The Report is part of the

"Improved Transparency and Accountability of Governance"

Project implemented by

Sigurna ženska kuća

STEČAJCI U CRNOJ GORI

Supported by

NGO BREZNICA - PLJEVLJA

POLLUTION IN PLJEVLJA

-Air Quality Report for the Municipality of Pljevlja 2009-2012-

December 2013.

This Report is developed through the "Improved Transparency and Accountability of Governance" project, supported by the European Union and implemented ▫by MANS with five project partners. NGO Breznica bears sole responsibility for its contents and views and opinions presented do not reflect views of the EU.

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INTRODUCTION

This Report is produced within the framework of the project implemented by six nongovernmental organisations: the Network for the Affirmation of the Nongovernmental Sector (MANS), the Safe Home for Women, Mogul, Stečajci u Crnoj Gori (Workers from Bankrupt Companies in Montenegro), Breznica, and the Youth Association of Montenegro.

Within the framework of the project, the NGO Breznica is monitoring the implementation of the Free Access to Information Law (FAI Law) by the state authorities responsible for environmental protection regarding access to the data on pollution in Pljevlja.

This Report contains the information on general geographic and climate features of the Municipality of Pljevlja, the key sources of pollution, and the information on air pollution. Finally, it features the data on the transparency of institutions responsible for environment and public health, and some conclusions and recommendations.

Some of the data for drafting this report were collected based on the information gathered from eight state institutions, obtained through the requests filed under the FAI Law. Other data were obtained from the official documents on the state of the environment posted on the websites of the Environmental Protection Agency (EPA) and the Ministry for Sustainable Development, from the press and other online sources.

2. MAIN FEATURES OF THE MUNICIPALITY OF PLJEVLJA

The Municipality of Pljevlja is located in the northernmost part of Montenegro, at the **border** with Serbia and with Bosnia and Herzegovina. The municipality covers the territory of 1,346 km^2, thus being the **third largest in Montenegro**.

The town of Pljevlja is located in a 6 km wide and 9 km long valley, along the Ćehotina river, surrounded by mountain slopes.

The major polluters, the Thermal Power Plant (TPP) and the open-pit Coal Mine, are located on the verge of the town, within the valley**.** At the same time, these are major employers within the municipality struggling with a high unemployment rate of 22.8%[1].

Photograph 1: Pljevlja covered in fog

The municipality is one of the wealthiest in the country judging by the **natural resources** it disposes of: ore, wood and minerals. The largest deposits of lead, coal, zinc, copper, marble, mercury, etc are found within the territory of this municipality. Agricultural land accounts for a large share of the municipal territory, close to 70,000 m^2 [2].

The municipality is affected by evident **depopulation**. According to the 2011 census, the total population of Pljevlja was 30,786, and 40 years ago it had 50% more inhabitants or 46,667[3]. Pljevlja ranks first in Montenegro by the negative population growth of - 22[4].

Given its location in the flatlands encircled by hills and mountains, there is not much air circulation, resulting in windless climatic conditions. Pljevlja is covered in **fog up to 200 days a year**.

1 http://pvportal.me/2012/10/stopa-nezaposlenosti-u-pljevljima-2280/
2 The data taken from the official web pages of the Municipality of Pljevlja
3 The data taken from the websites of the National Statistical Office (Monstat) and the Air Quality Plan for the Municipality of Pljevlja http://www.monstat.org/userfiles/file/popis2011/saopstenje/saopstenje(1).pdf
4 http://www.vijesti.me/vijesti/u-pljevljima-sve-manje-stanovnika-grad-koji-umire-clanak-121177

According to the information featured in the Air Quality Plan for the Municipality of Pljevlja, prepared by the Ministry of Sustainable Development and Tourism (MSDT) together with the Environmental Protection Agency (EPA) and the Municipality of Pljevlja in February 2013, an upward trend in the number of foggy days was noted from 1974 onwards, when the construction and putting online of major industrial facilities in Pljevlja started[5].

All of the above, the climate and geographic features in conjunction with the sources of pollution within the municipality, have an adverse impact on the air quality in Pljevlja.

5 The data taken from the Air Quality Plan for the Municipality of Pljevlja

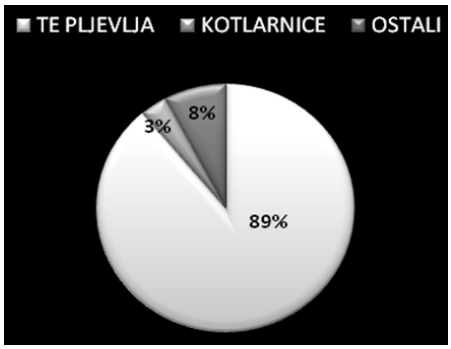
3. SOURCES OF POLLUTION IN PLJEVLJA

The State of the Environment Reports 2009 to 2012 made by the Environmental Protection Agency (EPA), recognise Pljevlja as a town with the largest level of pollution, both regarding the air, and the water and soil[6].

The information featured in the 2011 EPA Report indicating that the total of **193 exceeds of the daily limits for particulate matter** of radius under 10μm (PM_{10}) were recorded in Pljevlja is given as an illustration. **In 2012, such limits were exceeded in 217 instances**[7]. According to the Decree on Determining the Type of Pollutants, Limit Values and Other Air Quality Standards, the upper limits may not be exceeded for more than 35 times during one calendar year[8].

The two major polluters in Pljevlja are the Coal Mine A.D. "Pljevlja" with the Jagnjilo impoundment site, that started operating in early 1950s and the **Thermal Power Plant (TPP) with the slag and ash impoundment Maljevac**, using mostly coal, that was put online in early 1980s[9]. Our partner organisation MANS filed requests for accessing information to the MSDT and the Municipality of Pljevlja, the Secretariat for Spatial Development requesting the copies of the usage certificate for the first block of TPP Pljevlja. The MSDT, as an institution responsible for issuing usage certificates for such facilities, responded it did not hold the requested information[10]. This is only indicative of the fact that such a usage certificate for the TPP does not exist at all. The Secretariat for Spatial Development relinquished competence on this matter[11].

According to the 2010 State of the Environment Report, close to 1.8 million tonnes of coal is consumed in Pljevlja each year.



Graph 1: Annual coal consumption in the Municipality of Pljevlja in 2010i[14]

Out of this amount, the TPP consumes 90%, the district heating boilers somewhat over 3% and individual home heating a bit over 7 %[12].

The TPP Pljevlja is owned by the Elektroprivreda Crne Gore A.D. Nikšić (EPCG). According to the data from the official website of the Central Depositary Agency, the Government of Montenegro holds a majority stake in the EPCG with 55% of equity, and the Italian company A2A[13] is the second largest shareholder

6 http://www.epa.org.me/index.php/dokumenti/izvjestaji
7 The State of the Environment Reports for 2011 and 2012 – EPA
http://www.epa.org.me/images/izvjestaji/izvjestaj%20o%20radu%20agencije%202011.pdf
8 Decree on Determining the Type of Pollutants, Limit Values and Other Air Quality Standards adopted (Official Gazette of Montenegro " 25/2012)
9 The data taken from the document entitled Information Brief on the TPP-II Project found on the official website of the Government of Montenegro
https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&ved=0CCkQFjAA&url=http%3A%2F%2Fwww.gov.me%2FResourceManager%2FFileDownload.aspx%3FrId%3D137825%26rType%3D2&ei=1cWyUsPkPJP2ygO53YGwDg&usg=AFQjCNHSQYN_QEgxnK3T3kMg2e1Hp-pjFw&sig2=tAurk2Ipmp2GzVxnTdNyow&bvm=bv.58187178,d.Yms
10 The response given to the partner organisation MANS by the Ministry of Sustainable Development and Tourism (ref. no. 55231) on 04 October 2013.
11 The response given to the partner organisation MANS by the Municipality of Pljevlja, the Secretariat for Spatial Development (ref. no. 55230) on 22 November 2013 after MANS complained to the Agency for Personal Data Protection and Free Access to Information. The Secretariat failed to pass a decision within the statutory timeframe as per the request for information filed by the NGO MANS on 19 September 2013.
12 The State of the Environment Report for the Municipality of Pljevlja between 2008 and 2012, given to the partner organisation MANS ref. no. 53669 -53673) by the Municipality of Pljevlja.
13 In 2009 the Italian company A2A won the tender for the capital increase of the power supply company and acquired the managerial rights.
14 The graph was developed based on the State of the Environment Report for the Municipality of Pljevlja 2008 - 2012.

with 43.7%. The remaining shares are owned by a large number of natural and legal persons.

Photo 2: TPP Pljevlja

Photo 3: Coal mine Pljevlja

The owner of the majority stake in the second biggest polluter, the Coal Mine, is the same Italian Company A2A with 39.4%, the second largest shareholder is the Government with 31.1%, and the third, with 11.6%, Aco Đukanović, brother of the current Prime Minister, Milo Đukanović. The remaining share capital is held by various individuals and entities[15].

As majority share-holders of the two largest polluters, the Government of Montenegro and the Italian company A2A are obliged to implement the environmental protection measures. They are also obliged to carry out continuous measurement of harmful substances released into the environment through the activities of these two polluters and to make such data publicly accessible.

Apart from these two polluters, the State of the Environment Report for Pljevlja between 2008 and 2012 also identified the facilities of the **"Vektra Jakić"** corporation as sources of pollution. This company, since being privatised in 2006, stopped the operation several times. It was reopened last in October 2013, after 22 months of inactivity, involving only a share of the plants[16]. The "Vektra Jakić" disposal site contains some **200,000 m^3 of mostly self-combustible waste**, leading to frequent fires releasing greater amounts of carbon-monoxide (CO) and carbon-dioxide ($CO_{2)}$[17]. According to the information from the database of our partners, MANS, it is a known fact that in late 2007 the communal police, the environmental and health inspectors were requested to step up controls in Pljevlja and undertake all statutory measures against the polluters, including "Vektra Jakić". According to the press reporting, "Vektra Jakić" did not observe or carry out the measures envisaged by the Environmental Protection Programme.[18]

The **floating tailings impoundment Gradac located in the vicinity of the Ćehotina River** poses also a large problem to Pljevlja**.** Gradac is one of the largest hazardous waste disposal sites in Montenegro. It covers the area of around 15 ha with over 3.9 mil tonnes of hazardous waste containing heavy metals (lead, zinc, arsenic etc.) It has been used since the opening of the former lead and zinc mine "Šuplja stijena", close to five decades. The Government has been announcing the remediation of this site for quite a while already, but so far there were no specific steps towards its implementation.

In addition, the environment is polluted by transport, the landfill and illegal dumping sites.

[15] The official data from the CDA website http://www.cda.me/ME/Stranice/Registar-HOV.aspx
[16] http://www.portalanalitika.me/ekonomija/vijesti/117942-ponovo-pokrenuta-proizvodnja-u-vektri-jaki#CommentForm
[17] The State of the Environment Report for the Municipality of Pljevlja between 2008 and 2012, made available to the partner organisation MANS ref. no. 53669 -53673) by the Municipality of Pljevlja.
[18] Mina business, Polluter Must Pay, 08 December 2007.

4. AIR POLLUTION DATA

The Decree establishing the network of air quality monitoring stations sets the air quality zones and the structure of the air quality monitoring stations in Montenegro[19].

According to this Decree, there are three distinct air quality zones recognised in Montenegro: the zone for maintaining the air quality[20], the northern zone in need of improving the air quality[21] and the southern zone in need of improving the air quality[22].

Pljevlja belongs to the northern zone in need of improving the air quality, as depicted in the figure below[23].

Figure 4: Air quality zones in Montenegro

Air quality measurements according to the European standards, as stated in the Air Quality Control Plan for the Municipality of Pljevlja, started in 2009.

The pollutants mostly damaging the air in Pljevlja are the PM_{10} or particulate matter under the radius of 10 μm, sulphur(IV)oxide (SO_2), carbon (II)oxide better known as carbon-monoxide (CO), nitrogen(II)oxide (NO), nitrogen oxides (NO_x) and many other.

Below is the more detailed information from the State of the Environment Report for the Municipality of Pljevlja for the period 2008-2012. This Report was made available to our partners, MANS, by invoking the FAI Law in July 2013[24]. Other information presented was taken from the annual State of the Environment Reports for four consecutive years (2009 – 2012) drafted by the EPA and posted on their website. This Report uses also the information from the Air Quality Control Plan for the Municipality of Pljevlja which was adopted by the MSDT in 2013. Other information featuring in this report was published by the media or taken from other sources available online.

19 Official Gazette of Montenegro 44/2010 and 13/2011.
20 Andrijevica, Budva, Danilovgrad, Herceg Novi, Kolašin, Kotor, Mojkovac, Plav, Plužine, Rožaje, Šavnik, Tivat, Ulcinj and Žabljak.
21 Berane, Bijelo Polje i Pljevlja
22 Bar, Cetinje, Niksići Podgorica
23 The figure was taken from the Air Quality Control Plan for the Municipality of Pljevlja
24 The State of the Environment Report for the Municipality of Pljevlja between 2008 and 2012, made available to the partner organisation MANS ref. no. 53669 -53673) by the Municipality of Pljevlja, invoking the FAI Law.

4.1. PM_{10} PARTICLES

Particulate matter PM_{10} falls among the **most dangerous pollutants**. It consists of very small particles in liquid or solid form. Due to their small diameter, less than 1/7 of the diameter of a human hair, **when inhaled they can reach the furthest parts of lungs**.

PM_{10} cause or aggravate asthma, bronchitis and other lung diseases, and thus reduce the overall body resistance. PM_{10} have a particularly detrimental effect on children, pregnant women, the elderly and ill people. PM_{10} reduce visibility during the day, since they create the effects typical of mist often recognised as smog[25].

According to the measurements within the Pljevalja territory **between 2009 and 2012,** PM_{10} particles **were constantly exceeding the allowable limits**, set by the Decree establishing the type of pollutants, the limit values and other air quality standards. According to the Decree, the allowed mean daily value for PM_{10} particles is 50 $\mu g \cdot m^{-3}$ and must not be exceeded more than 35 times a year.

Graph 2: Number of days with the exceeded mean day allowed values (2009 – 2012)

It is relevant to note the absence of data for the first four months in 2009, since the measurements started only in May. Moreover, according to the official data taken from the EPCG AD Nikšić website, a set of replacement and repair works took place on the TPP[26]. Since the works lasted for several months during these two years, the TPP did not operate with its full capacity, as seen by the reduced number of days when the limit values were exceeded.

The table below features the data on PM_{10} by year. The table contains the data on the number of days when the mean allowable day values were exceeded (BDP) and the number of days when measurements took place (BDM).

YEAR	2009	2010	2011	2012
BDP	89	64	193	217
BDM	184	358	334	338

Table 1: An overview of PM_{10} by year

25 The information from the official website of the Chemical Institute in Belgrade http://www.chem.bg.ac.rs/~grzetic/predavanja/Osnovi%20hemije%20atmosfere%20i%20zagadjivaci%20vazduha/SUSPENDOVANE%20I%20RESPIRABILNE%20CESTICE%20U%20URBANIM%20SREDINAMA.pdf

26 Replacement of the electrical filter system, replacement of the control and management system, replacement of 6 and 0,4 kV installations for own consumption and replacement of the generator incitement system with the instalment of generator breakers http://www.epcg.co.me/01_04_02_03.html

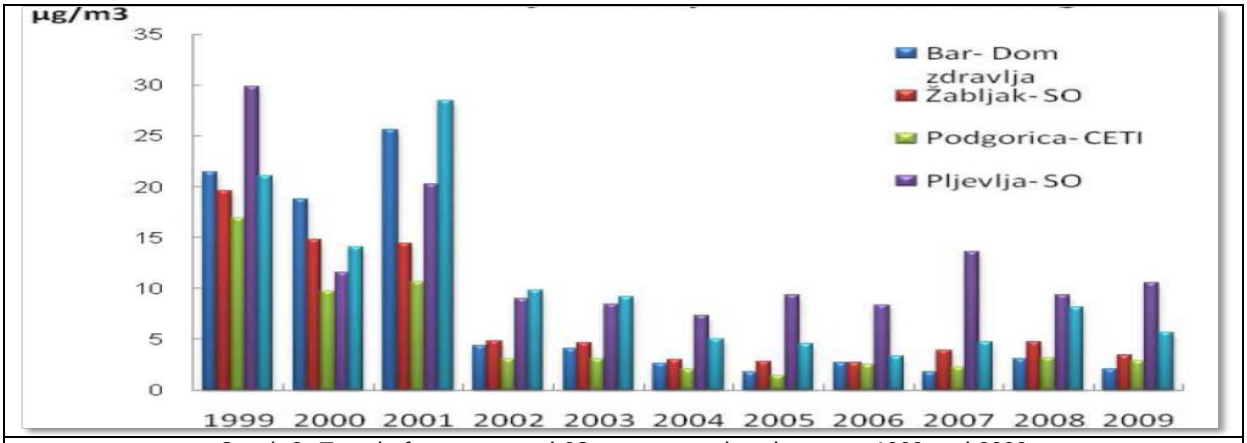
4.2. SULPHUR(IV)OXIDE (SO_2)

Sulphur(IV)oxide (SO_2) is a poisonous non-flammable gas, colourless, with the specific poignant smell. It has a very harmful effect on human organism, especially the **respiratory system**. It causes cough, bronchitis, weakness, and in greater concentrations it is **toxic**.

When dissolved in air, sulphur dioxide causes **acid rains**[27], and thus has an aggressive impact on the living and non-living nature. SO_2 has a direct impact on plants, may cause different biochemical and physiological changes on the plant tissue, dissolution of chlorophyll etc[28]. Due to its harmful effect, the SO_2 concentration is taken as a criterion for assessing air pollution.

The greatest source of SO_2 within the Pljevlja territory is the TPP "Pljevlja" due to burning of large quantities of fossil fuels (coal and heavy fuel oil). Boiler rooms and individual burners are recognized as another source of SO_2 emissions.

According to the data from the 2009 State of the Environment Report by the EPA, it is readily visible that Pljevlja has the greatest SO_2 concentration. The data show that after 2001 the SO_2 concentration saw a decline, but with subsequent increase in 2007, as shown in graph 3[29].



Graph 3: Trend of mean annual SO_2 concentrations between 1999 and 2009

According to the official data, in **2010** all the measured mean day SO_2 values, with reference to the limit values for the public health protection, were **under the set limit values**.

For the 2011 there are only general data for the territory of Montenegro which show that the SO_2 concentrations were **increased** only in **Pljevlja** and Podgorica. There is no information available by how many times the concentration exceeded the allowable limits, or for how many times during the year[30].

Neither for 2012 there are any data on the SO_2 concentrations for downtown Pljevlja most densely populated part. The EPA gave the data from the measurement station Gradina monitoring background pollution in the suburban area. The SO_2 concentration at this station was **increased** compared to other measurement stations, but still **below the set limit values**.

27 Sulphuric acid has a pronouncedly negative impact on green plants since it disturbs photosynthesis, dissolves nutrients they need for cell formation and damage the plant roots.
28 http://www.infoteh.rs.ba/rad/2012/ELS/ELS-5.pdf
29 The graph is taken from the 2009 State of the Environment report compiled by the EPA.
30 2011 State of the Environment report compiled by the EPA

4.3. CARBON-MONOXIDE (CO)

Carbon monoxide (CO) is a very poisonous colourless and odourless gas. It cannot be recognized in any way except with special CO detection instruments. It is a known fact that CO is one of major elements of any smoke gas from boiler rooms and other polluters.

It is a strong blood poison since CO attaches fast to haemoglobin, much faster than oxygen. This prevents movement of oxygen through the body, which may cause difficulties in breathing, diminished eye sight, headaches, low concentration, and loss of consciousness. Large CO quantities may cause permanent brain damage and death.

Within the area of Pljevlja, the burning of coal, heavy fuel oil and vehicle emissions annually **emit 8,230 t of CO into the atmosphere. There are almost no data of CO measurements.**

In 2009, it is known that only seven day measurements of CO air pollution were done in the vicinity of a busy junction, but the results of such measurements are unknown. The data for CO concentrations in Pljevlja during other years are equally unavailable. The 2012 annual EPA report states only that all maximum eight hour mean CO values, at all measurements stations were below the stipulated limit values in 2012.

The only known CO concentration data are from 2008 and refer to emission measurements of harmful and dangerous matter in smoke gas from boiler rooms in town with the capacity exceeding 0.5 MW. **The measurement was done at nine locations in town, with the CO levels increased in eight of them.**

At the location of the Vocational School, the CO concentration was over 1,600 mg/m^3 and the allowed limit value according to the then valid limit values was 500 mg/m^3.

However, all official reports of environmental protection institutions in reference to air pollution claim that CO concentrations do not exceed the limit values.

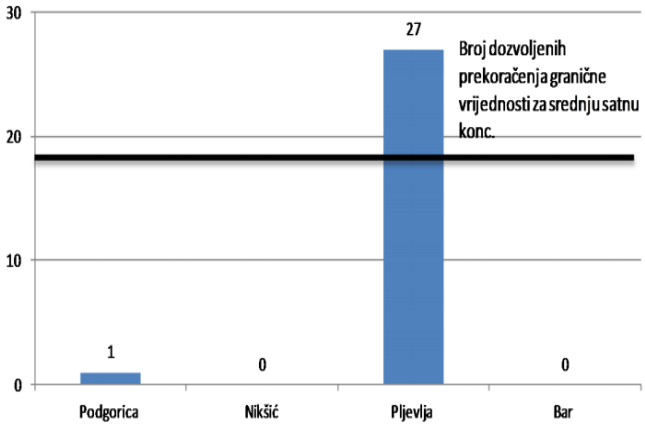
4.4. NITROGEN OXIDE (NO2)

Polluting nitrogen compounds known as nitrogen oxides (NO_x) are present in the air. Nitrogen-dioxide (NO_2) is a reddish-brown poisonous gas of characteristic odour. The greatest emitters of nitrogen oxides are thermal power plants and motor vehicles using liquid fuels, then industrial plants burning fossil fuels, etc. Given its environmental and public health impacts, the most relevant nitrogen oxides are NO or nitrogen monoxide,NO_2 or nitrogen dioxide, N_2O nitrogen suboxide. NO_2 is the most noxious of all[31].

The nitrogen dioxide, just like the CO, binds with haemoglobin and prevents the basic haemoglobin function - transport of oxygen[32]. Nitrogen compounds fall among the group of the leading carcinogen for lungs, stomach and bladder, they account for the increased prevalence of respiratory diseases and have mutagenic effect[33].

31 http://www.rgf.bg.ac.rs/predmet/RO/VII%20semestar/Sagorevanje/Predavanja/11oksidi%20azota.pdf
32http://www.ishrana-buducnosti.com/index.php?option=com_content&view=article&id=110:zagagaujui-polutanti-i-njihov-uticaj-na-zdravlje-ljudi&catid=5:aktuelno&Itemid=2
33 The State of the Environment Report for Pljevlja over the period 2008 to 2012, made available by the Municipality of Pljevlja, our ref. 53669 -53673.

The known data for Pljevlja **in 2009** show that the limit hourly NO_2 value of 200 µg/m^3 was once exceeded at the measurement station Pljevlja - Centar. It is furthermore claimed that the allowable mean annual value of 40 µg/m^3 was never exceeded.



Graph 4: NO_2 concentration in air – Pljevlja

There are somewhat more NO_2 data for **2010**. Graph 3[34] shows that the mean hourly value was exceeded **27 times during the year**. The total of **18 instances of exceeding this value** are allowed during one year. The mean annual NO_2 value was below the set limit value.

There are no data of NO_2 measurements **in 2011**, stipulating only that its air concentrations were within the stipulated value ranges.

According to the official data, in **2012** hourly mean NO_2 values were **below set** limit value of 200µg/m^3. The mean annual NO_2 concentration was also below the set limit value of 40µg/m^3, and amounted to 29,71µg/m^3.

34 The graph is taken from the National Air Quality Management Strategy with the Action Plan 2013-2016 http://www.google.me/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CCUQFjAA&url=http%3A%2F%2Fwww.gov.me%2FResourceManager%2FFileDownload.aspx%3FrId%3D122131%26rType%3D2&ei=Fsi2Uv_nG8qWyAPy8IDoDg&usg=AFQjCNFQe_3-knQxO-kvhgs_uGM167VE8g&sig2=ckRMMStozUtK3M7FKHClxA&bvm=bv.58187178,d.Yms

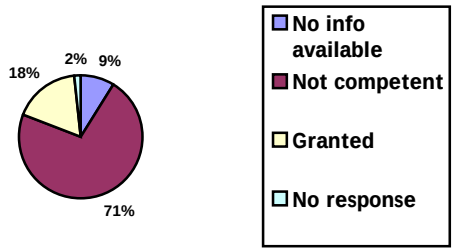
5. TRANSPARENCY OF INSTITUTIONS

Over the past six month the total of 57 requests for accessing information[35] were filed with the eight institutions recognised as responsible for environmental and public health protection in the Municipality of Pljevlja.

The above requests were filed with the Ministry for Sustainable Development and Tourism (MSDT), the Environmental Protection Agency (EPA), the Inspection Administration (Environmental and Mining Inspectorates), the Public Health Institute (PHI), the Municipality of Pljevlja, the Primary Health Care (PHC) Centre Pljevlja and the PHC Herceg Novi.

Our experience in attempting to gain access to information showed that the data on the state of the environment, pollution and impact of pollution on public health in Pljevlja are largely publicly unavailable.

Out of the total of 57 requests, filed with the eight institutions listed above, in 71% of cases the institutions relinquished their competence[36]. In 9% of cases they held no information, while the information requested was actually made available in 18% of the cases only.



Graph 5: Responses received

In order to create a more realistic picture of the state of the environment in the municipality of Pljevlja, the responsible authorities were requested the information referring to the state of the environment, and the water, soil and air analyses. The responsible institutions were requested the data on the payment of the pollution fees by some polluters and the copies of reports on environmental investments. **In most cases the institutions either did not hold the information requested or relinquished their competence.** This is particularly true for the EPA and the MSDT.

Such response to requests or lack thereof is in direct contravention to the Aarhus Convention that Montenegro acceded to in 2006. The principle underpinning the Convention refers to public availability of the environmental data. This convention has three pillars and the first pillar refers to the availability and dissemination of environmental data.

According to the Convention, **when an authority does not hold the information requested, it does not relieve it of the responsibility towards the requesting party.** The authority is obliged to notify the applicant as soon as possible of the body which actually holds the information requested or to forward the request to the competent authority and notify the applicant thereof.

Finally, Breznica also asked information from healthcare institutions regarding the numbers of persons with lung cancer, then prematurely born babies and children with congenital anomalies in the Municipality of Pljevlja. Again the institutions relinquished competence. The same requests were also filed with the PHI, which relinquished competence as per each of the requests filed.

35 Initial requests were filed on 18 July 2013.
36 Annex 1 features the detailed data on the institutions requested to provide access to information.

6. CONCLUSIONS AN RECOMMENDATIONS

According to the publicly available information, it is difficult to assess the air pollution levels in the Municipality of Pljevlja. **The data are incomplete and frequently it is not possible to monitor historic trends**, since the data available are not comparable (e.g. for one year the mean daily value is available, for other years mean annual values).

The institutions responsible for the environment do not hold such information on the air pollution levels in Pljevlja, resulting in the local population being able only to guess how polluted the air their breathe is.

According to the official data, **measuring stations** are often out of order or due to technical failures the equipment rests idle and is not being used properly. The stable flow of data from the Gradina station, where the measuring equipment was placed in the in mid 2012, donated by the International Atomic Energy Agency (IAEA) from Vienna, has not been established yet due to the problems with the internet connections,.

It is absolutely **not possible to obtain official data from Primary Healthcare Centres and the Public Health Institute** on prevalence of malign tumours, particularly lung cancers, and other respiratory diseases in the Municipality of Pljevlja.

The 2008-2012 State of the Environment Report for Pljevlja stated that the **number of people with malign diseases is constantly increasing**. There is a noticeable **increase in the prevalence of respiratory diseases, with the number increasing two and half times over three years**[37].

There is an evident increase in respiratory diseases among children, as well as an increasing number of prematurely born babies. The Pljevlja State of the Environment Report itself states that due to the inability to obtain official data from the PHC Centre and the PHI they used the data from the public media. The sources of data are not cited, thus it is unknown where the data came from.

This has an adverse impact on the quality of living in Pljevlja; hence, the data on huge depopulation trend from this area come as no surprise.

Given the problems in accessing the pollution information for Pljevlja, the NGO Breznica recommends the following:

1. the EPA to publish detailed information on individual measurements done within the Municipality of Pljevlja over the last five years by competent institutions;
2. the EPA to carry out regular air pollution measurements in Pljevlja, including the most densely populated urban core and proactively provide public information on quarterly basis;
3. the MoH and the PHI to publish the statistics on malign and respiratory diseases, broken down for children and for adults;
4. the MSDT and EPA to set targeted interventions to reduce the level of PM_{10} in air within the territory of the Pljevlja Municipality;
5. the Government, with full participation of citizens, to set the timeframe for aligning the operation of the TPP Pljevlja and the Coal Mine with the EU environmental standards.

[37] From 3,375 persons in 2008 to 8,563 in 2011. The State of the Environment Report for Pljevlja over the period 2008 to 2012, made available to MANS by the Municipality of Pljevlja, ref. no. 53669 -53673.

Annex 1

The table below features the detailed information on institutions that received requests for information and their responses as per such requests.

FILED	TO	REFERRING TO	DATE OF RESPONSE	RESPONSE
18 July 2013	EPA	Report on investments in environmental protection and occupational health and safety of the privatised polluters submitted by the "Šuplja stijena" mine.	05 Aug 2013	No information
18 July 2013	EPA	All documents containing info of pollution fees paid by the "Gradir Montenegro" d.o.o. Nikšić in 2008, 2009, 2010, 2011, 2012 and 2013.	05 Aug 2013	No information
18 July 2013	EPA	Copies of documents containing info on state of the environment in the vicinity of "Šuplja stijena" mine.	05 Aug 2013	No information
18 July 2013	EPA	Documents containing the data on the degree of pollution caused by the "Šuplja stijena" mine.	05 Aug 2013	Not competent
18 July 2013	EPA	Copies of all physical and chemical testing results for water, air and soil in the vicinity of the "Šuplja stijena" mine.	09 Sep 2013	Granted
18 July 2013	EPA	Copies of all documents with the data on payments made by the "Gradir Montenegro" d.o.o. Nikšić as concession fees for ore extraction in Šuplja Stijena, Đurđeve vode, Paljevine and Ribnik.	05 Aug 2013	Not competent
18 July 2013	EPA	All documents with the data on classification and categorisation of waters in the vicinity of the "Šuplja stijena" mine.	05 Aug 2013	Not competent
27 Oct 2013	EPA	Copies of documents with the data on the state of the environment in Herceg Novi.	07 Nov 2013	Acknowledged the receipt
27 Oct 2013	EPA	Copies of all physical and chemical testing results for water, air and soil in Herceg Novi.	15 Nov 2013	Granted
27 Oct 2013	EPA	All documents with the data on classification and categorisation of waters in Herceg Novi.	15 Nov 2013	Granted
18 July 2013	Primary Health Care Centre (PHC) Herceg Novi	Copies of all documents with the data on the number of lung cancer deaths in Herceg Novi between 2006 and 2012.	03 Sep 2013	Not competent
18 July 2013	PHC Centre Herceg Novi	Copies of all documents with the data on the number of stillbirths in Herceg Novi between 2006 and 2012.	03 Sep 2013	Not competent
18 July 2013	PHC Centre Herceg Novi	Copies of all documents with the data on the number of children with congenital anomalies in Herceg Novi.	03 Sep 2013	Not competent
18 July 2013	PHC Centre Pljevlja	Copies of all documents with the data on the number of lung cancer deaths in Pljevlja between 2006 and	25 July 2013	Made available reports on communicable

		2012.		diseases
18 July 2013	PHC Centre Pljevlja	Copies of all documents with the data on the number of stillbirths in Pljevlja between 2006 and 2012.	25 July 2013	No information
18 July 2013	PHC Centre Pljevlja	Copies of all documents with the data on the number of children with congenital anomalies in Pljevlja.	25 July 2013	No information
18 July 2013	PHC Centre Pljevlja	All annual reports of Hygiene and Epidemiological Service Pljevlja between 2006 and 2012.	25 July 2013	Made available the info on contagious diseases
18 July 2013	Environment and Mining inspections	Documents containing the data on the environmental pollution by the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	Environment and Mining inspections	Copies of documents with the state of the environment information in the vicinity of the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	Public Health Institute (PHI)	Copies of all documents with the data on the number of lung cancer deaths in Pljevlja between 2006 and 2012.	05 Aug 2013	Not competent
18 July 2013	PHI	Copies of all documents with the data on the number of stillbirths in Pljevlja o between 2006 and 2012.	08 Aug 2013	Not competent
18 July 2013	PHI	Copies of all documents with the data on the number of children with congenital anomalies in Pljevlja.	05 Aug 2013	Not competent
18 July 2013	PHI	All annual reports of Hygiene and Epidemiological Service Pljevlja between 2006 and 2012.	25 July 2013	Not competent
18 July 2013	PHI	Copies of all documents with the data on the number of lung cancer deaths in Herceg Novi between 2006 and 2012.	08 Aug 2013	Not competent
18 July 2013	PHI	Copies of all documents with the data on the number of stillbirths in Herceg Novi between 2006 and 2012.	08 Aug 2013	Not competent
18 July 2013	PHI	Copies of all documents with the data on the number of children with congenital anomalies in Herceg Novi.	08 Aug 2013	Not competent
18 July 2013	MSDT	Copies of documents with the state of the environment information in the vicinity of the “Šuplja stijena” mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Documents containing the data on the environmental pollution by the “Šuplja stijena” mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all physical and chemical testing results for water, air and soil in the vicinity of the “Šuplja stijena” mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all documents with the data on payments made by the "Gradir Montenegro" d.o.o. Nikšić as concession fees for ore extraction in Šuplja Stijena, Đurđeve vode, Paljevine and Ribnik.	05 Aug 2013	Not competent
18 July 2013	MSDT	All documents with the data on classification and categorisation of	05 Aug 2013	Not competent

		waters in the vicinity of the "Šuplja stijena" mine.		
18 July 2013	MSDT	Report on investments in environmental protection and occupational health and safety of the privatised polluters submitted by the "Šuplja stijena" mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	All documents containing info of pollution fees paid by the "Gradir Montenegro" d.o.o. Nikšić in 2008, 2009, 2010, 2011, 2012 and 2013.	05 Aug 2013	Not competent
18 July 2013	MSDT	Report on investments in environmental protection and occupational health and safety of the privatised polluters submitted by the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Documents containing the data on pollution caused by the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all inspection control reports made by EPA concerning the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of documents with the data on the state of the environment in the vicinity of the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	All decisions prohibiting the TPP Pljevlja to deposit ash and slag at the Maljevac disposal site at Zbljevo in the Municipality of Pljevlja.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all physical and chemical testing results for water, air and soil in the vicinity of the Maljevac dumping site.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all inspection control reports made by EPA concerning the TPP Pljevlja.	05 Aug 2013	Granted
18 July 2013	MSDT	All EPA reports made pursuant to environmental inspection controls of the Pljevlja coal mine.	05 Aug 2013	Not competent
18 July 2013	MSDT	Copies of all physical and chemical testing results for water, air and soil in the vicinity of the TPP Pljevlja.	05 Aug 2013	Not competent
27 Oct 2013	MSDT	Copies of documents with the data on the state of the environment in Herceg Novi.	07 Nov 2013	Not competent
27 Oct 2013	MSDT	Copies of all physical and chemical testing results for water, air and soil in Herceg Novi.	04 Nov 2013	Not competent
27 Oct 2013	MSDT	All documents with the data on classification and categorisation of waters in Herceg Novi.	04 Nov 2013	Not competent
18 July 2013	Ministry of Health (MoH)	Copies of all documents with the data on the number of lung cancer deaths in Pljevlja between 2006 and 2012.	05 Aug 2013	Not competent
18 July 2013	MoH	Copies of all documents with the data on the number of stillbirths in Pljevlja o between 2006 and 2012.	05 Aug 2013	Not competent

18 July 2013	MoH	Copies of all documents with the data on the number of children with congenital anomalies in Pljevlja.	05 Aug 2013	Not competent
18 July 2013	MoH	All annual reports of Hygiene and Epidemiological Service Pljevlja between 2006 and 2012.	05 Aug2013	Not competent
18 July 2013	MoH	Copies of all documents with the data on the number of lung cancer deaths in Herceg Novi between 2006 and 2012.	05 Aug 2013	Not competent
18 July 2013	MoH	Copies of all documents with the data on the number of stillbirths in Herceg Novi between 2006 and 2012.	05 Aug 2013	Not competent
18 July 2013	MoH	Copies of all documents with the data on the number of children with congenital anomalies in Herceg Novi.	05 Aug 2013	Not competent
18 July 2013	Municipality of Pljevlja	All documents with the data of pollution fees paid by the "Gradir Montenegro" d.o.o. Nikšić in 2008, 2009, 2010, 2011, 2012 and 2013.	05 Aug 2013	Not competent
18 July 2013	Inspection Administration Environmental Inspection	All environmental inspection control reports for the Pljevlja coal mine.	23 Aug 2013	Granted
27 Oct 2013	Inspection Administration	Copies of documents with the data on the state of the environment in Herceg Novi.	11 Nov 2013	Granted
27 Oct 2013	Inspection Administration	Copies of all physical and chemical testing results for water, air and soil in Herceg Novi.	11 Nov 2013	Granted
27 Oct 2013	Inspection Administration	All documents with the data on classification and categorisation of waters in Herceg Novi.	11 Nov2013	Granted