

(IN)VISIBLE MECHANISMS OF (MIS)USE OF PUBLIC RESOURCES: THE EXPO BELGRADE 2027 PROJECT

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1 INTRODUCTION

The EXPO Belgrade 2027 project represents one of the largest public interventions and urban transformation projects in recent decades. Due to its enormous public investments, non-transparent decision-making procedures, accelerated construction in a protected and sensitive area, unclear contents and spatial boundaries, it raises significant suspicion among professional and wider public communities, despite its high visibility in the public sphere.

It has proven impossible to unequivocally determine what the EXPO Belgrade 2027 project is or is not, despite its exceptional presence in official documents and media appearances by representatives of various public institutions.

This paper presents the methodology, process, and results of a transdisciplinary action research study examining the mechanisms of public resource utilization in the EXPO Belgrade 2027 project, conducted during student protests and subsequently broader societal protests and institutional crisis triggered by the collapse of the canopy at the railway station in Novi Sad.

The research process was realized through an ad hoc model shaped by two forces: the dynamics of student protest activities and the operations of public institutions functioning to realize the EXPO project during the research period. The research involved professors and students from the Faculty of Architecture, University of Belgrade during the teaching blockade. The connections between the research process and the student protests were established at the levels of motives, values, and objectives, as well as modes of action, with research findings serving as the basis for undertaking various types of actions within the student protest. Collaboration was established with professors and students from several faculties of the University of Belgrade, civil society organizations, and experts in the field of urban development.

This transdisciplinary, critical, and action-oriented approach to researching the planning, legal, and financial aspects of the EXPO Belgrade 2027 project from the perspective of sustainable urban development and good governance is grounded in institutional theory. Subsequent connections can be established with concepts of insurgent planning and insurgent pedagogy.

With the aim of examining planning solutions and detecting invisible risks accordingly, laws, spatial and urban plans, reports and decisions of public institutions, as well as media content were analyzed to understand the positions of competent institutions and public officials on matters significant to the project. The findings indicate that EXPO Belgrade 2027 represents a typical example of a megaproject. Its size and unclear boundaries, complexity and risks, imprecision and cost increases, political discourse and narrative manipulation, non-transparency and public exclusion underscore the importance of developing mechanisms for oversight, public control, and accountability.

2 THEORETICAL FRAMEWORK AND RESEARCH METHODOLOGY

The research combines analysis of formal institutions and policies through the lens of institutional theory with a critical, collaborative, and engaged approach to planning and education, aiming to affirm sustainable, just, and democratic development models.

2.1. Institutional Theory as an Analytical Framework for Understanding Megaprojects

Social relations and processes in the political, social, and economic spheres are shaped by institutions, embodied in formal institutions (norms and rules) and informal institutions (values, conventions, and behavioral patterns), organizational structure, and decision-making and implementation mechanisms (North, 1992). Urban development planning occurs within a densely institutionalized space - a network of laws, regulations, organizational systems, and practical routines (Lowndes, 2001). Since the 1990s, planning theory (Healy, 1997, 2002; Innes, 1995) has emphasized that the institutional system is not merely a framework within which planning occurs. Given that the success of governance and quality of decisions depends on the design of the institutional system, institutions must be the subject of analysis and design by planners (Milovanović Rodić & Maruna, 2022). Therefore, it is important to understand the institutionalization process and the manner and conditions for changing institutional arrangements.

An institutional framework that enables the expression of different interests, whereby public interest is determined, embedded in public policies, and realized with informed and active citizen participation, reduces the dominance of powerful actors. Conversely, frameworks that do not enable this allow their shaping by power relations and (mis)use by particular interests (Healy, 1997). Power structures all public policy creation processes and manifests at different levels. Pressures to advance the interests of powerful actors can be visible, making confrontation easier, but can also be invisible to the public and even professionals in the field, thereby becoming significantly more effective and harder to confront (Luke, 2002). The quality and resilience of the institutional system to such pressures largely depends on the degree of its alignment with the local context, primarily values and norms, but also other capacities (logistical, technical, knowledge and skills, etc.) of the professional community as well as the wider community and society as a whole. It is also important to understand that institutional solutions cannot be imported and transferred from other contexts without critical analysis and adaptation, which was

one of the causes of the failure of many legal and organizational solutions "imported" into the Serbian system in the EU accession process.

Although urban planners in Serbia still formally occupy an important position in spatial development management procedures, their actual influence on decision-making is gradually declining (Maruna et al., 2020). Decisions on land use are made through various mechanisms and by numerous institutions at local, regional, and national levels. Each of these organizations has specific jurisdiction, knowledge, and its own development vision, making the coordination process complex. Planning decisions, even when concerning a specific resource or territory, often require the involvement of multiple actors and consideration of different institutional rules and interests. In practice, multiple legitimate institutions claim decision-making authority over the same location, and it is not always clear who has ultimate responsibility. As a result, planning institutions face lengthy and complicated procedures involving numerous requirements, objections, and approval stages. Instead of the plan developing through reasoned discussion and exchange of different ideas and needs, it is often shaped through abbreviated procedures and narrow circles, increasing the risk of corruption and manipulation of public resources by adapting planning and subsequently design solutions to individual rather than public interest (Milovanović Rodić, 2015; Maruna, Teofilović & Milovanović Rodić, 2023; Nenadović & Milošević, 2022).

Serbia's planning and legal system has been significantly transformed to facilitate large infrastructure projects implemented over the past decade. The most significant from this perspective, and the largest in terms of public resource engagement, are the Belgrade Waterfront Project (Perić & Maruna, 2022; Zeković & Maričić, 2022) and the EXPO Belgrade 2027 Project (Transparency Serbia, 2024). Both projects satisfy other characteristics of megaprojects—they have strong political support and promotion, decision-making, planning, and construction occur through non-transparent procedures designed by special laws¹, budgets change significantly during implementation characterized by delays and questionable execution quality. Bent Flyvbjerg defines megaprojects as "large-scale investment projects costing a billion dollars or more, lasting many years, affecting millions of people, and involving numerous actors with different interests" (Flyvbjerg, 2014). He highlights structural weaknesses in planning and managing these projects, particularly emphasizing "strategic misrepresentation" and "optimism bias" as mechanisms enabling avoidance of accountability and concealment of actual costs and risks (Flyvbjerg, 2007).

Strategic misrepresentation refers to systematic manipulation of information by promoters and planners of large infrastructure projects—deliberately presenting projects in a more favorable

¹Laws that had the proclaimed objective of stimulating the construction industry under economic crisis conditions (Law on Stimulating the Construction Industry of the Republic of Serbia under Economic Crisis Conditions (2012), originally from 2010), implementing the Belgrade Waterfront project (Law on Determining Public Interest and Special Procedures for Expropriation and Issuing Construction Permits for Implementation of the "Belgrade Waterfront" Project (2020), originally from 2015), constructing the Morava Corridor (Law on Determining Public Interest and Special Procedures for Implementation of the E-761 Highway Infrastructure Corridor Construction Project, Pojate-Preljina Section (2019)), as well as the recently repealed Law on Special Procedures for Implementation of Construction and Reconstruction Projects of Linear Infrastructure Facilities of Special Importance for the Republic of Serbia (2020) (Transparency Serbia, 2024).

light than objective data shows, to secure approval and financing (Flyvbjerg, Bruzelius & Rothengatter, 2003; Flyvbjerg, 2007).

This most commonly involves deliberately underestimating costs and exaggerating benefits, ignoring or minimizing risks and negative effects, and manipulating feasibility analyses. Flyvbjerg (2007) argues this practice is not the result of errors or lack of knowledge, but a rational and deliberate strategy by actors with an interest in project approval—whether for political, economic, or personal reasons. This behavior often goes unpunished because institutional control mechanisms are weak and accountability is diffuse. Within institutional theory, strategic misrepresentation can be interpreted as a product of an institutional environment that stimulates a form of "organized ignorance," where success is defined not through project quality and outcome, but through its ability to fit into existing political-bureaucratic flows and be formally adopted.

Unlike strategic misrepresentation, optimism bias is an unconscious error in judgment and systematic tendency by planners and decision-makers to believe in their own ability to control project complexity and risks, though this is empirically unfounded. It leads people (or organizations) to overestimate the probability of positive outcomes while underestimating the probability of negative ones. In the context of planning and managing large projects, this means decision-makers underestimate costs, overestimate benefits, ignore risks and delays, and believe "this time will be different"—though historical data shows otherwise (Flyvbjerg, 2007).

Institutional theory offers a relevant analytical framework for examining these phenomena. Public authorities, as key carriers of megaprojects, operate within an institutional environment that can encourage non-transparency, clientelism, and resource misuse if adequate oversight and accountability mechanisms do not exist.

Using institutional theory, it is possible to analyze how formal rules (e.g., laws on public procurement, urban planning, etc.) and informal practices (e.g., political campaigns, interest group marketing pressures, etc.) together constitute the corrupt potential of megaprojects. This enables deeper understanding not only of individual corruption cases but also of systemic weaknesses enabling their recurrence.

In situations where special legal regimes are introduced that bypass regular institutional channels, and under conditions of limited transparency and weak data accessibility, the decision-making, planning, and construction process becomes extremely complex to monitor, interpret, and control. Precisely in such circumstances, analysis of institutional patterns requires additional critical effort to identify points of obstruction, exclusion, or misuse within the system.

Critical analysis of these formal institutions and their policies can reveal patterns of power and decision-making, enabling better understanding of plan and strategy development processes at city or state level and exposing points in the system where non-transparency and dysfunctions arise.

2.2. Engaged Teaching Model: Integrating Learning and Action in Real Environments

As a response to authoritarian governance, neoliberal development models (of cities), prioritization of particular interests over public interests, and citizen exclusion from decision-making processes, the concept of engaged and insurgent pedagogy has been developed. The concept is grounded in critical pedagogy and social justice theory with the aim of empowerment for constituting and articulating collective action in resistance and transformation of power relations in development decision-making processes (Čolić, Milovanović Rodić & Fokdal, 2023). It is based on the idea that education should not be neutral, but rather constitutes an act of resistance and emancipation through collective learning, dialogue, reflection, and action that do not rest on hierarchical relationships between teachers and students (Freire, 1970/2000). In contemporary contexts, insurgent pedagogy develops within urban studies and planning, particularly as a response to technocratic education that does not recognize the voices of communities. It is practiced through alternative forms of education in communities, protests, collective workshops, and other forms of "bottom-up" action. In the urbanism context, it develops through concepts of insurgent planning (Miraftab, 2009; Huq, 2020), whereby city development is a battleground for many conflicts and unequal struggles for resources, and planning becomes a potential space for resistance, articulation and integration of different knowledge, and struggle for the right to the city (Kočović-De-Santo, Milovanović Rodić, Babović & Kuzma, 2023). Such planning requires educational practices occurring not only in classrooms but also in situ, in communities affected by spatial injustice, where students and faculty learn together through direct action.

The insurgent pedagogy model is based on principles of horizontal organization and collective decision-making, combining theory and practice in real urban struggles, dialogue with communities and civil society as partners in knowledge creation (Miraftab, 2009), and use of art, narratives, and performance in education and planning.

Insurgent pedagogy in urbanism education, which does not separate the learning process from actual action but actively connects research, education, and engagement in the public interest (Fokdal, Čolić & Milovanović-Rodić, 2020; Maruna, Milovanović Rodić & Čolić, 2018; Milovanović-Rodić, Živković & Lalović, 2013), was an appropriate pedagogical model for the social crisis triggered by the railway station canopy collapse in Novi Sad in 2024. It was developed with the aim of enabling students, through mutual collaboration and cooperation with professors and expert community, to build the capacity for critical analysis and understanding of the institutional framework governing urban development, as well as tools for action regarding non-transparent processes of urban policy formulation and implementation and the use of public resources.

2.3. Research Methodology

Action research was initiated to illuminate and understand mechanisms of public resource utilization for planning and implementing the EXPO Belgrade 2027 project. It was initiated due to lack of transparency, public dialogue, and democratic oversight of its planning and implementation process, although it is a project of national interest advocated by representatives

of the highest state officials due to its exceptional financial, infrastructural, ecological, and social significance for Belgrade and Serbia. Given that this is a project engaging significant public resources with major impact on people's quality of life and the environment, various activities were undertaken to inform and mobilize the student population and wider public in accordance with research findings. Therefore, action research had three specific interconnected objectives:

- **Analytical objective:** An institutional analysis of the EXPO Belgrade 2027 project aimed at examining the system of governance and planning mechanisms serving its implementation.
- **Pedagogical objective:** To involve students in the research process as a process of learning, with the aim of developing critical awareness, acquiring knowledge and tools for analyzing complex infrastructure projects, and understanding how the institutional system functions and changes. Conveying the idea that as future professionals and citizens they can and should be "transformative forces" that can change structure, rules, and resource flows in struggle against various types of visible and invisible powers that tend to dominate public discourse (Giddens, 1984).
- **Action objective:** The production of socially relevant and mobilizing knowledge through the creation of content and events aimed at informing the wider public, and fostering dialogue and activism regarding the consequences of and alternatives to current development policies.

Within collaborative workshops involving professors, students, and experts in urban planning and architecture, a content analysis of valid official documents (laws, bylaws, plans, and decisions), as well as secondary sources, and media materials was carried out. Research findings were communicated to both wider and professional audiences with the aim of deepening understanding of the issues at stake, opening space for public debate, and stimulating collective action. In this approach transcended the boundaries of academia—knowledge was not retained in academic circles, but actively used as a tool for community empowerment, advocacy for change, and democratization of decision-making processes.

3 MECHANISMS OF PUBLIC RESOURCE (MIS)USE IN THE EXPO BELGRADE 2027 PROJECT

The research identified three key dimensions of the institutionalized (mis)use of public resources within the EXPO Belgrade 2027 project. The first concerns inconsistencies in the terminological definition of the project. The second relates to the special procedures, legal framework, and financing mechanisms that place the EXPO project outside standard planning and governance procedures. The third dimension explores spatial development through the process of "unveiling" the plan, its scope, and its contents, showing how planning mechanisms are used to territorially expand the project, transform space, and legitimize the redirection of public resources toward its implementation.

3.1. Terminological Fog: What the EXPO Belgrade 2027 Project Is (Not)

The International Bureau of Exhibitions (Bureau International des Expositions - BIE) decided in June 2023 that the Republic of Serbia would host the EXPO Belgrade 2027 International Specialized Exhibition. The exhibition will be held in Belgrade from May 15 to August 15, 2027, with the key theme "Play for Humanity—Sport and Music for All." Following the procedure, Serbia, like other candidates, competed by submitting a Recognition Dossier containing details about the program and financing methods for the exhibition. This Dossier was never made available to Serbian citizens, although significant public funds are engaged, and although this was permitted by BIE regulations, because our competent institutions declared it a business secret, claiming that its publication would affect business success.

According to BIE regulations, a specialized international exhibition is temporally limited to a maximum of three months and spatially to an area of up to 25 hectares. The exhibition space is entirely built by the organizer, while participants are allocated space in pavilions they can adapt according to their own interpretation of the exhibition's focused theme.

Despite clear BIE-defined regulations, it has proven impossible to unequivocally determine what the EXPO Belgrade 2027 project is or even what it is not, despite its exceptional presence in official documents and media appearances by representatives of various public institutions. Various terms with the EXPO prefix are simultaneously in circulation, whose institutional context, content, and spatial scope vary, partially overlap, differ, and are not mutually aligned, such as: *International Specialized Exhibition EXPO Belgrade 2027*, *EXPO Zone*, *EXPO 2027 Complex*, *EXPO Complex*, *EXPO 2027 Location*, *EXPO Belgrade 2027 Project*, *Jump into the Future—EXPO Serbia 2027*, etc.

Below are the meanings and characteristics of terms based on official documents:

- **International Specialized Exhibition EXPO Belgrade 2027** is an international event titled *Play for Humanity—Sport and Music for All* to be held in Serbia from May 15 to August 15, 2027. It belongs to one of four types of events regulated, supervised, and approved by the intergovernmental organization International Bureau for Exhibitions (*Bureau International des Expositions - BIE*): World EXPO exhibitions, Specialized EXPO exhibitions, Horticultural exhibitions, and the Milan Triennale. BIE comprises 184 countries, founded in 1928 in Paris, where its headquarters remains. Serbia competed for and received consent to host an International Specialized Exhibition (ISE) which, according to the *Convention on International Exhibitions (1928)*, the fundamental legal act of BIE, **should be held on an area of up to 25 hectares** and last up to 3 months².
- **Complex EXPO 2027** (ser. *Kompleks EXPO 2027*) is the name of a spatial-functional unit within the *Spatial Plan of Special Purpose Area for the National Football Stadium (SPSPA NFS)*, which

² Law on Ratification of the Protocol of November 30, 1972, with Amendments of June 24, 1982, and May 31, 1988, to the Convention on International Exhibitions signed in Paris on November 22, 1928, amended and supplemented by Protocols of May 10, 1948, November 16, 1966, November 30, 1972, and Amendments of June 24, 1982, and May 31, 1988, Article 4 (2023)

in the latest 4th phase adopted in July 2025 **occupies an area of 373.01 hectares**³. Complex EXPO 2027 consists of: **the exhibition space of 83.10 hectares** (more than 3 times larger than BIE regulations allowing a maximum of 25 hectares for organizing a Specialized International Exhibition), accommodation capacities of 1,600 apartments (8.57 ha), commercial facilities (22.90 ha), preschool institution (0.61 ha), elementary school (1.36 ha), hotel (1.94 ha), fire station (0.95 ha), and theme park (252.43 ha).

- **EXPO zone** (ser. *EXPO zona*) is a term cited in official promotional material of investment programme *SERBIA 2027 EXPO JUMP INTO THE FUTURE*⁴ and defined as

"EXPO Space (future Belgrade Fair), accompanying infrastructure, Residential complex, Aquatic center, Zemun-Airport-EXPO railway, New marina on the Sava River".

This material **does not define the size of the area** they occupy. Additionally, another new term is used - **EXPO Space** (ser. *Prostor EXPO*) indicating a relationship between the Specialized International Exhibition EXPO Belgrade 2027 and Belgrade Fair. This relationship remains undefined, raising the question of whether Belgrade Fair will extend over the entire area intended for the EXPO 2027 Complex exhibition space of 83.10 hectares as defined by the SPSPA NFS plan, or will occupy only part of it.

- **EXPO site** (ser. *EXPO lokacija*) is the name of a spatial unit of **33 hectares** with

"Exclusive purpose of realizing the EXPO 2027 specialized exhibition, containing participant pavilion area of approximately 100,000 m²"

in the *Public Call for Preparation of a Comprehensive EXPO Master Plan and Engagement of Chief Architect for a Three-Year Period*⁵. The tender documentation, in addition to the new term **EXPO master plan**, introduces a new term - **EXPO Complex**, which according to this document represents

"A set of spatial units and facilities functioning to realize the EXPO 2027 specialized exhibition over a total area of 81 hectares. It consists of EXPO Location, EXPO Village, EXPO Service, and EXPO Parking".

Those elements were never mentioned again, either in Phases 1–4 of the SPSPA NFS plan or in any other publicly available document.

³ The PPPN NFS 4th phase Draft increases the EXPO 2027 Complex area for accompanying accommodation capacities from 8.57 hectares in the 3rd phase to 9.20 hectares and adds new areas for a fire station of 0.95 hectares and a theme park on a single parcel of 252.43 hectares.

⁴ Distributed on April 12-14, 2025, during the "We Defend Serbia" gathering held in Belgrade, organised on the initiative of the "Movement For the People and State" and the President of the Republic of Serbia, Aleksandar Vučić.

⁵ Public Call for Preparation of a Comprehensive EXPO Master Plan and Engagement of Chief Architect for a Three-Year Period (procurement number: 30/24). Accessed June 12, 2025.
<https://www.ekapija.com/tender/4835711/izrada-sveobuhvatnog-expo-master-plana-i-integrisanje-u-prostornu-celinu-za-potrebe>

- **EXPO Belgrade 2027 Project** (ser. *Projekat EXPO Belgrade 2027*) is a term defined by the *Law on Special Procedures for implementing the EXPO BELGRADE 2027 international specialized exhibition* from 2023, whereby

"EXPO BELGRADE 2027 means a project encompassing all phases of the implementation of the Specialized International Exhibition EXPO BELGRADE 2027, other facilities and contents within the Spatial Plan, as well as facilities and contents not covered by the Spatial Plan but serving the implementation of the EXPO BELGRADE 2027 project, and refers both to the project as a whole and to the individual locations and activities designated for its implementation" (article 3)

This is one of the most significant and potentially most harmful definitions regarding the Specialized International Exhibition EXPO 2027, as its boundary is legally neutralized and extended to potentially any location in Serbia. This law enables the Government of the Republic of Serbia by decision and without prescribed criteria, to declare any project a project serving the implementation of the Specialized Expo Belgrade 2027. Since the same law significantly relaxes or suspends standard procedures (such as shortening public participation from 45 to 15 days, raising public procurement thresholds for goods and services 8 times and works 12 times, short deadlines for responding to public procurement notices, absence of appeal mechanisms, etc.) this introduces discrimination within the construction industry and creates significant disturbance in the planning and construction system.

- **Jump into the Future - Serbia EXPO 2027**⁶ (srp. *Skok u budućnost - Srbija EXPO 2027*) is the name of one of the largest state investment programs presented by the President of Serbia at a press conference on January 20, 2024, which was never presented to the public in document form, although it became the basis for significant redesign of public policies at national and local levels. In response to *Transparency Serbia's* request for document delivery and public information about persons and bodies participating in its preparation, as well as decisions and contracts on which basis they worked, sent to the Office of the President of the Republic of Serbia, Government of the Republic of Serbia, Ministry of Culture, and Ministry of Finance, the Government of the Republic of Serbia sent a response which, due to its specific illogicality impossible to paraphrase, we quote:

"Jump into the Future—Serbia EXPO 2027 is not a public policy document, more precisely a program within the meaning of the Law on the Planning System of the Republic of Serbia (2018). In that sense, no state administration body was a participant in preparing a planning system document within the meaning of the stated Law, nor submitted an initiative for amending, preparing, and adopting a public policy document, and as there were no such documents, consequently there are no copies of initiatives or proposals.

⁶ The name of the investment program also varies, as the program website lists it without EXPO in the title as Leap into the Future - Serbia 2027, while the Government of the Republic of Serbia website and many official national and international documents, such as the IMF report, cite it as Leap into the Future - Serbia EXPO 2027. This is not an insignificant difference, considering that *Lex specialis* for EXPO serves as the basis for implementing all projects brought into relation with the Specialized International Exhibition EXPO Belgrade 2027. Thus, precisely in this manner, space can be created for claims that will enable all 325+ projects to be implemented according to procedures and conditions defined by *Lex specialis* for EXPO.

According to the above, there is no service, employee, or external associate who would have participated in preparing the document you refer to"

Therefore, it turns out that the largest investment program defining how to spend 17.8 billion euros of public money is not a public document and is not based on any official document of any public institution. Numerous decisions of the Government of the Republic of Serbia, along with various public documents such as fiscal strategies, were adopted and both national and local budgets were restructured to support the implementation of this programme, even though the programme itself is not publicly accessible and the basis, process, timing, and circumstances of its formulation and adoption remain unclear. What makes it additionally peculiar is its relationship with EXPO, which appears in the program name, which would presumably mean that it will be implemented under the relaxed conditions defined by the *Law on Special Procedures for Implementation of the EXPO Belgrade 2027 International Specialized Exhibition* (2023).

- **EXPO Belgrade 2027 Project**⁷ is a term that appears on the investment program website *Jump into the Future - Serbia EXPO 2027* referring to a complex of **38 hectares** consisting of three areas. To illustrate the imprecision and ambiguity in term usage, we quote the areas description:

"Thematic area, International Participants Area, and Best Practice and Corporate Content Area with key space for theme development, facilities related to exhibition installations and events, facilities for operations and management, commercial and service facilities, as well as infrastructure for recreation and micro-mobility. In addition to the exhibition space, for successful realization of EXPO 2027, the so-called EXPO Village is also being built, namely a residential complex intended for Exhibition participants' accommodation. Beyond successful realization of the International Specialized Exhibition EXPO Belgrade 2027, the entire complex is carefully designed with the goal of 100% legacy that positions the Republic of Serbia at regional and European levels as a new cultural, convention, sports, and entertainment district"

The description further states that,

*"In addition to indirect revenues that the Republic of Serbia will generate during the three-month duration of the International Specialized Exhibition, projected at approximately **2.5 billion euros** (according to methodology applied by the BIE headquartered in Paris) in the observed period concerning operations and activities arising from Exhibition organization, it is expected that projected operational revenues for EXPO 2027 Belgrade (151.9 million euros) will be sufficient to cover operational costs currently estimated at approximately 128.8 million euros."*

- **EXPO 2027 Belgrade** is a term frequently used in official institutional communication with the public, primarily through promotional channels such as the government portal *Leap into the*

⁷ The term differs from the similar one in Lex specialis for EXPO in that it features "Beograd," in contrast to the one in the law which uses "Belgrade."

*Future - Serbia EXPO 2027*⁸. According to data from this website, EXPO 2027 Belgrade designates a complex set of spatial, infrastructural, and functional units exceeding the framework of the international exhibition itself. In spatial terms, it is defined as an urban area of **243 hectares** with construction completion in 2026. Its constituent elements are linear infrastructure (new state road connections, cruise marinas, city boulevards, 9,000 public parking spaces), Fair and EXPO 2027, National Football Stadium, and residential complex (160,000 m², 1,500 housing units, capacity of approximately 3,500 residents). Additionally mentioned are the Aquatic Center, new railway line, Belgrade Metro, bus and railway station buildings, construction and reconstruction of facilities within the Belgrade Waterfront project, and others. Thus, in this version, EXPO 2027 Belgrade represents a set of individual projects directly and indirectly related to the EXPO 2027 complex or that cannot even be brought into connection. Fair and EXPO 2027 in this context is defined as a complex of **25 hectares and 230,000 m² of exhibition facilities**. This term integrates and equates these two concepts, while actually expressing the intention to relocate Belgrade Fair to Surčin. As with previous terms, there is no explicit explanation of which area is intended for the future fair, and inconsistency regarding the exhibition's spatial capacity is repeated.

Terminological confusion accompanying the ISE EXPO Belgrade 2027 is not insignificant, nor primarily accidental - it has directly affected the ability to understand the project scope, jurisdictions, and methods of planning and managing it.

While some terms refer only to temporary structures in which the EXPO Belgrade 2027 exhibition will be realized, others include infrastructure and accompanying content in various combinations—residential and commercial zones and complexes, infrastructure areas and facilities, amusement parks, green corridors, and tourist facilities. There is no unified and official definition of the EXPO project's territorial scope, so some documents cite precise areas of 25 ha, 33 ha, 83.21 ha, or 373.01 ha, while others state that "*all of Serbia is EXPO*" and specify projects that do not form a clear functional coherent unit with the exhibition, although they are connected on that basis.

The impossibility of clearly answering what EXPO Belgrade 2027 is represents a serious problem for critical analysis of relationships with public interest and assessment of methods and justification for engaging public resources. Without a clear project definition, it is impossible to assess its actual costs, spatial consequences, infrastructure requirements, or potential environmental and local community risks.

A particular problem is the fact that the Specialized International Exhibition EXPO Belgrade 2027 was declared by the highest national institutions as the most significant national development opportunity, and around it as a cornerstone, the national investment program *Jump into the Future—Serbia EXPO 2027* was formed. It is projected that 17.8 billion euros will be invested within this program over the next 3 to 4 years in projects grouped into five units. One of these project groups is EXPO Belgrade 2027, for which 1.29 billion euros is allocated. This project list includes large infrastructure projects such as the Morava and Fruška Gora corridors, Kostolac B3

⁸ <https://srbija2027.gov.rs/expo-2027>

heating plant, Kostolac wind farm, BIO4 campus, innovation districts, but also unspecified project types such as local roads or investments in integrated development and tourism. It remains unclear why and how these projects are related to the EXPO specialized exhibition to be held on 25 hectares, lasting three months, and according to previous feasibility studies achieving 4 million visits, of which three-quarters of visitors will be from Serbia, mostly from Belgrade.

3.2. Legal Framework: Centralization of Decision-Making and Creation of Exemptions

The International Specialized Exhibition EXPO Belgrade 2027 was declared a project of special importance for the Republic of Serbia, and for its implementation in 2023, the *Law on Special Procedures for Implementing the EXPO BELGRADE 2027 International Specialized Exhibition* (2023, hereinafter *Lex specialis*) was adopted. It suspended entire or parts of existing laws concerning public resource expenditure, planning, and construction, thereby creating a different environment and "rules of the game" compared to the rest of the country.

The Law itself was adopted without public consultation, although according to the *Law on State Administration* (2018)⁹, state administration bodies were obligated to ensure conditions for public participation during draft law preparation, as it introduces a large number of significant changes "substantially altering the legal regime in the field" of spatial development management and planning "of particular public interest and whose adoption is significant". The importance of this Law is demonstrated by the great interest of the entire professional and wider public in the *Draft Law on Amendments* to this Law submitted by the Government of the Republic of Serbia to parliamentary procedure session on January 16, 2025. A joint request to the Government of the Republic of Serbia for its withdrawal was sent by the most significant institutions, organizations, and associations in architecture, planning and construction¹⁰. The Draft was withdrawn from parliamentary procedure without explanation, as was its second version from March 2025. Public consultation was initiated regarding the third, significantly reduced version of the draft amendments from 2025. The outcome of the public consultation is not yet known at the time of

⁹ Law on State Administration (2018), Article 77

¹⁰ Faculty of Architecture, University of Belgrade (AFUBG), Academy of Engineering Sciences of Serbia (AINS) – Department of Civil Engineering Sciences, Academy of Architecture of Serbia (AAS), Association of Spatial Planners (APPS), Faculty of Civil Engineering, University of Belgrade (GFUB), Faculty of Geography, University of Belgrade – Department of Spatial Planning, DocoMoMo Serbia, Society of Conservators of Serbia (DKS), Society of Structural Engineers of Serbia (DGKS), Europa Nostra Serbia, Institute of Architecture and Urban Planning of Serbia (IAUS), Ministry of Space (MP), National Committee ICOMOS Serbia, New Planning Practice (NPP), Regulatory Institute for Renewable Energy and Environment (RERI), Association of Civil Engineers of Serbia (SGIS), Association of Architects of Serbia (UAS) and its member organizations: Society of Architects of Belgrade (DAB), Society of Architects of Novi Sad (DaNS), Society of Architects of Niš (DAN), Society of Architects of Valjevo (DAV), Society of Architects of Zrenjanin (DAZ), Society of Architects of Vranje (DVA), Association of Landscape Architects of Serbia (UPAS), Association of Urbanists of Serbia (UUS), UNESCO Chair for Cultural Policy and Management at the University of Arts in Belgrade, Faculty of Forestry, University of Belgrade – Department of Landscape Architecture and Horticulture. The Committee of the Serbian Academy of Sciences and Arts (SANU) for the Environment, Engineering Chamber of Serbia (IKS), Investigation Commission for Examining Responsibility for the Canopy Collapse, and Association of Architectural Practices (ASAP) independently issued statements against these amendments.

writing this paper. The proposed changes further undermine the national legal and planning system, especially the *Law on Planning and Construction*, by introducing the possibility that all facilities built under *Lex specialis for EXPO* can be put into operation without prior obtaining of use permits.

Article 1, paragraph 1 of the *Draft Lex specialis* states that it

"Regulates conditions, criteria, manner, and procedure for implementing the EXPO BELGRADE 2027 international specialized exhibition and other content within the Spatial Plan of Special Purpose Area for the National Football Stadium, Spatial Plan of Special Purpose Area for the National Football Stadium—second phase, or other phases of the Spatial Plan of Special Purpose Area for the National Football Stadium, other spatial units outside the Spatial Plan serving the implementation of the EXPO BELGRADE 2027 international specialized exhibition, as well as construction of the National Football Stadium and residential facilities for accommodating participants and visitors."

Paragraph 2 of the same Article 2 further determines what is built outside the Spatial Plan boundaries, stating this includes

"Construction of infrastructure necessary for functioning content within the Spatial Plan of Special Purpose Area for the National Football Stadium, Spatial Plan of Special Purpose Area for the National Football Stadium—second phase, or other phases of the Spatial Plan of Special Purpose Area for the National Football Stadium, other spatial units outside the Spatial Plan serving the implementation of the EXPO BELGRADE 2027 international specialized exhibition, organizing accompanying events outside this plan's scope, facade renovation in certain urban zones and units, and other matters important for implementing the stated project."

Article 3, paragraph 1, point 1 of the *Draft Lex specialis* defines that

"EXPO BELGRADE 2027 means a project encompassing all phases of the implementation of the Specialized International Exhibition EXPO BELGRADE 2027, other facilities and contents within the Spatial Plan, as well as facilities and contents not covered by the Spatial Plan but serving the implementation of the EXPO BELGRADE 2027 project, and refers both to the project as a whole and to the individual locations and activities designated for its implementation"

It follows that the spatial scope boundary to which *Lex specialis* applies is not defined, as "other spatial units outside the Spatial Plan scope" and projects at "individual locations" are not specified (Article 1, paragraph 1; Article 3, paragraph 1, point 1). Given that what is meant by the formulation "*serving the implementation of the EXPO BELGRADE 2027 project*" is not defined, it is unclear what other spatial units and individual locations these provisions concern, what content is realized on them, on what criteria basis, by what legal and planning basis they are determined, and whether there is a final list of spatial units, individual locations, and content (Article 1, paragraphs 1 and 2; Article 3, paragraph 1, point 1).

Also undefined is the deadline until which *Lex specialis* will be applied, since it states it is adopted for "all phases of implementing the EXPO BELGRADE 2027 international specialized exhibition" (Article 3, paragraph 1, point 1). The 2nd phase of Spatial Plan of Special Purpose Area for the National Football Stadium planned "*content necessary for EXPO exhibition implementation*", the 3rd phase planned "*additional accompanying content important for EXPO exhibition implementation*", while the 4th phase planned "*further plan development of the area, begun in previous phases*". This may become the purpose of all subsequent phases of the Spatial Plan for the Special-Purpose Area of the National Football Stadium, the number of which may be unlimited, since no act defines their final number.

Lex specialis reduced public participation in Spatial Plan procedures by eliminating early public hearing and shortening public hearing from 30 to 15 days, as well as transparency in contracting processes due to suspension of the *Public Procurement Law* (2023). These solutions carry increased corruption risk in the implementation process and lead to justified suspicion that public resources will be irrationally used.

The process of planning urbanization of the Surčin area where the Specialized International Exhibition EXPO Belgrade 2027 will be implemented began in 2018, approximately three years before the decision to compete for hosting rights. The Government of the Republic of Serbia adopted the *Conclusion* on July 30, 2018, that the construction of the National Football Stadium with accompanying content in Surčin municipality territory is a project of importance for the Republic of Serbia. On 9 November 2018, the Government adopted the *Decision on the Preparation of the Spatial Plan for the Special-Purpose Area of the National Football Stadium (SPSPA NFS)*, on the basis of which the *Elaboration for the Early Public Review* was prepared. The Government adopted the *Decision on forming a working group for preparing and submitting the EXPO 2027 candidacy* in December 2021, after which on February 11, 2022, it adopted the second *Decision on preparation of SPSPA NFS*, introducing the possibility of phased plan preparation and expanding content to "other public purposes of national importance."

Table 1. Chronological overview of key events relevant to understanding the governance and planning of the EXPO project.

DATE	KEY EVENTS
30.07.2018	Government of the Republic of Serbia: Conclusion that the National Football Stadium (NFS) construction project with accompanying content in Surčin municipality territory is a project of importance for the Republic of Serbia.
09.11.2018	Decision on the Preparation of the Spatial Plan for the Special-Purpose Area of the National Football Stadium (SPSPA NFS)
14.02.2019	Government of the Republic of Serbia: Conclusion that the National Football Stadium (NFS) construction project is a project of importance for the Republic of Serbia

16-30.04.2019	Early public hearing of SPSPA NFS
1-30.10.2021	Public hearing of SPSPA NFS
2.12.2021	Government of the Republic of Serbia Decision on forming a working group for ISE EXPO 2027 candidacy
26.1.2022	Government of the Republic of Serbia submitted Candidacy Letter for ISE EXPO 2027
11.02.2022	Decision (II) on preparation of SPSPA NFS (amendment to 2018 decision: phased preparation and other public purposes of national importance)
20.02.2022	Government of the Republic of Serbia allocated 23.6 million dinars from budget reserve to Belgrade Fair for Serbia's EXPO 2027 exhibition candidacy preparation needs
09.03.2022	Government of the Republic of Serbia adopts the SPSPA NFS
11.04.2022	Government of the Republic of Serbia Decision to allocate 56.5 million dinars from budget reserve to Belgrade Fair for promotion of Serbia's candidacy for organizing EXPO Belgrade 2027 exhibition
30.06.2022	Government of the Republic of Serbia: Decision that the construction of facilities for EXPO 2027 and accompanying content is a project of importance for the Republic of Serbia.
September 2022	BIE visit and beginning of mission in Belgrade for project assessment
October 2022	Government of the Republic of Serbia Decision to allocate 95 million dinars from budget reserve to Belgrade Fair for preparation of Recognition Dossier for EXPO Belgrade 2027 ISE
19.10.- 17.11.2022	Public hearing of SPSPA NFS - 2nd phase
08.02.2023	Government of the Republic of Serbia adopts the SPSPA NFS - 2nd phase
21.06.2023	BIE Final decision adopted on host city and country for ISE EXPO 2027
27.10.2023	Law on Special Procedures for Implementation of ISE EXPO BELGRADE 2027
27.10.2023	Regulation on conditions, criteria, and documentation content for construction projects of importance for the Republic of Serbia
21.11.2023	Decision on establishment of public enterprise "EXPO 2027" Ltd.
19.12.2023.- 17.01.2024	Public hearing of SPSPA NFS - 3rd phase

12.01.2024	Decision on establishment of public enterprise "SPV Galovica 1" Ltd.
12.01.2024	Decision on establishment of public enterprise "SPV Galovica 2" Ltd.
12.01.2024	Decision on establishment of public enterprise "SPV Galovica 3" Ltd.
12.01.2024	Decision on establishment of public enterprise "SPV Petrac 1" Ltd.
12.01.2024	Decision on establishment of public enterprise "SPV Petrac 2" Ltd.
12.01.2024	Decision on establishment of public enterprise "SPV Petrac 3" Ltd.
20.01.2024	President of the Republic of Serbia presented the <i>Leap into the Future - Serbia EXPO 2027</i> program for the period from 2024 to 2027
24.01.2024	<i>Transparency Serbia</i> submitted <i>Request for Access to Information of Public Importance to the General Secretariat of the President of the Republic of Serbia</i> - requested <i>Leap into the Future - Serbia EXPO 2027</i> program document
02.02.2024	Decision on establishment of public enterprise "SPV Aquatic Center" Ltd.
06.02.2024	Regulation on rules for procurement procedure for goods, services, or works necessary for implementation of EXPO BELGRADE 2027 international specialized exhibition
21.02.2024	Government of the Republic of Serbia adopts the SPSPA NFS - 3rd phase
27.03.2024	Government of the Republic of Serbia sent response to <i>Transparency Serbia</i> based on repeated <i>Request for Access to Information</i> from 18.3.2024
22.04.2024	Constitutional Court requests National Assembly opinion regarding <i>Transparency Serbia</i> initiative for constitutional review of <i>Law on Special Procedures for Implementation of ISE EXPO BELGRADE 2027 (Lex speciali)</i>
05.09.2024	Government of the Republic of Serbia submits <i>Dossier for the International Specialised Exhibition</i> to BIE
26.11.2024	BIE Assembly adopts <i>Recognition Dossier</i>
03.12.2024	<i>Transparency Serbia</i> submitted <i>Request to National Assembly of the Republic of Serbia</i> for delivery of opinion copy that the Committee for Constitutional Issues and Legislation sent to Constitutional Court regarding initiative to initiate constitutional review procedure of Lex
17.01.2025	Amendments to <i>Lex specialis</i> and <i>Law on Planning and Construction</i> submitted to parliamentary procedure

10.02.2025	Request from 26 institutions for withdrawal of amendments to <i>Lex specialis</i> and <i>Law on Planning and Construction</i> from procedure
04.03.2025	First session of National Assembly of the Republic of Serbia in 2025 - <i>Lex specialis</i> and <i>Law on Planning and Construction</i> amendments not on agenda
10-24.02.2025	Public hearing of SPSPA NFS - 4th phase
07.03.2025	Public session of Planning Commission for SPSPA NFS - 4th phase was cancelled
21.03.2025	Public session of Planning Commission for SPSPA NFS - 4th phase was cancelled
21-28.03.2025	Public presentation of Urban Project Aquatic Center – without the documentation being made available online, although it is legally required
13.06.2025	Public session of Planning Commission for PPPPN NFS - 4th phase the session was held electronically
03.07.2025	Government of the Republic of Serbia adopts the SPSPA NFS - 4th phase

3.3. Spatial Dimension: Non-Transparent and Phased Planning

The Government of the Republic of Serbia adopted the *Conclusion* in July 2018 that the National Football Stadium construction project with accompanying content in Surčin municipality territory is a project of importance for the Republic of Serbia (Vlada RS, 2018a), then in November of the same year the *Decision on preparation of the Spatial Plan of Special Purpose Area for the National Football Stadium* (SPSPA NFS). Public hearing of the *Elaboration for early public review* was held from April 16-30, 2019. **The Elaboration content indicates that the idea of intensive area urbanization existed well before adopting the Government Decision on forming a working group for preparing and submitting the EXPO 2027 candidacy.** In addition to 35.4 hectares for "sports facilities and complexes—National Football Stadium," which is repeated in similar amounts in all future plan phases, the Elaboration provided 326.7 hectares for "accompanying content areas" (Fig. 1, Table 2).

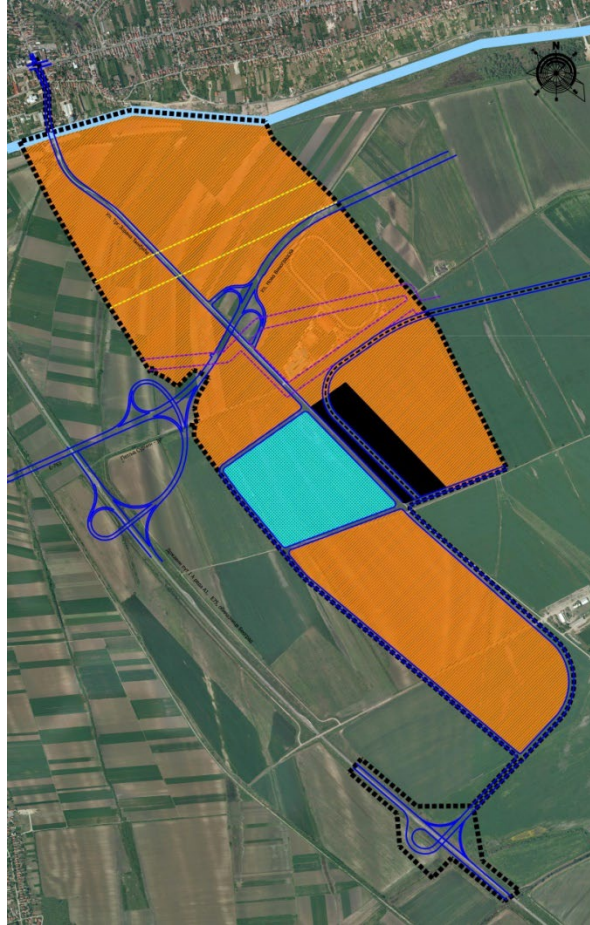


Figure 1: Planned Land Use within Elaboration for Early Public Review of Spatial Plan of Special Purpose Area for the National Football Stadium (SPSPA NFS). It was prepared based on the first Government Decision on preparation of SPSPA NFS (Government of the Republic of Serbia, 2018). Early public hearing was held from April 16 to 30, 2019. Thus, nineteen months before the Government Decision on forming a working group for preparing and submitting the EXPO 2027 candidacy (Government of the Republic of Serbia, 2021), there was an intention for intensive urbanization of this area. In the graphic annex, areas for "Sports facilities and complexes - National Football Stadium" (35.4 ha) are marked in blue, and "Areas for accompanying content" (326.7 ha) in orange (see Table 2 also). Source: Elaboration for Early Public Review of SPSPA NFS documentation.

After adopting the *Decision on forming a working group for preparing and submitting the EXPO 2027 candidacy* in December 2021 (Vlada RS, 2021), the Government of the Republic of Serbia adopted an amendment to the *Decision on preparation of the Spatial Plan of Special Purpose Area for the National Football Stadium* in February 2022 (Vlada RS, 2022a), enabling phased plan preparation and introducing "other public purposes of national importance." Based on this Decision, the SPSPA NFS Draft was prepared, which underwent on public hearing from October 1-30, 2021. The Draft SPSPA NFS no longer planned areas for accompanying content, although the traffic matrix indicates that the intention for further area urbanization in the surroundings remained current. SPSPA NFS was adopted in March 2022 (119 hectares) (Vlada RS, 2022b).

Subsequently, in June 2022, the Government of the Republic of Serbia adopted the *Decision that construction of facilities for EXPO 2027 and accompanying content is a project of importance for the Republic of Serbia* (Vlada RS, 2022c) and the *Decision on preparation of SPSPA NFS - 2nd phase*, which provided that the location for the Specialized International Exhibition EXPO Belgrade 2027 would be in Surčin in immediate vicinity of the national football stadium. Thus two projects of national importance became parts of the same plan, adopted in 2023 (Vlada RS, 2023b). Review of SPSPA NFS - 2nd phase shows that the space intended for the EXPO international exhibition is significantly larger than the maximum allowed by BIE regulations (25 hectares). Within the planning area of 167 hectares, the EXPO complex occupies 113 hectares. Within the EXPO complex, construction of exhibition space of 83.10 hectares, accompanying accommodation capacities of 6.90 hectares, and accompanying commercial facilities of 22.90 hectares is planned. The reasons for engaging such a large area for implementing a Specialized international exhibition remain unclear (Fig. 2, Table 2)

After BIE decided on June 21, 2023, that Serbia would host the EXPO Belgrade 2027 international specialized exhibition, the 3rd phase of SPSPA NFS was adopted in February 2024, adding accompanying content to the EXPO complex, expanding its area to 118.95 hectares. Additionally, this phase introduced preschool institution, elementary school, and hotel.

In July 2025, after public hearing, approximately 700 submitted citizen comments, two postponed public sessions, and the first electronic public session held in Serbia, the 4th phase of SPSPA NFS was adopted. This plan increased the total plan area to 813.6 hectares. The planning area was expanded to include the Sava embankment area and land strip in the protected area up to Block 45, as well as a 252-hectare parcel of valuable agricultural land for a theme park. Beside fire station, a new road and a second tourist marina on the river Sava were introduced. The documentation basis of the Draft Plan was not available on the Agency for spatial planning's website, preventing review of studies and verification of data with competent institution conditions. Draft Plan graphic annexes were fragmented so that their reading and understanding was completely prevented. Each of four graphic annexes were given in 16 illogically overlapping segments of different orientations, dimensions, and legends (even were prepared and existed as unified wholes). The integration of these segments into unified graphic annexes was a prerequisite for understanding the Draft. These preparatory activities were time-consuming and required specific knowledge, skills, software, and hardware. The question can be raised what was the reason for presenting planning documentation of this project of national importance in such a non-transparent manner. This raises concerns that the intention was either to discourage scrutiny of the proposed solution or to substantially limit the right of interested citizens to participate in the planning process in an informed manner.



Figure 2: PPPN NFS Draft, Planned Land Use.
Adopted 2022

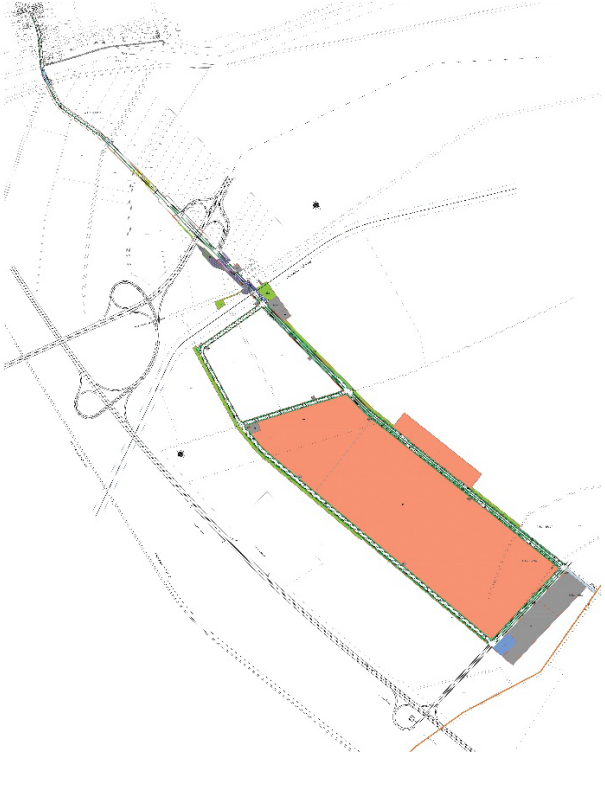


Figure 3: PPPN Draft - 2nd Phase, Planned Land Use.
Adopted 2023

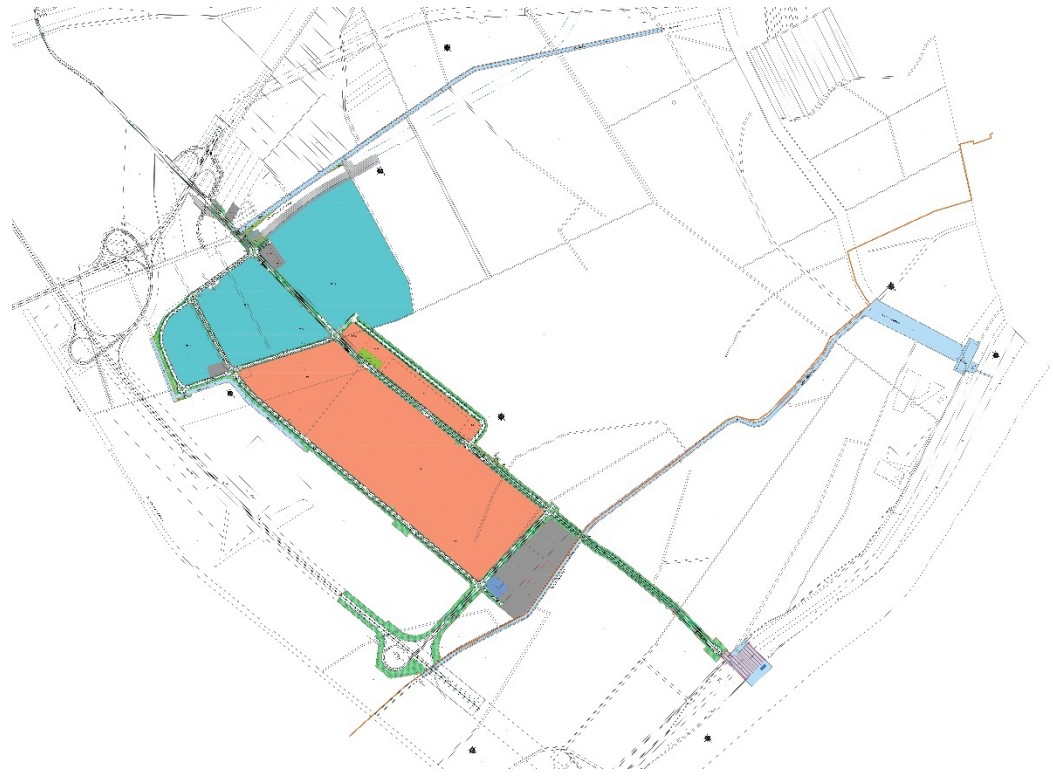


Figure 4: PPPN NFS Draft - 3rd Phase, Planned Land Use. Adopted 2024

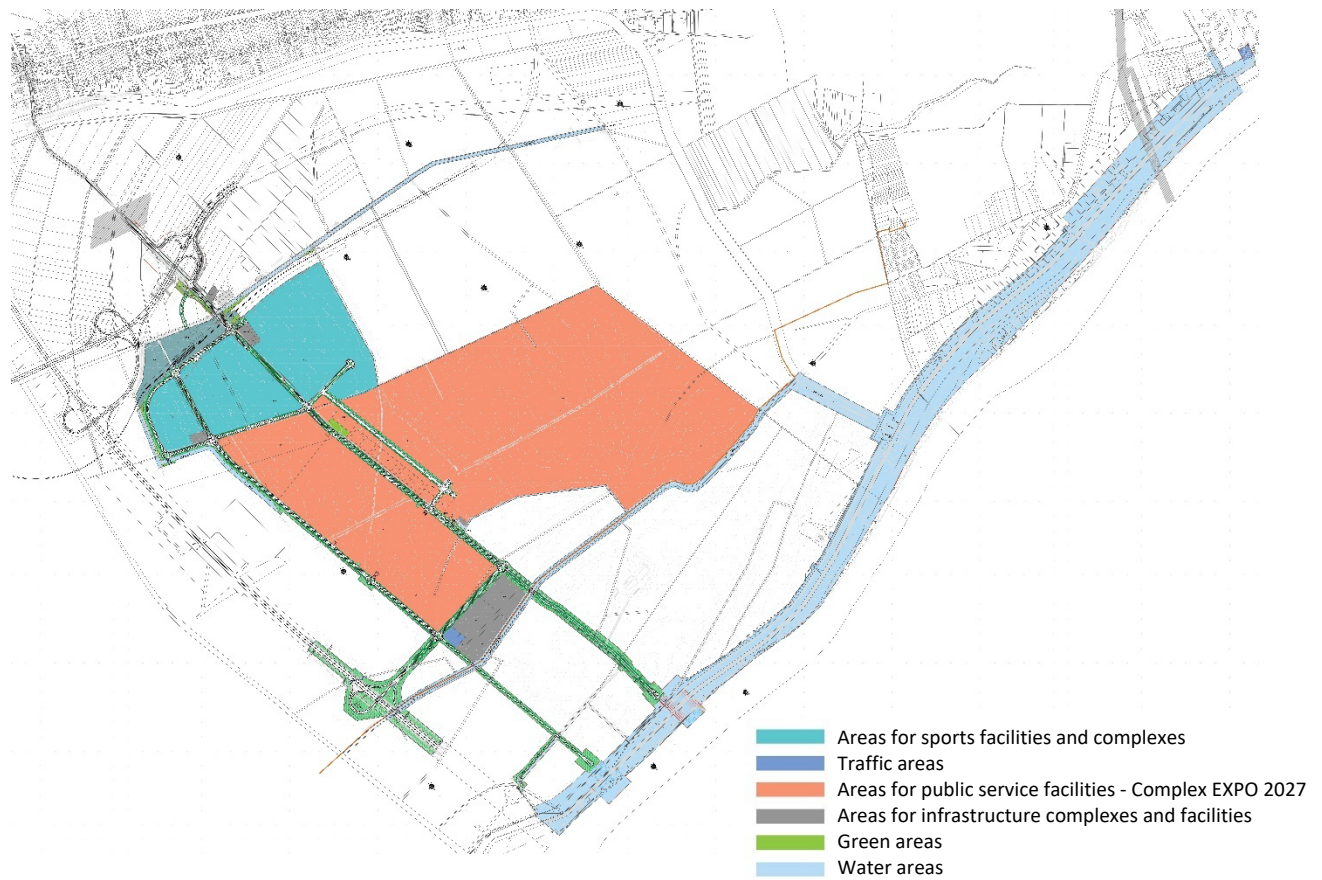


Figure 5: PPPN NFS Draft - 4th Phase, Planned Land Use. Adopted 2025.

Table 2 provides a comparative overview of changes in the area of the entire planning zone and the areas of planned purposes within the *Elaboration for early public insight* (2019) and the *Drafts of SPSPA NFS phases 1-4* (2022, 2023, 2024, 2025).

Table 2: Comparative Overview of Area Balance of the Elaboration for Early Public Hearing of SPSPA NFS (ERJU SPSPA NFS, 2019), SPSPA NFS Draft (2022), SPSPA NFS Draft - 2nd Phase (2023), SPSPA NFS Draft - 3rd Phase (2024), SPSPA NFS Draft - 4th Phase (2025). Colors in the table refer to land use colors in Figures 1, 2, 3, 4, and 5.

Data from Plan Drafts (graphic annexes of adopted plans are not publicly available due to CRPD non-functionality)	Early Public Hearing SPSPA NFS 2019 (Figure 1)	Draft SPSPA NFS 2022 (Figure 2)	Draft SPSPA NFS 2nd Phase 2023 (Figure 3)	Draft SPSPA NFS 3rd Phase 2024 (Figure 4)	Draft PPPPN NFS 4th Phase 2025 (Figure 5)
PUBLIC PURPOSE AREAS (ha)	430.20	114.00	167.00	350.43	813.65
Traffic areas	65.50	55.00	32.40	1.13	1.79
Road network	/	/	/	69.08	105.30
Railway	/	/	/	/	12.75
Infrastructure facilities	/	3.80	13.40	17.10	16.44
Water areas	2.60	7.50	1.10	46.90	207.46
Green areas	/	1.10	7.10	2.87	3.09
Utility areas	/	/	/	0.37	0.37
Sports facilities and complexes	/	46.60	/	/	/
National football stadium	35.40	31.80	/	31.40	31.41
sports facilities	/	14.80	/	63.50	62.02
Areas for accompanying content*	326.70*	/	/	/	/
EXPO 2027 Complex	/	/	113.00	118.95	373.01
Exhibition space	/	/	83.10	83.10	83.15
Acommodation capacities	/	/	6.90	8.57	9.20
Commercial facilities	/	/	22.90	23.37	23.37
Preschool institution	/	/	/	0.61	0.61
Elementary school	/	/	/	1.36	1.36
Hotel	/	/	/	1.94	1.94
Fire station	/	/	/	/	0.95
Theme park	/	/	/	/	252.43
OTHER PURPOSE AREAS	0	0	0	0	0
Agricultural areas	0	0	0	0	0
TOTAL	430.20 ha	114.00 ha	167.00 ha	350.43 ha	813.65 ha

* Note: In the Elaboration for Public Review of SPSPA NFS from 2019, an area of 326.70 ha was designated for accompanying NFS content (while the area for the NFS itself is 35.40 ha), which completely disappears in the SPSPA NFS Draft, and then in the SPSPA NFS Draft – 2nd Phase, the EXPO 2027 Complex – exhibition space (83.10 ha) is planned in part of that zone, and in the SPSPA NFS Draft – 3rd Phase, accompanying sports facilities (63.50 ha) are added. The remainder of the accompanying content zone above the railway line from the Early Public Review from 2019 no longer appears in further planning solutions.

3.4. From Analysis to Action: Research as a Tool for Change

The previously presented research findings emerged from the collaborative work of students and professors from the Faculty of Architecture, supported by urban development experts and colleagues from several faculties of the University of Belgrade. Both the findings themselves and the research process as a whole became instruments of mobilization and alliance-building in the struggle for the public good.

Research and pedagogical models were jointly conceived, developed, and implemented under conditions of student protest and institutional crisis, resulting in a close interweaving of educational, research, and activist processes. Educational practice unfolded not only within the Faculty of Architecture, but also across multiple faculties, in both open and enclosed public spaces, and on digital platforms, generating outcomes that informed a wide range of actions in different formats. The pedagogical model operated through three interconnected levels: (1) collaborative work within a student-professor team, (2) cooperation with experts and civil society organizations, and (3) communication with wider public - engagement in the public sphere aimed at data collection and analysis, understanding of the phenomenon, initiation of public discussion, knowledge transfer, mobilization of both professional and wider publics. This practice of learning through action enabled all involved to better understand the mechanisms of spatial and political power and to develop tools for responsible action in the public interest.

The pedagogical model was designed from the standpoint that education aims not only at understanding the world but also at its transformation—in accordance with community needs and in service of the common good (Fokdal, Čolić & Milovanović-Rodić, 2020; Maruna, Milovanović Rodić & Čolić, 2018; Milovanović-Rodić, Živković & Lalović, 2013). In the synergy of research, education, and activism, all involved not only acquired knowledge about complex urban transformation mechanisms but also actively contributed to shaping public consciousness and building resistance to non-transparent public resource management.



Figure 6. Continuous interdisciplinary and intersectoral EXPO workshop at the Faculty of Architecture, February 15 - June 1, 2025. Author: Danijela Milovanović Rodić



Figure 7. Protest in front of the City Administration on March 7, 2025, due to the cancellation of the public session of the Commission for public insight into the Draft SPSAP NFS - 4th Phase. Author: Zoran Đukanović.



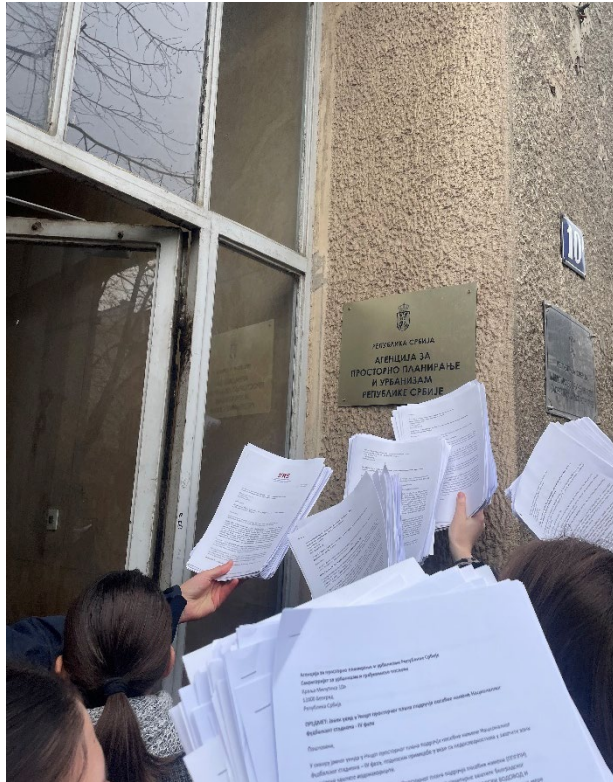
Figure 8. Introductory EXPO lecture at the Faculty of Civil Engineering, April 3, 2025. Author: Andrej Josifovski



Figures 9, 10. Posters announcing EXPO panel discussions held at the Rectorate of the University of Arts on May 16, 2025 and at the Student Cultural Center on June 5, 2025. Author: Ansambl Generalštab Initiative



Figures 11, 12. Posters announcing EXPO public forums held in cooperation with the student unit "Student in Every Village" at the Center for Culture in Kučevo on July 26, 2025 and on the Cultural Center plato in Banatsko Novo selo on August 31, 2025. Author: Working unit "Student in Every Village".



Figures 13, 14, 15. Submission of remarks on the Draft PPPN – 4th Phase on February 24, 2025 (Fig. 13 Author: student of the Faculty of Architecture), "Defend with Knowledge" manifestation organized by the Rebellious University on May 10, 2025 (Fig. 14, Author: student of the Faculty of Architecture), conversation with residents of Požarevac and distribution of educational materials within the "Student in Every Village" program on August 2, 2025 (Fig. 15, Author: Working unit "Student in Every Village").

4 FROM ANALYSIS TO ACTION: KEY FINDINGS

Numerous preparatory activities have already been undertaken for the implementation of the EXPO Belgrade 2027 International Specialized Exhibition. These include land expropriation, the adoption of a special law, the approval of plans and urban design projects, the preparation of technical project documentation, the issuance of construction permits, the allocation of funds in both national and local government budgets, the withdrawal of loans, and the establishment of public enterprises and business companies to manage complex project segments. At the same time, construction has already advanced significantly, including transport and utility infrastructure, the stadium, exhibition facilities, the residential complex, and the marina on the Sava River.

Based on an examination of relevant laws, spatial and urban plans and their scope and content, reports and decisions issued by public institutions, as well as media coverage, it can be concluded that the project components already being implemented under the *Lex specialis* pose a threat to several essential aspects of the location in question. Above all, the EXPO Belgrade 2027 project has served as a basis for land expropriation, including privately owned land, for environmental endangerment, for derogations from the Law on Planning and Construction, and for the expenditure of public funds through non-transparent procedures justified by insufficiently explained claims of national importance and public interest. Given that the same law permits interventions across the entire territory of Serbia whenever they are deemed to “serve the implementation of EXPO,” this may reasonably be understood as a systemic threat.

Particularly concerning is the fact that the EXPO Belgrade 2027 project is planned within one of Belgrade’s most significant water-source areas, Surčin Field, which until recently supplied around 30% of the city’s water. The planned urbanization of this area, including the construction of high-rise buildings requiring deep foundations, is especially problematic, as such interventions are permitted only in exceptional cases and require complex and highly demanding water-source protection measures (Nenadović, Tekić, & Đorđević, 2018). Without the consistent application of these measures, groundwater quality could be seriously compromised, potentially to the point of rendering its treatment unfeasible and leading to the eventual closure of the water source.

Additional concern arises from interventions, still insufficiently defined, affecting the Sava embankment itself, which plays a critical role in protecting New Belgrade from flooding. The urbanization of this area also increases future flood risk due to the planned “concreting” of land surfaces and the consequent reduction in soil infiltration capacity. Finally, the project’s dependence on a wastewater treatment system that has not yet been constructed raises the risk of untreated wastewater being discharged directly into the Sava River.

These represent only some of the most significant problems identified so far, several of which have already become evident, while others are likely to manifest in the near future. In light of the project’s non-transparent governance, its phased planning logic without clearly established limits to further expansion, and the ad hoc introduction and amendment of special laws designed to facilitate its implementation, it remains impossible to fully grasp the scale, scope, and content

of the intervention, its potential effects, or the mechanisms through which public resources are being deployed. It is therefore necessary to:

- Restrict the spatial scope of EXPO Belgrade 2027, and consequently the application of the EXPO Lex specialis, to the area permitted for specialized international exhibitions under the Convention Relating to International Exhibitions (1928). In accordance with the Convention, as amended in 1988, ratified in 1996, and in force since 2008, the maximum area for this type of exhibition is 25 hectares.
- Ensure full public access to the Dossier submitted by the Republic of Serbia in its bid to host the Specialized International Exhibition EXPO. This should enable a comparison between the content of the bid documentation and the definitions, scope, and implementation framework of EXPO Belgrade 2027 as presented in official domestic documents and justified under the privileged legal regime established by the EXPO Lex specialis.
- Assess the justification for the scale and progressive expansion of the areas designated for EXPO Belgrade 2027 in the relevant planning documents. Particular attention should be given to the discrepancy between the officially justified exhibition function and the extensive territorial expansion provided by the SPSPA NFS - 2nd phase (2023), 3rd phase (2024), and 4th phase (2025), in which the overall EXPO complex expands dramatically while the exhibition space itself remains almost unchanged.
- Review the legality of the procedures through which the SPSPA NFS - 2nd phase (2023), 3rd phase (2024), and 4th phase (2025) were adopted.
- Review the constitutionality and legality of the Law on Special Procedures for the Implementation of the EXPO BELGRADE 2027 International Specialized Exhibition (2023).
- Suspend the adoption of the proposed amendments to the Law on Special Procedures for the Implementation of the EXPO BELGRADE 2027 International Specialized Exhibition until their legality, necessity, and implications for the public interest have been thoroughly examined.
- Prepare and publish a comprehensive register of all complexes and individual locations where projects are being implemented on the grounds that they serve EXPO Belgrade 2027. For each project, this register should specify:
 - o the basis on which it is considered to be “in function of EXPO”;
 - o the criteria used for making such a determination;
 - o the precise amount of public funds allocated or planned;
 - o the financing model and sources of funding;
 - o the legal basis for implementation;
 - o and the corresponding feasibility assessment justifying the use of public resources.
- Ensure full public access to all legal, planning, and project documentation necessary for the examination of the legality of previously conducted procedures and their consequences for the public interest.

5 CONCLUDING REMARKS

The EXPO Belgrade 2027 International Specialized Exhibition was announced as a catalyst for positive change and development potential for Serbia. However, research into public resource allocation mechanisms within the EXPO Belgrade 2027 project has shown that behind the rhetorical figure of "national development opportunity" lies a series of systemic deviations from principles of legality, transparency, and public interest. Through combination of institutional analysis and action-oriented, transdisciplinary approach, it has been shown that EXPO Belgrade 2027 is not unequivocally defined by content, scope, or legal framework, and that through terminological confusion, phased planning, and legal exemptions, uncontrolled project expansion and non-transparent public spending are enabled.

A tendency toward decision-making centralization and derogation of valid laws in favor of ad hoc legal solutions applied selectively and outside usual procedures has been observed. This has created an institutional framework preventing democratic control and public participation while simultaneously enabling questionable spatial interventions, including those with potentially serious ecological consequences—especially regarding the Surčin Field water source and Sava embankment.

Therefore, the paper emphasizes the need for urgent examination of the project's legal, spatial, and institutional basis. It is necessary to halt further expansion of planned content, ensure access to complete documentation, restore respect for the Law on Planning and Construction, and ensure real rather than formal public participation in decision-making. Projects of this size and complexity require transparent, accountable, and democratic procedures that will not bypass basic principles of sustainable development and public interest.

The role of the academic community, especially through engaged education and insurgent planning, has proven crucial in demystifying planning processes and mobilizing resistance to unjust practices. Knowledge built in and for the community can be the basis for transforming current development models—from closed, centralized, and non-transparent to inclusive, just, and sustainable.

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