related to the general goal: Increasing the share of RES in electricity production includes measure MP_D25 Updating, Simplifying, and Optimizing the Spatial Planning Framework. Given that the nature of this measure is categorized as a "reform" in the field of spatial planning, it is unclear why in the Draft INECP, as well as in the Strategic Environmental Assessment report, it is not clearly explained what type of simplification is necessary or which parts of the spatial planning process are contentious from the perspective of efficiently implementing RES projects.	Comment related to INECP (not SEA) - Not adopted	
Transnafta	In INECP (sr) in 3.3. Dimension Energy Security, in policies and measures table with code PM_ES9 and title Development of a pumped storage project in Bistrica in part Progress indicators on page 134 there is a text that refers to oil product pipelines: „Pipeline capacity by product, pipeline length, terminals“. Need to be corrected.		Comment related to INECP (not SEA) - Not adopted	
Joris Zantvort Damnjanović	Chapter 3. Dimension of decarbonization, 3.1. Emission of greenhouse gases (GHG) emission reduction to be supplemented by the mining sector	Mining is a major emitter of greenhouse gases. Explosives are used in the process of exploitation of non-metallic and metallic mineral raw materials. During blasting, nitrogen oxide gases are produced, which are	Comment related to INECP (not SEA) - Not adopted	

stakeholder	comment	explanation	answer	response
		<p>significant greenhouse gases. For drilling, digging, loading, transport, drilling, machines, equipment and means that emit large amounts of carbon oxides are used. In order to carry out surface mining, forests are cleared, as well as for waste dumps. In the Republic of Serbia, there are a large number of abandoned, unreclaimed surface mines, and, according to the cadastre, over 250 abandoned mining waste dumps (landfills and flotation tailings). These surfaces are a source of greenhouse gases. They should be reclaimed and reforested in order to reduce emissions and turn them into sinks for these gases. The development strategy of the Republic of Serbia is based on the development of mining, and in the coming period the emission of gases with the greenhouse effect will be more and more significant, and unreclaimed surface mines and landfills of waste and tailings will be more and more numerous, and their surfaces will be more and more extensive. It is necessary to plan measures to reduce emissions in this program.</p>		
Ministry of Agriculture, Forestry, and Water Management, Republic	On the maps where the district boundaries are indicated, it is necessary to add the boundary of the Republic of Serbia, as currently a part of Kosovo and Metohija (Kosovo-Mitrovica, Kosovski, Kosovo-Pomoravski, Pečki, and	If there are no data available for the districts in Kosovo and Metohija, as part of the Republic of Serbia, it is necessary to be shown on the map.	Adopted	Reviewed and corrected

stakeholder	comment	explanation	answer	response
Directorate for Water	Prizrenski districts) is missing. For example, on Figure 3.47, Figure 3.49, Figure 3.52, and Figure 3.61.			
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris Zantvort Damnjanović, Dragan Srećković	In Table 3.3, for policy measure MP_ES6, it is listed as "Emergency Preparedness Plan for Electrical Energy Risk."		it is a technical translation error, all measures have been updated in accordance with the final version of the Plan	Policy measure PM_ES9 now stays as: Electricity Risk Preparedness plan
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris Zantvort Damnjanović, Dragan Srećković	In Table 3.3, for policy measure MP_ES9, it is stated "Preparation of the inflated storage project in Bistrica."	Can you explain what this project is about?	it is a technical translation error, all measures have been updated in accordance with the final version of the Plan	Policy measure PM_ES9 now stays as: Development of a pumped storage project in Bistrica
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris Zantvort Damnjanović, Dragan Srećković	In Table 3.3, for policy measure MP_ES10, it is stated "Development of additional production of compressed natural gas."	Can you explain what this project is about? Additionally, it is mentioned that the project relates to electric energy?	it is a technical translation error, all measures have been updated in accordance with the final version of the Plan	Policy measure PM_ES10 now stays as: "Development of additional dispatchable generation from natural gas"

stakeholder	comment	explanation	answer	response
Network of CSOs "Climate Forum" & Center for Environmental Improvement, Coalition 27, Joris Zantvort Damnjanović, Dragan Srećković	In section 3.4.2.1, below Table 3.8, the sentence is given as: "As a ton of coal has 20,025 million BTU, it means that it emits 1.892.387 kg CO2 when it is burned."	That's not accurate information, as one ton of coal approximately generates around 1,000 kg of CO2.	Not adopted	There is no absolute/single value; coal is very variable in its carbon content, and in its calorific value too. Both vary in the same direction: the carbon content decreases at the same time as the calorific value; CO2 emissions are generally higher for less energy-efficient coals, but with a certain weighting. Value based on what is included as a value in the INECP
RERI	Chapter 3.2 - Stakeholder Consultations	The submitter points out that in Chapter 3.2 Consultations with Stakeholders, information and processes related to the development of the INECP were copied, rather than those from the Strategic Environmental Assessment (SEA). Namely, the Law on SEA stipulates that the baseline contains a description of the results of previous consultations with relevant authorities and organizations, which are essential from the perspective of the objectives and assessment of possible impacts	Not adopted	Previous consultations with authorities and organisations concerned that are relevant from the aspect of objectives and evaluation of potential impact of the strategic assessment are the ones that were

stakeholder	comment	explanation	answer	response
		<p>of the SEA. This description is missing from this part of the SEA report, thus the SEA report formally does not meet the requirements prescribed by the law. Judging by all indications, it seems that the SEA report's author did not carry out consultations, so there is nothing to write in this section.</p>		<p>conducted within the framework of the preparation of the INECP and described in the relevant section. These consultations provided access to information related to the plan, including aspects related to potential environmental and social impacts. A wide range of stakeholders had active participation incl. among others the MoEP and CS representatives (RES Foundation, the Belgrade Open School and the Centre for Ecology and Sustainable Development)</p>
RERI	Subsection 3.4.2 - Description of Considered Alternatives	<p>In subsection 3.4.2 of the INPEC, it is stated that "the possibility and potential for cross-border impacts of implementing the strategic document vary depending on the measures/actions considered in the INPEC.</p>	Not adopted	<p>The report evaluates the magnitude (spatial extent) of potential environmental impacts, including</p>

stakeholder	comment	explanation	answer	response
		<p>Since the Republic of Serbia, Ministry of Finance, Sector for Contracting and Financing of EU Programs, Ministry of Mining and Energy, the Strategic Environmental Assessment of the Integral National Energy and Climate Plan (NPEC) of the Republic of Serbia involves considering and analyzing the potential for energy development at a strategic level. At that moment, it is difficult to identify cross-border impacts and their details." Furthermore, the Author of the SEA Report lists some projects (without clear criteria or order) for which they believe that "general cross-border impacts could be related," omitting projects for which they claim to have cross-border impacts in the previous part of the text (e.g., thermal power complexes).</p> <p>Finally, the Author of the SEA Report concludes that "in accordance with relevant legal regulations, the energy sector will assess the possible environmental impacts and potential cross-border impacts in detail, prescribe binding environmental protection measures, and appropriate monitoring at the level of specific projects, with clearly defined deadlines for implementation. Cross-border impacts should be considered individually and in detail at the project level or in the EIA procedures."</p>		<p>international/transboundary. For accuracy reasons, the transboundary nature of impacts needs to be determined at lower strategic levels when additional information is made available and the strategy is concretized. SEA is a strategic document used to identify the environmental and social impacts of a proposed plan and facilitate the integration of environmental and social issues in the decision-making process. The object of the SEA generates different methodological requirements related to the scale of assessment than an</p>

stakeholder	comment	explanation	answer	response
		<p>The Submitter first observes that from the entire text of the Report, it is clear that the Author of this Report does not differentiate between cross-border environmental impact assessments of projects and plans, and thus incorrectly concludes that cross-border impacts can only be determined at the project level. The Submitter points out that the legal framework is specified by the Law on Strategic Environmental Assessment, which regulates cross-border consultations, but omits to mention in the part describing the material regulated by the Law on Strategic Environmental Assessment that it also regulates the exchange of information in a cross-border context. This could be an oversight, but the Report confirms this on page 85 when it states that, as a signatory to the Espoo Convention and the Kiev Protocol, the Republic of Serbia has committed to informing other countries about proposed projects that may have cross-border impacts. Additionally, the Author of the SEA Report only refers to the Espoo Convention (which regulates cross-border consultations on projects) but does not refer to the Protocol on Strategic Environmental Assessment under the Espoo Convention (which regulates cross-border consultations on plans, programs, and policies).</p> <p>It is clear that the Author of the SEA Report</p>		<p>EIA, which is a technical assessment tool that relates to planned projects and activities with specific geographic and technical specifications and has a higher level of certainty, reflecting the level of detail of the activity planning. At the time of implementation of specific technical measures, then an EIA will need to be elaborated in accordance with national and international regulatory frameworks, as appropriate, for the specific measures. The responsibility for the process of cross-border consultations does</p>

stakeholder	comment	explanation	answer	response
		<p>neglects the fact that the Law on Ratification of the Protocol on Strategic Environmental Assessment under the Convention on Environmental Impact Assessment in a Transboundary Context stipulates a list of projects (Annex I and II) for which a strategic environmental assessment is required, as well as the provisions of Article 10 of the said law, which regulate the procedure of cross-border consultations. It is not clear based on what data, reports, studies, analytical documents, or any other documents the Author of the SEA Report concludes that it is not possible to identify specific projects that could have cross-border impacts. The Submitter points out that Article 2 of the Law on Ratification defines plans and programs, including their amendments, which require legal, regulatory, or administrative provisions and are subject to preparation and/or adoption by a state body or prepared by a state body for adoption in a formal procedure by the parliament or government. Article 4 of the Law on Ratification prescribes that each Party shall ensure that a strategic environmental assessment is conducted for plans and programs mentioned in paragraphs 2, 3, and 4 that are likely to have significant impacts on the environment, including health. Paragraph 2 of the same article prescribes that a strategic environmental assessment is conducted for plans and programs prepared in agriculture,</p>		<p>not lie with the consultant.</p>

stakeholder	comment	explanation	answer	response
		<p>forestry, fisheries, energy, industry including mining, transportation, regional development, waste management, water management, telecommunications, tourism, urban or spatial planning, or land use, which define a framework for future project approval mentioned in Annex I or any other project mentioned in Annex II that requires an environmental impact assessment under national laws.</p> <p>The Author of the SEA Report has not provided evidence that it is possible to exclude cross-border impacts from the spatial arrangement of power facilities, nor has it concluded that these impacts are uncertain and cannot be determined in this planning phase. It is clear that cross-border impacts of these facilities can be determined, and there are numerous reports and studies showing that thermal power plants, hydroelectric power plants, etc., which do not necessarily have to be within a cross-border belt, have significant cross-border impacts.</p>		
RERI	Chapter 3.5 - Overview of Existing Environmental Conditions and Quality	This chapter's presentation is shallow and generalized, providing an overview of some available information about the state of the environment in the Republic of Serbia. However, it lacks an analysis of the environmental state in areas directly affected by the implementation of policies outlined in the National Plan for Environmental	The comment is partially adopted and in a document data on the state of the environment for air quality and waste management was updated in	In line with SEA requirements the SEA provides an "outline of the current status and quality of the environment in the area that the report

stakeholder	comment	explanation	answer	response
		<p>Protection (NPEC). This general presentation of the environmental state is not significant for assessing the impacts of the NPEC on the environment. It's concerning that this chapter doesn't include an overview of the environmental state in areas directly impacted by the operation of thermal power plants or mining activities. Despite the expectation of significant growth in industrial production and the potential environmental impacts of mining activities, the Author does not analyze the environmental state around cement plants, copper and steel processing facilities, and so on.</p> <p>In subsection 3.5.2.2 of the Strategic Environmental Assessment (SEA) Report, the Author mentions that forests cover 29% of Serbia's territory without citing the data source. Is this data from the National Forest Inventory of 2008? Does the Author consider data from 2008 relevant for the SEA Report in 2023? In the working version of the Climate Change Adaptation Program (CCAP), which is publicly available, it's stated that the forested area in Serbia (excluding the territory of AP Kosovo and Metohija) is 2,261,386 hectares, and preliminary data from the new Forest Inventory indicates a total forestation rate of 39.42%. This data (with a cited source) is inconsistent with the data in this SEA Report, likely due to the imprecise territorial coverage</p>	<p>accordance with the latest available SEPA Reports for 2022, as well as data on forests.</p>	<p>refers to" and not an exhaustively detailed presentation. The level is national to coincide with the geographical scope of the INECP. Studies at lower hierarchical level will examine local conditions as appropriate. Extensive research was conducted over several months to gather the data, please refer to Chapter on difficulties encountered where the issue of availability of data for the assessment of the current state of the environment is referred to. There are many approaches to the calculations of greenhouse gas (GHG) emissions,</p>

stakeholder	comment	explanation	answer	response
		<p>of the plan. Instead of focusing on geopolitics, the Author should have addressed the formal content requirements of the Strategic Plan for the Environment (SPE). Additionally, the difference in forestation data between the INPEC and CCAP suggests that all calculations in the NPEC, including forestation data, are inaccurate. Is this not relevant? The data about the state of forests, which is of exceptional importance for the INPEC, is outdated and superficial. The data is outdated, and there's no attention to the territorial distribution of forests or the overall forest state. Based on this superficial representation of the forest state, it's impossible to assess the impacts of the NPEC on the environment. However, this didn't seem to concern the Author of the SEA Report.</p> <p>In subsection 3.5.3., the presentation of air quality state is shallow and general. The key data source is the 2020 Air Quality State Report by the Environmental Protection Agency. Firstly, there's a report for 2021, which is publicly available. Additionally, air quality cannot be presented based on a single year in this report. Instead of copying parts of the Agency's report, the air quality state should have been presented specifically concerning activities and regions significant to the INPEC, to assess the impacts of policies on air quality. This aspect is also missing in this</p>		<p>calculation by sectors was the approach selected and serves the purpose of the Report as do several other approaches which also have their merits.</p>

stakeholder	comment	explanation	answer	response
		<p>SEA Report.</p> <p>If in subsection 3.5.4.2., the Author provides calculations of greenhouse gas (GHG) emissions by sectors, why did the Author not propose quantifying policy goals in the INPEC concerning emissions from different sectors? Additionally, if the Author presented emissions from the industrial processes sector, why did the omission of this sector from emission reduction goals in the INPEC not raise concerns for the Author?</p>		
RERI	Chapter 3.5.8 - Health of the Population	"The chapter is superficial and done just to satisfy the form. Superficial representation of the state the environment was also reflected on assessment of the impact of INECP on environment. The SEA report does not contain an assessment of the impact of measures and environmental policy."	Not adopted	In line with SEA requirements the SEA provides an "outline of the current status and quality of the environment in the area that the report refers to" and not an exhaustively detailed presentation.
EMS	Table 3.10	In the guidance document for the implementation of Directive 2001/42/EC (Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment), which the SEA report's author refers to, there is a detailed description of how the presentation of alternatives should be approached.	Comment is adopted	The subject table contained data taken from the Plan itself, from the time frame for the implementation of policy measures IEM8.1-8.9.

stakeholder	comment	explanation	answer	response
		However, the SEA report's author does not comply with the law and provisions of the directive.		However, due to its irrelevance to the subject SEA, it was removed from the document

v. Chapter 4

stakeholder	comment	explanation	answer	response
RERI	4.3. Indicator selection	In table 3.26. Overview of general and specific environmental goals and indicators with the explanation of the choice of indicators Specific objective 02.1 is inconsistent and not clear at all as the Report Maker brought to connection reduction of greenhouse gas emissions gardens by 40.3% in 2030 compared to 1990 with a reduction in emissions pollutants into the air. Before everything, since he doesn't understand the difference between emissions into the atmosphere and emissions into the air The maker wasn't even supposed to is doing the Report on the SEA, it should have already been done to politely thank you for the offer. If such a report is received consent will bear responsibility Ministry of Mining and Energy and the Ministry of Environmental Protection environment. Indicators that it is Report maker offered with this one specific goals are not entirely regarding the reduction of GHG emissions, especially not in relation to the goal which includes LULUCF. However, the Reporter did not take it into	Adopted	An increase in the use of renewable energy sources (RES) has diverse benefits for society including mitigating climate change and reducing the emission of air pollutants. Increasing the share of renewable energy across the different sectors of the economy is therefore a key building block to reaching climate objectives. The indicator is amended to "share of renewable energy in gross final energy consumption" in line

stakeholder	comment	explanation	answer	response
		<p>account anywhere construction of facilities for resistance, their influence on increase in CO2 emissions, nor theirs contribution to the reduction of SO2 emissions.</p>		<p>with SDG 7 Target 7.2 By 2030, increase substantially the share of renewable energy in the global energy mix, Indicator 7.2.1 Share of renewable energy in gross final energy consumption. This indicator is one of the 83 indicators used by Serbia to monitor the 17 SDGs, therefore also in line with the requirement of defining indicators on the basis of requests and objectives related to environmental protection in other plans and programmes, environmental protection objectives set at the</p>

stakeholder	comment	explanation	answer	response
				Republic and international levels
Marija Tasić	In Strategy, not all losses due to the installation of devices of renewable energy sources have been quantified.	There is no land in Serbia that could not be used for agriculture or for the cultivation of cultivated forests. This means that in places where land is given over to devices for renewable energy sources, the losses of "absorbed" CO2 and produced oxygen, which would have been obtained if there was a forest, orchard, vineyard on that area, must be taken into account, since SE04.3 , SE05.1,	Comment is not accepted	The scope and scale of the assessment does not allow for such information to be included. Detailed studies should be performed to conclude on such issues.

stakeholder	comment	explanation	answer	response
		SE05.2, SE06.1 and SE07.1 cannot possibly be achieved.		
Marija Tasić	The negative impacts related to the landfill problem of renewable energy sources, explained in this strategy, will be solved in accordance with international practices and applications. By which?	Uncritical analogies of "That's the way they do it in the world" when building larger installed forces can be strategically dangerous. Recycling of e-waste does not work in the world (there are very few of them) because recycling technologies are more expensive than the price of raw materials obtained by recycling. This will only increase the generation of waste, which makes SEC02.5 impossible to achieve.	Not adopted	Although it is not the object of this study, it can be noted that waste and resource challenges associated with the shift to renewable energy technologies can be addressed through circular economy approaches such as eco-design, material-specific recycling targets and extended producer responsibility schemes. There are strong potential benefits because much of the wastes arising either belong to established recycling systems

stakeholder	comment	explanation	answer	response
				(e.g. steel, glass, aluminum); or are high-value critical raw materials.
Marija Tasić	False It is firm that GHG reductions will be made.	Namely, the calculation does not include emissions for the actual production of materials from which the device of renewable energy sources is constructed. GHG emissions will decrease immediately where such devices are located, but will increase where the materials for the construction of such facilities are produced (for example, Bor, Beochin, Trepcha). It can be easily calculated that the "saved" GHG emission is significantly less than the amount already emitted in the production process of the materials for their construction. Thus, SECO2.1 cannot be realized in any way.	Not adopted	Outside the SEA scope

vi. Chapter 5

stakeholder	comment	explanation	answer	response
SEPA	There is no figure 5.33 as stated in the text		Adopted	Text is corrected
Media and reform center Niš	"5.2 DESCRIPTION OF MEASURES TO PREVENT AND REDUCE NEGATIVES AND INCREASE POSITIVE IMPACTS ON THE ENVIRONMENT point 4 is changed to "ensure education and	"The Report correctly concludes that "due to the significance of the potential negative and positive impacts of the proposed INECP on life environment, people's health, social and economic status of local communities, is	Adopted	Text is corrected

stakeholder	comment	explanation	answer	response
	<p>public participation through the improvement of the legal framework and local decisions and practices in public participation in accordance with the standards of Open Administration in all phases of the implementation of energy projects; ensure public participation in local communities in accordance with the improved legal framework and examples of good practice in accordance with the standards of the Open Administration of local communities, in whose territories are foreseen measures to reduce emissions, in making decisions in all stages of implementing these measures;</p> <p>"</p>	<p>special it is necessary to adequately and "transparently" involve interested parties in the adoption process decisions related to environmental protection issues at a higher level than the current practice". That is why it is necessary to improve the legal framework for public participation, which is very poor and undefined, and the practices are very non-transparent, and improvements to the legal framework and practices are very necessary as part of the measures in accordance with the standards of Open Administration. By the way, the Republic of Serbia is a signatory to the international Open Government Partnership."</p>		
SEPA	<p>give priority to creating a register of polluting substances and create an inventory of greenhouse gases</p>	<p>"When preparing the INECP , the Agency was not consulted regarding the National Register of Pollution Sources and the Inventory of GHG. The National Register has been maintained since 2008 and contains data from over 30,000 legal entities and entrepreneurs. As for the inventory of greenhouse gases, it has been created since 2012. In accordance with the Law on Climate Change, the Agency is the state body responsible for creating the GHG inventory. The inventory is created using the IPCC 2006 methodology, update 2019.</p>	<p>Comment related to INECP (not SEA) - Not adopted</p>	

stakeholder	comment	explanation	answer	response
		It is necessary to correct the text from INECP in accordance with the above."		
RERI	"Subchapter 5.1.2.8 - Environmental the goal of "Stable economic and social environment""	<p>In subsection 3.1.2 - Overview of INECP, as one of the key ones aims to strengthen geopolitics role of the Republic of Serbia. In order to ensured its realization by the maker The report states that it is urgent it is necessary to complete the existing inter connections and design new ones international interconnections with gas pipelines from neighboring countries, and indicates that it will be promoted a few cross-border/international natural transport projects of gas, which will be increased diversification of energy sources a, combined with promotion natural storage projects of gas, his will be provided adequate levels in case of shortage natural gas. Report maker o SEA is stepping out of its role here and feels the need to justify political decisions that have nothing to do with strategic impact assessment. Instead of expressing their beliefs about the urgency of certain things measure The producer of the Report on the SEA was supposed to evaluate the measures and policies in relation to the goals of life protection environment and sustainable development and theirs possible impact on the environment.</p> <p>In subsection 3.1.2.1 Maker The SEA report states that the central goal of INECP is reduction GHG emissions by 40.3% in 2030</p>	Comment related to INECP (not SEA) - Not adopted	

stakeholder	comment	explanation	answer	response
		<p>compared to to 1990, inclusive agriculture, waste and LULUCF, repeating the same mistakes in defining goals. We are that problem explained in detail in the comments to the INECP Draft and we will not have them repeat. If neither the Maker Neither INECP nor the Report on SEA tried to reduce the goals GHG emission performance in accordance with internationally accepted the methodology should not have accept the task of making it like this important documents. Tolerance towards elementary ignorance is the responsibility primarily the Ministry of Mining and of Energy and the EU Delegation which is provided the means for production INECP and SEA.</p>		
EMS	<p>"5.1.2.4.1 ENVIRONMENTAL SUBOBJECTIVE "" IMPROVING THE STATUS OR ECOLOGICAL POTENTIAL OF WATER BODIES INCLUDING SURFACE AND GROUNDWATER ""</p> <p>Evaluation of the impact of INECP implementation Description and assessment of the impact on the chemical status</p> <p>INECP also foresees an increase in the capacity of electricity production from small hydroelectric power plants (MHE)."</p>	Add what is the capacity of MHE	Comment related to INECP (not SEA) - Not adopted	

stakeholder	comment	explanation	answer	response
RERI		<p>In subchapter 5.1.2.10 Cross-border influences producer Reports are generally "considered" cross-border influences, but it does so in relation to sub-goals, not in relation to the effects of the measures and policies foreseen plan. Thus, it is stated that "on the basis of the foreseen INECP measures which directly affect emissions of pollutants into the air and of estimated emissions of substances in air, it can be concluded that they are not foreseen measures that could, in the larger scale, in neighboring countries, cause potentially ambient air pollution." However, the Report maker does not considers in what way it will not taking certain measures to which Serbia committed itself to international agreements to affect pollution.</p>	Not adopted	<p>INECP measures are prepared at the strategic level, detailed descriptions of the interventions are not available at this stage. Taking into account the mitigation measures provided in the SEA, we estimate that there will be no significant transboundary impacts. For plans that could have a significant impact on the environment in neighboring countries, a cross-border EIA process should be carried out in the further stages of project documentation development.</p> <p>According to the projections of the reduction of national emissions</p>

stakeholder	comment	explanation	answer	response
				<p>of individual pollutants, a continuation of the reduction of the long-range cross-border movement of pollutants and their disposal in neighboring countries can be expected, and vice versa. This will also reduce the impact on the environment and human health. If the measure to build a new gas power plant is implemented, the potential cross-border impact will have to be assessed in the spatial planning phase, within the comprehensive environmental impact assessment and later in the environmental impact assessment phase.</p>

stakeholder	comment	explanation	answer	response
		<p>Thus, according to the INECP draft, it is not planned shutdown of thermal power plants. Thermal power plants in Serbia emit several times higher emissions of sulfur dioxide on an annual level than it is allowed by the National Plan to reduce emissions and there are studies which indicate cross-border character of this pollution, with what would the creator of the Report had to be familiar. Without measures related to closure of thermal energy facilities, with a precise time frame for their extinguishment, explaining which facilities remain online, and which will measures taken to make these objects kept online and at the same time were aligned with the equirements of the National plan to reduce emissions, that is limit values of the Directive on industrial emissions, it can't either come to a significant reduction air pollution.</p>	Not adopted	Comment is regarding the INECP and not regarding the SEA
		<p>Besides, no the impact of significant is also analyzed increase in the volume of production from cross-border industries pollution. In addition, certain thermal power plants are located in the area along the borders with neighboring countries and is a producer. Report was obliged to determine the cross-border nature of the impact, not to make them lump sums throw it away. Determination of cross-border influence is the report makers obligation , which has been established confirmed international agreements, which are in accordance with the Constitution of the</p>		<p>No new thermal power plants are planned to be built in the border area with neighboring countries. Reconstructions are planned for the existing large fossil fuel power facilities, which will be in operation until their closure, in order to</p>

stakeholder	comment	explanation	answer	response
		<p>Republic of Serbia ("Official Gazette of the RS" no. 98/06) have legal supremacy over national laws.</p> <p>The only cross-border influence that the creator of the Report observes that it is the installation of a gas power plant near the neighboring border, which, he concludes, not likely. This attitude especially argues that the power plant will use natural gas which is one of the cleanest fossil fuels in terms of the emission of substances into the air consequently affecting the quality ambient air. Although it is not clearly to which scientific sources they refer the Report maker calls when classifies environmental acceptability fossil fuels he misses that notice that in modern society there are technologies they use renewable energy sources whose environmental friendliness is far away greater than any fossil fuel.</p>		<p>reduce the emission of harmful gases.</p> <p>The only potential cross-border impact would be caused by the construction of a gas power plant near the border of neighboring states, and its cross-border impact will be assessed in the next stages of project documentation elaboration, i.e. at lower hierarchical levels of SEA and EIA.</p>
		<p>By comparing the shows that are produced by burning fuel oil, coal and natural gas Report maker easily comes to the conclusion that it is natural gas more acceptable than e.g. fuel oil and coal. A strategic role of SEA is to analyze and argue (based on verifiable facts and analyses) show that they are technological solutions for which the carrier really decided on the creation of INECP "the most environmentally friendly".</p>	<p>Comment is not adopted</p>	<p>It is a well-known fact that natural gas is more acceptable as an energy source than fuel oil and coal, so apart from this we have nothing else to add in response to this comment.</p>

stakeholder	comment	explanation	answer	response
		<p>Further, the Report maker only basically identifies that the construction will HPP "Đerdap 3" has cross-border influences, but does not analyze them either it qualifies nor quantifies, but states that when it is completed it will Preliminary project of RHE Danube "Đerdap 3", in order to obtain ecological consents (probably Maker of report means consent to EIA), start the procedure environmental impact assessments, within which it is carried out and cross-border impact assessment in accordance with the ESPOO Convention, that is, in accordance with Article 6 of the Convention on cross-border impacts on environment. It is stated, as which the Applicant previously explained unacceptable having in see that the cross-border assessment of the impact of the mentioned SEA project to be carried out at the level of creation of INECP (in the process of strategic assessment impact on the environment) and at the level of an individual project (in the process of EIA).</p>	<p>Comment is not adopted</p>	<p>Considering that the construction of HPP Đerdap 3 is in the planning phase, and that there is no concrete and definitive decision on the location, as well as considering that this is a SEA at the national level, we believe that a more detailed assessment of the impact is not possible and is not necessary at this level. As mentioned, the SEA and EIA will be performed at lower hierarchical levels for this specific project in one of the following phases. Also, the SEA is not done on the basis of the ESPOO Convention, but on the basis of the Protocol on Strategic</p>

stakeholder	comment	explanation	answer	response
		<p>Finally, the report maker "estimates" that the effects of INECP will on the state of surface waters to be insignificant, taking into account the measures mitigation. Based on which parameters, analysis, reports and data is the creator of the Report concluded that the impacts will be insignificant?</p>	<p>Comment is not adopted</p>	<p>Environmental Impact Assessment. A detailed impact analysis is given in chapter 4.1. Concretely, the impacts of the implementation of INECP on the quality of surface and underground waters are given in chapter 4.1.2.4 Environmental goal "Protection and improvement of surface and underground waters (morphology, ecological status and quality)"</p>
<p>RERI</p>	<p>"5.1.2.4.1 Environmental objective " status improvement or ecological potential of water bodies including superficial and underground waters"</p>	<p>It is not clear where it is in INECP Producer of the Report on the SEA found policy measures that related to the construction of small hydroelectric power plant, then executed evaluation of their impacts? How is it could make an assessment at all of the impact of objects for which he does not know where they will be located and what capacity will it be? Spotted potential negative impacts of measures and policy Maker of SEA is, through</p>	<p>Adopted</p>	<p>Text of the SEA was corrected in accordance with the comment and the analysis of the impact of small hydroelectric power stations was removed from it. The previously performed analysis</p>

stakeholder	comment	explanation	answer	response
		presentation of estimated impacts variant solutions of the plan and program favorable from the point of view of protection environment with a description of measures for prevention and limitation negative, i.e. increase positive impact on environment, present those solutions that are acceptable from the environmental protection point of view. So, let's take just one example, in table 5.12 Report maker estimated that it exists negative impact of implementation of INECP at EC 04, but it was not considered alternatives that would contributed to positive effects on the environment. The report on SEA was made in order to satisfied form it is not done.		was done in a theoretical sense, on the basis of the existing smal hydropower plants, without connecting it with policy measures from INECP.
RERI	"5.2. Description of measures to prevent decreasing negative and increasing positive impact on life the middle"	The measurements given are superficial and general, they do not arise from the analysis variant solutions (which and not exists) nor analysis of the state of life environment, nor the estimated impacts on environment. Measures, of which the majority, which refer to mandatory application of valid regulations, are complete unnecessary and it is not clear why Producer of the Report suggests measures that imply application of applicable regulations? Does Report maker thinks that the regulations will not respect if he does not list them in measures? What is the purpose and meaning of these measure?	Comment is not adopted	The comment represents a subjective opinion and will not be considered.
		The Report maker states that it is necessary to give priority for creating the register of	Adopted	The measure "give priority to the

stakeholder	comment	explanation	answer	response
		<p>polluting substances and produce greenhouse gas inventory (GHG) in the energy sector, industry, agriculture, of forestry and waste management, with GHG emission balances. Is that the producer of the SEA Report reliably knows that registers and inventories do not exist (environmental Protection Agency claims to exist) or thoughts that they are not reliable? In both cases, it is an obligation that is established by valid regulations.</p>		<p>creation of: a register of polluting substances and create an inventory of greenhouse gases (GHG) in the energy, industry, agriculture, forestry and waste management sectors, with GHG emission balances" was determined by the current regulations and was previously included in the SEA document, but considering the comment, it will be removed from SEA.</p>
		<p>Measures related to education and public participation are superficial, general and do not deserve comment. What does it mean when the Maker of the SEA report recommends as a measure mandatory implementation of monitoring the quality of the environment in accordance with the relevant legal regulations and the Program environmental monitoring defined in this SEA Report. Does he think that monitoring is otherwise not carried out, or it does not</p>	<p>Adopted</p>	<p>Measure will be removed from SEA in accordance with a comment.</p>

stakeholder	comment	explanation	answer	response
		implement well or legislative framework is not good?		
		Measures related to construction of fish tracks were probably overwritten from another document.	Comment is not adopted	Fish tracks are very important from the point of view of biodiversity protection, and it is necessary to form them on water courses where hydroelectric power plants are located and planned.
		Measure "Increase the use of renewable energy in relation to fossil fuels" represents the pinnacle of creativity maker and one gets the impression that maker is joking with us and yes indeed he is not serious. The same applies to the measure "to improve the energy efficiency". Is it possible that it is someone entrusted with the preparation of the Report on SEA to propose such measures?	Adopted	The measure will be removed from the text.
		What does the measure "Establish national body for energy efficiency" and "Create action climate emergency plans situations". What technologies is he referring to?	Adopted	Based on the comments, the first measure "Establish a national body for energy efficiency" will be removed, while the second will be corrected and now will state:

stakeholder	comment	explanation	answer	response
				"Create Action Plans for responding in case of extraordinary climate events, as a measure of adaptation to changed climate conditions."
		When the manufacturer proposes that it is necessary "Promote clean electrical production technologies energy from coal. Where Maker saw that there is clean technology electricity production from coal?"	Adopted	The measure is changed and will state: "Promote the best available techniques (BAT) for environmental protection during the design of new plants and the reconstruction of existing plants for the production of electricity from fossil fuels."

vii. Chapter 6

stakeholder	comment	explanation	answer	Response
Media and reform center Niš	6. GUIDELINES FOR THE PREPARATION OF STRATEGIC IMPACT ASSESSMENTS AT LOWER LEVELS OF THE HIERARCHY In addition to the legal obligations that	As the Report correctly concludes that "implementation of energy and climate goals must be achieved with bottom-up support and a top-down approach to planned activities" (INECP RS goals), it is necessary to use the	Not adopted	This is outside the scope of the SEA

stakeholder	comment	explanation	answer	Response
	already exist, introduce as a mandatory measure the "Preparation of a Report on the strategic assessment of the impact of regional and/or local territorial coverage, which will be followed by INECP, all recommended measures and its impact on local communities and regions". The situation in Serbia is very different, taking into account the geography of the terrain, biodiversities, water, soil, sources of pollutants, cultural and historical heritage, population, development and capacities of local communities, and the consequences of the implementation of INECP RS.	bottom-up principle in planning and reporting on strategic impact assessment. That is why it is necessary for local authorities to have the obligation to create a Strategic Assessment of the impact of all measures foreseen by INECP, independently or in cooperation with state authorities. This is especially important when LGUs do not have their own local Energy and Climate Plans.		

viii. Chapter 7

stakeholder	comment	explanation	answer	Response
SEPA	it is stated that in certain cases the opinion of the Agency should be sought	In accordance with the Law on Ministries and the Law on Environmental Protection, the Environmental Protection Agency does not have the authority to issue an opinion, as a document issued in an administrative procedure.	Adopted	Text is corrected accordingly

ix. Chapter 10

stakeholder	comment	explanation	answer	Response
MEP	Article 12, paragraph 2, item 8 of the Law on Strategic Environmental Impact Assessment prescribes that the SEA Report contains "conclusions reached during the preparation of the SEA Report, presented in a manner understandable to the public".	<p>The stated conclusions, i.e. a non-technical summary, should be an overview of the information and the most important results derived from the SEA report that are communicated in a way that is understandable and accessible to the public and contain:</p> <ol style="list-style-type: none"> 1) the way in which the problems, issues and goals of environmental protection are integrated into the plan and program; 2) established significant impacts of the implementation of the plan and program on the environment; 3) proposed measures for the prevention and/or reduction of negative impacts and the manner of their implementation in the implementation of the plan and program; 4) the main variants that were considered and the reasons for the chosen solution from the point of view of the goal, purpose, geographical scope and impact of the plan and program on the environment; 5) measures planned by the monitoring program of all significant 	It is adopted	Text is updated

stakeholder	comment	explanation	answer	Response
		<p>impacts of the implementation of the plan and/or program.</p> <p>The mentioned points must be clear, short and comprehensible to the general public, which would determine and explain the influence of the Holder and the team for the preparation of the SEA Report (which is carried out during the process of preparing the INECP) in bringing more favorable solutions for the environment in the INECP in, as well as the adoption of measures to reduce negative impacts on the environment, where it was not possible to implement more favorable solutions for the environment.</p>		

x. Comments on literature

stakeholder	comment	explanation	answer	response
Ministry of Agriculture, Forestry, and Water Management, Republic Directorate for Water	<p>"instead of "Water management strategy on the territory of the Republic of Serbia - analysis and research (2015). Ministry of Agriculture and Environmental Protection. Jaroslav Černi Institute for Water Resources Development. Belgrade"</p> <p>should stand:</p> <p>"Strategy of water management on the territory of the Republic of Serbia until</p>	correction of the name of the document	Adopted	Text is corrected

stakeholder	comment	explanation	answer	response
	2034" Official Gazette of the RS, no. 3/2017)""			
Ministry of Agriculture, Forestry, and Water Management, Republic Directorate for Water	Page 348, it states "Water Law (Official Gazette of the RS, No. 46/91, 53/93, 67/93, 48/94, 54/96)" should be replaced with: Water Law (Official Gazette of the RS, no. 30/10, 93/12, 101/16, 95/18 and 95/18 and other laws)	correction of the name of the document	Adopted	Text is corrected

ANNEX III: RECOMMENDATIONS FROM THE ENERGY COMMUNITY SECRETARIAT

Recommendation EnC	Justification	Response
<p>Extend the consultation period to allow for the thorough incorporation of opinions from both public and transboundary consultations and the SEA report into the development of the NECP, with particular attention to transboundary consultation results, given the plan's substantial cross-border impact and interconnection projects with neighbouring Contracting Parties and EU Member States in Southeast and Central Europe.</p>	<p>During the preparation of the INECP, MoME ensured that all relevant stakeholders were included in the consultation process and the whole process was very transparent. The preparation of INECP has started in February 2021 and during all this period the stakeholders were informed on the outcomes of the scenario analyses in regular working group meetings. However the process had to be finalised as we informed the Energy Community Secretariat. MoME was in constant communication with the Ministry of Environmental Protection in order to include comments and updates after the deadline of August 5, 2023. Therefore, the period of consultation was not so strict and comments have been accepted even long after the deadline of the Consultation period. For example, we have received comments from the Romanian Ministry of Environment, Waters and Forests on the Strategic Environmental Impact Assessment for the INECP by 11th October 2023 which will be responded accordingly. Please note that until today, 13th November 2023, MoME received comments only from Romania.</p>	<p>Already Addressed</p>
<p>Include a detailed description of all consultations carried out in the development of the draft NECP and the reasons in case the received feedback was not taken into account, in whole or in parts, in the final NECP.</p>	<p>A full Public Consultation Report will be available with all comments received and relevant responses, and which comments were incorporated in the final version of the NECP and which not. As MoME informed the Energy Community Secretariat the comments have mainly technical character aiming to clarify some information or some comments were repeated from the previous period, during the consultation within the working group, and were already known to MoME before the public consultations. There were no comments which impacted significantly the content of the draft of NECP.</p>	<p>Already Addressed</p>

Recommendation EnC	Justification	Response
<p>Regarding general methodology and approach, describe the quantitative contribution of all policies and measures to the achievement of the respective 2030 target or other policy objectives in a more explicit manner, such as adding the expected contribution to the reduction of greenhouse gas (“GHG”) emissions of each individual policy and measure.</p>	<p>Quantitative estimation has been provided for the most important policy measures regarding their contribution to the achievement of the main objectives for each dimension separately (e.g. increased RES penetration, achieved final energy savings etc). Due to the fact that numerous horizontal and supplementary policy measures are foreseen, it is not possible to distinguish their contribution compared to the respective ones triggered by the most important measures. For this reason It has been decided to highlight their contribution to the implementation of the most important policy measures. Generally, we recommend to quantify the delivered impacts to each dimension separately and not using a common metric (such as GHG emission reduction), because it can lead to misrepresentation about the effectiveness of each policy measure.</p>	<p>Partially accepted to the extent possible</p>
<p>Formulate policies and measures, in particular related to the planned adoption and implementation of legal acts, policy programmes or similar, in more concrete terms with clear milestones and progress indicators.</p>	<p>Many milestones of measures have been revised after public consultations and we have shorten the timeplan of implementation from 2024-2027.for regulatory and reform measures. Please add detailed description</p>	<p>Partially accepted to the extent possible</p>
<p>Explain the synergies between dimensions (such as how specific policy measures related to renewable energy contribute to energy and GHG savings or reduce electricity imports, energy efficiency).</p>	<p>A description of the delivered synergies with the other dimensions will be added for each different policy measure separately in the relevant section of the table (Other relevant Energy Union dimension(s) affected).</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
Include the waste, land use, land use change and forestry ("LULUCF") sectors in all scenario projections.	The Waste and LULUCF sectors analysis have already been included in all scenarios. We will add in the text of the INECP all the relevant analysis in order to make clear their projected contribution for GHG emissions.	Accepted
Significantly improve the SEA report by integrating relevant international, Energy Community and national environmental protection obligations, while providing a clear description of interactions in relation to biodiversity and the renewable energy targets pursued.	During the public consultation process we had comments on regulation chapter addressing that some of the Laws and Strategies were not included in SEA so in the final version we have included all relevant Laws, Strategies, bylaws, etc. and updated that chapter. Regarding this comment we will include in sub-chapter "Legal and regulatory framework" a clear reference to the Republic of Serbia's obligations with regard to the Energy Community. Also in chapter "Guidelines for the development of strategic impact assessments at lower levels of hierarchy" we will clearly state that all project assessments at lower levels of hierarchy should consider Energy Community obligations. Regarding the interaction of biodiversity and renewable energy targets, it was part of an assessment given in chapter "Assessment of the potential environmental impacts and measures to reduce negative impacts on the environment". There is a list of measures regarding biodiversity related objectives in chapter "Guidance and measures to prevent, reduce and offset significant impact of INECP on the environment ". An explanation on the interaction of biodiversity and renewable energy has also been outlined in the current section 4.1.2.5.1.	Partially accepted
Ensure the utilization of comprehensive and up-to-date environmental data to refine the measures and monitoring plan for identified significant impacts.	All relevant environment data for this SEA was taken from the official Report on the state of the environment in the Republic of Serbia for 2021, from Serbian Environment Protection Agency which was published in December 2022. As the SEA was developed during May and June 2023 this was the latest available relevant data. In meantime during October 2023 SEPA published two new reports for 2022 - Air quality report and Waste management report. These two reports will be included in the final SEA version and old data will be updated in accordance with it.	Accepted

Recommendation EnC	Justification	Response
<p>Related to decarbonisation and GHG emission reduction, implement a more ambitious reduction in coal-based electricity generation spread evenly between 2025 and 2050, i.e. start the decarbonisation earlier than 2030, which would significantly contribute to spreading the burden of the transition both on the economy and on citizens.</p>	<p>The decarbonisation pattern which was included in the scenario was based on a realistic timeframe for the introduction of renewable energy and the gradual reduction of generation from lignite (there is a reduction of generation by lignite fired plants in 2030 by 25% compared to the 2019 levels). The current geopolitical circumstances and the short timeframe until 2030 have been taken into account for a realistic but also meaningful reduction of lignite use. Moreover, the decarbonisation process is very important for the Energy sector of Serbia, but the actual decarbonisation path has been projected taking into account the security of supply aspects. Please note that after 2030, the decarbonization process is faster.</p>	<p>Not Accepted with justification</p>
<p>Assess and reconsider any investments that might result in significant stranded assets – such as the planned EUR 1.3 bn measure to modernize the coal mining industry between 2023-2030 and gas infrastructure that is not future proof. Give particular attention to expected useful lifetime and the costs of alternative solutions (including electricity imports) and ensure consistency across the Energy Union dimensions, in particular decarbonization.</p>	<p>The modernisation of coal mining is coupled with a modernisation of the older power plants, so that they can be compatible with projected gradual reduction of generation from lignite and the Large Combustion Plant Directive requirements. This will lead to less emissions from older plants in the short term and a gradual reduction of their use in the medium to long term.</p> <p>In this context, the modernisation of the coal mining industry coupled with power plants gradually reduce emissions and investments in gas infrastructure to ensure a smooth energy transition in Serbia are considered key and significant transitional measures. The Serbian power system will not be reliable if it was based on importing electricity from the neighboring countries and at the same time depend on the uncertain operation of old lignite fired power plants. Therefore, investing in rehabilitating the lignite plants is enhancing the reliability of the system and provides security of supply.</p> <p>More specifically, the modernisation of the coal mining industry includes investments in systems that lead to the reduction of harmful emissions and their associated negative impact on the environment due to more efficient and increased productivity. These investments will help with better product quality because of selective mining, homogenization and the introduction of an integral coal quality management system. These actions will ensure that the</p>	<p>Not Accepted with justification</p>

Recommendation EnC	Justification	Response
	<p>operation of the coal mining industry complies with the highest environmental standards, and facilitate the reduction of dust emissions, particulate matter, etc.</p>	
<p>Include in Chapter 5 an assessment of the impacts of implementing the Energy Community Large Combustion Plants² and Industrial Emissions Directives³, as required by Annex I of the Governance Regulation. Analyse the NECP's interactions with air quality and present the impacts on air pollution for the various scenarios.</p>	<p>NECP defines the trajectory of GHG emission reduction and in accordance to this reduction of electricity production from lignite which leads to a decrease of the TPP operation. In the final version of INECP in Chapter 5.3 the necessary investments for the compliance of TPPs with the Large Combustion Directive have been included, with a detailed list of upgrades of lignite fired TPPs. The NECP includes the overall strategic directions and the detailed operation of TPPs will be analysed in subsequent plans.</p> <p>With regards to the potential impacts of the INECP on air quality, it is assessed in Chapter 5 of the SEA draft that was published for consultations (now chapter 4, Section 4.1.2.2.1). Under EO 02 "protection of human health", SEO 02.1 "Reduction of air emission, including GHG emissions, by 40.3% in 2030 compared to 1990", guiding question EQ2.1 "Will the interventions of INECP lead to a reduction of polluting air emissions?". For the comparison of scenarios, this was covered under the "Climate change and ambient air" titles; it has now been further elaborated and is analysed under the title "Climate change and ambient air pollution" for both the WEM and WAM scenarios (now section 2.4.3).</p>	<p>Accepted</p>
<p>Consider implementing methane emission reductions, in line with Serbia's commitment to the Global Methane Pledge, in particular in coal mines, oil and gas sector.</p>	<p>Methane emissions reduction from energy use and fugitive emissions from coal mines and oil and gas sector are already accounted and included in analysis. In chapter 5 we will add a paragraph describing the analysis of the modelling results, the details and the projected reductions.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
<p>Integrate fair and just transition aspects better both on the level of objectives and in policies and measures, notably by providing more details on social, employment and skills impacts of planned objectives, and policies and measures. Prioritise the implementation and monitoring of Just Transition and the related Action Plan via an active planning for the transition of the regions and communities impacted by the coal phase-out, as well as incorporate more just transition policies and measures in the NECP itself. Increase the dedicated amount of funding of the just transition related measure from EUR 2 mln, which is less than 0.2% of the investment related to the modernisation of coal mines.</p>	<p>NECP contains measures and policies (MP D6, MP EE1, MP EE 2, MP EE 3) as well as information about the Just Transition Plan, having in mind that this topic is the subject of a separate Study "Diagnostic on Just Transition Serbia" which MoME currently develops in cooperation with EBRD. The main output of this Study is the "Just Transition Action Plan" which is under preparation. The costs presented under the Just Transition measure in NECP are only related to the implementation and monitoring of the Just Transition Action Plan and not for the investments necessary for the implementation of the Just Transition action plan which will be presented in due time with the finalisation of the aforementioned study.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
<p>Envisage a more impactful carbon price instrument designed and adopted under the Energy Community Treaty, to internalise the costs of emissions and in view of the European Union's Carbon Border Adjustment Mechanism⁴ ("CBAM Regulation") and electricity market coupling.</p>	<p>In the analysis we have considered a gradual introduction of carbon pricing in the sectors that are expected to be influenced by CBAM (electricity production and industrial sectors like cement, iron and steel and aluminum). Please note that the level of CO₂ price presented in the draft NECP was used for analysing the scenarios, since there is still uncertainty on the mode of implementation of carbon pricing. Also it is important to say that CBAM regulation was adopted in May 2023 by EU, and it is not possible to include relevant precise information in NECP. This issue should be analysed in detail.</p> <p>Carbon pricing is included in this set of scenarios for the sectors which are identified in the EU-ETS scheme according to the values in the following table. The background assumption is that carbon pricing is first introduced in Serbia in 2027 at a low rate of 4€/ton. It is subsequently increased to 40€/ton in 2030, corresponding to half of the EU-ETS price as projected in the document "Recommended parameters for reporting on GHG projections in 2023" (EC DG Climate Action), and reaches the full projected EU-ETS price, by 2045.</p> <p>However, the exact way of implementation and the level of Carbon pricing is still not known, and is currently under discussion and consultations both in Serbia and among the EnC contracting parties.</p>	<p>Not Accepted with justification</p>
<p>Link measures related to boosting electromobility to incentives in the energy market regulation to ensure that electric vehicle charging infrastructure is supplied from renewable energy instead of the fossil fuel-based electricity.</p>	<p>Obviously, the increased penetration of RES is linked with the electrification of the end-uses. The share of the consumed electricity in the electric vehicle charging infrastructure will be increased gradually according to the penetration of RES. A reference will be added in the NECP text for exploring further the possibility to boost the RES consumption in electromobility through targeted incentives during the deployment of the required infrastructure (mainly the public one).</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
Consider introducing policies and measures for transport sectors other than road transport, especially multi modal systems.	A well balanced mixture has already been included (PM_EE15-Promotion of modal shift both for passenger and freight transport - Enabling 'Mobility as a Service' (MaaS), PM_EE16-Promotion of energy efficiency in inland waterways transport, PM_EE17-Promotion of energy efficiency in rail transport and PM_EE18-Continuous enhancement and extension of the relative infrastructure for public transport).	Already Addressed
In the area of decarbonisation and renewable energy, match the level of ambition – i.e. 40.7% instead of a mere 33.6% – in the planned minimum share of renewable energy in gross final energy consumption by 2030 to the decision of the Energy Community Ministerial Council ⁵ , or explain the specific national circumstances to justify the gap between the ambition in the draft NECP and the target agreed by the Energy Community Ministerial Council.	<p>The deviation of the national contribution target from the MD is justified according to specific circumstances foreseen under Article 6 of the MD and more specifically under the criteria of Article 31 of the Governance Regulation as follows:</p> <ol style="list-style-type: none"> 1) According to criterion (ii) economic conditions and potential, including GDP per capita; potential for cost-effective renewable energy deployment, <ol style="list-style-type: none"> a. An unrealistic increase in the use of heat pumps in households and in the tertiary sector, reaching 11.1 GWth by 2030, corresponding to 444 thousand units, which means an unrealistic addition of 1.6 GWth (63 thousand units per year). INECP proposed national contribution the installation of heat pumps reaches 7 GWth (282 thousand units) by 2030 (40 thousand units per year). According to the current trends only 4 thousand heat pumps were sold in Serbia in 2021. An average Seasonal Performance Factor (SPF) of 3.3 is considered by 2030, which is closer to the average efficiency of current trends for the equipment, while the higher target would require SPF at the level of 5 which is a performance that can be achieved by high-end products only. 	Not Accepted with justification

Recommendation EnC	Justification	Response								
<p>Increase the target for the share of renewable energy sources in heating and cooling, including district heating, and thus align with Articles 23 and 24 of the Energy Community Renewable Energy Directive6 (“Renewables Directive”).</p>	<p>b. The MD proposed national contribution indicated net exports at the level of 5TWh by 2030 which is rather high and cannot be justified by relevant studies. The INECP analysis projects 0.1TWh of net exports by 2030, indicating a self-sufficient power system.</p> <p>c. The MD proposed national contribution, would require at least 88 ktoe of eligible biofuels and the introduction of 89 thousand electric vehicles in 2030. The INECP national contribution includes a more realistic assumption for biofuels (49ktoe by 2030) and the introduction of EVs reaching 44 thousand by 2030.</p> <p>d. The MD proposed national contribution would require higher capacities of variable renewable technologies. The analysis showed that this would further require the installation of hydro pump storage stations providing higher balancing reserve at an over optimistic timeframe, requiring that Bistrica will be operational by 2028 and Djerdap 3 by 2030. In the INCEP analysis a more realistic schedule is applied with Bistrica operational by 2032 and Djerdap 3 by 2035, providing the additional flexibility and balancing requirements for the system.</p> <p>2) According to criterion (iii) geographical, environmental and natural constraints, including those of non-interconnected areas and regions:</p> <p>a. The MD national contribution would require the use of biomass above the resources that can be exploited in a sustainable manner in Serbia. The necessary primary production of biomass to reach this target was estimated to be 1.9 Mtoe by 2030 which is above the level the estimated sustainable potential for agricultural and forest biomass (current studies put the technical potential at the level of 1.9-2.0Mtoe but sustainability criteria considerations reduce this level). The INECP national contribution requires a primary production of 1.7Mtoe of biomass in 2030, close to today’s level, but consumed in more efficient devices.</p> <p>The differences described above are quantified as can be seen in the following table:</p> <table border="1" data-bbox="663 1310 1738 1375"> <thead> <tr> <th data-bbox="663 1310 1021 1375"></th> <th data-bbox="1021 1310 1303 1375">MD proposed national contribution</th> <th data-bbox="1303 1310 1588 1375">INECP proposed national contribution</th> <th data-bbox="1588 1310 1738 1375">Difference</th> </tr> </thead> <tbody> <tr> <td data-bbox="663 1375 1021 1375"></td> <td data-bbox="1021 1375 1303 1375"></td> <td data-bbox="1303 1375 1588 1375"></td> <td data-bbox="1588 1375 1738 1375"></td> </tr> </tbody> </table>		MD proposed national contribution	INECP proposed national contribution	Difference					<p>Not Accepted with justification</p>
	MD proposed national contribution	INECP proposed national contribution	Difference							

Recommendation EnC	Justification				Response
	Contribution of biomass to the GFEC target	18.3%	16.0%	-2.3%	
	Contribution of heat pumps to the GFEC target	4.5%	2.1%	-2.4%	
	Contribution of RES electricity generation to the GFEC target (reduction to avoid excessive exports)	17.0%	15.0%	-2.0%	
	Contribution of biofuels in transportation in GFEC	0.9%	0.5%	-0.4%	
	Overall share of RES in GFEC	40.7%	33.6%	-7.1%	
	<p>Therefore, the reduction of biomass contributes to a reduction of the target by 2.3%, the reduction of the use of heat pumps contribute to a reduction by 2.4%, the reduction of RES electricity to avoid unnecessary excessive electricity exports contributes to a reduction of 2% and the lower level of biofuels in transportation to a reduction of 0.4%. These lead to an overall reduction of the share of RES in GFEC to a level of 33.6%, keeping the overall reduction of GHG emissions to 40.3% by 2030. The sectoral shares were 45% RES in electricity generation, 7% RES in transportation and 41% RES in heating.</p> <p>For the specific case of the target in the heating and cooling sector, it should be noted that the indicative targets from Article 23 of RED II, are not binding and the EnC members are not obliged to monitor the growth of 1,1% RES per year in the heating and cooling sector. Achieving an average growth rate of 1.1% per year would require the over-optimistic assumptions described above regarding the sustainable potential of biomass and the rate of introduction and SPF of heat pumps. With the more realistic assumptions applied for the calculation of the INECP national contribution, an average annual growth rate of 0.6% per year until 2030 is achieved.</p> <p>In regard to clear annual breakdowns comment, the annual trajectory of RES share in GFEC target until 2030 is given in Chapter 2.2 of the Final INECP and in the following table. Annual trajectory of GHG emissions reduction is given in Chapter 2.1 and annual trajectory of Final and Primary Energy Consumption is given in Chapter 2.3.</p>				

Recommendation EnC	Justification							Response	
		2025	2026	2027	2028	2029	2030		
	Share of RES in GFEC	29.8%	30.6%	31.2%	31.9%	32.6%	33.6%		
	<p>Regarding the comment on policy measure for uptake of renewable power purchase agreements (PPAs), policy measure PM_D21 was supplemented to include assessing of the potential regulatory and administrative barriers to remove unjustified barriers, to foster their unhampered deployment and to ensure that the renewables power purchase agreements are not subject to disproportionate or discriminatory procedures or charges.</p> <p>Concerning IRENA study on Serbia’s solar PV potential comment, the technical potential estimated at a macro level by IRENA does not mean that all this capacity can be added until 2030. The capacities that can be added in the next 6 years in Serbia depend a lot on the current market maturity and the capacity to invest. Therefore a conservative target was set for 2030, while the capacity of solar PV plants gradually increases to 18GW by 2050.</p> <p>Regarding the comment on Article 6 of the Renewables Directive, in policy measure PM_D19 it is noted that the three-year incentive plan, which is foreseen in Article 13 of the Law on Rational Use of Energy will be drafted taking into account the planned RES investments including detailed information about the estimated timing and the anticipated capacities.</p> <p>Considering the comment with the statement that natural gas will remain the dominant fuel for district heating, in the INECP it is anticipated for natural gas to have the largest contribution in the district heating sector in all scenarios in 2030 and 2050, as a transitional fuel, replacing the polluting solid fuels used in heat stations and respecting the sustainable utilisation of biomass in Serbia. The options of centralised heat pumps and other clean technologies for centralised heat production were included in the analysis but their relative costs remain high within the considered time period.</p>								

Recommendation EnC	Justification	Response
<p>Enhance the spatial planning policy and measures to expedite the deployment of renewable energy projects by incorporating explicit criteria for designating suitable areas, while adhering to the "do no significant harm principle" and establish an efficient dispute resolution mechanism.</p>	<p>Measure D25 "Updating and optimizing the spatial planning framework" will be revised in order to cover the recommendation. However, the new Spatial plan that is under preparation the following has been included already: in the preparation of planning documents for spatial and urban planning, areas that are suitable for the implementation of projects from renewable energy sources should be mapped. Such areas are defined as areas with a lower potential risk for the environment, if they are areas of landfills, industrial sites, mines, roofs of buildings, traffic infrastructure, degraded land, etc.</p>	<p>Accepted</p>
<p>In energy efficiency, pursue the same level of ambition – i.e. maximum 9.54 Mtoe instead of 9.7 Mtoe – in the planned total maximum level of final energy consumption by 2030 as per the decision of the Energy Community Ministerial Council7.</p>	<p>The scenario for achieving the same level of ambition for GHG emissions reduction, at 40.3% in 2030 lead to almost equivalent levels of final energy consumption and lower levels of Primary Energy Consumption (reaching 14.68 ktoe in 2030) improving the overall efficiency of the energy Sector. We consider that the difference in the solution of the FEC is within the level of statistical errors.</p>	<p>Not Accepted with justification</p>

Recommendation EnC	Justification	Response
<p>Complete the legislation and regulations on energy performance of buildings as soon as possible and start activities already in 2024 to create enabling legislative framework for a number of other policies and measures related to energy efficiency and renovation of buildings.</p>	<p>There are several measures connected with EPB Directive in the draft NECP (apart from PM-EE4 "Completion of legislative framework in alignment with Directive 2018/844/EU and regulatory measures to promote nearly-zero energy buildings (nZEBs)" there are also PM-EE7 "Enhancing the role of the energy performance certificates", PM-EE35 "Improvement and further development of a scheme for the qualification, accreditation and certification of energy efficiency professionals", PM-EE37 "Strengthening the technical and administrative capacity of the involved policy makers") . The Ministry of Construction will implement the EPBD as soon as possible in order to provide the realization of the proposed measures. NECP will be updated with this information in the relative measures.</p>	<p>Accepted</p>
<p>Finalise the adoption of comprehensive assessment of the potential for efficient heating and cooling and reflect the findings in the NECP. Introduce policies and measures that demonstrate full implementation of consumption metering and billing of district heat in line with the Energy Community Energy Efficiency Directive8 ("Energy Efficiency Directive").</p>	<p>The conduction of the comprehensive assessment is foreseen by Article 14 of the EED and it is mandatory for the different countries. Therefore, it is recommended to add a new measure, which will foresee the adoption of the plan in its alignment with the priorities of the NECP. The addition is imperative in the case that the country has the official obligation. The current response describes specific projects for the promotion of the efficient heating and cooling outside the official framework of the comprehensive assessment.</p> <p>In regards the second recommendation about the implementation of the consumption metering and billing of district heat, the Law on Energy Efficiency and Rational Use of Energy has already taken into account these provisions. Our recommendation to add a new policy measure in order to monitor and potentially improve the existing provisions.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
(23) Concerning energy security, base policies and measures on clean energy sources, new technologies and energy efficiency and include regional cooperation and market integration instead of focusing only on self-sufficiency.	<p>There are already several measures included in the NECP focusing on this direction :</p> <p>Regional cooperation and market coupling: PM_ES1 (Serbia-Bulgaria Interconnector), PM_ES2 (Enhancement of regional electricity and gas interconnections), PM_ES3.1 (Banatski dvor, natural gas storage expansion), PM_ES6 (Electricity Risk Preparedness plan), PM_ES7 (Update in Security of supply regulation)</p> <p>Clean energy sources & new tech: PM_ES3 (Building capacities for electricity storage), PM_ES9 (Development of a pumped storage project in Bistrica)</p>	Accepted
Reconsider the strong reliance on fossil fuels in ensuring energy security such as additional dispatchable generation from natural gas and related gas infrastructure that is not future proof.	<p>The modernization of the mining industry in line with the planned decreasing engagement of Thermal Power Plants and investments in gas infrastructure to ensure a smooth energy transition in Serbia are considered key and significant transitional measures, providing Security of Supply</p> <p>Natural gas is considered as a transitional fuel, since it is a lower emission fuel compared with lignite, necessary to balance large amounts of renewable energy in the power sector. Hence, such investments support the objectives of the INECP on one hand, while facilitating the penetration of RES and the safe and reliable operation of the power system.</p>	Not Accepted with justification

Recommendation EnC	Justification	Response
<p>Introduce policies and measures that demonstrate how Serbia is planning to implement the Gas Security of Supply Regulation⁹ and the Electricity Integration Package adopted by the Energy Community in 2022.</p>	<p><i>The Decree on establishing the Crisis Plan to ensure security of natural gas supply and the Decree on establishing the Preventive Action Plan to ensure security of natural gas supply, adopted in 2018, are in line with the requirements of EU Regulation 994/2010 on measures to ensure security of natural gas supply. As per measure PM_ES7: Update in Security of Supply Regulation the aforementioned acts will be harmonized with the requirements of EU Regulation 2017/1938 addressing critical aspects of security of natural gas supply. Measure PM_ES7 will be further amended/broadened to include the assessment of the missing elements with regards to the full implementation of Regulation 2017/1938 and the respective implementation of the needed activities such as storage arrangements and burden-sharing mechanism, templates of the Preventative Action Plan, templates of the Emergency Plans, etc. as required. Measure PM_ES5 will be amended accordingly.</i></p> <p>Please see below for the Electricity Integration Package (i.e. Row 30)</p>	<p>Accepted</p>
<p>Further align the draft NECP with the latest Ten-Year Network Development Plan (“TYNDP”) 2023-2032 of the electricity transmission system operator (“TSO”), especially to reflect the possibility to integrate a considerably higher amount of renewable energy – as determined by the transmission system operator in the draft NECP.</p>	<p>The share of RES in the INECP is in line with the latest approved TYNDP of EMS. The MoME collaborated closely with the Serbian TSO, EMS, throughout the development of the INECP by organising frequent meetings and holding engagement sessions to analyse views, proposals and feedback points from EMS. This close collaboration led to a commonly agreed approach that is reflected in the INECP. Since the INECP includes the minimum level of commitment for the integration of RES into the Serbian system, it is fully aligned with other draft more ambitious projections, such as the draft TYNDP 2023-2032 of EMS.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
<p>Focus policies and measures on using the existing electricity and gas infrastructure in a more efficient manner, implement market rules that remove limitations from capacity use and focus on regional cooperation, instead of pursuing extensive new infrastructure projects. When proposing new infrastructure projects ensure that consultation with the impacted Contracting Party is undertaken to ensure the viability and successful implementation of the future project.</p>	<p>All projects presented in the NECP are known and where part of the Energy Sector Development Strategy for the period up to 2025 with the projections up to 2030. Please note that many of these projects were the subject of regional analysis for PCI, PEI, PMI and other list of projects.</p> <p>All electricity and gas interconnection projects are being developed in close collaboration and consultation with the relevant neighbouring countries to ensure their viability, cost-efficiency and successful implementation. It is worth mentioning that the included projects form part of the Energy Sector Development Strategy up to 2025 with projections up to 2030, and are clearly references in the TYNDP of the electricity and gas TSOs. The majority of the projects were also subject to extended regional analysis & consultation as part of PCI, PEI, PMI and other similar lists of projects.</p>	<p>Accepted</p>
<p>Regarding the internal energy market, design policies and measures in electricity that enable the fulfilment of the minimum cross-zonal capacity target of 70% and the development of competitive wholesale and retail markets. Include increased regional and European cooperation, especially for the exchange of balancing resources, in the</p>	<p>The relevant legal & regulatory amendments to support the implementation of the Electricity Integration Package (that is part of Serbia's obligation under the Energy Community Treaty) are already included in the PMs of the INECP. Hence, to aid the readability of the INECP doc, these will be referred more explicitly in PM_IEM21, PM_IEM23, PM_IEM24, and PM_IEM25. These amendments will take place through the introduction of new legislation acts.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
<p>policies and measures to enable the objective of increased flexibility necessary for the integration of renewable energy.</p>		
<p>Revise the net metering scheme, as granting new rights under such schemes after 31 December 2026 is no longer allowed.</p>	<p>This is the subject of amendments to Energy Law which are under the preparation. Therefore MoME consider that it is not subject of NECP.</p> <p>We will update the completion timeline (i.e. 2026) as suggested & include in the PM's description that these amendments are subject to the update of the Energy Law that is currently underway.</p>	<p>Accepted</p>
<p>Define and implement adequate policies and measures to complete electricity market coupling, and thus ensure alignment with the CBAM Regulation in order to minimise its impact on the operation of the domestic and regional electricity sector.</p>	<p>Regarding market coupling, we have already included the relevant measures to the extent possible, so will make this more explicit in the text.</p> <p>We have already included a level a carbon pricing in the analysis, however, the exact way of implementation CBAM and the level of Carbon pricing is still not known, and is currently under discussion and consultations both in Serbia and among the EnC contracting parties. CBAM regulation was adopted in May 2023 by EU and many countries are in the process of analysis and consideration of how to implement CBAM. Therefore this should be subject of the process of the revision of NECP.</p>	<p>Accepted</p>

Recommendation EnC	Justification	Response
<p>Be more precise in mapping envisaged funding sources in the area of research, innovation and competitiveness.</p>	<p>It is not possible to define precisely the funds and sources having in mind intensive development of new technologies in EU and that one of the main sources of funding is the National Budget. Additionally, the Study "Diagnostic of Just Transition in Serbia" will also define some information relevant for analysing this area. Certainly funds should be increased and emphasize the larger inclusion of science institutions and faculties in the future development of energy sector of Serbia. However, the Volume of R&I Funds will depend significantly on the willingness of the EU to include Researchers from Serbia and other EnC countries in the development of New Energy Technologies.</p>	<p>Not Accepted with justification</p>

ANNEX IV: REGIONAL CONSULTATIONS

i. Letter for participation in the regional consultation procedure for INECP



MINISTRY OF ENVIRONMENT
WATERS AND FORESTS

MINISTER CABINET

No.: DGEICPSC/10823Iziy//W 2023

To: Irena Vujovic, Minister
Ministry of Environmental Protection of the Republic of Serbia

Ref: Transboundary consultations for the Integrated National Energy And Climate Plan of the Republic Of Serbia for the period up to 2030 with the projections up to 2050

Dear Minister Irena Vujovic,

Following your letter no. 264-2/2023 regarding the transboundary consultations for the Integrated National Energy and Climate Plan of the Republic Of Serbia for the period up to 2030 with the projections up to 2050 and the accompanying Strategic Environmental Assessment Report, I have the pleasure to forward, in accordance with the provisions of the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a transboundary context, several comments and proposals from our side related to the contents of the submitted documents.

The Integrated National Energy And Climate Plan of the Republic Of Serbia addresses the five dimensions of Regulation (EU) 2018/1999 on the management of the Energy Union and action in the area of climate: decarbonization (greenhouse gas emissions and renewable energy), energy efficiency, energy security, internal energy market and research, innovation and competitiveness, in an integrated way. The INECP defines measures and policies to support the Green Agenda, provides the development of the sustainable energy sector in the Republic of Serbia and envisions an increased penetration of RES in Serbia's energy

mix along with targeted energy efficiency measures with the aim of reducing the final energy consumption by increasing energy performance.

The plan establishes additional national objectives:

- Strengthening interconnectivity and security of energy supply
- Liberalizing and increasing competitiveness of the energy markets
- Facilitating the optimal development and operation of the energy system and energy infrastructures
- Protecting and strengthening the role of consumers
- Altering of the current consumption patterns and promoting energy-efficient and low- emission fuels in end-users
- Strengthening the competitiveness of the national economy
- Promoting the research and innovation in environmental and energy issues

After careful consideration of the information provided and the consultations with the competent authorities in our country, the following comments and proposals have been formulated:

The Strategic Environmental Assessment Report focuses on aspects that can impact the environment at national level and gives little attention to transboundary impact. We would like to draw your attention that these aspects should be analyzed separately and should constitute a different chapter in the Strategic Environmental Assessment Report.

During 2018-2021, the Natural Park Administration Portile de Fier implemented a project in partnership with several European states, located along the Green Corridor of Europe, within which the Portile de Fier - Djerdap area was selected as a pilot area. Following the implementation of this project, the administrations of the two parks, Portile de Fier and Djerdap, developed the "Catalogue of common measures for maintaining ecological connectivity".

Within the same project, the document "Description of the ecological corridors identified in pilot region 4: Iron Gates - Djerdap" was developed, the Danube, being identified through a study led by the Serbian side as the main migration corridor for bird species. Both the catalogue and the description of the ecological corridors are attached to this letter.

We suggest that the results of the project can be used and integrated in the environmental report, in such a way that there is a reduction of the potential negative impact on protected natural areas.

General aspects

In the environmental report, the maps, graphs and charts presented are in Serbian and cannot be understood even from the interpretation of the explanatory text in relation to them.

As a general observation, we note that the potential cross-border impact from the implementation of the planning document varies depending on the measures/actions considered in the INECP. Given that the consideration and analysis of energy development opportunities is done at a strategic level, it is currently difficult to identify the cross-border impact and its details. From the presented documentation it follows that the potential cross-border impacts can be associated with the following types of projects:

- large hydropower plants;
- smaller hydropower installations situated in border regions;
- wind farms situated in border regions;
- cross-border natural gas infrastructure in order to diversify supply routes;
- improvements (new investments and revitalization) in the electricity transmission system network.

Specific aspects

In the environmental assessment report, in table "Table 4.3: Overview of general and specific environmental objectives and indicators with explanation of the choice of indicators", the indicator proposed for the specific environmental objective SEO 04.2 *Sustainable use of water* (page 208) refers only to the amount of groundwater used. We believe that the indicator should also refer to surface waters that are used for various purposes, including energy production. In addition, it would be advisable to use the indicator Water exploitation Index (WEI+) which defines the level of pressure that anthropogenic activities exert on natural water resources in a certain space (subbasins, hydrographic basin, national territory and international district), in order to identify those areas prone to water shortages. Thus, WEI+ illustrates the percentage of water use relative to renewable freshwater resources at a given time and place, i.e. the ratio of total freshwater consumption to renewable freshwater resources (groundwater and surface water) at a given time and place given.

Regarding the hydroelectric power plants, the presented documentation does not clearly indicate the location of the two RHPP Bistrica I Djerdap 3 power plants, in order to identify the hydromorphological parameters (at the level of the Danube and or its tributaries) that could be affected. In the documentation, on page 309, it is stated that *"the cross-border impact of the Portile de Fier f reversible hydropower plant will be insignificant due to the mitigation measures that will be applied"* the study does not present what mitigation measures are envisaged (these are described only in a general way) nor the elements/parameters considered by these mitigation measures (what exactly is being mitigated). It is mentioned, for example, that the hydroelectric power plant is of the pumped power plant type, so we consider necessary to include an analysis in the context of the impact on the hydrological regime of the Danube downstream of Portile de Fier 2, taking into account both the provision of the ecological flows (especially in the period of low waters) and of flows for uses (mainly navigation).

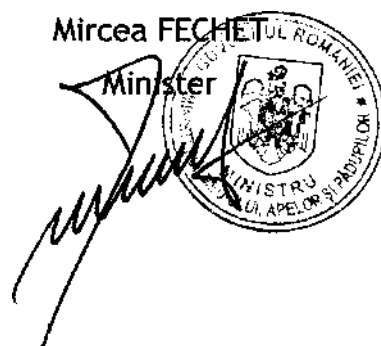
The documentation refers to microhydropower plants without specifying their location. This aspect makes it difficult to conduct an analysis regarding a possible impact on transboundary watercourses.

Based on the above, in accordance with article 10 of the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a transboundary context, I would like to inform you that we wish to take part in the Strategic Environmental Assessment procedure in a transboundary context for the Integrated National Energy and Climate Plan of the Republic Of Serbia for the period up to 2030 with the projections up to 2050. Also, we request to be notified of the projects included in the INECP that can have potential significant transboundary impact.

I would like to inform you that the Plan and the accompanying documents have been published on the website of the Ministry of Environment, Waters and Forests for public consultation. The deadline for this step of the procedure was the 17* of September 2023. During the public consultation process, the NGO CEE Bankwatch Romania has submitted its comments, attached to this letter.

Please accept, Ms. Vujovic, the assurance of my highest consideration.

Mircea FECHET
Minister

The image shows a handwritten signature in black ink over a circular official seal. The seal contains the text 'ROMANIA' at the top, 'MINISTRUL ROMANIEI' at the bottom, and 'MINISTRU MEDIULI DE MEDIU SI PADURILOR' in the center. The signature is written in a cursive style.

ii. RESPONSE TO THE LETTER RECEIVED BY THE ROMANIAN MINISTRY OF ENVIRONMENT, WATERS AND FORESTS, DURING THE TRANSBOUNDARY CONSULTATION OF THE SERBIAN INECP AND RELEVANT SEA

In response to the letter received by the Romanian Ministry of Environment, Waters and Forests, during the Transboundary Consultation of the Serbian INECP and relevant SEA for INECP, regarding General aspects:

We done corrections in the SEA in accordance with the comments referred to maps, graphs and charts.

We considered once again and revised SEA regarding proposed projects and their potential cross border impact.

Responses regarding Specific aspects:

- Indicator for the specific Objective SEO 04.2 Sustainable use of water is revised in accordance with the comment

- Information about RHPP Djerdap 3 and Bistrica in SEA is revised. Please note that NECP is document on national level **and the detailed descriptions of projects and activities are not available at this stage. The process of cross-border environmental impact assessment should be carried out in the further stages of project documentation in accordance with the ESPOO Convention.** As it concerns the location of RHPP Bistrica, it is not close to the Romanian borders. RHPP Bistrica is in the west of Serbia, on the basin of the river Lim.
- The information regarding small hydropower plants in the SEA is revised since the capacities regarding hydropower plants should be increased through the modernization and revitalization of existing capacities.

INECP presented projects based on the document **Initial basis of the energy infrastructure development plan and energy efficiency measures for the period up to 2028 with projections up to 2030** since all projects adopted by Serbian Government on June 15, 2023.

Beside that all Projects were included in the “Energy Sector Development Strategy up to 2025 with projections up to 2030” of the Republic of Serbia adopted by Serbian Parliament in December 2015. Also the mentioned projects were part of the regional Analysis and discussion through the preparation PEI list of Energy Community Secretariat in 2013 (when Serbia proposed Djerdap 3 and Bistrica) and after that regarding electricity, gas and oil network.

For all planned capital energy facilities such as hydroelectric power plants (especially refers to hydroelectric power plants whose construction is planned on the same watercourse), which may have synergistic and cross-border impacts, appropriate planning documents must be prepared. Such projects require the preparation of a Strategic Environmental Impact Assessment and the preparation of an Environmental Impact Assessment Study of the specific project in order to take a broader view of the possible environmental impacts, with cumulative, synergistic and trans-boundary impacts, and define appropriate planning and technical protection measures for mitigation possible negative impacts.