

ICOMOS



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**Joint Statement by EUROPA NOSTRA,  
ICOMOS, DOCOMOMO International and The Architects' Council of Europe**

**Calling for the withdrawal of the proposed "Lex Specialis" Law related to  
the Generalštab Modernist Complex in Belgrade, Serbia**

4 November 2025

The leading European and international heritage organisations, [EUROPA NOSTRA](#), [International Council on Monuments and Sites \(ICOMOS\)](#), [DOCOMOMO International](#), and [The Architects' Council of Europe \(ACE\)](#) express their **deep concern and firm opposition** to the proposed "Lex Specialis" Law related to the Generalštab Modernist Complex in Belgrade. This proposal was tabled on 2 November by a group of MPs and is due for discussion by the **National Assembly of the Republic of Serbia already today, on 4 November 2025**. This draft Law seeks to enable the demolition of the **Generalštab Modernist Complex, a masterpiece of the renowned architect Nikola Dobrović which is protected by law as a cultural monument of national importance**. Such a law would subsequently pave the way for the construction on this site of a massive hotel and real estate development project, known as the "Trump Tower Belgrade".

The proposed "Lex Specialis" aims to suspend Serbia's existing laws on cultural heritage and environment regarding the implementation of any future development project related to the Generalštab ensemble. Its possible adoption would constitute a **grave breach of the Constitution and the rule of law in Serbia**, particularly as the **Office of the Prosecutor for Organised Crime** is currently investigating the **removal of the site's protected status** by Government Decision of 14 November 2024, which is considered by many as illegal.

This draft Law falsely presents the Generalštab as a "ruin dangerous to citizens", disregarding decades of expert recognition of its **exceptional architectural and historical value**. The complex - which was damaged during the NATO bombing campaign in 1999 - has been repeatedly assessed by national and international experts who are all convinced that this Modernist ensemble can and should be revitalised in accordance with the highest standards of the conservation practice.

The possible **demolition of the Generalštab Complex** would not only erase a **European masterpiece of modernist architecture and a symbol of Yugoslavia's and Serbia's post-war creativity and identity**, but also inflict further irreparable damage on the country's **international reputation**, especially in the framework of its relationship with the European Union, the Council of Europe and UNESCO.

International organisations have already repeatedly expressed the values and importance of this masterpiece: ICOMOS through the [ICOMOS Heritage Alert procedure](#), DOCOMOMO, through its [Alert and Petition procedure](#), and EUROPA NOSTRA, through its inclusion on the [7 Most Endangered List for 2025](#).

Due reference to the serious threats to the Generalštab Modernist Ensemble was also included in Europa Nostra's most recent [Statement of Solidarity with Serbia's Civil Society and Heritage Activists Defending European Values](#), adopted as a follow-up to the discussions held at the European Cultural Heritage Summit 2025 held in Brussels.

Last but not least, we recall that this case has already been included as a matter of concern for the European Union in the [European Parliament Resolution on Serbia adopted in May 2025](#).

In line with the above, our organisations fully endorse and support the following demands, already formulated and published on 3 November 2025 by the very large coalition of heritage and architecture professionals and experts from Serbia:

1. **Immediate withdrawal** of the draft "*Lex Specialis*" from parliamentary procedure;
2. **Annulment** of the Government's decision that illegally removed the Generalštab's protected status;
3. **Publication of all agreements and contracts** concerning this site, and annulment of any document that contravene Serbia's Constitution and laws;
4. **Initiation of a transparent and inclusive public and expert debate** on the revitalisation of the Generalštab Modernist Complex, in line with the public interest and the principle of democratic governance, the respect of the rule of law – including the series of relevant European and international conventions signed and ratified by Serbia, with the view of ensuring proper safeguard and enhancement of cultural heritage of national and European importance, with due participation of experts, civil society and local community.

## About Europa Nostra

[Europa Nostra](#) is the European voice of civil society committed to safeguarding and promoting cultural and natural heritage. It is a pan-European federation of heritage NGOs, supported by a wide network of public bodies, private companies and individuals, covering over 40 countries. It is the largest and the most representative heritage network in Europe, maintaining close relations with the European Union, the Council of Europe, UNESCO and other international bodies. Founded in 1963, Europa Nostra celebrated its 60<sup>th</sup> anniversary in 2023.

Europa Nostra campaigns to save Europe's endangered monuments, sites and landscapes, in particular through the [7 Most Endangered Programme](#). It celebrates and disseminates excellence through the [European Heritage Awards / Europa Nostra Awards](#). Europa Nostra actively contributes to the definition and implementation of European strategies and policies related to heritage, through a participatory dialogue with European Institutions and the coordination of the [European Heritage Alliance](#). It is also a partner of the [New European Bauhaus](#) initiative developed by the European Commission, and a leading European member and supporter of the [Climate Heritage Network](#).

Europa Nostra has led the European consortium selected by the European Commission to run the [European Heritage Hub](#) project since 2023.

## About ICOMOS

[ICOMOS](#), the International Council on Monuments and Sites, is a non-governmental organisation working to conserve and protect cultural heritage sites around the world. ICOMOS is the only

worldwide NGO dedicated to applying scientific techniques, theories and methodology to the conservation of both tangible and intangible elements of cultural heritage places. ICOMOS is named within the World Heritage Convention as an Advisory Body to the World Heritage Committee, making it an official advisor of State Parties.

## **About DOCOMOMO**

[DOCOMOMO International](#) is a non-profit organization dedicated to the documentation and conservation of buildings, sites and neighborhoods of the Modern Movement. DOCOMOMO – currently represented in over 80 countries/regions - was initiated in 1988, to create, collect and share knowledge about Modern Movement architecture and to safeguard its heritage. Over the years an extensive, global, knowledgebase has been established; the importance of Modern Movement architecture has been brought to the attention of a professional and laymen audience and consequently many buildings, sites and neighborhoods from the Modern Movement are protected by legal means and/or public and private initiatives of preservation and adaptive reuse.

## **About ACE**

The [Architects' Council of Europe](#) (ACE) is the representative organisation for the architectural profession at European level. Its current membership consists of 52 Member Organisations, including the regulatory and professional representative bodies in all EU Member States, 6 Observers Members from the Accession Countries (Serbia, Kosovo\*, Ukraine, Montenegro, Republic of North Macedonia and Moldova) plus Members with special status (UK, Switzerland and Norway). Through them, the ACE represents the interests of over half a million architects from 36 countries in Europe.

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*\* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*