

ENVIRONMENTAL STATUS REPORT FOR BOSNIA AND HERZEGOVINA MARCH 2008



Report commissioned by the Embassy of Switzerland in BiH



Switzerland.

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*The views expressed in this report do not necessarily represent those of the
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I. EXECUTIVE SUMMARY

1.1 Introduction

This Environmental Status report for the Swiss Embassy in Bosnia and Herzegovina will be based on European standards set by the National Environmental Action Plan (NEAP) for Bosnia and Herzegovina (BiH). NEAP is the first environmental strategy document adopted at the national level by governments and assemblies of both entities (FBiH and RS) in March 2003 and represents a constructive example of the use of foreign aid for environmental capacity building and reform. The NEAP was developed with the assistance of the International Development Fund (IDF), a grant from the World Bank, and the participation of over one hundred professors, experts, and representatives from ministries of both entities and various NGO's. Since its adoption in March 2003, NEAP has become the guide and main reference for the realization of any project concerning the environment in BiH.

The Environmental Status Report is developed within the logical framework of ten essential aspects on environmental protection:

- 1.Environmental policy
- 2.Nature and landscape
- 3.Forests
- 4.Water protection
- 5.Waste Management
- 6.Noise abatement
- 7.Air pollution prevention
- 8.Materials, soil and biotechnology
- 9.Transversal subject areas
- 10.Information sources

1.2 Methodology

Being that environmental issues are amongst the most poorly coordinated activities at an institutional level in BiH, the research methodology of this report required a multi-approach strategy. Information sharing was identified as a great weakness of the environmental sector, particularly on an institutional level. Access to reports, laws, amendments, legal issues and enforcement mechanisms were often stalled, ignored, or simply denied. This required that the research team take a comprehensive approach to gather information:

- Existing reports completed by both local and international institutions
- Website research on ministries, public institutions, international and local NGO's
- Field research: this entailed both physical inspections as well as interviews with NGO's, local stakeholders, and community authorities.
- Face to face interviews with relevant stakeholders (ministries, NGO's, communities, local authorities)
- Articles from both local media and internationally published documents
- European Union documents and policies on environmental protection and standards
- Examining international treaties and conferences on environmental issues

1.3 Challenges

Under each section of Part I. there are challenges identified for each respective topic. Environmental protection is a rather dynamic one that faces many challenges and

problems in effectively addressing these issues. General challenges identified throughout our research are as follows:

- Lack of coordination between mandated institutions at all levels of government
- Little or no transparency in most aspects of environmental issues: concessions for hydro electric dams, public debates, access to information, accurate figures on environment, etc.
- A complete lack of mechanisms to enforce pre-existing laws let alone being able to effectively bring BiH within the framework of EU environmental standards.
- Lack of political will to properly introduce and enforce environmental law
- Insufficient cadre in the environmental field at all levels
- The international community has no clear policy on environmental issues nor the ability to prioritize key challenges needed for BiH to meet required EU standards.
- The lack of a legally mandated state agency to effectively enforce environmental law at the entity, cantonal, and municipal level.
- BiH has the smallest amount of protected areas in Europe. This directly threatens bio-diversity, wildlife, and many opportunities for sustainable development.
- Drastic changes in land usage due to deforestation.

1.4 Recommendations

There are many reasons why environmental policy documents are difficult to implement. They can be attributed to the lack of any environmental monitoring methodology as well as legal and economic environmental instruments and incentives. These issues represent one of the main obstacles for the development of efficient policy making. Equally inhibiting factors are the lack of environmental data and non-quantifiable issues such as the level of public and administrative environmental awareness and political will. Factual environmental policy making is based on availability of environmental data, which provides the basis for determining environmental sector priorities, strategies, as well as legal and economic methods of enforcement. With this in mind there are ten environmental needs which are current obstacles to policy making and should be addressed at face value:

1. Ratification of the Aarhus Convention by BiH Parliament to promote transparency, communication and legal standards for both institutions and civil society.
2. More active role by the European Union and international community in not only introducing and promoting EU environmental standards but providing institutional assistance aimed at strengthening practical mechanisms for the full implementation and enforcement of NEAP and BiH environmental law.
3. The creation of a comprehensive, cross sector development strategy for BiH's main economic pillars: a. Energy sector b. Tourism c. Agriculture d. Metal and auto part industry
e. Service industry.
4. The formation of an Environmental Protection Agency that would ensure the full, coordinated implementation of NEAP and LEAP on a nation-wide scale and ensure environmental monitoring and assessment methodology.

5. Completing all the necessary secondary and tertiary environmental legislation needed to create a 'rule of law' atmosphere, harmonization of laws at the entity levels and provide practical mechanisms for law enforcement.
6. The need for development of economic and legal incentives for development of 'green businesses' or 'greening of the industry' as well as economic instruments for environmental policy enforcement (ex. polluter pays principle).
7. Introduction of ecology and environment as part of the official education curriculum in primary and secondary schools nationwide.
8. Immediately enacting the official formation of three proposed national parks: Bjelašnica/Igman, Una River, Prenj/Čvrstica/Čabulja.
9. The creation of a transparent and multi-disciplinary strategy for the energy sector with independent monitoring on environmental impact assessments.
10. Training and education on environmental issues, law, practices, and trends for relevant institutions, private sector stakeholders, and ENGO community and the full establishment of eco-fund

II. ENVIRONMENTAL STATUS REPORT

Introduction

In this particular report, Green Visions will present what has been accomplished regarding the implementation of the NEAP and highlight areas that are still considered problematic and a priority concern. In order to fully understand the triumphs and challenges in the field of the environment, we feel its important it give a general overview of the role of the public sector, the legal frameworks and issues concerning international compliance.

2.1 PRESENT STATE OF ENVIRONMENTAL PUBLIC SECTOR

According the FRESBH (2005) the environmental public administration is described as understaffed, lacking professional knowledge, inefficient, scattered and under funded. This is valid for all four administrative layers characterizing the public administration in BiH – state, entity, cantonal and municipal levels of governance. Combined with the three levels of autonomy (the state, entities and cantons) public administration is, in general, described as very complex and the same applies to the environmental field. Environmental sector at present seems to be disregarded within the BiH administrative power structure, while environmental issues and concerns are constantly increasing.

The mandate of the state in addressing environmental issues of nation wide concern is very limited, since the country still lacks a firm environmental administrative body at the national level. That is, a ministry dealing precisely with environmental issues does not exist. Instead, the responsibility of environmental protection is assigned to the Ministry of Foreign Trade and Economic Relations (MoFTER), by the Law on the Ministries and Other Administrative Bodies of Bosnia and Herzegovina.

It is quite obvious of the lack of *constitutional* priority given to the field of the environment. Constitutional Law does not mention “environmental and water sectors” or the need for their institutionalization, neither at the national or entity levels. However, the law delegates all governmental functions and powers not assigned by the constitution to the institutions of BiH to those of the entities. Observing this issue, the Council of Ministers approved in 2002 the establishment of the National Steering Committee for Environment and Sustainable Development (NSCESD) at the state level. The work of NSCESD is carried out by eight sub committees, each reflecting BiH’s international environmental obligations; protection of ozone layer, climate change, long range transboundary air pollution (LRTAP), persistent organic pollutants (POPs), biodiversity, land degradation, transboundary waters and transboundary movements of hazardous waste. The committees’ efficiency and authority is questionable but its structure resembles a pro-modern approach to environmental management and policymaking. The committee is composed of policy makers, scientists, academic institutions, NGOs and certain other key stakeholders. On paper, it appears to bridge the ever emerging gap between politicians, scientist and key public stakeholders.

The real environmental institutional and legal power, indirectly provided by the inadequacies of the Constitutional Law is based at the level of two BiH entities, the Federation of BiH (FBiH) and the Republic of Srpska (RS), and to certain extent to the District of Brcko (DB). These two entities are autonomous and apply different legal and institutional practices granted by their respective constitutions. From this aspect these two entities to a large degree represent two different environmental sectors in their practices under a weak national environmental administration, with different institutional and legal setups. The FBiH is decentralized and shares environmental and related competencies, with exception to land use policies, with the constituent ten cantons. Environmental policies and use of natural resources, including water resources, fall under this domain of ‘joint competencies’ implying that the powers of the Federation and the Cantons can be “executed jointly, separately or by the Cantons as coordinated by the Federation Government.” The Constitution of the FBiH further states that the Cantons and the Federation have a duty to consult one another in discharging these responsibilities, while the Federation has a duty to “respect cantonal prerogatives” when enacting or implementing Federation laws. The RS represents a centralized entity without cantons and far less municipalities than the Federation (almost 30% less). The Constitution of the RS declares that all state functions belong to the RS except those transferred by the Constitution explicitly to the state institutions of BiH. Natural resources are designated by law as public goods and fall under the ownership of the state, where the RS government supports reasonable use of natural resources. The government of this entity also provides systems for environmental protection and international cooperation to extent to which they are not a responsibility of state institutions.

Keeping in mind that the environmental policy making and legal power is institutionalized at the entity level of governance, it is the accepted norm that the inter-entity bodies represent the main mechanisms for inter-entity cooperation, nationwide environmental policy and legislation making. The state is almost stripped of environmental legislative power, while inter-entity and national coordination is facilitated by two steering committees for the environment and water management: the Inter-entity Steering Committee for the Environment (IESCE) and the Inter-entity Advisory Commission for Coordination of Water Management. Both of these bodies

are formed at parity basis and are under the direct control of their respective entity governments. The FRESBH (2005) report states that the national institutions, such as the MoFTER, do not have any responsibility or influence on their work. Furthermore, their collaboration with the NSCESD is unknown but considering that this committee operates at the state level it is safe to assume that the significance of cooperation is at the basic required minimum. However, the establishment of these two committees is internationally perceived as a success since they are able to negotiate the practice of relatively similar environmental standards and have merits in facilitating and furthering inter-entity institutional environmental cooperation. The environmental legal jurisdiction given to the steering committees is best evident in the fact that both “bodies cover fields of responsibility like cooperation with the European Environmental Agency (EEA),” otherwise a responsibility of a permanent secretariat or environmental agency at the state level.”

2.2 ENVIRONMENTAL POLICY MAKING

This section of the report is designed to provide an overview of environmental policy making in Bosnia and Herzegovina (BiH) throughout the governing environmental public sector. The objective is to analyze the existing sector capacities for policy making, as the key indicator of government environmental public performance, indicate recent developments, describe the key obstacles for development of environmental policy and provide recommendations for improvement.

As Bosnia and Herzegovina moves closer to European integration there has been considerable improvement in addressing environmental law and entity level harmonization of these laws. For the first time since the Dayton Accords there is a widely accepted framework on environmental policies. The process, however, seems intentionally slow. There is a genuine interest and attempts from both entity institutions in creating and implementing harmonized environmental standards and practices.

Environmental Legislation

As mentioned earlier, environmental policy making and management is in large delegated to the level of entities, the same applies to law targeting specifically the environmental sector. Environmental laws are drafted by entity institutions with varying degrees of cooperation facilitated by the two inter-entity committees, and enter force following their adoption by entity parliaments. Environmental laws at the level of the state do not exist as yet. The EFRBH report states that the environmental legal framework in BiH is relatively weak, while legislative power is divided between 14 authorities and the degree of legislative cooperation is questionable.

Between 2002-04 the two entities, including the District of Brcko (DB), prepared, with the assistance of the EU CARDS project, and adopted a set of environmental laws. The laws regard (i) environmental protection, (ii) air protection, (iii) water protection, (iv) waste management, (v) protection of nature and (vi) the establishment of an environmental fund. This environmental legislation is fairly consistent between the two entities and with the introduced environmental impact assessment (EIA) and strategic environmental assessment (SEA) as new elements of environmental management the environmental framework is to a considerable extent harmonized with the EU standards, more notably the EC Water Framework Directive and the EC Pollution Prevention Directive.

Considering that BiH is not an EU state, and in fact its future potential for accession is still pending, every joint step toward EU environmental legal framework is regarded as a success and not only in terms of environment but also in terms of national security and cooperation. However, the number of bylaws which need to be adopted in order to place each law in function is outstanding. According to the FRESBH (2005) Table 5b, only 38 acts are adopted while 289 are outstanding in FBiH this ratio is at 25/100, RS 13/91 and DB 0/98. The huge legislative backlog should not be surprising. The FRESBH (2005) as well as the MPAEU (2002) reports found that not a single environmental legislation or policy specialist could be identified in any of the governance structures. At present this situation remains unchanged. While the number of bylaws adopted slightly increased, full legal environmental framework still cannot be implemented.

International Compliance

Compliance with international environmental conventions and regional agreements is outstanding. BiH is a signatory to an insignificant number of Multilateral Environmental Agreements (MEAs) and to even less MEA's and their protocols a party. Even though the National Parliamentary Assembly (i.e. Parliament of BiH or NPA) approved the ratification of a few additional extremely relevant conventions, the overall situation is relatively poor considering that BiH is not a signatory or a party to an estimated 20 relevant environmental Multi-Lateral Environmental Agreements.

Following the adoption of the Law on Signing of International Legal Instruments in 2000 by the NPA, BiH up to present has signed a few conventions including the UN Convention on Biodiversity and ratified the United Nation Framework Agreement on Climate Change (UNFACC), the Convention on Cooperation for Protection and Sustainable Use of the Danube River (i.e. Danube River Protection Convention or DRPC), more recently the Framework Agreement for the Sava River Basin (FASRB) and most recently the UNFACC Kyoto Protocol. Furthermore, the country did not ratify any of the relevant international water agreements, with exception of aforementioned two regional agreements, and is only an observer to the International Water Convention.

The BiH government is planning in the near future to ratify the ESOPs Convention on the EIA in Transboundary Context (Espo Convention) and the Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters (i.e. Aarhus Convention). The foundations for future ratification exist in the current legislature. As mentioned, both entities have adopted the law on EIA and established a basin legal framework for Strategic Environmental Assessment (SEA), while the Law on Access to Information was adopted by both parliaments even earlier. Both conventions are equally important. The Espo Convention will internationally standardize the EIA process, otherwise required for assessing existing infrastructure and providing permits for future industrial development. Ratification of the Aarhus Convention would also greatly enhance public participation, transparency and promote more open communications between the public and NGO sectors.

Another issue of concern is the low level of national compliance with existing MEAs. There are two reasons that are often cited for the lack of international cooperation.

The first reason is attributed to the existing environmental public administration and the lack of clearly defined legal course of competencies and the second is found the normatively presumed low level of political will. From an administrative perspective there is underlying defect of inability to oversee and manage MEAs. Even though the accession to new MEAs is under the exclusive competence of the NAP, their implementation is under the competencies of entity institutions. Without a mechanism for enforcement of international obligations at the state level, such as a state EPA, the degree of implementation tends to vary at the entity levels where the state is legally stripped of any due action. Protagonists often state that additional MEAs demand significant human and financial resources of member countries, which BiH at the moment cannot provide. What they often overlook is that almost all MEAs provide significant financial and technical assistance in aiding the implementation process and monitoring of international procedures and standards contained in such agreements.

Challenges

- With the focus on legislative reform, institutional enforcement mechanisms remain entirely inadequate and a low priority.
- Despite the NEAP clearly prescribing the training of the existing inspectorate staff, little or no training has been accomplished.
- According to the Federation and RS ministries, the number of government employees responsible for environmental issues (around 10 in the FBiH and 6 in RS) is inadequate.
- As nature sets its own boundaries, Bosnia and Herzegovina is responsible for its environmental actions at the international level. As a signatory to key international agreements regarding environment such as UNFCCC, CBD, CCD, CITIES and RAMSAR, and Kyoto conventions, Bosnia and Herzegovina has legal obligations to uphold.

2.3 NATURE AND LANDSCAPES

BiH's greatest resources are by far its abundant and vast tracks of pristine wilderness. Bosnia and Herzegovina unfortunately has amongst the lowest levels of protected areas in all of Europe, with only 0.6% of the total territory of the country enjoying some level of protected status. This has put many natural areas at great risk. Experts have estimated that 16% of the total territory of Bosnia and Herzegovina would need to be protected in order to preserve the biodiversity present in this very fragile and rich ecosystem. BiH is home to over 400 types of endemic flora and fauna and has the unique geographic position of sharing the remarkable contrasts of Alpine Nordic, Euro-Siberian and Mediterranean region climates.

Challenges

- The slow implementation of the NEAP has allowed for the continued excessive exploitation of the country's natural resources, which have severely degraded areas of rich biodiversity.
- Heavy deforestation not only has created unprecedented flooding but also has set a trend for a dramatic change in land usage. With little replanting many forested areas are now used for grazing or agricultural purposes.
- Pollution is apparent throughout BiH's countryside and particularly along riverbanks where plastic bottles and bags collect from the countless illegal dumpsites spread all across the country. There are little for no enforcement mechanisms in place to ensure that BiH's natural landscapes remain pristine and untouched.
- The establishment of planned national parks (i.e., Bjelašnica/Igman; Prenj, Čvrstica, Čabulja, Una NP) have been stalled and delayed as illegal exploitation is intensified and strong lobbies for the construction of hydroelectric dams on the Neretva and Una Rivers have stirred heated debates.
- No energy strategy yet concession calls for the construction of major dams and mini-dams continues in both entities, threatening ALL protected areas in BiH.

2.4 FORESTS

Bosnia and Herzegovina ranks fourth among European countries in respect to extent and variety of forest cover. Pre-war statistics claim that 53,4% of the total territory was covered by forested land. Current estimates drastically vary but large-scale clear cutting with no systematic replanting has severely reduced this figure. Around 80% BiH's forests are state-owned. The remainder is owned by a large number of individual private owners. If managed properly forests have potential to provide valuable contribution in the social, ecological and economic spheres of BiH sustainable development, especially in rural areas (as many depend on this stock for survival).

Only 0,05 % of the forests are protected in BiH. The short-term standard set by NEAP is to extend the protection of forested areas to 5%. Even though some actions have been undertaken towards improvement of management of forests, major problems persist. Continuous uncontrolled illegal exploitation is the most urgent, as they have already proved to have significant negative impacts on the environment (flooding, erosion, and damage to water supply).

Only recently have governments acknowledged illegal logging and a corrupted forestry service as an important issue. The former anti-corruption unit of the Office of the High Representative (OHR) that was active up until 2005 had only begun to assist in prosecution of environmental corruption (such as Srpske Šume case in RS) when that unit was dissolved. EUFOR has conducted random inspections by sending units throughout the country to stop criminal activity in this sector since 2005 and even setting up checkpoints in the forest itself. Some illegal sawmills have been shut down due to this.

**Let it be noted that whilst the international community has taken severe measures to try and halt this illegal activity, the local government has done almost nothing. High-ranking EUFOR officials have openly stated that the illegal logging is directly tied to some of the highest-ranking officials in the country at both the entity and state level.*

The exportation of raw timber as opposed to wood processing in the country is also an issue. Although natural regeneration plays an important role in revitalization of the forest, clear cutting all but eliminates that possibility. Clear cutting is a common practice at many logging sites. Nevertheless, priority of the Ministries of Water Management and Forestry is still the preparation of the secondary legislation and not law enforcement. At the institutional level, each entity has its own Forest Law (adopted RS 2002, FBiH 2003). There has been an attempt by OHR to propose draft of a national law on forestry.

A key issue in the RS however, is the new amendment to its forestry law. This amendment was intended to centralize the activities of Srpske Šume. In doing so, over 900 forestry units were consolidated in 23 managed units, thus providing more easily controlled accounts and establishing lines of responsibility. What has unfortunately occurred to these previously uncontrolled forestry units is that they have continued exploiting the forest out of the realm of Srpske Šume, even exempting themselves from the few taxes they paid before.

Standards and certificates concerning logging etiquette are far from being homogenized in both entities. For example, in RS it is a requirement to take off bark of the tree before transporting them to avoid insects flying everywhere. In FBiH, this is not yet required.

Challenges

- BiH still lacks national standards and certificates concerning trees
- Wood-processing industry is extremely underutilised (furniture and other wood production).
- Lack of reliable information on the current volume of illegal logging in BiH.
- Lack of centralized national level action leads to fragmented structure of forest administration and ongoing reorganization (urgent need of reform)
- Lack of will on behalf of both governments to clamp down and establish enforcement mechanisms to control illegal logging.
- No adequate analysis of effects over-cutting of forests may have on the environment (risk of soil erosion, flooding, change in land usage)
- Rampant corruption on every level, even from EU member and neighbouring country purchasers of BiH hardwood.
- Intensive use of forest resources combined with outdated technology is causing organic pollution of many rivers
- Extraction methods, even with properly regulated forestry services, are often outdated and cause significant damage to surroundings.

2.5 WATER PROTECTION

Bosnia and Herzegovina has two rather diverse watersheds that have a significant local and regional impact on European waterways. The Neretva River and its tributaries flow to south to the Adriatic Sea whilst the Bosna and Drina Rivers flow north to the Sava and Danube Rivers, which belong to the Black Sea basin. Protection and pollution prevention of these waters is therefore of crucial international importance.

Damage to the infrastructure during the war combined with insufficient maintenance and an inadequate regulatory framework have allowed water resources to be exposed to a wide range of pollutants. Drinking water is deteriorating steadily and risk of

floods is increasing because of deteriorating infrastructure for flood control and the continuing trend in devastating, uncontrolled clear cutting.

Drinking water supply is mainly based on the use of groundwater (89%). The remaining sources come from rivers (10,2%), from natural lakes and artificial reservoirs. Pollution of groundwater due to industrial discharge and wild dumpsites is a major issue, yet has not been addressed in an adequate or systematic matter.

The main goal of the NEAP in this sector was to provide sufficient quantities of high-quality water for water supply and other needs, to protect water resources and preserve surface and groundwater quality; and to protect from flooding. The Mid-term Development Strategy (2004-2007), adopted by both entities in February 2004, notes that the sustainable development of water requires more attention. Its focus is on integrated river-basin water management. The following nine development priorities are identified: (Environmental Performance review 2004)

- 1) Repairing flood-control facilities along the rivers Sava and Neretva
- 2) Regulating the river beds and torrential watercourses in most vulnerable areas
- 3) Ensuring an adequate supply of clean water to inhabited areas
- 4) Improving the quality of water supplied to the rural population
- 5) Creating the right conditions for the restoration of navigation on the river Sava in cooperation with Croatia, Slovenia, and Serbia and Montenegro
- 6) Repairing and renovating sewerage systems and rehabilitating water treatment plants for urban waste water, as well as building new ones
- 7) Introducing measures to protect existing and potential sources of drinking water
- 8) Ensuring a sufficient volume of water to irrigate cultivated land for intensive farming
- 9) Increasing the level of exploitation of hydro energy by building multi-purpose water management facilities not only for power generation but also for the development of tourism and recreation, flood control, irrigation and fish farming, among other activities

In cooperation with the European Commission, a new Law on Water Protection based on the European Directives for water is in the process of being adopted in both entities.

Challenges

- High quantity of waste waters from industrial plants containing organic and hazardous substances are, with a few exceptions, discharged into the nearest watercourse with little or no treatment. No doubt that these discharges represent a threat to the environment and health of the local population.
- The proposed system of hydroelectric dams on the Neretva River, Una River and the Gornji Horizont will not only threaten potable water sources but serious limit and/or destroy watersheds that support agriculture, stock, eco-tourism and other alternative and sustainable economic activities.
- Massive deforestation and illegal sand quarries in the Neretva Valley have caused serious erosion which has negative effects on the Neretva River Basin. It also damages sensitive biodiversity areas.
- Lack of adequate infrastructure for sewage. For example, the city of Bijeljina still counts 16,000 sewage tanks with no water sanitation facilities.
- Not enough has been undertaken or researched in treatment of wastewaters, especially in Herzegovina. In Herzegovina, the specific rocky terrain complicates water sanitation.
- There are still tonnes of plastic, glass and other wastes polluting the rivers.

2.6 WASTE MANAGEMENT

Although neglected in the past this sector has been placed higher on the priority agenda of local, entity and state level institutions. A comprehensive strategy has been developed with three important guidance documents: NEAP, the Solid Waste Management Strategy (EC) and the Mid-term Development Strategy (2004-2007). Both entities have harmonized laws on waste management in which the framework is based on existing EU legislation. Work has also begun on the construction of regional sanitary landfill sites. Enforcement of these laws, however, has yet to be implemented in an adequate manner.

Waste management represents a major issue in Bosnia and Herzegovina with an estimated 10,000 wild dumpsites and very few sanitary regional landfills. The lack of recycling and alternative energy use from waste represents a great economic loss at all levels. A concerted effort to properly inform the public and inspire better practices in waste disposal and management is non-existent.

Currently, the priority in this sector is the organization of waste disposal for several municipalities around a single site. The population served per landfill should be 200 tons per day, and transport no more than 100 km. Since this will require the construction of at least 15 regional landfills, the governments have estimated a time of 15 to 20 years for completion of the Solid Waste Management Strategy. The World Bank is currently assisting with the initial phase in the *Solid Waste Management Project* (2005/2008) which is focusing on the construction of multi-municipal sanitary landfills (or improvement of existing ones) at five locations.

- In RS, the long-term goal is the establishment of eight landfills. Work on the regional dumpsite at Banja Luka has been started.
- In FBiH, this first phase plans the rehabilitation of 5 landfills including Tuzla, Mostar, Bihać, Gorazde, and Zenica. Currently, the sanitary regional landfill in Smiljevići at Sarajevo serves as the best example of the country. It has a gas collection system, which enables use of methane for energy. However, it still lacks a system for cleaning of underground aquifer systems, recycling equipment for plastic, glass and metal and no means of adequate disposal of hazardous waste.

Challenges

- The short-term planned sanitary landfills are not sufficient. Many refuse to drive hours to dispose of waste, thus illegal dumping remains a more convenient alternative.
- Control mechanisms of illegal dumping are almost non-existent. To counter these problems, eco-police units have been formed in several regions but possess little or no real enforcement powers and are severely under trained and under funded.
- No treatment or separation of medical waste. According to NEAP, an estimated 120 tons of health care waste is generated per day, of which 15% could be considered as being very toxic, requiring adequate incineration or disposal.
- There is no entity or state level strategy for recycling. There are only a few isolated pilot recycling projects and have not been efficient in awareness building.
- The lack of or slow response to waste management problems worsens the current hazards of underground water and soil contamination.

2.7 NOISE ABATEMENT

Noise abatement in Bosnia and Herzegovina has not been identified as a problematic or priority area. The NEAP does not specifically address the noise abatement issue nor do any major environmental reports carried out by the international community (World Bank, EU, UN). There are municipal noise level laws as well as industrial noise abatement legislation that have never, according to this research, been implemented or addressed in any serious manner.

2.8 AIR POLLUTION

The decrease of industrial activity during and after the war had a positive effect on the atmosphere in the country. According to NEAP the main sources of air pollution in the country are the large and rather outdated thermal power plants in Kakanj, Tuzla, Ugljevik and Gacko. The use of bad quality, low-heat coal for household heating as well as the increase of traffic, number of motor vehicles and old cars significantly contribute to the emissions of acid and greenhouse gases in BiH.

In regard to Multilateral Environmental Agreements on air quality the situation has improved with recent ratification of the Kyoto Protocol. The benefits in form of Clean Development Mechanism(s) (CDMs) are expected to draw international investments, partially rehabilitate the industry sector and improve air quality. From the perspective of the LRTAP convention, inherited from former Yugoslavia, international compliance in the field of Air Quality is still questionable. The NPA did not ratify any of the eight existing protocols.

Since NEAP work has been done in improvement of air monitoring and information database storage but little or nothing in curbing the rate of polluting emissions. The monitoring system for air quality is slowly developing, making data more reliable and better organized. The European Commission has donated 400,000 Euro worth of equipment for air quality monitoring systems within its Community Assistance, Reconstruction, Development and Stabilization (CARDS) programme.

The purpose of EC donated equipment is to improve continuous monitoring of toxic substances in the air (such as sulphur dioxide, carbon monoxide, etc.) and transmit this data electronically to the national reference centres in Banja Luka and Sarajevo. This information is equally important for the public information sharing on the air

quality and on potential risks for human health, but should also provide data to the Authorities for decisions on priority measures to prevent harmful effect resulting from air pollution.

Challenges

- Insufficient general knowledge of civil society about global and local environmental issues such as climate change
- Lack of extensive research on possibility of post-war radiation (especially from depleted uranium). The issue has received relatively little publicity.
- The reliability of some air emissions data is still questionable
- Setting standards for better coal quality is often dismissed due to the economic consequences of higher quality coal options.
- Second-hand smoke affects from a large cigarette smoking local population are not addressed. Lack of non-smoking options in public institutions and restaurants
- Outdated thermal power plants pose significant health hazards due lack of modernization and infrastructure investments to reduce pollution.

2.9 MATERIAL, SOIL AND BIOTECHNOLOGY

Soil is the most important filter of human waste: it transforms it into organic material. Little has been done to research to what extent soil has been contaminated in Bosnia and Herzegovina. There has not been a single comprehensive, multi-disciplinary study to monitor the effects that industry, current wild dumpsites, untreated wastewater and chemicals have had on the soil. BiH has also experienced a drastic change in land usage due to illegal logging and lack of replanting, as cited by the REC.

Soil in Bosnia and Herzegovina is mostly heterogeneous. Fertile land is limited due to urban construction along the river valleys, extensive industrial activity during Yugoslav times (Bosnia and Herzegovina was the most active amongst the former social republics), and extensive mountainous terrain.

Challenges

- Topsoil loss due to floods and logging has yet to be investigated and systematically analysed.
- Agriculture in BiH is still well below its full potential and productivity is less than half of the levels achieved in Western Europe. Since the creation of NEAP, there has been little improvement in encouraging youth to stay and work the land, leaving many fertile areas to an undermanned, retired population.
- The Mediterranean climate is favourable for early production of fruit and vegetable – due to a lack of a workforce and market access, this advantage is not realized.
- Since there are no agricultural environmental monitoring mechanisms in place, any analysis of the situation is based purely on estimates. In the main productive areas and in the river valleys the incorrect and excessive use of mineral fertilizers is a threat. Nitrates from these fertilizers can easily pollute the soil.
- The combined lack of training, information, enforcement, and non-existent subsidies to farmers and unfavourable market conditions for local producers do not encourage farmers to respect environmental standards. Existential questions become their main concern.

Biotechnology

Biotechnology is very underdeveloped in BiH. Most seeds and fertilizers are imported and there is little quality control. Only the Institute of Agriculture in Banja

Luka possesses technical equipment for the identification of genetically modified matter and this capacity is under-utilised. It is estimated that up to 70% of the wheat and flour that has been donated and/or imported from abroad is genetically modified. Seeds used in re-establishing farms and co-ops are also reported to be largely GMO's. There is little or no accountability currently in this field.

2.10 TRANSVERSAL SUBJECT AREAS

Environmental Awareness

There have been dozens of environmental awareness campaigns and projects funded by both the international community and local authorities. Very few long term and large scale projects have been launched regarding environmental awareness but the number of initiatives dramatically increases year by year.

At the NGO level, there continues to be a rise in activities ranging from education to arranging public debates. The EU CARDS, UNDP, USAID, the Swiss Embassy and many local ministries have funded environmental awareness programs. Ecological standards have been accepted by many municipalities who have voluntarily sought to improve environmental standards in their respective communities. The Centre Municipality of the City of Sarajevo has on its own accord sought the 140001 Ecological Certificate in order to cease further degradation of its natural resources, promote educational programs, and show a willingness to adopt environmental standards.

Small NGO's tend to do a large bulk of environmental awareness programs. Although they often are under funded and have limited capacity, there are many who are extremely successful in their mission: Zeleni Neretva Konjic, Ekotim Sarajevo, Mladi Istraživači from Banja Luka, Gorsko Oko from Konjic, Lijepa Naša from Kiseljak, Encijan Foča, and many others have launched successful environmental awareness campaigns.

The need for a comprehensive, long term and high profile environmental awareness campaign should not be underestimated. Education and positive propaganda have been effective tools in every western nation in addressing pressing environmental issues and preparing new generations for the challenges ahead.

Radiation

During the conflict it is estimated that 3,5 million tonnes of radioactive ordinance exploded on the territory of Bosnia and Herzegovina, NATO has admitted the use of depleted uranium during the autumn 1994 and 1995 military operations. The areas of Han-Pijesak, Hadžići and Kalinovik are claimed to be the most critically exposed to radiation. Health issues have arisen but investigations have not proven conclusive.

Although local health hazards had been suspected for some time, only in 2004 did this issue begin to be seriously addressed by the local authorities. The Italian government is currently investigating the reasons behind the deaths of forty Italian soldiers who participated in peace missions in Kosovo and BiH. Their deaths are possibly linked to exposure to radiation, namely depleted uranium.

The Council of Ministers of BiH is planning the formation of an agency, which would be responsible for nuclear security and safety. An urgent sanitation will also be

undertaken in order to get rid of non-exploded ordinances suspected to contain radioactive substances.

The number of BiH citizens who have died or been contaminated from radiation exposure remains unknown. The consequences for the environment are potentially devastating to aquifer systems and biodiversity.

Erosion

One of the most serious examples of uncontrolled industrial activity is the sinking erosion catastrophe in Tuzla. Due to heavy exploitation of salt resources below the city it is estimated that some parts of ground surface is sinking 25 centimetres per year! The reason for the drastic increase in erosion is due to intensified exploitation for both salt production and the chemical industry in Tuzla. The mine Tušanj has sunk due to the extraction of 1.5 million cubic meters for the manufacturer's 'Fabrike Sode' in Lukavac and another 500,000 cubic meters for Solane. Local officials, despite the cries of environmentalist and mine specialists, have yet to stop the exploitation even after an estimated 85 million KM in damages to homes, infrastructure, and businesses in Tuzla and the surrounding region.

Other examples of severe erosion are largely caused by deforestation and illegal logging, particularly on steep, mountainous slopes in river basins.

Protected Areas: Total number of protected areas in BiH is 253. This number tends to be misleading as these areas comprise of only 28,127ha, which represents 0.55% of the total area of Bosnia and Herzegovina. As previously stated, experts estimate that 16% of the territory of BiH would need to enjoy some sort of protection status to preserve the rich bio-diversity of the country. The formation of national parks have been stalled which in turn not only have negative affects on pristine natural areas, but also severely hinder local economic growth.

Mines

Mines not only have the ability to contaminate soil and water, but now pose a threat during the demining process itself. The destruction of mines and UXO's are often done in isolated natural areas. There are several sites where water contamination has been reported in the vicinity of these sites. In Lanište, in the Hadžići municipality, the destruction of mines and UXO's has contributed to the spread of disease of the nearby forests. Large swaths of trees in this area have been dying out since this site was used as mine sanitation zone.

2.11 ROLE OF THE INTERNATIONAL COMMUNITY

To date, the international community has achieved a limited amount in producing real results on the environmental 'front.' Although a solid legal foundation has been established in accordance to EU directives, BiH institutions still do not have the proper resources and skills to implement Local and National Environmental Action Plans. Much of the interventions have produced useful starting points, but have failed in creating a cohesive and comprehensive approach to the myriad of environmental issues that BiH faces. Practical interventions, like those of the World Bank's landfill project, will certainly have lasting positive effects. USAID wood processing project has produced impressive results in the forestry sector. Other initiatives and projects from the various bodies of the European Commission have also produced positive results in terms of legislative reform, public awareness, and setting ecological standards. Bosnia and Herzegovina's road to European integration, however, will

require a significant amount of funding on every level to bring the country nearer to basic EU standards.

III. POLICY RECOMMENDATIONS

3.1 The State of Policy Making and Perceived Needs

Recent initiatives, financed by the entity environmental institutions, to establish a separate Environmental Strategy in each entity show that certain improvements have been made. These two documents are still in the preparation process and their current contents are unavailable. While this process should be welcomed as it demonstrates an increase in administrative environmental awareness and political will, its objectives are expected not to significantly differ from existing environmental action plans. Prior to these two recent initiatives, environmental policy was expected to evolve from the development of the BHNEAP, the Poverty Reduction Strategy Paper (PRSP) and the Solid Waste Management Strategy. These three policy documents, produced by the environmental administration respectively represent sector, multi sector and sub sector strategies. However, even though they are considered extremely useful, the FRESBH report found that they are limited in scope with the exception of solid waste strategy. Furthermore, the implementation processes of the BHNEAP and the PRSP are not meeting their deadlines and are encountering numerous difficulties since their action plans do not precisely outline an implementation policy or an adequate allocation of responsibilities.

3.2 Recommendations for Interventions and Improving Policy Making

1. Ratification of the Aarhus Convention by BiH Parliament to promote transparency, communication and legal standards for both institutions and civil society.

The Aarhus convention will internationally oblige the entity governments to improve the levels of transparency, public participation and further prioritize environmental issues. Moreover, the Aarhus convention is already in force in the EU countries and is affecting the formulation of environmental directives.

2. More active role by the European Union and international community in not only introducing and promoting EU environmental standards but providing institutional assistance aimed at strengthening practical mechanisms for the full implementation and enforcement of NEAP and BiH environmental law.

Unfortunately, no one donor or international body has assumed a lead role in the environmental sector. Although the OSCE is legally mandated and many missions have an environmental department, the mission to BiH has not yet identified the environment as a main goal of its objectives. Ideally, either the EU or the OSCE would take a lead role in advancing environmental policy in BiH in partnership with local institution

3. The creation of a comprehensive, cross sector development strategy for BiH's main economic pillars: a. Energy sector b. Tourism c. Agriculture d. Metal and auto part industry e. Service industry.

An overall weakness of existing policy and strategy documents is that they are not specifically endorsed and integrated by the ministries responsible for sector policies:

transport, energy, agriculture, water management, tourism etc. Future implementation of environmental policies in BiH will not be possible without integrating environmental concerns into sector policies. While this principle of environmental integration is fully recognized and endorsed within the EU by the Cardiff process, it is still missing in BiH. The fact the FRESBH survey showed that the entity governments are relatively aware of the existence of these two documents should not be regarded lightly. For example, only in FBiH, not more than one third of cantons are aware of the PRSP and only two thirds of the BHNEAP. Municipalities in both entities do not use these documents, while the Federation Cantons use them to an irrelevant degree.

4. The formation of an Environmental Protection Agency that would ensure the full, coordinated implementation of NEAP and LEAP on a nation-wide scale and ensure environmental monitoring and assessment methodology.

It should be mentioned that there have been efforts aimed at establishing an Environmental Protection Agency by REReP since 2003. A feasibility study on establishment of the BiH EPA was published in 2005; a year after the draft environmental legal framework was adopted by the two entities. The study found there is a constitutional legal basis for establishing a national EPA. Such an agency is supposed to represent an independent professional institution for “for protection, management and monitoring of environment in BiH, and for international cooperation and implementation of international obligations, but which will not overlap with the competencies of the State and Entity authorities...” In this sense, the EPA will not take charge in developing environmental policy and legislation, but it would integrate professional environmental institutes in charge of environmental management of natural resources and environmental monitoring and aid the development of environmental policies. The power of such an agency would not be based on policy making but rather on management, surveillance and monitoring as well as facilitation of inter-entity coordination and cooperation. The establishment of such agency remains to be adopted by the National Parliament of BiH, and its current status remains unknown.

5. Completing all the necessary secondary and tertiary environmental legislation needed to create a ‘rule of law’ atmosphere, harmonization of laws at the entity levels and provide practical mechanisms for law enforcement.

Considering the relatively poor condition of the environmental sector, the FRESBH report found that all administrative units, all institutions in the field do have their mandates based on legal provisions, with detailed competencies and functions. However, due to lack of secondary environmental legislation necessary for implementation of primary legislation the competencies are not fully defined yet. This situation at present remains unchanged, which is evident in the following section where passed laws vs. required bylaws are discussed. Another issue concerns the sheer bureaucracy associated with the environmental public administrative sector. Numerous regulating bodies in forms of ministries, associated institutions and institutes, complemented by a great number of laws have created an administrative and procedural ‘mess.’ In sum, “there is too much room for misinterpretation, so that neither the clientele nor, often, the officials find their way regarding the competencies and functions.”

6. The need for development of economic and legal incentives for development of 'green businesses' or 'greening of the industry' as well as economic instruments for environmental policy enforcement (ex. polluter pays principle).

The evident lack of economic mechanisms (taxations and incentives) as the major tool for promoting and enforcing environmental policies should be regarded at present as an obstacle. Enforcement and control mechanisms, like the most common 'polluter pays' principle are completely inexistent and overlooked. As a result the polluters remain uncontrolled, disregard environment as a significant business consideration, while the government is deprived of vital source of funding. On the other hand, environmental incentives for promoting business initiated pollution abatement, or development of environmentally friendly technologies such as wind energy and recycling need to be introduced and applied alongside enforcement measures in order to create market driven environmental development. These methods exist in almost all Western EU countries

7. Introduction of ecology and environment campaign as well as develop an official educational curriculum in primary and secondary schools nationwide to raise awareness.

Environment is not a public or political concern in BiH. Great efforts are required to modify this situation and create publicly driven environmental development. Similar, previously mentioned, economic mechanisms are applicable for enforcing environmental public regulations, thus creating a public response. However, current economic instability and low levels of social welfare might result in an environmentally negative reaction. At present the best approach is to publicize environmental issues through creation of an independent nation-wide environmental information and assistance center. Such center would involve local environmental professionals who will work jointly with the citizens on identifying local environmental issues of immediate concern, provide knowledge based assistance, publicly advertise the issue at hand, publicly target the polluters and collaborate with environmental decision makers.

Education is the by far the best preventative tool any community possesses. The need for mandatory nation-wide environmental curriculum in schools will help plant the seeds of change. Without a high level of awareness, which comes from knowledge, the continual problems BiH faces from ignorance and lack of knowledge will only be passed on to future generations.

8. Immediately enacting the official formation of three proposed national parks: Bjelasnica/Igman, Una River, Prenj/Čvrstica/Čabulja.

Bosnia and Herzegovina has the least amount of protected lands on continental Europe. There are plans for three national parks, all within the Federation of BiH (which doesn't have a single national park). The World Bank has provided extensive funding for feasibility, bio-diversity, management, and natural characteristics studies. All of these reports have given positive feedback and validated the necessity of these areas becoming national parks. Due to the rich natural resources and great hydro potential in the Bjelasnica/Igman and Una River NP's in particular, the energy lobby – openly backed by certain political parties and the Ministry of Energy – have consistently blocked the official formation of these parks.

This not only hampers our requirements for protected territory as potential EU members, but puts development progress on hold that is essentially hog-tying communities in and around the proposed parks due to certain protection laws. Modern national parks are superb models of balancing economic and ecological values. They are a fantastic marketing tool, implying simply by the name with ‘national park’ that there are activities, infrastructure, beautiful nature, and safe. Sustainable development for local communities can be achieved through the formation of NP’s, instead of allowing them to fall victim to the aggressive energy lobby.

9. The creation of a transparent and multi-disciplinary strategy for the energy sector with independent monitoring on environmental impact assessments.

One of the key threats to BiH’s environment is the lack of coordination and strategic planning from the energy sector. BiH and the EU have identified energy as a great development potential for the country. Both entities, however, continue to push ahead with concessions and plans for both hydro and thermal electricity plants without a strategy. The Fed Ministry of Energy even submitted a 33 point plan for its ministry to the Federation parliament, complete with dates and deadlines to meet the stated goals. Number 33 was the development of an energy strategy – it was the only point with no date or deadline.

Several key factors need to be addressed before plans for new energy facilities go ahead

- Extensive research into the modernization of the existing infrastructure. It is believed that most energy facilities in BiH are outdated and lose a significant amount of energy due to old technology
- Independent Environmental Impact Assessments need to be completed. More often than not these vital procedures are often just lip service to justify energy facility construction.
- Transparency and public debates are a legal obligation before the state’s vital natural resources can be managed. This is generally ignored in both the Federation and RS.
- The energy sector, although presenting great opportunities for the country, also poses a threat to other key industries such as agriculture and tourism. Pollution and flooding from new energy facilities can create micro-climate changes, loss of topsoil, in as seen by some reservoirs in BiH – health hazards from polluted water. A multi-disciplinary approach to development in all sectors will create sustainable development.

10. Training and education on environmental issues, law, practices, and trends for relevant institutions, private sector stakeholders, and ENGO community and the full establishment of eco-fund.

The inexistence of environmental legislative and policy professionals in the environmental administrative sector represents a serious issue. Employing persons with a strong understanding of ongoing international policies, legal instruments and economic mechanisms is recommended, but considering that the national education system does not include ‘environment’ as an academic option and more so in the field of social sciences, there are two likely options remaining: (i) selecting a number of existing employees with strong performance records for additional education in

foreign academic institutions and (ii) employing nationals with degrees, often foreign, in these areas of expertise and providing them with additional training on constitutional and administrative frameworks.

Eco funds represent another key economic mechanism for promotion of environmental protection and development. The present inexistence of such a fund (whose establishment is debated since 2004) in BiH is normative considering that a method for 'funding the fund' remains to be established. Polluter pays principle represents only one source of 'taxation' revenue among a myriad of mechanisms. The budget of this fund should be independent of national budgetary estimations, and the funds objectives should prioritize the financing of pollution abatement projects and provide economic incentives for development of environmentally friendly technologies.

IV. CONCLUSIONS

4.1 Conclusions

There is no doubt that Bosnia and Herzegovina, however belated, has begun to embrace European environmental principles and standards. Much has been done in developing frameworks for the desired goals and objectives of Bosnia and Herzegovina in terms of environmental protection and sustainable development. This process has been a particularly slow one, however, and the country has yet to seriously embark on completing secondary legislation that would require the responsible institutions to implement the NEAP and the LEAP. Bosnia and Herzegovina has done a tremendous amount on paper, it is now time for real implementation and addressing the problems identified in this report by environmental NGO's, international experts, and many local government officials.

It is clear that European integration will require a significant amount of effort from the public and private sector. Environmentally sustainable development should not only be a lip service in reports to donors. Bosnia and Herzegovina, endowed with one of the greatest natural riches in all of Europe, must follow a path that takes environmental factors into every decision. There are alternative economic solutions that will raise BiH from its current economic and environmental crisis. Transparency and cooperation are key in finding viable solutions that will satisfy the socio-economic needs of the people of Bosnia and Herzegovina whilst still preserving the vast natural resources that are vital to our health and well being. .

As Bosnia and Herzegovina moves towards the signing of the Stabilisation and Accession Agreement with European Union, the role of the international community – and in particular the EU itself – will need to make considerable strides in assisting BiH attain EU standards on the environment. Institutional intervention at municipal, entity and state levels will need to be exhilarated. The OSCE's current assessment on the role of the BiH Parliament on environmental issues can also be a key factor in ratifying the Aarhus Convention. This fact alone would offer an international platform for the public, private and NGO sectors to gather and share information as well as create much needed transparency and dialog between government and civil society. It is quite clear that local institutions do not have the know-how, resources and political will to fully implement and enforce its own environmental laws. Intensified interventions and assistance from the international community would place environmental issues higher on this government's priority list and provide civil society not only with the tools for self-determination, but allow a democratic process to take root in the management of this country's natural resources that, naturally, belong to its people.

4.2 INFORMATION SOURCES

ORGANIZATION/INSTITUTION	CONTACT(s)	PHONE NUMBER(s)	ADDRESS	EMAIL & WEBSITE
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Federal Ministry of forestry, water-management and agriculture	Aziz Čomor – (water-management)	(387) 33 203 428	Titova 15 (zgrada Šipada) 71 000 Sarajevo	www.fmpvs.gov.ba
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Office of the High Representative (OHR)	Heikki Wendorf – International prosecutor	(387) 33 283 521	Emerika Bluma 1 71 000 Sarajevo	heikki.wendorf@ohr.int
Institute for Hydro-meteorology, Sarajevo	Martin Tais – (air quality monitoring)	(387) 33 276 715	Bijelave, 71 000 Sarajevo	m.tais@smartnet.ba
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BOSNA OIL SERVICES (environmental consulting)	Esma Kreso - Environmental Specialist	(387) 33 278 040	Nova ulica 26 71 000 Sarajevo	bosna-s@bih.net.ba www.bosna-s.ba
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BALWOIS Mostar City Council	Sejo Pintul	(387) 61 723 098	Mostar City Council	
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RELEVANT WEBSITES:

www.worldbank.org
www.delbih.cec.eu.int
www.sdc-seco.ba
www.rec.org.ba
www.usaid.ba
www.fmpvs.gov.ba
www.ekomrezazabih.net
www.vladars.net
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www.undp.ba

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- 14)Aarhus Convention
- 15)Kyoto Protocol

ABBREVIATIONS

NEAP – National Environmental Action Plan

BALWOIS – Balkan Water Observation and Information Systems

UNFCCC – United Nations Framework Convention on Climate Change

CCD - Convention to Combat Desertification

CBD – Convention on Biological Diversity

REC – Regional Environmental Center

RS – Republika Srpska

FBiH – Federation of Bosnia and Herzegovina

GEF - Global Environment Facility

Ramsar - Convention on Wetlands signed in Ramsar, Iran 1971

OHR – Office of the High Representative

EUFOR – European Union Force (NATO contingent)

FDCP – Forest Development and Conservation Project

WB – World Bank

GIS – Geographic Information Systems

NGO – Non-governmental organization

IDP – International Development Fund

NATO – North Atlantic Treaty Organization

SEED – Southeast Europe Development

PRG – **Plant Genetic Resources**

CARDS – Community Assistance, Reconstruction, Development and Stabilization Programme

FAO – Food and Agriculture Organization

UNDP – United Nations Development Programme

We hope that this report will reach the hands of all interested parties countrywide. We welcome comments, suggestions and encourage local NGO's to submit a summary of their work and problems faced to sarajevo@greenvisions.ba. We thank those who participated and assisted us in this research.

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