

EXPO 2027 Belgrade: Strategic Briefing on Governance, Risks, and Compliance

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To: Policymakers, Oversight Bodies, and International Stakeholders

Subject: Assessment of Compliance with EU Accession Criteria, Rule-of-Law Standards, and Environmental Safeguards

Executive Summary

The Republic of Serbia is preparing to host the Specialised Expo 2027 in Belgrade (15 May – 15 August 2027) under the theme "Play for Humanity: Sport and Music for All."¹ While the event is positioned as a catalyst for regional development, the specific legislative framework governing its implementation, the "Lex Specialis" (adopted in December 2023), has raised significant concerns regarding:

1. The erosion of public procurement standards and competitive transparency.²
2. The circumvention of judicial and administrative oversight mechanisms.³
3. Environmental non-compliance with national and EU-aligned regulations.⁴
4. Geopolitical dependencies arising from non-transparent intergovernmental agreements with the People's Republic of China.⁵
5. The systemic suppression of civil society and dissent linked to project opposition.⁶

Recent findings from the European Parliament's Committee on Foreign Affairs (AFET) and the UN Human Rights Council Working Group on Business and Human Rights corroborate these risks, explicitly calling for the amendment or withdrawal of the EXPO special legal framework to restore democratic safeguards.⁷

Legislative Framework: The "Lex Specialis"

A specific legal framework adopted for this project allows the spending of public funds without applying the Law on Public Procurement. This exemption is contrary to Serbia's international obligations, including the Stabilisation and Association Agreement with the European Union, which requires transparent and competitive public procurement.³

Key Points:

- **Procurement Exemption:** Article 14 explicitly exempts "EXPO companies" from the Law on Public Procurement, permitting direct contract awards without competitive tendering.⁸ The UN Working Group confirmed it was "alarmed" that this framework

permits contracts valued up to €1 billion to be awarded without bidding, noting that 86% of tenders already awarded received only a single bid.⁹

- **Permitting Waivers:** The law authorises construction and operation of facilities without standard urban planning permits, including occupancy permits for a period of up to two years post-completion.¹⁰
- **Centralised Authority:** It empowers the Government to issue decrees regulating procurement procedures, a mechanism critics argue constitutes an unconstitutional delegation of legislative power.¹¹
- **Scope Expansion:** The law bundles EXPO-specific facilities with a broader infrastructure package (323 projects), including 500 km of highways and 2,000 km of railways, effectively extending exemptions to sectors unrelated to the exhibition.¹²

Legal Challenges:

- **Constitutional Court:** An initiative filed by Transparency Serbia in January 2024 challenges the constitutionality of Article 14, citing violations of legislative procedure and incompatibility with the Stabilisation and Association Agreement (SAA) with the EU. A ruling remains pending.¹³
- **Lack of Public Consultation:** The law was adopted without the mandatory public debate required under Article 77 of the Law on State Administration.¹⁴
- **International Condemnation:** The UN Working Group explicitly recommended that the Government "withdraw or amend the special legal framework for Expo 2027 and restore existing safeguards and public oversight."¹⁵

Systemic Risks and Compliance Gaps

Governance and Rule of Law

- **Procurement Irregularities:** Data indicates approximately 86% of EXPO-related contracts have received only a single bid, suggesting a lack of genuine competition.⁹ The absence of legal recourse eliminates mechanisms for unsuccessful bidders to challenge discriminatory conditions, contravening EU Directive 2014/24/EU principles.¹⁶
- **Institutional Concentration:** The European Parliament Think Tank characterises the governance model as exhibiting a "heavy concentration of power" and weakened checks and balances, correlating with increased civil unrest.¹⁷ The AFET draft report notes that EU-related reforms have stalled or backslid, particularly regarding the rule of law and media freedom.¹⁸
- **Democratic Indicators:** Freedom House (2025) classifies Serbia as "Partly Free," noting declines in judicial independence.¹⁹ The AFET report expresses deep concern over the "deepening political crisis" and mass protests reflecting the public's reaction to systemic corruption and lack of accountability.²⁰
- **Project Pretext:** Most mega-projects associated with the "Jump into the Future" investment plan use EXPO mainly as a pretext. Construction of the aquarium, dolphinarium, and theme park will not start until 2028—well after EXPO ends.²¹

Infrastructure Safety and Contractor Due Diligence

- **National Stadium:** The €600 million–€1 billion flagship project is being executed by Power Construction Corporation of China (PowerChina) via a non-competitive intergovernmental agreement.^{11, 22}
- **Novi Sad Precedent:** The CRIC–CCCC consortium, currently executing major EXPO-linked rail infrastructure, was the primary contractor for the Novi Sad railway station renovation. The station's canopy collapse in November 2024 resulted in 16 fatalities.²³
- **Investigation Status:** The UN Working Group highlighted the collapse as a catalyst for protests, noting the "lack of quick and transparent relevant information" and an unclear process for charging key individuals and businesses.²⁴ The AFET report calls for "full transparency, accountability and judicial independence" in these proceedings.²⁵
- **Oversight Deficits:** The waiver of independent external audits and reliance on contractor self-inspection raises critical safety concerns. The UN report emphasizes that the absence of independent oversight mechanisms for EXPO 2027 is a source of serious concern.⁹
- **Delayed Infrastructure:** To fund 30 new electric trains, the government secured a loan justified by the urgent need to handle the EXPO 2027 passenger influx. However, delivery is scheduled for late 2029, meaning visitors will rely on an obsolete fleet.²⁶

Environmental and Urban Planning Violations

- **Land Use:** The 813.65-hectare site comprises 74.3% high-quality agricultural land (Category II-1). Only 0.4% is designated as green space.⁴
- **Water Security:** The site overlaps with Sanitary Protection Zones of the Surčin polje water source, supplying 30% of Belgrade's drinking water.²⁷ Installation of 2,300 deep reinforced-concrete pillars occurred without a prior Environmental Impact Assessment (EIA).²⁸
- **Systemic EIA Failures:** The UN Working Group observed that EIAs in Serbia are frequently segmented to avoid scrutiny or omit mandatory elements, a practice exemplified by major development projects.²⁹ It noted that meaningful community participation in environmental decision-making is "inadequate or non-existent."³⁰
- **Ecological Networks:** The project encroaches upon the "Sava–Danube Confluence" ecological corridor, conflicting with EU Directives.³¹ The Serbian Academy of Sciences has issued formal alerts regarding "irreversible environmental damage."³²
- **EU Backsliding:** The AFET report reiterates the importance of protecting environmental standards, noting that reforms in this area have shown significant backsliding, directly impacting projects like EXPO.³³

Geopolitical and Financial Implications

- **Chinese Strategic Presence:** Chinese entities hold a significant portion of major infrastructure contracts. PowerChina alone manages approximately €4 billion in projects since 2012.³⁴
- **Confidentiality Clauses:** The 2009 Framework Agreement allows for direct contracting and classifies loan and contract terms as state secrets, hindering public accountability.³⁵ The UN report highlights that international investment agreements in Serbia often provide robust investor protections while human rights safeguards remain weak or non-enforceable.³⁶
- **Budgetary Opacity:** The bundled infrastructure package totals €17.8 billion. The lack of competitive tendering obscures true market costs.^{24, 37}
- **International Complicity:** The current regime proceeds with the documented acquiescence of international partners, evidenced by continued foreign direct investment and the European Commission's release of pre-accession funds despite explicit warnings from UN and EU bodies regarding the erosion of rule-of-law standards.^{7, 9}

Suppression of Dissent and Civil Society

- **Shrinking Civic Space:** The UN Working Group received troubling reports of intimidation, surveillance, and attacks targeting journalists and activists who opposed harmful business practices.³⁸
- **Repression of Protest:** The AFET report condemns the "unlawful arrest and expulsion of EU citizens" who supported student protests and rejects government allegations of foreign interference.³⁹ It calls for targeted sanctions against individuals responsible for human rights violations.⁴⁰
- **Legal Harassment:** The use of strategic lawsuits against public participation (SLAPPs) has increased, with 14 cases recorded in 2025 alone, imposing significant burdens on activists.⁴¹ The UN report also expressed concern over the proposed "foreign agent law," warning it would have a chilling effect on civil society.⁴²

Comparative Analysis: International Standards

Parameter	EXPO 2027 (Serbia)	Paris 2024 / Osaka 2025
Legal Basis	Permanent legislative exemption ("Lex Specialis")	Temporary, event-specific regulatory adjustments
Scope of Exemptions	Extends to national transport networks	Strictly limited to event venues and logistics

Oversight Mechanisms	Suspended; limited judicial review	Robust independent auditing and judicial oversight
Permitting	Waived for up to 2 years post-completion	Full compliance with building and safety codes
Civil Society Role	Restricted; reports of intimidation and SLAPPs	Protected; formal consultation mechanisms

*Sources: Comparative analysis derived from official BIE reports, French Senate inquiries, Japanese Ministry guidelines, and UN/EU findings.^{*43, 44}

Conclusion

While EXPO 2027 presents an opportunity for Serbia to demonstrate developmental progress, the current implementation framework poses substantial risks to the rule of law, environmental sustainability, and public safety. The systematic bypassing of established legal procedures undermines Serbia's commitments under the Stabilisation and Association Agreement and may risk future EU accession negotiations.

Critically, both the UN Human Rights Council Working Group and the European Parliament's Committee on Foreign Affairs have identified the EXPO legal framework as a focal point of democratic backsliding. The UN has explicitly recommended the withdrawal or amendment of the "Lex Specialis" to restore oversight. Immediate corrective actions are required to align the project with international best practices, ethical standards, and EU accession criteria.

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⁵ Radio Free Europe/Radio Liberty, "China-Backed Bridge Project In Belgrade Draws Scrutiny Over Hidden Contracts," June 2025. <https://www.rferl.org/a/china-serbia-sava-bridge-infrastructure-contract-loan/33617429.html>

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⁸ Transparency Serbia, "Special Law for EXPO and Its Application," report, January 2024. https://www.transparentnost.org.rs/images/dokumenti_uz_vesti/Special_Law_for_EXPO.pdf

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¹² Government of the Republic of Serbia, "'Leap into the Future – Serbia EXPO 2027' plan presented," press release, December 2023. <https://www.srbija.gov.rs/vest/en/217752/leap-into-the-future-serbia-expo-2027-plan-presented.php>

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¹⁴ Law on State Administration, Official Gazette of the Republic of Serbia, Article 77.

- ¹⁵ United Nations Human Rights Council, "Report... on its visit to Serbia," Recommendation 119(i), April 2026. <https://docs.un.org/en/A/HRC/62/36/Add.1>
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⁴² United Nations Human Rights Council, "Report... on its visit to Serbia," Paragraph 26 (Foreign Agent Law), April 2026. <https://docs.un.org/en/A/HRC/62/36/Add.1>

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