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The Permanent Mission of the Republic of Serbia to the United Nations Office and other International Organizations in Geneva presents its compliments to the Office of the High Commissioner for Human Rights and, with regard to the communication from the Special Rapporteur in the field of cultural rights Ms. Alexandra Xanthaki of 29 November 2024 (Ref: UA SRB 4/2024), has the honor to enclose herewith the response from the Government of the Republic of Serbia.

The Permanent Mission of the Republic of Serbia to the United Nations Office and other International Organizations in Geneva avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 27 January 2025

Office of the High Commissioner for Human Rights
Special Procedures Branch
Palais des Nations, 1211 GENEVA 10

RESPONSE TO THE QUESTIONS OF THE SPECIAL RAPPORTEUR IN THE FIELD OF CULTURAL RIGHTS

The Republic of Serbia remains consistently committed to upholding the values of rights in the domain of culture and to the consistent fulfillment of obligations within the framework of international conventions, norms, and principles that serve as the foundation and guide in the domain of cultural rights.

Its commitment is reflected in active and substantive participation in all segments of cultural heritage protection, including the direct safeguarding of cultural assets, fostering a culture of remembrance, nurturing and promoting cultural diversity, combating all forms of abuse and illegal activities, and promoting cooperation both bilaterally and within international organizations.

The Republic of Serbia is a signatory to five UNESCO conventions in the field of culture, including the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), which it actively implements through the activities of relevant national cultural and heritage protection institutions. By ratifying cultural conventions, the Republic of Serbia has committed to applying the highest standards for the promotion and protection of cultural heritage.

When it comes to the protection of immovable cultural heritage, the Republic of Serbia works to promote the highest standards in this area. The standards and principles of the Convention and its Operational Guidelines have served as the basis for the drafting of the current Law on Cultural Heritage (2021). These standards are applied to all cultural assets in the Republic of Serbia, especially those inscribed on UNESCO's World Heritage List. The highest standards for the promotion and protection of immovable cultural heritage are implemented through a network of national institutions, primarily through the network of institutes for the protection of cultural monuments across the territory of the Republic of Serbia (13 in total).

Within the framework of cooperation with international organizations, special focus is placed on regional collaboration and joint activities aimed at protecting cultural heritage, particularly through the preparation of multinational nominations for the World Heritage List.¹

In terms of the instruments of the Council of Europe in the field of culture, the Republic of Serbia ratified the Council of Europe Framework Convention on the Value of Cultural Heritage for Society (Faro Convention, 2005) in 2007.

In this context, the protection of cultural heritage represents one of the most important issues overall, encompassing historical, identity-related, developmental, and many other aspects.

In this regard, a key condition for a substantive understanding of cultural heritage preservation in the Republic of Serbia is recognizing the fact that the greatest challenge in this field is the protection of cultural

¹ **Nomination of the Property "Frontiers of the Roman Empire – Danube Limes – Eastern Segment."**

In 2024, representatives of four participating countries – the Republic of Serbia, the Republic of Bulgaria, the Republic of Croatia, and Romania – signed a Cooperation Agreement for the preparation of the nomination of the property "Frontiers of the Roman Empire – Danube Limes – Eastern Segment" for inclusion on the World Heritage List. This agreement establishes interstate cooperation in the preparation and presentation of the joint nomination project for the said property.

heritage in Kosovo and Metohija². This issue has been acknowledged by the international community and international organizations, particularly UNESCO.

Serbian cultural heritage in Kosovo and Metohija remains, in the 21st century, one of the most endangered cultural assets in Europe.³

² Since 2006, four monuments of Serbian culture in the territory of Kosovo and Metohija have been inscribed on UNESCO's List of World Heritage in Danger – the Monastery of the Patriarchate of Peć, the Church of the Virgin of Ljeviša in Prizren, the Gračanica Monastery, and the Dečani Monastery. These are outstanding achievements of Serbian medieval art and Christian holy places of the highest rank, a harmonious blend of Romanesque elements and Eastern Byzantine style, with frescoes some of which depictions are unique in the world. These monuments are of special significance for Serbian ecclesiastical and national history, as well as for the life of the Serbian Orthodox Church – the Patriarchate of Peć as the centuries-old center and burial site of canonized leaders of the Serbian Orthodox Church, the Virgin of Ljeviša and Gračanica as ancient cathedral churches of the bishops of Prizren and Lipljan, and Dečani as the resting place of its founder, Saint King Stefan Dečanski.

The endangerment of Serbian medieval monuments in Kosovo and Metohija is reflected in two aspects: one is the physical endangerment of the properties, while the other pertains to the falsification of history. Regarding physical endangerment, from June 1999 to date, over 150 Orthodox churches and monasteries in Kosovo and Metohija have been demolished, destroyed, or burned, many of which were built in the 13th and 14th centuries, along with 122 Serbian cemeteries. In March 2004, 34 churches and monasteries were destroyed, burned, or damaged, and three cemeteries were demolished. Some of the destroyed and damaged Orthodox medieval jewels were on UNESCO's World Cultural Heritage List.

More than 10,000 icons, church art, and liturgical items have been destroyed or stolen. A total of 5,261 tombstones have been destroyed or damaged in 256 Orthodox cemeteries, while in more than 50 cemeteries, not a single intact monument remains.

Among the Serbian monuments currently on UNESCO's list, the Church of the Virgin of Ljeviša was damaged during organized attacks in 2004, with its frescoes severely affected by a fire caused by three different types of explosives placed in the church. The fact that this church, whose frescoes have since been restored to the extent possible, was inscribed on UNESCO's World Heritage List two years after the destruction, but simultaneously on the List of World Heritage in Danger, gives hope that it will be spared further physical destruction in the future. This also applies to the other three Serbian monuments in the territory of Kosovo and Metohija on the List of World Heritage in Danger, which, fortunately, have been spared from destructive actions in recent years.

³ The Dečani Monastery still does not enjoy the right to 24 hectares of monastery property, and since 2014 it has been further endangered by plans of the Dečani Municipality to construct the main road Dečani–Plav, in Montenegro, with the route planned to pass through the buffer zone of the Dečani Monastery and directly adjacent to the narrower protection zone of the property. The works carried out in 2020 were halted only after the intervention of the international community, but the area has not been restored to its original state. The seriousness of the situation is evidenced by the fact that in 2021, *Europa Nostra* included the Dečani Monastery on its list of the "7 Most Endangered Heritage Sites in Europe."

Despite the efforts of relevant institutions of the Government of the Republic of Serbia, such as the Ministry of Culture, the Office for Kosovo and Metohija, and the Republic Institute for the Protection of Cultural Monuments, the implementation of conservation and restoration works on these properties is hindered, even though conservation work and systematic research on all four properties have been carried out since the first half of the 20th century, and all four properties are still under the protection of KFOR representatives and the police.

Although the heritage of the four properties that are part of UNESCO's World Heritage has exceptional universal value, constant attacks on Serbian heritage in Kosovo and Metohija, as well as attempts at renaming and falsifying history, have become everyday occurrences. Attacks on the religious and objects of the Serbian Orthodox Church in Kosovo and Metohija continue to take place, hindering daily life and activities related to the protection of Serbia's movable and immovable cultural heritage.

To ensure additional protection, a new Law on Cultural Heritage ("Official Gazette of the Republic of Serbia," No. 129/2021) came into force in 2022, which provides cultural heritage inscribed on UNESCO's World Heritage List with special treatment, protection, care, and preservation, including cultural heritage located in the territory of the Autonomous Province of Kosovo and Metohija (Article 40).

The Government of the Republic of Serbia continues to make efforts with full attention and dedication in the field of cultural heritage protection and cultural rights as a whole, and reiterates its position that it remains committed to upholding the values of rights in the domain of culture and to consistently fulfilling obligations within the framework of international conventions, norms, and principles in this field.

From 2012 to 2024, over the past twelve years, the Republic of Serbia has adopted 210 decisions on the designation of immovable cultural properties, including: 206 cultural properties, one immovable cultural property of great importance, and three immovable cultural properties of exceptional importance.

In the same period, 6,907,714,729.00 dinars was allocated from the budget of the Ministry of Culture solely for the field of immovable cultural heritage protection. 2,026,829,217.00 dinars were granted for support to projects through ministry competitions, while the Republic Institute for the Protection of Cultural Monuments received 1,531,808,955.80 dinars through its work program for projects aimed at protecting immovable cultural heritage, including two major capital projects for reconstruction, restoration, and conservation of immovable cultural properties: the capital project "Research, Protection and Presentation of the Archaeological Site Belo Brdo in Vinča" and "Conservation, Restoration, and Presentation of the Archaeological Site Caričin Grad in the Municipality of Lebane."

It is important to note that, from 2017 to 2021, several large-scale capital projects were implemented for the reconstruction and restoration of monuments of immovable cultural properties that house national museum headquarters, achieving comprehensive protection and presentation of both immovable and movable cultural heritage.⁴

All financial efforts and investments in the field of monument heritage protection have been made in accordance with the fundamental goals of national regulations as well as ratified conventions in the field of

⁴ Examples:

1. The building of the Museum of Contemporary Art was designated as an immovable cultural property in 1987. After being closed to the public for ten years due to reconstruction, it was reopened on October 20, 2017. The value of the works amounted to 1,022,750,000 dinars (8,667,372 euros).
2. In 2018, the reconstructed and adapted building and the permanent exhibition of the National Museum of Serbia were opened. The building of the National Museum is a cultural monument of great importance. The value of the works amounted to 1,621,923,557 dinars (13,745,114 euros).
3. The "Reconstruction and Expansion of the Building of the Museum of Naïve and Marginal Art in Jagodina," which was designated as a cultural monument, was carried out at a total value of 339,403,000.00 dinars.
4. In 2024, funds were provided for the first phase of the project for the Reconstruction, Restoration and Adaptation of the former Main Railway Station building in Belgrade, a cultural monument of great importance, with its purpose being changed to serve as the building of the Historical Museum of Serbia. The allocated amount was 350,000,000 dinars (2,966,101 euros).
5. The Ministry of Culture provided 119,740,000.00 dinars for the period from 2021 to 2024 for the Restoration and Adaptation of the Memorial Museum of Nadežda and Rastko Petrović, which was declared a cultural monument in 1974. Its opening to the public is planned for March 2025.

culture. The Republic of Serbia and its institutions have committed to applying the highest standards for the promotion and protection of cultural heritage and to ensuring public accessibility to cultural properties.

The Ministry of Culture of the Republic of Serbia, in cooperation with a network of institutes for the protection of cultural monuments, headed by the Republic Institute for the Protection of Cultural Monuments as the focal point for the Convention Concerning the Protection of the World Cultural and Natural Heritage, works on implementing the highest standards for the protection of immovable cultural heritage. In addition to the tasks and activities related to research and technical protection, the institutes, with the support of the ministry, organize scientific conferences and exhibitions and have developed publishing activities, all of which collectively contribute to enhanced protection of the architectural heritage.

A major step forward and one of the most important measures undertaken by the Republic of Serbia to improve the protection of cultural heritage was the adoption of the Law on Cultural Heritage in 2021. Before its adoption, the field of cultural heritage was regulated by the Law on Cultural Assets from 1994. The standards and principles of the 1972 Convention and its Operational Guidelines served as the basis for drafting the Law on Cultural Heritage, achieving full alignment with all binding EU regulations in this field.

Transparency in the adoption of regulations and decisions in the protection of cultural heritage is systematically ensured through the legal framework of the Republic of Serbia. The Law on State Administration of the Republic of Serbia and the Law on the Planning System stipulate that before the adoption of laws, it is necessary to conduct public consultations and discussions at all stages of drafting to enable the participation of all interested parties and target groups in order to define optimal solutions in the regulations. The entire procedure was applied during the drafting of the Law on Cultural Heritage.

We emphasize that the Republic of Serbia has a developed system of support for projects and activities in the protection of cultural heritage, based on the existing national legal framework.

Through the annual activity plans of national cultural and heritage protection institutions, as well as through the annual public competitions of the Ministry of Culture, projects that contribute to the protection of immovable cultural heritage are regularly funded or co-funded. These include projects involving scientific research, documentation, the creation of project-technical and conservation documentation, implementation of works, or the digitalization of monument heritage to ensure its proper presentation to the broader public⁵.

An essential and important step in the preservation and sustainable use of immovable cultural properties is the preparation of project-technical documentation, which requires expertise, dedication, time, and often significant financial resources.⁶

The level of dedication and complexity of the Republic of Serbia's efforts in protecting cultural heritage is evidenced by the fact that in 2020, after seven decades, the Law on the Memorial Center "Staro Sajmište"

⁵ Among the numerous projects of reconstruction and rehabilitation of cultural monuments, we can highlight the Steam Bath of the Krsmanović Brothers in Belgrade, a cultural property that was completely closed to the public in 2004 and has since remained neglected and abandoned.

⁶ Among the numerous projects financed by the Ministry of Culture, we highlight the preparation of the study and project-technical documentation for the reconstruction of the "Kaštel" Castle in Temerin, as well as the conservation and restoration works on the renovation of the castle, with a total value of 44,900,000 dinars. Additionally, the Ministry of Culture financed the Project for Research and Conservation Works on the Renovation of the Castle in Vlajkovac, the Project for the Static Rehabilitation of the Castle, with a total value of 3,168,000 dinars (26,847 euros), as well as the Project for Research and Conservation Works on the Renovation of the Small Castle of the Lazarević Family in Veliko Središte and the rehabilitation of part of the structure, with a total value of 12,590,000 dinars (106,694 euros). All supported projects represent the first indispensable steps in a series of future activities that will lead to the reconstruction and revitalization of the mentioned buildings.

was adopted, establishing a new cultural institution, the Memorial Center "Staro Sajmište," with the aim of honoring the memory of the victims of the former Nazi concentration camp Sajmište.⁷

As part of the renovation of the Memorial Center's buildings during 2022-2023, the Central Tower was reconstructed, becoming an exhibition space equipped with the most modern technology and completed in accordance with the highest museum and conservation standards. The total value of the works amounted to 544,273,150 dinars (4,612,484 euros). In 2025, the continuation of works is planned on the administrative building of the Memorial Center, landscaping, and further resolution of property and legal issues for other buildings within the memorial complex.

We emphasize that in the Republic of Serbia, there is a normative and political framework, as well as a framework for open and free public dialogue, that enables meaningful and principled consideration and resolution of all issues in the context of cultural rights, in the interest of the entire community and with the participation of interested stakeholders. Within public debates and communication through institutions, media, and public spaces, the Republic of Serbia proceeds from the position that there is no monopoly on the expression and enjoyment of rights in culture, but that the field of culture itself requires mutual respect in public dialogue.

Recognizing the importance of ensuring objectivity and non-selectivity in the realization of economic, social, and cultural rights, eliminating potential double standards, and avoiding politicization of any issues, and based on the principle of cooperation and genuine dialogue with all citizens, on the proposal of the Government, the Law on the Ratification of the Optional Protocol to the International Covenant on Economic, Social, and Cultural Rights ("Official Gazette of the RS - International Treaties," No. 5/2023) was adopted on 6 September, 2023. With this act, the Republic of Serbia completed the system of international protection in the field of economic, social, and cultural rights and provided additional protection to all potential victims of rights violations.

In addition, we emphasize the importance of the work and activities of the Council for Monitoring the Implementation of Recommendations from the UN Human Rights Mechanisms, as well as the Council for Creating a Supportive Environment for the Development of Civil Society.

The Council for Monitoring the Implementation of UN Human Rights Mechanism Recommendations, established in 2014, continuously includes representatives of state bodies, independent human rights institutions, the Platform of Civil Society Organizations (26 organizations cooperating with UN bodies), the Standing Conference of Towns and Municipalities, representatives of the academic community, and international organizations accredited in Serbia. Since its establishment, the Council has

⁷ Once the most modern exhibition and fair complex in the region, the "Belgrade Fair" was built during the period of 1936-1937. The urban concept of the complex and the architecture of the fair pavilions were a representative example of modern architecture and urbanism of the 1930s. Not long after its opening, immediately following the outbreak of World War II, this fair complex became a site of atrocities and a place of horrific suffering. The Gestapo established a concentration camp there for the liquidation of Jewish and Roma populations in Belgrade and Serbia. By May 1942, when the extermination of Jews was completed and Serbia was declared "Judenrein" – cleansed of Jews – the camp began receiving other hostages: communists, partisans, Chetniks, as well as civilians captured in areas of wartime activity from May 1942 to July 1944. The erasure of memory and neglect caused this site to only be designated as a cultural property in 1987 under the name "Staro Sajmište – Gestapo Camp," but no concrete actions were taken for its arrangement and protection. With the adoption of the Law in 2020, systemic organization of the space and restoration of the monumental and historical heritage of this cultural property began.

developed a Plan for Monitoring the Implementation of United Nations Recommendations, which is regularly updated and currently contains 481 recommendations addressed to the Republic of Serbia.

A review of the Plan confirms that the Republic of Serbia has not received any UN mechanism recommendations concerning cases of cultural rights violations.

During 2024, the Council held multiple regular and thematic sessions, including the last one on 18 December, 2024; however, none were initiated concerning the protection of cultural and historical heritage in the Republic of Serbia.

The Council for Creating a Supportive Environment for the Development of Civil Society was established in 2022, with 11 representatives from nearly the entire civil sector regularly participating in its work. The Council serves as an additional institutional mechanism available to interested individuals, human rights defenders, and the public to initiate direct discussions on various issues through civil society representatives, and to request public statements from the Government of the Republic of Serbia and other competent authorities on specific details, including all issues related to the threat and destruction of Belgrade's localities. During the second half of 2024, the Council held four sessions, including one extraordinary session at the request of associations, during which the issue of the environment in which civil society organizations operate was discussed in the National Assembly. During this session, which included a large number of representatives of citizens' associations in a hybrid format, no issues related to potential violations of cultural rights were raised.

In 2020, the Government introduced the institution of social dialogue for the first time. Since January 2021, the Ministry for Human and Minority Rights and Social Dialogue has facilitated 68 social dialogue sessions, engaging more than 4,000 participants from government agencies and institutions, local government units, the academic community, national councils of national minorities, activists and civil society organizations, international organizations, experts, and prominent individuals from various social fields.

At the same time, the ministry has not received any complaints, written statements, or grievances from citizens or groups expressing disagreement with the work or conduct of any authority regarding urban development and the protection of cultural heritage, nor in relation to the alleged irreversible destruction of cultural sites in Belgrade.

In the context of the statements provided, we also emphasize that the Government of the Republic of Serbia fully takes into account the views of interested parties in all areas when formulating and implementing policies and recognizes the fact that dialogue in these processes necessarily includes diverse and opposing opinions and perspectives.

In this regard, we are guided by the position that every structure and location requires, in addition to correct and adequate formal approaches, an understanding of the essence of each individual case and the specific reasons regarding its status, including its history.

Regarding the statements provided, we also emphasize that state authorities conduct activities in accordance with laws, norms, and principles established by relevant international conventions to prevent abuses or discrimination, including various forms of instrumentalization in the context of cultural rights. In this respect, transparency, inclusiveness, accessibility, and the promotion of diversity are set as high priorities. We believe that this approach represents the best way to overcome partiality in determining the authentic cultural expression of public goods. We underline that the Government of the Republic of Serbia acts with respect for public interest and maintains the integrity of the decision-making process, adhering to legal procedures.

We also emphasize that, in the domain of cultural rights, the Republic of Serbia considers that the best model for the relationship between heritage protection, contemporary creativity, and developmental policies in the broadest sense involves not only a balance or complementarity of these dimensions of culture but also their mutual encouragement as a concrete expression of a holistic approach. Sustainable development implies respect and understanding of cultural heritage, just as respect for tradition requires its recognition within the forces of creative development.

At the same time, in the interest of understanding the background of the provided statements, we point to the importance of distinguishing between forms of formal and informal symbolic, as well as official, evaluations of the cultural significance of a site or structure (which in the statements are not always clear or accurate), and that the perspective or approach to each specific issue, in the interest of truth and respect for human rights, must be taken into account to avoid arbitrary actions that open space for misunderstandings and a context outside the interest of cultural heritage.

Simultaneously, we also emphasize the importance of distinguishing between assessments and impressions from claims that would be supported by recognizable references and relevant sources. In this respect, the position that we highly value is the avoidance of prejudging the accuracy of the statements provided.

Regarding the statements in the letter claiming that cultural heritage is "threatened" by the expansion of the development project "Belgrade Waterfront," which allegedly harms public interest, we point to the following facts:

- The Government of the Republic of Serbia has adopted a series of decisions aimed at revitalizing, restoring, and adapting the monumental heritage in the area stretching from the Savski Trg (Sava Square) Old Railway Station building to Hall 1 of the Belgrade Fair to serve as the headquarters of cultural institutions and venues for rich cultural programs.
- In 2024, the Government of the Republic of Serbia approved a capital project for the reconstruction, restoration, and adaptation of the former Main Railway Station building in Belgrade, a cultural monument of great significance, into the new building of the Historical Museum of Serbia. The building was constructed in 1885, modeled after the railway stations of major European countries. A part of the building was damaged during the Allied bombing in 1944. After the war, the building was repaired without extensive reconstruction and returned to function. After more than seven decades, in 2024, work began on a four-year project for the comprehensive reconstruction, restoration, and adaptation of this cultural monument, with a total budget allocation of 2,211,000,000.00 dinars.
- In close proximity to the Old Railway Station building, the future Historical Museum of Serbia, is the Old Post Office building, designed by the renowned architect Momir Korunović and built in 1929 in the modern Serbian-Byzantine style. This building, which was once prominently featured on postcards of old Belgrade, suffered significant damage during World War II. After the war, it was restored in a socialist-realist spirit, with the ornamental and decorative elements that once adorned it removed, rendering it unrecognizable from its original design. As a result, it lacked the attributes to be designated as a cultural monument. In 2024, the Government of the Republic of Serbia decided to restore the building after decades of neglect, returning its original façade based on archival documentation and Korunović's original drawings. The restored building, which will preserve its original dimensions and regain its impressive decorative façade according to Korunović's designs, will house the new Archaeological Museum as well as two theater stages. Along with the planned Historical Museum of Serbia

and the most modern educational campus in the country, "Ložionica," this will position Sava Square as the new cultural and educational center of the city.

- The state's respect for the fundamental principle of preserving cultural and historical heritage, with a clear vision of its development, ensuring conditions for its self-sustainability, and applying modern conservation elements and structures that do not endanger its monumental properties but contribute to its active inclusion in the creative processes of contemporary life, is exemplified by the "Ložionica" project. Ložionica, a former turntable for steam locomotives near the Mostarska petlja in Belgrade, is an immovable cultural property under preliminary protection. The creative-innovative multifunctional center "Ložionica" aims to revitalize the previously neglected and abandoned turntable, Ložionica, and the Belgrade Railway Station Water Tower, along with their surroundings, through the synergy of old and new. The Ložionica building itself will be reconstructed into a multifunctional center, a gathering place for creative and innovative people of various profiles and industries, positioning the site as a symbolic location of contemporary progress in creative industries and modern creativity.
- Continuing along this spatial sequence is the next cultural monument: the immovable cultural property "Milan Vapa Paper Mill" ("Official Gazette of the Republic of Serbia," No. 35/13). Until March 2024, this representative architectural building, a symbol of industrial heritage in the city of Belgrade and the Republic of Serbia, had been neglected and left to decay for decades. Thanks to the Government of the Republic of Serbia's decision to designate the monument for the purposes of the Nikola Tesla Museum, preparations for its restoration and adaptation began. By December 2024, the international architectural competition for the new Nikola Tesla Museum building was completed, with the winning design submitted by the renowned London architectural firm [REDACTED] in collaboration with Belgrade-based Bureau Cube Partners. The monument will retain its status as a cultural property, and the reconstruction will adhere to protection measures and modern conservation principles, adapted to the museum's needs, where the personal and scientific legacy of Nikola Tesla, one of the greatest scientists of all time, will be exhibited.
- The series of monumental heritage sites in the area from Savski Trg begins with the Old Railway Station, which will serve as the new headquarters of the Historical Museum of Serbia. Adjacent to it, the Old Post Office building will be restored to house the new Archaeological Museum and two theater stages. Continuing along is the Ložionica complex and the Milan Vapa Paper Mill, the future building of the Nikola Tesla Museum, concluding with Hall 1 of the Belgrade Fair, an established cultural monument designed for cultural programs. This strategic vision for the development of this city center establishes a new hub with preserved historical values of modern industrial architecture in Serbia, adapted to contemporary, content-rich spaces for new museum exhibits, theaters, and various cultural programs.
- Regarding the claims that the Belgrade Fortress (Kalemegdan), a cultural landmark of exceptional significance, is allegedly threatened by various urban projects, including the expansion of Vojvoda Bojović Boulevard and a proposed cable car linking the Sava River with the fortress, we note that no cable car construction work is taking place, and in November 2024, the Republic Institute for the Protection of Cultural Monuments prohibited the public enterprise "Putevi Beograd" from carrying out works to expand Vojvoda Bojović Boulevard (13-23/2024 from 4.11.2024). Concerns that the proposed construction projects could endanger the status of the Belgrade Fortress are in stark contrast to the lack of any reaction from international organizations when, during the 1999 NATO bombing, the former Central Committee building in New Belgrade, located only a few hundred meters from the Belgrade Fortress, was

repeatedly hit, directly threatening its integrity and protection. At the same time, we emphasize that the Belgrade Fortress is not inscribed on UNESCO's World Heritage List; rather, one of its segments is on the Tentative List as part of the property "Frontiers of the Roman Empire – Danube Limes – Eastern Segment."

- In relation to the claims about the removal of the cultural property status of the General Staff complex, the Government of the Republic of Serbia, which was also heavily damaged during the 1999 NATO aggression, made the decision to revoke the cultural property status of the General Staff buildings of the Army of Serbia and Montenegro and the Ministry of Defense in Belgrade in a manner and procedure prescribed by the Law on Cultural Heritage, based on a reasoned proposal from the Republic Institute for the Protection of Cultural Monuments – Belgrade.
- Furthermore, with respect to the status of protection, it is important to note that the *Old Sava Bridge*, *Hotel Jugoslavija*, and various halls of the *Belgrade Fair* are not recognized as cultural properties and do not possess any prior protective status.

Serbia places a special focus on the care and protection of immovable cultural heritage, particularly on properties listed as UNESCO World Heritage Sites and those on the Tentative List. In line with this, projects contributing to their better presentation have been supported in the recent period.

We emphasize the importance of ensuring that employees of the Institute for the Protection of Cultural Monuments, as well as other relevant actors and experts in the field of culture participating in the process, are not subjected to external pressure from private interests when determining the "historical status" of a building. This is regulated by general provisions governing the issue and prohibits illegal actions, such as those defined in the Criminal Code, which includes criminal offenses like coercion, extortion, blackmail, bribery, and others. Similarly, the Law on General Administrative Procedure provides for the annulment of final decisions made as a result of coercion, extortion, blackmail, pressure, or other prohibited actions.

At the same time, in terms of planning urban projects, the Law on Planning and Construction stipulates that during the development of spatial or urban plans, the plan's proponent must organize public engagement with legal and natural persons to familiarize them with the general objectives and purpose of the plan, potential solutions for the development of the spatial unit, potential solutions for urban renewal, and the effects of the planning.

The first phase is an early public review, which involves announcements in public media and in electronic form on the websites of the local self-government unit and the plan proponent. This phase lasts for 15 days. During the early public review, conditions and other significant data for drafting the planning document are obtained from authorities, special organizations, public authorities, and other institutions. Authorities, special organizations, public authorities, and other institutions are required to provide conditions and all available data upon the plan proponent's request within the duration of the early public review, no later than 15 days or 30 days from the receipt of the request.

All comments and suggestions from legal and natural persons are recorded by the plan proponent, and these recorded comments and suggestions may influence the planning solutions. The public must have the opportunity to express their opinions, and the recorded comments may impact the planning solutions.

Subsequently, the procedure for public review of the planning documents is conducted. These documents include the obtained conditions, with the possibility of intervention by interested parties within 15 or 30 days.

The plan proponent is required to invite all authorities, special organizations, and public authorities that participated in the early public review and provided specific conditions to the public review.

An authority, special organization, or public authority that provided conditions and data for drafting the planning document participates during the public review and gives opinions on the planning document. However, new or different conditions from those provided for drafting the planning document cannot be imposed.

Once again, we reiterate that the Republic of Serbia remains steadfastly committed to the realization of legal values within the realm of culture and to the consistent fulfillment of obligations in accordance with international conventions, norms, and principles that serve as the foundation and guiding framework for cultural rights.