EUROPA NOSTRA REPORT

ON THE PROPOSED KALEMEGDAN-UŠĆE CABLE-CAR PROJECT IN BELGRADE - SERBIA

Based on the High-level Delegation mission to Belgrade on 4 - 10 May 2019 endorsed by the Europa Nostra Board and Europa Nostra Council at their meetings on 18-19 June 2019 in Athens

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1. INTRODUCTION

This Report was prepared by Europa Nostra as a result of a scope mission to Belgrade, which took place on 4-10 May 2019. The mission aimed at meeting and discussing with Serbian authorities, various professional institutions and NGOs about the proposed construction of a cable-car at the Belgrade Fortress.

The Belgrade Fortress is a first grade listed heritage site and monument of Serbia (monument of highest level of State protection). It is also a valuable record of Europe’s history, since it witnesses building phases of the Roman, Byzantine, Hungarian, Bulgarian, Serbian, Ottoman and Habsburg Periods. The environment context is also unique and significantly well preserved. The Belgrade Fortress is also included in the tentative list for potential future inscription on the UNESCO World Heritage List, as part of the transnational nomination for the "Frontiers of the Roman Empire".

In March 2019, after more than 100 trees were cut in the Kalemegdan and Ušće Parks in order to start the planned archaeological investigations and construction works in the area, Europa Nostra Serbia together with other Serbian professional associations and institutions alarmed Europa Nostra about the devastating consequences of the project. The Board of Europa Nostra immediately expressed concerns about the threat to cultural heritage represented by the construction of the cable-car and decided to send a High-Level Delegation to Belgrade. The mission took place from 4 to 10 May 2019.
The Europa Nostra Delegation was composed of the following members:

- **Dr Guy Clausse** (Luxembourg), economist, Executive Vice President (acting as Head of Delegation)
- **Dr Laurent Lévi-Strauss** (France), policy and heritage expert, Board Member
- **Prof. Dr Fani Mallouchou-Tufano** (Greece), archaeologist and conservator, Council Member
- **Prof. Dr Paolo Vitti** (Italy), architect-conservator and historian, Board Member
- **Prof. Dr Isik Aydemir** (Turkey), architect, Scientific Committee Member
- **Sneška Quaedvlieg-Mihailović** (Serbia / The Netherlands), expert in international and European law and policy, Secretary General

Upon special invitation by Europa Nostra, **Luca Jahier** (Italy), President of the European Economic and Social Committee, and **Magda Herbowska** (Poland), Head of his Cabinet, joined the Delegation’s visit to Belgrade on 6-7 May 2019. The Europa Nostra Delegation benefitted from the expert support and advice of:

- **Prof. Emer. Dr Irina Subotić** (Serbia) art historian, Vice-President of Europa Nostra, President of Europa Nostra Serbia and Lecturer at the UNESCO Chair in Cultural Policy and Management, at the University of Arts in Belgrade
- **Ass. prof. dr Višnja Kisić** (Serbia), heritage management and policy expert, Secretary General of Europa Nostra Serbia and Lecturer at the UNESCO Chair in Cultural Policy and Management at the University of Arts in Belgrade
- **Ass. prof. dr Goran Tomka** (Serbia), cultural tourism and cultural policy expert, Faculty of Sport and Tourism Novi Sad and Lecturer at the UNESCO Chair in Cultural Policy and Management, at the University of Arts in Belgrade

During its mission to Belgrade, the Europa Nostra Delegation held site visits and meetings with NGOs and professional bodies as well as with public institutions and Ministries concerned. The Delegation also had a meeting with the Prime Minister of Serbia (for the full programme see Annex I). The collaborative spirit of all interlocutors and their openness to discuss the different aspects of this controversial project were much appreciated by the Delegation.

The Europa Nostra Delegation assessed that the cable-car project is questionable from the point of view of its compliance with the law and that it will irreversibly affect the authenticity, integrity, vistas and diverse historic layers of the Belgrade Fortress. At the same time, it will disperse public funds for an investment with unclear rationale from the point of view of its urban and social benefits.

For these reasons, Europa Nostra Serbia has nominated the Belgrade Fortress for the next “7 Most Endangered List” which will be examined by the Advisory Panel in November 2019. The final selection will be made by the Europa Nostra Board and it will be announced in spring 2020 by Europa Nostra in partnership with the European Investment Bank Institute (For more information on this civil society campaign to save Europe’s heritage in danger see www.7mostendangered.eu).
This Report first gives a brief description of the significance of the endangered heritage site as well as a brief description of the proposed cable-car project and the related protest campaign followed by ten main observations and concerns. It also formulates seven recommendations for action aiming at safeguarding and enhancing the Belgrade Fortress without compromising its outstanding value, authenticity, integrity and significance.

Last but not least, the Report contains a series of relevant annexes, the first one giving a detailed programme of the visit to Belgrade of the Europa Nostra mission; the second one giving an overview of the relevant legal framework, the third one giving an extensive chronological overview of the public launch of the cable-car project and of the wide public campaign opposing this project.

Serbian media has given an extensive coverage of the controversy around the proposed Kalemegdan-Ušće cable-car project. The fourth annex therefore gives a selection of key TV and press interviews and articles dedicated to this topic.

On 17 July 2019, this Report was presented to the Minister of Culture and Information, Mr Vladan Vukosavljević and to the Cabinet of the Prime Minister of Serbia, Ms Ana Brnabić.
2. DESCRIPTION

2.1 The Site

The Belgrade Fortress is located at the confluence of the Sava River with the Danube River at the north-west end of the historic city of Belgrade, in the municipality of Stari Grad. It consists of the old citadel (Upper and Lower Town) and the Kalemegdan Park (Large and Little Kalemegdan). The Belgrade Fortress was declared a Cultural Monument of Exceptional Importance in 1979, and is protected by the Republic of Serbia.

The Fortress is located on top of the ending ridge of the Šumadija geological bar. The cliff-like ridge overlooks the Great War Island and is considered the most beautiful natural lookouts in Belgrade. The Belgrade Fortress represents a historical mosaic that has been successively created in various epochs of construction. Its fortified structures have been formed from the 1st to the 18th century, evolving from a Roman castrum, through the Byzantine and Medieval city to today's Fortress.

It is the most visited tourist site in Belgrade. The Belgrade Fortress with Kalemegdan permanently remains the most special and strongest emphasis of Belgrade panorama from its Sava and Danube sides.

The Kalemegdan Park (from two Turkish words, kale – fortress - and meydan – battlefield) is located in the Belgrade Fortress and forms part of this important and protected cultural site. It is the largest park in the center of Belgrade and one of the oldest public parks in Serbia, created between the second half of the 19th century and the first half of the 20th century, following the European style public parks trends. The Kalemegdan Park brings the youngest historic layer to the Belgrade Fortress, the one which turned centuries long military fortifications into the newly created civic area, with new cultural and artistic institutions, statues, monuments, recreational and green areas. Since that time, what used to be a border fortification of numerous Empires, has turned into the very heart of the capital city of Serbia, loved and enjoyed by generations of inhabitants of Belgrade and Serbia.

Image 5. The Kalemegdan Park / Photo credits: Europa Nostra, 2019
**Ancient Singidunum** is the Roman settlement, archaeological site listed as cultural heritage of great importance, covering the whole area of the Belgrade Fortress and extending well beyond the Fortress to the Old Town, Terazije reef and Vračar. The *castrum* of the Roman settlement is located where the IV Flaviae Legion and part of the Roman Danube Fleet were permanently stationed. This site, as a central component of the Belgrade Fortress, is included in Serbia’s contribution to the transnational nomination to the UNESCO World Heritage List of ‘Frontiers of the Roman Empire’.

**The Ušće Park** is a park on the left bank of the Sava River, in front of Belgrade Fortress. The park has the status of a preliminary protected site within the historic area “Riverside of Sava and New Belgrade”. Such a status provides the same level of legal protection as for listed monuments. The Ušće Park forms part of the modernist, post-WWII urban expansion of Belgrade. It includes the Friendship Park, the Museum of Contemporary Art and the Ušće Tower. It thus forms a unique environmental ensemble with the Belgrade Fortress, and it offers the best viewpoints on the Fortress. This is the place where the lower starting station of the cable-car is planned.

Other listed sites and monuments are in close vicinity to the project of the cable-car. Namely: **Knez Mihajlova Street Area, Kosančićev venac and Staro Sajmište Concentration Camp.**

### 2.2 Historical Phases

The Belgrade Fortress documents building phases dating from the 1st to the 18th century. Through this long period, the Belgrade Fortress has evolved from the Roman *castrum* to a Byzantine and Medieval city to today’s Fortress. The entire complex documents unique material remains from the past. Together with the walls, many other constructions are valuable remnants of the dense history of the site.

The settlement was founded in the 3rd century BC as *Singidunum* by a Celtic tribe and was conquered by the Romans, becoming part of the military *limes*. The *castrum* was defended by the Roman legion IV *Flaviae*. It was built from the white Tašmajdan limestone and spread over an area of 16 ha, and the most relevant remains are visible near the Mehmet Pasha Fountain.

In the period between 378 AD and 441 the Roman camp was repeatedly destroyed in the invasions by the Goths and the Huns. In 476 Belgrade again became the border between the Western Roman Empire and Eastern Roman Empire (Byzantine Empire), and the Slav-Avar State in the north.

The Byzantine Emperor Justinian I rebuilt the fortress around 535. By the 7th century Serbs and other Slavic tribes settled in the Belgrade area as well as the regions west and south of Belgrade. The name Belgrade means a "white town" or a "white fortress" and was first mentioned in AD 878 by Bulgarians. The fortress remained a Byzantine stronghold until the 12th century. It then became a border city of the Serbian Kingdom, later Empire, with Hungary. The Hungarian King Béla I gave the fortress to Serbia in the 11th century, but it remained effectively part of Hungary.
After the Serbian state collapsed following the Battle of Kosovo, Belgrade was chosen as the capital of Despot Stefan Lazarević in 1402. The lower town at the banks of the Danube was the main urban center with a newly built Orthodox cathedral. The upper town with its castle was defending the city from invasions from the inland. Belgrade remained in Serbian hands for almost a century. After the Despot’s death in 1427, it had to be returned to Hungary.

In 1521 the fortress was conquered by the Turks and remained under the rule of the Ottoman Empire until the year 1867, when the Turks withdrew from Belgrade and Serbia. During a short period of Austrian rule (1718–1738), the Fortress was largely rebuilt and modernized. It witnessed the Great Serbian Migration in the 17th century and two Serbian Uprisings in the 19th century, during the Turkish Period.

The Kalemegdan Park was created in the 1860s, when Belgrade officially became free from the Ottoman Empire, as part of the wider process of urban modifications and Europeanisation of the city. Its spatial layout and horticulture have been created to resemble Western European public parks. The park continued its development well into the second half of the 20th century, hosting numerous artists’ busts, sculptures, the Cvijeta Zuzorić Art Pavilion, the Museum of Nature, the Military Museum, the Tower Nebojša Museum, as well as the Observatory and the Belgrade Zoo.

As the Lower Town field of the Fortress was modified for planes in January 1911, the Fortress suffered further damage during the First and the Second World Wars.

2.3 Significance of the Site

The Belgrade Fortress is a most important heritage site and monument of the Republic of Serbia, a listed heritage site labeled as being of the "highest level of State protection". It is also on Serbia's Tentative List for UNESCO World Heritage Sites. It is an outstanding example of a multi-layered fortified architectural complex developed in the long period from the 1st to the 18th century AD. The Fortress forms a unity with the surrounding landscape. They bear witness to the presence of humans since the Neolithic Period, with evidence from the Celtic, Roman, Byzantine, Hungarian, Bulgarian, Serbian, Ottoman and Habsburg Periods. Therefore, the complex of Belgrade Fortress as a whole today represents a unique and irreplaceable historical palimpsest with material remains which allow for an understanding of the historical development of the city and the region.

While noting that a comprehensive document assessing the heritage value and significance of the Belgrade Fortress (with the Kalemegdan Park) is not yet available, this report indicates several aspects of the huge significance of this heritage site:

a) Historical Significance

The Belgrade Fortress is a unique and irreplaceable record of the history of the city, from antiquity to nowadays, without which it would be impossible to study and understand its historical development. Unlike numerous European cities which developed because of trade networks, Belgrade was formed as a fortress and remained throughout its history a fundamental military outpost. The urban settlement remained in the shadow of the military fortress till 15th century, despite objective conditions for economic and cultural prosperity.
b) Environmental Significance

The Belgrade Fortress with the Kalemegdan Park gives the most special and strongest emphasis of Belgrade’s panorama. They remain a vivid testimony of environmental values, which include views, fauna and flora that are unique for the city. Views from and to the Belgrade Fortress open to the Sava and Danube Rivers, which merge under the promontory of the fortress, as well as to the plains of Srem and Banat, and to the hillsides of Topčider and Avala. This remarkable landscape includes the Great War Island on the Danube, an uninhabited wildlife zone and a natural fish spawning area protected since 2005. The 360-degree views and vistas from the Belgrade Fortress, as well as the views on the Fortress, are legally protected through the existing national heritage protection laws and related urban regulations and master plans.
c) Architectural Significance

The built heritage of the site is composed of many important historic buildings, which have preserved their original architectural values. Despite some pressure for development, the area has not undergone irreversible and invasive concrete construction, thus preserving most of its authenticity.

The architectural testimony of this heritage is divided between the Lower Town (Donji Grad) and the Upper Town (Gornji Grad), and includes, amongst others: the so-called "Roman well" (Rimski bunar), the Popular Observatory in the Despot Stefan Tower, the Turbeh (Mauseoleum) of Damad Ali Pasha, Mehmed Paša Sokolović’s Fountain, the gunpowder stockroom, the Serb orthodox church of Sveta Petka, the Gate of Charles VI - a masterpiece of Balthasar Neumann -, and the Kula Nebojša ("Impregnable, Fearless, or Daredevil Tower"). The walls and bastions record the different building phases.
d) Archaeological Significance

Excavations brought evidence of archaeological remains in different areas of the Fortress and the Kalemegdan Park, which bear witness of a rich archaeological evidence, mostly buried and visible only in few parts. This archaeological heritage extends also to heritage of later times, which are currently in ruined condition.

Image 10. Interpretation panel at Roman Castrum / Photo credits Europa Nostra, 2019

Image 11. Remains of the Roman wall near the Mehmed Paša Sokolović’s fountain / Photo credits Europa Nostra 2019
e) Urban Significance
The site is a bold testimony of the urban development of the city of Belgrade and its earlier phases. At the same time its stands as a fundamental component of the historic urban layout of the city, by keeping its character of urban park, and being the most prominent marker of historic urban landscape at the confluence of Sava and Danube.

![Image 12. Upper town plateau Belgrade Fortress](/photo/credits Europa Nostra, 2019)

f) Cultural and Artistic Significance
The Belgrade Fortress is the location of numerous cultural and artistic institutions, such as the artistic pavilion of Cvijeta Zuzorić, the Museum of Natural History, the Military Museum, and the Belgrade City Institute for the Protection of Cultural Monuments. Also, numerous busts and sculptures in the Kalemegdan Park commemorate prominent intellectuals and artists. Among the most significant visual symbols in Belgrade is the Statue of the Victorious Man (“Pobednik”), as well as the recently restored Monument of Gratitude to France, both built after the WWI on the design of the famous Yugoslav sculptor Ivan Meštrović.

![Image 13. Pobednik (The Victor) monument on the Upper town plateau](/photo/credits Maja Djordjevic)
g) Social/Religious Significance

The Belgrade Fortress is a most significant place for social gathering of Belgrade citizens, particularly popular in the summertime, because of the rich vegetation offering relief from the heat. The site is also used for smaller festivals, recreation, sports and other activities. The churches are places for gathering along the spiritual festivities, particularly in the Serbian Orthodox Church of Saint Petka, and its miraculous water source.

Image 14. Youth gathering and enjoying at the Belgrade Fortress / Photo credits Europa Nostra, 2019

Image 15. Church of Saint Ružica, Belgrade Fortress / Photo credits Europa Nostra,
h) Touristic Significance

The site is the most important tourist place in the city of Belgrade. Despite its importance, still the interpretative infrastructure is weak and does not allow the visitors to be fully informed about the significance of the site. The Tower Nebojša and its museum have strong potential to attract visitors, but the location stands disconnected from the upper fortress. The zoological park, on the west side of the fortress, is an attraction for local population. The touristic potential of the site is also linked to the facilities that are located along the Sava River, on both sides, which are connected to the Fortress through walkways.

i) European Significance

The Belgrade Fortress is a unique example of European fortified heritage with a well-preserved cultural landscape that surrounds it. The Fortress has been a border area between the most important empires and kingdoms dividing Europe’s West and East and this for a period as long as eighteen centuries: between Roman Empire and barbaric states; between Hungarian Kingdom and Byzantine Empire; between Hungarian Kingdom and the Kingdom of Serbia; between Habsburg and Ottoman Empire. Today, standing in the very heart of Belgrade, on the Belgrade Fortress and Kalemegdan Park, one can contemplate the still visible landscape of those historic frontiers. The Kalemegdan Park was the first park in Serbia to be designed mirroring European style public parks, while the prominent Monument of Gratitude to France, built after the WWI, testifies of the joint European history of mutual solidarity and support.
j) World Heritage Significance
Furthermore, the Belgrade Fortress with the Ancient Singidunum is a candidate for the UNESCO World Heritage List within the pan-European transnational nomination “Frontiers of the Roman Empire”, as one of the main components (on the territory of Serbia only two Roman legion camps are preserved, namely Singidunum and Viminacium) that justifies the recognition of the “Outstanding Universal Value” (OUV) for the Serbian part of this transnational nomination which is currently under preparation.
3. ABOUT THE CABLE CAR PROJECT KALEMEGDAN-UŠĆE

The project of the cable-car was announced by the Serbian Government in August 2017 (cf. article by Daliborka Mučibabić “Srpski Central park na Ušću” published in Politika, on 27/08/2017, p.16). It envisages connecting the Belgrade Fortress with the Ušće Park, starting position of the Station Ušće at 75m above sea level and ending at the Station Kalemegdan at 105m above sea level, thus covering a difference of only 30 meters in altitude. The cable-car with 30-35 cabins is planned to transfer 3000 persons per hour in both directions with a speed of 20km/h, with the transfer lasting 5 minutes. It was indicated that the cost of a one-way ticket would be roughly 4 Euro, with subsidised prices for the elderly and the youth.

The project consists of two massive concrete buildings standing at the two ends of the cable-car: Station Ušće is planned to cover an area of ca. 1000m2, while the Station Kalemegdan would cover an area of ca. 800m2. Six monumental pillars up to 42m in height, and 10m wide will support the cable-car between the two stations.

The construction of the two cable-car stations will have a severe impact on the Fortress, since it entails massive excavations and concrete piling with profound earthwork and possible removal/damage of archaeological remains. The construction of this cable-car project will have a negative impact on the still well preserved cultural historic landscape of Belgrade Fortress and Ušće, while leading to a large influx of people and constituting a new transportation function which is not compatible with the historic area of the Belgrade Fortress.

It is announced that the 15M Euro project will be financed by the Ministry of Trade, Tourism and Telecommunications and the City of Belgrade, while the public company “Skijališta Srbije” (Ski Company Serbia) will act as the investor for the cable-car project. The project is intended to offer transportation for locals and as a tourist attraction. The design process started in late 2016 when “Skijališta Srbije” issued a tender for the preparation of the technical documentation for the project.

During 2017 and mid 2018 a Detailed Regulation Plan for the construction of the cable car Kalemegdan/Ušće (DRP) was prepared and it was adopted by the City Assembly of Belgrade in Summer 2018, despite the fact that the General Urban Plan of Belgrade until 2021 (2016) and the General Regulation Plan of Belgrade (2016) impose absolute protection for the Belgrade Fortress and the confluence between the two rivers, and explicitly forbids the “construction of transmission lines and cables for alternative transport and recreation on the Belgrade Fortress and its territorial and acquatorial surrounding zones”. Despite the valid urban plans and the highest protection level of the Belgrade Fortress, the investor has managed to secure the necessary permissions and consents from the Republic Institute for the Protection of Cultural Monuments of Serbia. The Institute defined the “measures for technical prescriptions” for the DRP in May 2017 allowing the construction of the cable car, and referred to the same measures in early 2019 when issuing a document with regard to the definition of the “location conditions”. The only public hearing during the implementation of the whole project took place in April 2018. However, public comments and appeals related to DRP’s violation of the General Regulation Plan remained ignored by the responsible State bodies.
In December 2018 “Skijališta Srbije” signed a contract for the construction of a cable-car with a consortium composed of the joint venture of three Serbian companies (Koto doo, Elkoms doo and Del Ing doo) and the company Leitner, a global cable-car producer from Italy. At the time when this contract was signed, neither the location permit nor the construction permit for preliminary works were issued.

The construction permit for preliminary works was issued on 1 April 2019 by the Ministry of Construction, Transport and Infrastructure. The works that were supposed to start on 18 April 2019 were temporarily stopped by the Administrative Court (Upravni Sud) until the Court assesses the legality of the permit. However, on 16 July 2019, the Ministry of Construction, Transport and Infrastructure decided to file a case with the Supreme Court of Cassation against the decision by the Administrative Court to temporarily stop the preliminary works for the cable-car project.

The Ministry of Culture and Information is currently examining the critical reports submitted by the Supervisory and Governing Boards of the Republic Institute for the Protection of Cultural Monuments of Serbia, which both take a position against the project, be it for administrative or for heritage impact related reasons. Last but not least, the Constitutional Court is currently assessing two initiatives questioning the compliance of the Detailed Regulation Plan related to the cable-car project with existing legislation: the initiative submitted by the citizens' activist group, “Let’s not drawn Belgrade” (Ne Da(vi)mo Beograd) and the initiative submitted by a group of members of the National Parliament.
4. 10 KEY OBSERVATIONS AND CONCERNS

I. Need to preserve an irreplaceable cultural and natural heritage site

*The Belgrade Fortress with the surrounding cultural landscape is an irreplaceable and valuable testimony of fortified heritage and frontiers of numerous empires that have shaped Belgrade, Serbia and Europe.*

The Belgrade Fortress is an irreplaceable example of European fortified heritage and cultural landscape that has preserved its integrity against development pressure, and which has impacted the neighboring city centre. The medieval layer of the Fortress is particularly well preserved and visible, as well as the Ottoman and the Baroque phases. The remains of the Roman fortification and settlement are buried under present day levels, with the possible exception of a sector of the city walls recently excavated.

The integrity and the authenticity of this multi-layered site and historic urban landscape at the confluence of Sava and Danube Rivers are intertwined and create an exceptional compound with uninterrupted views on a green belt around Belgrade. This landscape is a sound record of the Roman Limes as well as of the frontiers of later Empires and States (the Hungarian Empire, the Serbian Medieval State, the Habsburg Monarchy, Austro-Hungarian Empire, the Ottoman Empire). This interaction between the Fortress and the landscape dominated by the confluence of two large European rivers is a most unique feature which forms part of the identity of Belgrade and makes it different from other capital cities of Europe.

Its importance in terms of national and European significance, cultural and historical value, prominence in cultural landscape and visual identity of the city call for a holistic conservation approach. In fact, the Belgrade Fortress is for Belgrade what is the Acropolis for Athens and any attempt to depreciate such a site with a modern infrastructure will irreversibly break its integrity and unity.

II. Need to avoid irreversible damage to the authenticity and integrity of the multi-layered heritage

*The character of the cable-car project aimed at entertainment and transport is incompatible with the significance and the character of the Belgrade Fortress and its historic and aesthetic values and identity.*

Despite ongoing research on the Belgrade Fortress since 1960s, there are still many uncertainties on the exact extent of the settlement, especially on its east sector, where the cable-car interventions will cause irreversible transformations.

Particularly invasive will be the digging activities for the landing of the cable-car and the cutting down of trees (already occurred). Massive concrete walls and concrete piling needed to create a sound anchor to the cables will become the sad testimony of a disrespectful attitude towards heritage. The fact that these concrete structures will be buried under the surface does not reduce their invasiveness. Securing the archaeological excavation pit by injecting 75 concrete pillars, 11m long and 60 cm in diameter, will cause immediate and irreparable loss to the archaeological heritage.
The construction of the cable-car stations at Kalemegdan and Ušće, and pillars across the river Sava will also jeopardize the historic cultural landscape of the Belgrade Fortress and its surrounding, which still preserve the image and the historic landscape as developed along 20 centuries, whose values are relevant for humanity and cannot be altered for the sake of a modern ephemeral infrastructure.

III. Unclear rationale of the cable-car project

*The cable-car is a costly, invasive and potentially destructive solution for a problem that is not evident or proved, that is likely not to benefit the city in terms of transportation and economic growth.*

There is no clear definition and understanding of the benefits resulting from the cable-car project. The studies that were delivered as well as the cost and benefit analysis are not at the expected level of detail and the need for such invasive intervention is questionable. The significance of the site calls for a detailed impact assessment and an exhaustive design and feasibility study.

The proposed need to improve public transportation is unclear, since the cable-car will mainly serve as an entertainment for a selected citizens and for tourists. The cable-car covers a very small difference in altitude between the two end points. The cable-car in fact will remain well below the height of the hill. Panoramic views will thus remain limited, and will not add another significant understanding of the environmental components of the area. At the same time, the cable-car will definitely compromise all the views from and to the Fortress.

While it would not contribute to fostering the understanding of visitors to the site, the proposed plan furthermore causes a detriment in tourist circulation. Tourists are supposed to get to the Ušće Park by bus, to take the cable-car to the Fortress, and from there they will be transported out of the city to visit other tourist sites away from Belgrade. This will result in shorter times spent and lower expenditure with the same polluting effect. Moreover, present trends of decrease in the number of tourists could have dramatic results on the expected number of customers using the cable-car.

IV. Lack of serious Heritage Impact Assessment and criticism of the Study of the Environmental Impact Assessment

*It is surprising and deplorable that no decision was taken to carry out a comprehensive and transparent preliminary Heritage Impact Assessment (HIA) Study before the issuing of specific heritage protection measures for the proposed cable-car project. It is equally surprising and deplorable that the mandatory Study of the Environmental Impact Assessment (EIA) that was carried out did not duly include a proper heritage dimension.*

In compliance with good practice across Europe and as requested by leading UNESCO documents also adopted by Serbia, a Heritage Impact Assessment study should be carried out to examine whether the integrity and the authenticity of the site would indeed be preserved after the proposed construction of the cable-car.
The Study of the Environmental Impact Assessment for the cable car Ušće-Kalemegdan project, which has been submitted by the investor to the Ministry of Environment in May 2019 and discussed publicly on 11 June, has totally omitted to analyse the cultural heritage sites and the cultural landscape of the affected area. It has also omitted to assess the impact of the construction of the cable-car on cultural heritage as part of the urban environment. The team of authors of the Study did not include a heritage specialist; the Study has no methodological base for assessing the impact on cultural heritage; it failed to consult crucial international and European conventions, national legal documents and professional and scientific literature related to the cultural heritage of the location; it failed to determine the cultural heritage and landscape layers, values, attributes, significance and character. The Study has also failed to assess the impact of the project on cultural heritage and cultural landscape; and has failed to foresee necessary measures for the minimisation of the negative impact on cultural heritage. These omissions are against the Law on Environmental Impact Assessment and the Law on Environmental Protection, which clearly recognize cultural heritage and cultural landscapes as important aspects of environment that should be safeguarded and taken into consideration.

These and other serious objections and critical remarks to the Study were sent in writing and expressed during the public debate by Dr Višnja Kisić, Secretary General of Europa Nostra Serbia, urging the Ministry of the Environment not to give consent to this Study. (N.B. This document is available in Serbian language upon request from the Europa Nostra Secretariat).

Furthermore, prior to any positive opinion related to the construction works, a systematic archaeological research demonstrating that the intervention will not compromise the future understanding of archaeological layers is needed. The proposed excavations cannot be considered as being sufficient for a proper Heritage Impact Assessment, since the understanding of a site needs extensive archaeological excavations and not a research limited only to the area of the landing of the cable-car. Also, it should be noted that any HIA should be based on the outcome of the archaeological research, which is still to come.

V. Nomination to the UNESCO World Heritage List is under threat

The inscription of the Belgrade Fortress with Ancient Singidunum to the UNESCO World Heritage List within the transnational nomination “Frontiers of the Roman Empire” is a unique opportunity for ensuring long-term preservation, sustainable tourism development and international cultural branding of Belgrade and Serbia. However, should the cable-car project be implemented, a rejection of this nomination is more than likely, since this project would affect both the integrity and authenticity of the site.

In 2015 the Belgrade Fortress with the Roman castrum were inscribed in the Tentative List of a transnational nomination for the World Heritage List “Frontiers of the Roman Empire-Serbia”. This is the largest transnational pan-European heritage effort to connect sites related to the Roman Limes across Europe and, in the future, in North Africa. This international nomination is a subject of extensive cooperation and joint work of numerous countries.
At present, the Danube Limes (Western Segment) regarding the upper part of the Danube River that was nominated jointly by Germany, Austria, Slovakia and Hungary, has received a positive recommendation from ICOMOS for being inscribed on the World Heritage List but was temporarily referred by the World Heritage Committee at its 43rd session in July 2019 due to the withdrawal by Hungary of some of its nominated sites. The next segment the Danube Limes (Eastern Segment) will be submitted jointly by Croatia, Serbia, Bulgaria and Romania. As far as Serbia is considered, the Belgrade Fortress with the Roman Castrum is among the sites planned for nomination, and together with Viminacium, are the only two Serbian sites with remains of Roman Legions. Therefore, these sites are the key components of the Serbian part of this nomination and are also very important for the entire transnational nomination dossier.

The planned cable-car project is likely to affect the positive outcome of the nomination process. UNESCO is expected to express concern because of the lack of the Heritage Impact Assessment Study and the probable rejection of this nomination would entail for Serbia a particular responsibility towards the other European partner states by having broken the continuity of this major transfrontier World Heritage Site.

VI. Incompatibility of the cable-car project with present legislation, urban planning documents and international and European conventions

*Rigorous assessment of the legality and constitutionality of the cable-car project should be prepared. Institutions and Ministries should supervise that all national, European and international regulations and standards were respected and considered.*

The Belgrade planning documents safeguard the area and viewpoints of the Fortress. The valid and current General Urban Plan of Belgrade defines the site as having an utter historical significance and as being a permanent public good for the City. It imposes the protection of the views and vistas to and from the Fortress.

Furthermore, the General Regulatory Plan for the Construction Areas of the Local Self-Government Units - City of Belgrade, entities I-XIX, explicitly “forbids the installation of transmission lines, wire cables for alternative transport and recreation in the area of the Belgrade Fortress and in its wider landscape and aquaterritorial areas”.

Despite the above regulation aiming at the conservation of the site, the Detailed Regulation Plan for the construction of the cable-car Kalemegdan-Ušće was created and adopted, and a Construction Permit for the Preliminary Works was issued allowing construction of the cable-car. During the meetings, the Prime Minister and all Ministries concerned have assured the Europa Nostra Delegation that due care would be given to ensure that laws and procedures are respected.

VII. Undue pressures on heritage institutions and bypassing of professional bodies

*Besides the vital need to include the most qualified institutional stakeholders for addressing the interventions on a cultural heritage site of such multiple significance,*
no proper consultation has taken place and there is evidence of high political pressure on the decision making process.

The Expert Council of the Republic Institute for the Protection of Cultural Monuments of Serbia on April 2019 issued a statement (7379/2019 from 22.04.2019) highlighting that the Institute was not consulted during the project phase, while assessing that the cable-car project would cause irreparable damage to the Belgrade Fortress and breach international conventions. Supervisory and Governing Boards of the Republic Institute for the Protection of Cultural Monuments of Serbia compiled their respective opinions and reports (see the Archive of the Republic Institute for the Protection of Cultural Monuments of Serbia no. 11-270/2019 from 07.05.2019, for the Report by the Supervisory Board; 11-289/2019 from 14.05.2019 and 11-297/2019 from 16.05.2019, for the Report and Decision by the Governing Board) expressing that decisions and proposed actions related to the project were violating the existing urban planning documents while being implemented in a non-transparent manner.

In addition to the lack of wider consultations within the Republic Institute for the Protection of Cultural Monuments of Serbia, there is evidence that this Institute has removed from the project those employees who expressed their opposition to the project.

VIII. Lack of transparency and consultations with professional bodies

The low level of transparency, participation and public dialogue related to the project with such a serious impact on a cultural monument of highest significance, public space and identity of the city of Belgrade leads to deplorable restriction of public debate regarding a decision making process of a most important intervention on the city.

A construction project with such a huge impact on the environment and cultural heritage should have been openly and widely discussed with all relevant professional bodies, while participation and consultation should have been encouraged. In the period of three years during which the project has been under preparation, key investors and promoters behind the project have not reached out to key heritage stakeholders. The only official opportunity for participation was the public consultation about the "Detailed Regulation Plan for construction of the cable car Kalemegdan-Ušće". However, the date of this public consultation was not widely promoted as to include as many relevant stakeholders as possible (heritage experts, environmental protectionists, tourist guides etc.). Moreover, the time allocated to the discussion during the meeting was insufficient as to express all the concerns. The lack of transparency and consultations has resulted in the outburst of protests once the first actions on the spot were taken and presented in mass and social media. Still, the documentation of the project remains difficult to be consulted.

IX. Widespread Criticism from experts, civil society, public institutions, citizens and media

Civil society’s voice as well as most important national and international NGOs’ concerns should be taken into consideration by the Government.
Numerous experts and civil society organisations have raised their voice against the project, questioning the legality of such a procedure and highlighting that the broad consultations with heritage stakeholders and the inhabitants of Belgrade for this planned development have not taken place. Protest letters to all responsible public bodies have been sent by a large number of authoritative expert organisations, such as Europa Nostra Serbia, Serbia’s Society of Conservators, Serbia’s Society of Archaeologists, ICOMOS Serbia, ICOM Serbia, and the University of Arts in Belgrade, the Departments of Archaeology and Art History at the Faculty of Philosophy, Academy of Architecture, among others, as well as by reputable individuals of Serbia’s public, academic and cultural life. Last but not least, The Serbian Academy of Sciences and Arts has joined the appeals to stop the project.

Within the campaign, a public petition launched by the expert organisations has been signed by more than 15,800 citizens requesting the abortion of the project. In parallel, a group of local inhabitants starts a campaign for collecting handwritten signatures at the Fortress - some 4,500 signatures are collected in several days of collection.

X. Not an isolated case of unsatisfactory heritage protection

A strong systemic support is needed to strengthen heritage protection in Serbia, to reinforce its prominent role in urban planning policy and practice, and to ensure the autonomy of those Institutions who are responsible for heritage protection.

At present, the area around the Belgrade Fortress is also threatened by other development projects which are putting serious risk to the preservation of the environmental and historic values of the area. A big real estate development project, called K-District, is currently taking place in the very protected zone of the Belgrade Fortress. Advertisement for the project is based on selling the image of the Fortress to hide massive eight and ten stories high elite housing buildings, despite the fact that these are inappropriate in height and size for such a location. It is deplorable that the investor “Kalemegdan development” d.o.o. has received all necessary conditions and measures from the Republic Institute for the Protection of Cultural Monuments of Serbia and has acquired construction permit for building.

Among other cases of endangered heritage in Serbia, mention should be made of the archaeological sites of Vinča (for which the Serbian government is currently preparing a comprehensive plan for conservation and management; Europa Nostra has offered its expert advice to ensure the best quality of such a plan and its implementation) and Viminacium, the Petrovaradin Fortress, the Slobodište Memorial Park, the Niš Fortress, the Historic Center of Novi Pazar as well as other historic urban centers of towns and cities across Serbia.

The system of heritage protection which has failed so far for the Belgrade Fortress, is also failing for many other sites and areas, due to undue pressures, disempowerment of heritage profession, and an increasingly permissive urban planning and construction system. Heritage protection is rarely integrated in all aspects of spatial and urban plans, paving the way for inadequate and intensive transformations of urban spaces in close vicinity of protected heritage sites and historic areas.

At the same time, numerous national and local strategies for culture, tourism and urban planning in Serbia declared cultural heritage as a valuable asset for the country's image.
and sustainable development. This commitment has been clearly highlighted during Europa Nostra meetings with Prime Minister Ana Brnabić, as well as with the representatives of the Ministry of Trade, Tourism and Telecommunications. If this direction is to be seriously implemented, a strong systemic support is needed to strengthen the autonomy of institutions responsible for heritage protection and sustainable use, to build capacities for applying the highest professional standards in this area and to introduce various forms of participatory governance of cultural heritage by encouraging a constructive dialogue with civil society organisations, citizens and their communities.
5. 7 MAIN RECOMMENDATIONS

I. Reconsider all questionable planning documents, measures and permits

The Constitutional Court and Administrative Court must rigorously assess the constitutionality of the Detailed Regulation Plan and permits issued during the planning and implementation phase of the cable-car project. The Ministry of Construction, Transport and Infrastructure must itself reassess the legality of the Detailed Regulation Plan in a rigorous and detailed manner.

Following serious critical voices from representatives of the heritage profession, appeals by the employees of the Republic Institute for the Protection of Cultural Monuments of Serbia, and especially the reports and opinions issued by the Expert Council, Supervisory Board and Governing Board of this Institute, the decisions and protection measures issued by the Institute have to be questioned and reassessed.

Europa Nostra invites the Ministry of Culture and Information and well as the Prime Minister and Government of Serbia to make sure that national and European heritage of highest importance is not being compromised by illegal or inadequate decisions made within the Republic Institute for the Protection of Cultural Monuments of Serbia.

II. Prepare a thorough Heritage Impact Assessment of the cable-car project

In the process of revision of the measures for heritage protection, a Heritage Impact Assessment (HIA) should be urgently done. The Assessment should be done by an independent team of experts competent in HIA. It would have to include a detailed valorisation of the diverse heritage layers of the Belgrade Fortress, Ušće and the surrounding historic landscape, as well as the impact on attributes and values of heritage and integrity of the whole site. Furthermore, prior to giving any final opinion related to the proposed construction works, systematic archaeological excavations, valorisation and protection must be conducted in an exhaustive way.

III. Invest efforts and expertise for a successful nomination of the Belgrade Fortress for inclusion on the UNESCO World Heritage List

A successful inscription of the Belgrade Fortress and other sites linked to the Roman Limes in Serbia onto the World Heritage List as part of the transnational nomination of Frontiers of Roman Empire represent a unique opportunity for long-term preservation, local socio-economic development, cultural tourism and positive country branding. Furthermore, such inscription would strengthen public diplomacy, cultural cooperation and tourism offer in the Danube region and beyond. Due care and resources should be dedicated to work on the preparation of this nomination, the prevention of all threats, and the management plan for all the sites, while making sure that their current condition is improved, instead of endangered.
IV. Ensure systemic heritage research, restoration, maintenance and presentation enhancing knowledge and attractiveness of the site

Layered architectural and archaeological heritage represents a potential for enhancing the Belgrade Fortress. Numerous pathways, gates and architectural structures within Belgrade Fortress require investment in restoration, maintenance and interpretation to prevent its deterioration and enhance the attractiveness of the site. Furthermore, currently fairly invisible archaeological heritage, if properly researched, valorised, protected and presented, could serve as an important educational resource and tourist attraction. However, preventive archaeological excavations are envisaged only on a limited area of construction and are part of the project for cable-car construction, funded by the investor. If archaeological excavations are to be made, these should be systemic archaeological excavations aimed at generating detailed knowledge about the historic layers of the Belgrade Fortress, valorising them, protecting them long term and where possible presenting them to the public in situ.

V. Find suitable, less costly, non-invasive alternatives

In case an analysis of local and visitor needs shows that the existing connection between the two banks of the Sava River is inadequate, other less invasive and more affordable options should be taken into consideration. One of it is a pedestrian/cycling bridge which could be very well integrated into the landscape without obstructing the views or endangering the underground remains. The advantages are a low-cost maintenance; enabling also use during windy periods; and a bike/scooter/rollers-friendly crossing which opens up new possibilities for bypassing the dense traffic of the city.

The other is a system of eco-boats, noise-less, pollution-less vessels, that could transport visitors and locals across the river. The advantages of this option are 1) that it would enable the development of a wider system of river boats that could connect the other less accessible points along the Sava and Danube riverbanks and 2) that it represents a dynamic, scalable and mobile solution that can be modified and adapted to real needs of users over time (both seasonally and over years). Both alternatives would be much more economically accessible to many locals and visitors while at the same time enable users to enjoy unobstructed views of the Fortress and its surroundings.

VI. Provide for transparency and due involvement of experts and citizens

The process of mapping needs and possible solutions for the development of such a central and valuable site has to be transparent and participatory. In the decision-making process, all relevant professions need to be involved. Historians, archaeologists, environmentalists, urban planners, architects, traffic and construction engineers, local tour guides, tourism experts, all have specific perspectives that need to be taken into consideration when making any kind of informed decision. Moreover, these findings need to be compiled in a comprehensive study and shared with interested public, local civil-society organisations and other crucial stakeholders. It is also important to dedicate enough time and resources for this participatory process.
VII. Treat heritage as the country’s key asset for sustainable long-term development and strengthen heritage protection and management system

Serbia’s cultural and natural heritage is the country’s key asset for sustainable development, which implies immense responsibility for decision makers, investors and heritage professionals to enable future generations to admire and to be proud of the richness and diversity of Serbia’s heritage. In terms of investments in protected areas and landscapes, numerous national, European and international studies provide strong evidence that investing in safeguarding cultural heritage pays multiple times more than investing in construction or infrastructure projects which are harmful to cultural heritage. This however requires structural support in stronger heritage protection regulations. Stricter urban planning and construction regulations are needed to make sure that heritage of all citizens is not compromised for short term investments and profits of a few. If heritage is to play part in smart and long-term development of Serbia, then strengthening the autonomy of institutions responsible for heritage protection and management, encouraging intersectoral cooperation and building capacities for applying the highest professional standards in the area should become high priorities.
ANNEX I
PROGRAMME OF MEETINGS AND VISITS BY THE EUROPA NOSTRA DELEGATION (4-10 MAY 2019)

4-5 May 2019

Site visits were held on 4 and 5 May afternoon. Working meetings with representatives of Europa Nostra Serbia, the Serbian Archaeological Society, the Association of Conservators of Serbia, the Regulatory Institute for Renewable Energy (RERI), the Institute for Urban Politics, ICOMOS Serbia, the Balkan Museum Network, UNESCO Chair in Cultural Management and Policy at the University of Arts Belgrade, the Department of Archaeology and the Center for Theoretical Archaeology at Faculty of Philosophy University of Belgrade, the Institute for Danube Studies and the Association of Independent Cultural Scene of Serbia - all involved in the campaign against the construction of the cable-car on the Belgrade Fortress.

Image 19. Europa Nostra Delegation site visit - experts pointing at a cut tree
From left to right: Laurent Lévi-Strauss, Irina Subotić, Luka Knežević-Strika Jelena Mijić, Katarina Maksimov, Višnja Kisić, Ksenija Radovanović, Goran Tomka, Paolo Vitti, Sneška Quaedvlieg-Mihailović, Guy Clausse, Fani Mallouchou-Tufan, / Photo credits Europa Nostra, 2019

6 May 2019

Meetings with representatives of the Archaeological Institute: Dr Snežana Golubović, Deputy Director, Dr Vesna Bikić, Dr Vujadin Ivanišević and Dr Stefan Pop-Lazić who are in charge of preventive archaeological excavations within the preparatory works for the construction of the cable-car.
Europa Nostra Delegation (Laurent Lévi-Strauss, Guy Clausse, Sneška Quaedvlég-Mihailović and Irina Subotić) meets with the President of the Serbian Academy of Science and Arts, Dr Vladimir Kostić and with the Secretary General of the Academy Dr Marko Andelković.

Meeting with the representatives of the Ministry of Culture and Information: Mr Igor Jovičić, State Secretary for Culture, Ms. Danijela Vanušić, Advisor for Cultural Heritage to the Minister of Culture and Information, Mr Miloš Gajić, Advisor.

Europa Nostra Secretary General is interviewed by N1 TV Station.

Luca Jahier, President of the European Economic and Social Committee is interviewed by BETA Agency.

http://rs.n1info.com/Vesti/a481726/Zaje-Proces-evrointegracije-Srbije-ide-presporo-naci-nacin-da-se-on-ubrza.html
7 May 2019
Meeting with the Prime Minister of Serbia **Ms. Ana Brnabić**

Brief encounter at the Media Centre with **H.E. Mr Sem Fabrizi**, Ambassador and Head of Delegation of the EU to Serbia

**Press Conference held at the Media Centre**

8 May 2019
Meeting with **H.E. Mr Frédéric Mondoloni**, Ambassador of France in Serbia
9 May 2019
Participation at the Europe Day reception hosted by H.E. Mr Sem Fabrizi, Ambassador and Head of Delegation of the EU to Serbia

10 May 2019
Meeting with the representatives of the Ministry of Trade, Tourism and Telecommunication, Dr Miroslav Knežević, State Secretary for Tourism, Dr Renata Pindžo, Advisor to the Minister of Tourism, Mrs Jelisaveta Stevanović, Deputy Director of Ski Company Serbia.

Meeting with the representatives of the Ministry of Construction, Transport and Infrastructure, Mrs Aleksandra Damjanović, State Secretary for Construction and Mrs Jovanka Atanacković, Assistant to the Minister of Construction, Infrastructure and Transport.

Meeting with the representatives of the Republic Institute for the Protection of Cultural Monuments of Serbia, Mrs Mirjana Andrić, director and Mrs Snežana Jejić, architect conservator who has signed Institutes’ decisions related to the cable car project.

Image 23. Europa Nostra Delegation at the Europe Day reception in Belgrade (9 May)
From left to right: Mrs Sem Fabrizi, Sem Fabrizi and Sneška Quaedvlieg-Mihailović / Photo credits Europa Nostra, 2019

Image 24. Meeting with the representatives of the Republic Institute for the Protection of Cultural Monuments of Serbia. From left to right: Snežana Jejić, Mirjana Andrić, Sneška Quaedvlieg-Mihailović, Višnja Kisić / Photo credits Europa Nostra, 2019
Meeting with Mr Marko Bastać, President of the Municipal Council of the Stari Grad Municipality on the territory of which is located the Belgrade Fortress. At this meeting, the Municipality of Stari Grad decides to sign the “Berlin Call to Action: Cultural Heritage for the Future of Europe” and to apply to become an associate organisation of Europa Nostra.

Image 25. Meeting with Mr Marko Bastać, President of the Municipal Council of the Stari Grad Municipality on the territory / Photo credits Europa Nostra, 2019
ANNEX II
RELEVANT LEGAL ASPECTS AND REFERENCE DOCUMENTS

1949 The Belgrade Fortress Protected by Law for the first time

1956 Ancient Singidunum Protected by Law

1991 The Belgrade Fortress assigned the highest rank of protected monuments

1994 The Law on Cultural Heritage
The Law on Cultural Heritage, together with a number of international and European conventions on heritage protection ratified by the Republic of Serbia, guarantees the holistic protection, the authenticity and the integrity of cultural heritage sites as well as the protection of all historic layers of protected cultural landscapes, such as the Belgrade Fortress.

The Law defines that the Republic Institute for the Protection of Cultural Monuments of Serbia as the central institution is responsible for implementing all international conventions signed by Serbia.

International and European Conventions
The Republic of Serbia has signed and ratified all international conventions in the field of cultural heritage such as the UNESCO Convention concerning the Protection of World Cultural and Natural Heritage (Paris, 1972), and a series of European Conventions adopted under the auspices of the Council of Europe such as the European Convention on the Protection of Architectural Heritage (Granada, 1985), the European Convention on Archaeological Heritage (Valetta, 1992), the European Landscape Convention (Florence, 2000), and the European Framework Convention on the Value of Heritage for Society (Faro, 2005).

For the full list see the site of the Ministry of Culture of the Republic of Serbia (http://www.kultura.gov.rs/lat/medjunarodna-saradnja/medjunarodna-dokumenta)

All these conventions provide an additional legal framework which guarantees the highest protection of the Belgrade Fortress.

2010 Law on Spatial Planning of the Republic of Serbia
The protection of Belgrade Fortress is guaranteed by the Law (No. 88/2010) that defines the Belgrade Fortress as the cultural heritage site of highest priority.
2015 The Belgrade Fortress inscribed on the Tentative site for the UNESCO World Heritage Site
The Republic Institute for the Protection of Cultural Monuments of Serbia - the institution in charge of the preparation of the transnational nomination "Borders of the Roman Empire - Serbia" for the UNESCO World Heritage List – has selected the Belgrade Fortress as one of the key sites for the nomination, due to the importance of the Roman castrum. The inscription on the Tentative List was realized in 2015, and since then, the Republic of Serbia, the European Union and other international bodies have been investing funds in work conducted by the Republic Institute for the Protection of Cultural Monuments for the preparation of the Nomination Dossier for the World Heritage List, in cooperation with partners from Croatia, Romania and Bulgaria.

7 March 2016 - General Urban Plan for the city of Belgrade is adopted
The Belgrade Fortress is defined as “key symbol of Belgrade's European identity”. It is placed on the map of “lasting public goods” and it protects 360-degrees of vistas from the fortress.

21 March 2016 - General Regulation Plan (GRP) of the urban area of the city of Belgrade (I-XIX part)
In accordance with the opinion expressed in October 2015 by the Republic Institute for the Protection of Cultural Monuments of Serbia, the GRP was adopted in March 2016 with the explicit provision which “forbids the installation of transmission lines, wire cables for alternative transport and recreation in the area of the Belgrade Fortress and in its wider landscape and aquaterritorial areas".
ANNEX III
ABOUT THE CAMPAIGN AGAINST THE CABLE-CAR PROJECT

This Annex gives a detailed and chronological account of the various developments with regard to the cable-car project and the wide campaign against this project.

December 2015 - Meeting with the Republic Institute for the Protection of Cultural Monuments of Serbia
At their initial informal meeting, Belgrade City officials and the company “Skijališta Srbije” acting as investors ask for the expert opinion from the Institute on the proposed cable-car project. Two assigned employees of the Institute reject the project and note that it would be harmful for the Belgrade Fortress, in line with the Institute’s opinion about the necessity to forbid the construction of cable-cars on this site in the General Regulation Plan. Subsequently, these two employees were removed from working on the project.

January 2017 – The Republic Institute for the Protection of Cultural Monuments of Serbia issues a positive opinion
Contrary to previous opinions and the General Regulation Plan, the Institute states that a cable-car could potentially be built at the site. However, before undertaking any further steps, they ask for the elaboration of a feasibility study as well as for a possible heritage impact assessment before. They also state that a “wide professional consensus” has to be reached on this project because of the great importance of the site.

20 October 2017 - The Republic Institute issues the so-called “measures for safeguarding” which enable the project to begin
Despite the previous objections and reservations, at the request of investors, the Institute issues a positive opinion even without asking for further preliminary assessments, debates or studies, and in violation of the explicit prohibition of cable-cars on the Belgrade Fortress which is contained in the General Regulation Plan. That opinion is signed by the director and prepared by only one assigned employee. The “measures for safeguarding” were debated only within the department for architecture and no consensus was reached. No other departments (e.g. department for archaeology) were consulted despite usual good practice. This procedure has later been criticized by other employees of the Institute.

31 January 2018 - The then Mayor of Belgrade, Siniša Mali, presents the project to the media

12 April 2018 - Strong criticism of the violation of the General Regulation Plan is ignored during the public hearing on the proposed Plan of Detailed Regulation for the construction of the Kalemegdan-Ušće cable-car
2 July 2018 – the Detailed Regulation Plan for the construction of Kalemegdan-Ušće cable-car is adopted
At the request of “Skijališta Srbije”, the City of Belgrade adopts the Detailed Regulation Plan produced by the Institute for Architecture and Urbanism despite its obvious violation of the General Regulation Plan adopted in March 2016.

October 2018 - NGO “Right to the City”, requests the inspection of the Detailed Regulation Plan by the Construction Inspector due to its violation of the General Regulation Plan.
The Construction Inspector prepares its report without actually assessing and answering the issue of compatibility between the General Regulation Plan and the Detailed Regulation Plan (DRP). Some government officials use this report to state that the DRP is regular and legal.

December 2018 - Agreement signed with an international consortium of companies
The Ministry of Trade, Tourism and Telecommunications and the City of Belgrade transfer a total of 15 million Euros to “Skijališta Srbije” for the cable-car project, without any further debate and public consultations. The Consortium is composed of Serbian companies Koto doo, Elkoms doo, Del Ing doo and of the global cable-car producer Leitner from Italy.

February 2019 – Proposed design of the cable car published
Proposed design shows the scale and looks of the cable-car with its two stations, including the indication that various commercial contents are planned within the starting and ending stations.

14 February 2019 – The Ministry of Construction, Transport and Infrastructure issues the so-called “Location Conditions” for the construction of the proposed cable-car.

19 February 2019 – The Archaeological Institute is granted the permission for undertaking protective excavations
The Ministry of Culture and Information grants the permission to the Archaeological Institute to undertake protective works, in the period from February to May 2019. The agreed works do not require in situ presentation and protection of the findings; just documentation and presentation through publications and exhibitions. Geophysical prospecting was done in April 2019, but the results were not published. According to unofficial information received by Europa Nostra, these results show the existence of Roman fortification walls at the very location of the planned upper cable car station.
19 March 2019 – The Public Petition against the cable-car project is launched
Europa Nostra Serbia initiates the Petition, together with Serbia's Society of Conservators, Serbia's Society of Archaeologists, ICOMOS Serbia, ICOM Serbia, DOCOMOMO Serbia, the University of Arts Belgrade, the Departments of Archaeology and Art History at the Faculty of Philosophy, Academy of Architecture, SEE Heritage Network, Balkan Museum Network, etc (20 professional bodies in total), as well as by reputable experts and individuals from Serbia's public, academic and cultural life. The Petition is signed by over 15,800 people in just several days of the campaign. The Petition has later been translated into English. In parallel, a group of local inhabitants starts a campaign for collecting hand-written signatures at the Fortress - some 4500 signatures are collected in several days of collection.

21 March 2019 – The Constitutional Court receives the Initiative to assess the legality of the Detailed Regulation Plan for the construction of the “Kalemegdan-Ušće” cable-car
The initiative is filed by the citizen activist group “Let’s not drown Belgrade” (Ne Da(vi)mo Beograd), whose architect has been following the project from its beginning. The same initiative has been filed by a group of Members of the National Parliament. The latter initiative ought to be dealt with in a rapid manner by the Court.

26 March 2019 – Europa Nostra Board meets in Vienna, discusses the cable-car project, expresses its support to the campaign launched by Europa Nostra Serbia and decides to send a high-level delegation to Belgrade at the beginning of May

27 March 2019 - Media conference organised and joint protest letters sent to the responsible Ministries and institutions
The initiators of the public petition request from the Minister of Culture to apply the law, to reconsider the measures agreed by the Republic Institute for the Protection of Cultural Monuments of Serbia, as well as to revoke the provisions of the Detailed Regulation Plan which do not comply with the General Regulation Plan and thus to halt the construction of the cable-car due to its harmful effect on cultural heritage.

Similar letters were sent by the same group to the Minister of Construction, Transport and Infrastructure (who is also a Deputy Prime Minister), to the National Commission for Cooperation with UNESCO and to the Director of the Republic Institute for the Protection of Cultural Monuments of Serbia. The President of National Commission has received the delegation of the organisations which have signed the joint protest letters on 8 April, the Minister of Culture on 11 April (see details below), and the response from the Institute was received on 12 April. No response was received from the Minister of Construction, Transport and Infrastructure.

28 March 2019 – Europa Nostra sends a Letter to the European Commissioner for European Neighbourhood Policy and Enlargement Negotiations, Johannes Hahn, and to the European Commissioner for Education, Culture, Youth and Sport, Tibor Navracsics
The Letter informs them on the cable-car project and its harmful impact on the Belgrade Fortress prior to Commissioner Hahn’s official visit to Serbia, among others to attend the opening of the Golubac Fortress in Serbia, for which the EU has funded the reconstruction works.
29 March 2019 – The Geotechnical investigation undertaken by the Archaeological Institute shows the presence of various archaeological layers at the location
In total eight boreholes were dug up to the depth of 9 meters; several of them showing that “archaeological layers could be expected” from various epochs: Prehistoric, Roman, Late Roman, The Migration Period, Middle Ages, and 17th and 18th century. This study is the second of this kind, while the previous one (dating back to 2017) was based on a different location than the proposed cable-car station and showed no traces of archaeological remains. The investors keep citing the outcome of the older investigation which is not relevant for the proposed cable-car project.

1 April 2019 – The construction permit for the preparatory works issued by the Ministry of Construction, Transport and Infrastructure
The permit foresees works on stabilising the terrain as well as securing the digging ground with 75 concrete piles 11m deep, 60cm in diameter. The area foreseen for preparatory works is two times larger than the area where archaeological excavations have been agreed. The investor intends to bring heavy mechanisation, put 75 concrete piles first, and only after that start with required archaeological excavations. Upon hearing these plans, the archaeological supervisors of the construction works from the Republic Institute for the Protection of Cultural Monuments of Serbia oppose such plans and ask for all plans to be stopped until the project is reassessed. This is met by the oral support from the Director, but – according to our information - the Director refuses to sign any written document in that regard. As meetings continue, the experts of the Republic Institute for the Protection of Cultural Monuments of Serbia, in charge of archaeological supervision of the construction site write a letter to the Minister of Culture warning him that the foreseen works of putting 75 concrete pillars are invasive and would destroy archeological heritage, and therefore asking him to stop the works. The Director of the Institute does not want to sign the letter so employees decide to send it themselves. No response is received from the Minister.

5 April 2019 - Open letter sent to the Minister of Trade, Tourism and Telecommunications
A group of tourism experts, researchers and tour operators write an open letter to the Minister of Trade, Tourism and Telecommunications in which they object to the cable-car project. They claim that the project is not aligned with the values of the Strategy of Sustainable Tourism Development; that it is too costly amounting to the entire annual budget for capital investments in tourism and that such a project cannot be considered as priority because other rural and urban areas are more in need; that the project has not undergone expert and/or citizen consultations; that the planning of the cable-car is not in accordance with tourist needs at the Belgrade Fortress and that any claim that it is going to become a tourist attraction is highly doubtful. They request from the Minister to reconsider this investment and to protect the tourism profession from instrumentalisation by some private interests.

In response, on 16 April, the Minister of Tourism has organised a meeting with the signatories of this letter together with the Executive director of “Skijališta Srbije” and Chief Urban Planner of Belgrade. Both sides laid their arguments without reaching any conclusions.
5 April 2019 - After sending an official letter by Europa Nostra, Laurent Lévi-Strauss, Board Member and Sneška Quaedvlieg-Mihailović, Secretary General of Europa Nostra, meet with Dr Mechthild Rössler, Director of UNESCO World Heritage Centre in Paris

The Director of the World Heritage Centre promises to send an inquiry letter to the Serbian Permanent Delegation to UNESCO in Paris and to the National Commission for Cooperation with UNESCO in Belgrade. This letter was sent already on 8 April, before the meeting of representatives of EN Serbia, the Serbian Conservators Society, and the Serbian Archaeological Society with the President of the National Commission for Cooperation with UNESCO.

The working group for the nomination of "Frontiers of the Roman Empire - Serbia, from the Republic Institute for the Protection of Cultural Monuments of Serbia, wrote a draft of the response to the Serbian Permanent Delegation to UNESCO, stating that the project would damage the integrity and authenticity of the site and would have negative consequences on the nomination dossier currently under preparation. The Director of the Institute has so far refused to sign and send this letter.

9 April 2019 - Protest letters of employees of the Republic Institute for the Protection of Cultural Monuments of Serbia are published

Two thirds of employees of the Republic Institute issue a Public Appeal to their Director, to the Mayor of Belgrade and to responsible Ministries, sharing with the public the information that they have not been consulted, nor have they consented to any of the measures and opinions issued by the Institute which gave support to the cable-car project. In their appeal, the employees explained the numerous irregularities that were made in the decision-making process within their Institute, at the same time proposing legal steps to be taken in order to stop the project and ensure the preservation of the Belgrade Fortress.

11 April 2019 – The Minister of Culture and Information, Mr Vladan Vukosavljević, receives the delegation of Serbian heritage organisations

The delegation consisting of representatives of Europa Nostra Serbia, the Serbian Conservators Society, and the Serbian Archaeological Society has presented serious concerns and authoritative arguments against the cable-car project to the Minister. The Minister has agreed to examine these concerns and arguments and to inspect the appropriateness of the work conducted by the Republic Institute for the Protection of Cultural Monuments. He has asked for a detailed analysis of any irregular and/or inadequate steps and decisions made by the Republic Institute while approving the construction of a cable car, on the basis of which he could possibly take action on behalf of the Government. The delegation sent the requested material on 17 April.

According to the information made available to Europa Nostra, representatives of the Ministry of Culture have subsequently been present at various official and non-official meetings within the Republic Institute for the Protection of Cultural Monuments of Serbia with a clear intention to obstruct any opposition to the project. The Minister has also hosted a non-official meeting with members of the Governing Board of the Institute to discuss the topic. Governing Board members have also received calls from the Minister's Advisors with the aim to defend the work of the Republic Institute.
16 April 2019 - Historical Sciences Department of the Serbian Academy of Sciences and Arts (SANU) joins protests, followed by more reactions from SANU

The Department of Historic Sciences of the Serbian Academy of Science and Arts sends an open letter against the construction of the cable-car and sends copies to the responsible ministries and institutions. A week later, the Language and Literature Sciences Department of the Serbian Academy of Sciences and Arts joins the protest campaign.

17 April 2019 - NGO “Regulatory Institute for Renewable Energy” (RERI) files a lawsuit before the Administrative Court against the construction permit for preparatory works which was issued by the Ministry of Construction, Transport and Infrastructure on 1 April 2019

RERI has filed a lawsuit before the Administrative Court stating that the construction permit for preparatory works was issued despite the serious shortcomings of the procedures as required for the protection of the environment.

17 April 2019 - Europa Nostra sends a letter to Ms Ana Brnabić, Prime Minister of the Republic of Serbia

18 April 2019 – Preparatory construction works are officially planned to start, but have not

22 April 2019 – The Expert Council (“Stručni Savet”) of the Republic Institute for the Protection of Cultural Monuments issues a statement against the construction of the cable-car

This statement has been reached through consensus of all members of the Expert Council, stating that the project would harm the integrity and authenticity of the Belgrade Fortress.

23 April 2019 – The Administrative Court orders the cessation of any construction activities at the site

The lawsuit filed by RERI (see above) results in the Administrative Court’s decision to halt any construction activities until the legality of the construction permit for preliminary works has been assessed. Politicians and the investor state that they will respect the Court’s decision, but insist that the project complies with the law.

27 April 2019 – The National Assembly of the Republic of Serbia applies an accelerated procedure to modify the existing Law on Cable Cars

According to changes, in future no consent from the Ministry of Environment is needed when deciding on various development projects; illegally constructed cable cars could be legalised; the cable cars do not have to be operated by legal entities.

20-30 April 2019 – Europa Nostra sends letters to Serbian officials asking for meetings during the Europa Nostra Delegation visit to Belgrade

Letters were sent to the Prime Minister, the Minister of Construction, Transport and Infrastructure (who is also the Deputy Prime Minister); the Minister of Culture and Information; the Minister of Trade, Tourism and Telecommunication and to the Director of the Republic Institute for the Protection of Cultural Monuments.
4-10 May 2019 – Europa Nostra Delegation visits Belgrade (for the detailed programme of this visit see annex I)

11-15 May 2019 – The Governing Board (“Upravni Odbor”) issues a decision and the Supervisory Board (“Nadzorni Odbor) issues a report on the process, engagement and decisions made by the Republic Institute for the Protection of Cultural Monuments with regard to the cable car project. The Ministry of Culture and Information is currently examining these critical documents.

17 May 2019 – A delegation composed of representatives of the Republic Institute for the Protection of Cultural Monuments and the Archaeological Institute visit Paris for meetings with Dr Mechtild Rössler, Director of the World Heritage Centre at the UNESCO Headquarters on Serbia’s contribution to the transnational nomination “Frontiers of the Roman Limes” for UNESCO’s World Heritage List. No public statements are made concerning the outcome of these talks.

22 May 2019 - The Study of the Environmental Impact Assessment for the cable car Ušće-Kalemegdan project, which was commissioned by the investor and submitted to the Ministry of Environment, is made public. During a period of twenty days interested stakeholders and citizens are given the opportunity to analyze the Study and send their comments, questions and objections to the Ministry of Environment before the public hearing scheduled for 11 June. Numerous professional associations and individuals have sent their objections to the Study, highlighting that the Study has totally omitted to analyze cultural heritage sites and cultural landscape of the affected area and to assess the impact of the construction of the cable car on cultural heritage as part of the urban environment, and therefore asking the Ministry not to give its official consent to it. The Republic Institute for the Protection of Cultural Monuments officially sent a negative opinion on the Study for the above-mentioned reason.

11 June 2019 – The Public Hearing on the Environmental Impact Assessment Study is held revealing serious criticism on the quality, content and relevance of the Study. The Study of the Environmental Impact Assessment for the cable car Ušće-Kalemegdan project was presented and discussed publicly on 11 June, with significant objections and questions about the way in which the Study has ignored to analyze the impact of the cable-car project on cultural heritage, landscape and vistas. In short, some of the key objections are that the team of authors of the Study did not have a heritage specialist; the Study does not have methodological base for assessing impact on cultural heritage; it failed to consult crucial international conventions, national legal documents and professional and scientific literature related to the cultural heritage of the location; it failed to determine the cultural heritage and landscape layers, values, attributes, significance and character.

The Study has also failed to assess the impact of the project on cultural heritage and cultural landscape; and has failed to foresee necessary measures for the minimisation of the negative impact on cultural heritage. These omissions are against the Law on Environmental Impact Assessment and the Law on Environmental Protection, which clearly recognise cultural heritage and cultural landscapes as important aspects of environment that should be safeguarded and taken into consideration.
Serious objections and criticism to the Study were sent in writing and expressed during the public debate, calling for the Ministry of the Environment not to give its approval to this Study. The authors of the Study were not able to respond to any of the mentioned criticism and questions put forward by heritage professionals.

28 May – 16 June 2019 - Referendum for the Citizens of the Municipality Stari Grad was held; among other questions, citizens were asked whether they support the construction of the cable car in Kalemegdan. The response rate was 21.7%, out of which 90.64% said they were against the construction of the cable car.

18-19 June 2019 – Europa Nostra Board and Council meet in Athens where they express their endorsement of the present report.

July 2019 – In Baku, at the 43th session of the UNESCO World Heritage Committee, Europa Nostra Secretary General had further talks about the endangered Belgrade Fortress with the Secretariat of the World Heritage Centre and with H.E. Mrs Tamara Rastovac Siamašvili, Ambassador of Serbia to UNESCO.

16 July 2019 - The Ministry of Construction, Transport and Infrastructure decides to file a case with the Supreme Court of Cassation against the decision by the Administrative Court to temporarily stop the preliminary works for the cable-car project.

17 July 2019 - The present Report by Europa Nostra is presented to the Minister of Culture and Information, Mr Vladan Vukosavljević and to the Cabinet of the Prime Minister of Serbia.
ANNEX IV – A SELECTION OF RELATED MEDIA COVERAGE

The proposed cable-car project and the campaign against this project have been extensively covered by media and social media in Serbia. A selection of most relevant articles or TV programmes are enlisted below:

In English language:

- Planned cable-car attraction over Belgrade historic fortress should be suspended, 03/06/2019: https://www.theartnewspaper.com/news/planned-cable-car-attraction-over-belgrade-historic-fortress-should-be-suspended

In Serbian language:

- “Više od 13.000 potpisa protiv gradnje gondole”, 26/03/2019 https://www.danas.rs/drustvo/vise-od-13-000-potpisa-protiv-gradnje-gondole/
- “Pored 14000 građana i Evropska organizacija uključila se u borbu protiv gondole na Kalemegdanu”, 27/03/2019 https://www.vice.com/rs/article/7xny7d/pored-14000-gradana-i-evropska-organizacija-se-ukljucila-u-borbu-protiv-gondole-na-kalemegdanu?fbclid=IwAR1rD9OwHgn4kxln8hSaUHKJpFYu2uCQ7mteWfHvefoSUrMLH5mZ-sfXQY
- “Slučaj „gondola“: Turistička atrakcija ili uništavanje Kalemegdanske tvrđave”, 03/04/2019 https://insajder.net/sr/sajt/tema/13979/
- “Konzervatori Republičkog zavoda za zaštitu spomenika kulture traže obustavljenje izgradnje gondole”, 10/04/2019
https://insajder.net/sr/sajt/vazno/14067/Konzervatori- Republi%C4%8Dkog-
zavoda-za-za%C5%A1titu-spomenika-kulture-tra%C5%BEe-obustavljenje-
izgradnje-gondole.htm

- “Odeljenje istorijskih nauka SANU: Izgradnjom gondole na Beogradskoj
  tvrđavi ugrožavaju se viševekovni ostaci prošlosti”, 17/04/2019
  https://insajder.net/sr/sajt/vazno/14149/Odeljenje-istorijskih-nauka-SANU-
  Izgradnjom-gondole-na-Beogradskoj-tvr%C4%91avi-ugro%C5%BEavaju-se-
  vi%C5%A1evkovni-ostaci-pro%C5%A1osti.htm

- “Prevozno sredstvo imaginarnih turista”, 11/04/2019

- “Ko štiti a ko ruši Beograd”, 18/04/2019

- Evropa Nostra: Projekat gondole “invazivan za kulturno nasleđe, 07/05/2019
  http://rs.n1info.com/Vesti/a481870/Evropa-Nostra-Projekat-gondole-
  invazivan-za-kulturno-nasledje.html

- Najveća evropska organizacija za zaštitu kulturnog nasleđa: Brnabić
  obećala da će Vlada razmotriti primedbe na izgradnju gondole, 7/05/2019
  https://insajder.net/sr/sajt/vazno/14351/

- Neće valjda od Kalemegdana da prave Diznilend? Intervju sa Sneškom
  Kvadvlih-Mihailović, 16/06/2019
  http://nin.co.rs/pages/article.php?id=119207

- Stručnjaci zaobiđeni u odlučivanju o gondoli na Kalemegdanu
  https://www.danas.rs/drustvo/strucnjaci-zaobidjeni-u-odlucivanju-o-gondoli-
  na-kalemegdanu/?fbclid=IwAR0v46zY4TbIQ1Cv3oBv9hZwomMv2-
  _JAtWMTt1gL2uoZTWaKj-AxGzVGWs

- Burna javna rasprava: Predstavnici struka traže od Ministarstva ekologije
  da ne prihvati Studiju o izgradnji gondole na Beogradskoj tvrdavi
  11/06/2019
  https://insajder.net/sr/sajt/vazno/14741/Burna-javna-rasprava-Predstavnici-
  struka-tra%C5%BEe-od-Ministarstva-ekologije-da-ne-prihvati-Studiju-o-
  izgradnji-gondole-na-Beogradskoj-
  tvr%C4%91avi.htm?fbclid=1wAR01vHN4Bvll2Wx8aGz-
  v4DTlnrQ3p29EHnKRkgOceWUwQ_QSY-K_iCbpmc
ANNEX V
THE AUTHORS OF THIS REPORT / EUROPA NOSTRA GROUP OF EXPERTS

This Report could not have been completed without the expertise, dedication and tireless commitment of the European and Serbian experts involved, to whom Europa Nostra is most grateful.

During its mission to Belgrade, the Europa Nostra Delegation was composed of the following members:

Dr Guy Clausse
(Luxembourg)

Economist, Executive Vice-President of Europa Nostra, acting as the Head of Delegation

Dr Laurent Lévi-Strauss
(France)

Policy and heritage expert, Europa Nostra Board Member
Prof. Dr Fani Mallouchou-Tufano  
(Greece)  
Archaeologist and conservator, Europa Nostra Council Member

Prof. Dr Paolo Vitti  
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Architect-conservator and historian, Europa Nostra Board Member

Sneška Quaedvlieg-Mihailović  
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Expert in international & European law and policy, Europa Nostra Secretary General

Prof. Dr Isik Aydemir  
(Turkey)  
Architect  
Europa Nostra Scientific Committee Member
Upon special invitation by Europa Nostra, Luca Jahier, President of the European Economic and Social Committee, and Magda Herbowska, Head of his Cabinet, joined the Delegation’s visit to Belgrade on 6-7 May 2019.

**Luca Jahier**  
(Italy)  
*President of the European Economic and Social Committee*

**Magda Herbowska**  
(Poland)  
*Head of Cabinet of the President of the European Economic and Social Committee Luca Jahier*
The Europa Nostra Delegation benefitted from the expert support and advice of:

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