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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
46th meeting
Strasbourg, 7-11 December 2026

Bureau of the Standing Committee
17-18 June 2026
Strasbourg

Complaint on stand-by: 2021/07

**Alleged threat to fauna species and protected sites due to the
proposed construction of a lithium mine in the Jadar River Valley
(Serbia)**

-GOVERNMENT REPORT-

*Prepared by
the Ministry of Environmental Protection of the Republic of Serbia*



Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION
No: 003198399 2025 14850 004 007 020 092
Date: 16 April 2026
Belgrade

Council of Europe
Directorate General of Democracy
Secretariat of the Bern Convention
F-67075 Strasbourg, France
Ms Alessandra Siino,
Secretary of the Bern Convention

Subject: Report on Complaint No. 2021/7: Complaint on stand-by: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley

Dear Ms Siino,

With reference to the request of the Secretariat of the Bern Convention dated 17 July 2025, pertaining to Complaint No. 2021/7: Complaint on stand-by: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley, on behalf of the Ministry of Environmental Protection, we hereby inform you of the following:

In accordance with the Decision of the Standing Committee of the Bern Convention, the Ministry of Environmental Protection, in its official capacity as the competent authority responsible for monitoring the implementation of the Bern Convention in the Republic of Serbia, submitted Request for a Statement on the aforementioned complaint (No. 003198399 2025 14850 004 007 020 092 dated 1 August 2025) to the competent authorities and institutions, namely: the Ministry of Construction, Transport and Infrastructure, the Ministry of Mining and Energy, the Ministry of Agriculture, Forestry and Water Management, the Republic Water Directorate and the Institute for Nature Conservation of Serbia. This request was also addressed to the relevant departments of the Ministry of Environmental Protection, which submitted an internal report on the matter.

Based on the reports received from the competent authorities and organizations (translated copies of which are enclosed herewith), we inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure informed that, in accordance with the Decision of the Constitutional Court, the Decree on Determining the Spatial Plan for the Special Purpose Area for the Implementation of the „Jadar” Project of Exploitation and Processing of Jadarite Mineral resumed its application as of the date of entry into force of the Decree on the Implementation of the Decree on Determining the Spatial Plan for the Special Purpose Area for the Implementation of the “Jadar” Project of Exploitation and Processing of Jadarite Mineral (“Official Gazette of the Republic of Serbia”, No. 60/2024).

2. The Ministry of Mining and Energy informed that, upon reviewing the official records, it was established that no subsequent information or activities within its scope of competence have been identified in relation to the subject complaint, apart from the previous response submitted to the Secretariat of the Bern Convention on 31 April 2025.

3. The Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate informed that, in accordance with the provisions of the Water Law („Official Gazette of the Republic of Serbia”, Nos. 30/2010, 93/2012, 101/2016, 95/2018 and 95/2018 – other law), it issued water conditions (No. 002323353 2024 14843 001 325 024 of 21 August 2024) as part of the procedure for preparing and drafting technical documentation – namely, the Feasibility Study and mining projects for the execution of mining works related to the underground exploitation of the lithium and boron ore deposit „Jadar” on cadastral parcels within the cadastral municipalities of Gornje Nedeljice and Slatina, in the territory of the City of Loznica, for the purpose of preserving the water regime.

Pertaining to the aforementioned water conditions, in addition to the technical and other requirements that the investor must meet in the design and construction of mining works and facilities which may permanently, periodically or temporarily affect changes in the water regime, the following were also required:

- 1) A hydrological–hydraulic model of the water regime, providing both analytical and graphical representations of flood zones and the regime of high waters of the rivers Drina, Jadar, Korenita, and Stupnička River for return periods $Q\ 1\%$ and $Q\ 0.1\%$;
- 2) A hydrodynamic model of groundwater based on the results of exploratory works;
- 3) A study on the potential impact on the planned source of the regional water supply system of Mačva and Srem;
- 4) A risk study on torrential waters, including the definition of possible scenarios;
- 5) A study on the impact of mining and all other wastes generated during the exploitation process and other activities foreseen under the „Jadar” project;
- 6) An analysis of the exploratory works carried out and their impact on the environment, including a presentation of the baseline („zero”) status of the quality of surface and groundwater.

4. The Institute for Nature Conservation of Serbia (hereinafter: the Institute) informed that, at the request of Rio Sava Exploration LLC – Belgrade, it issued a Decision (Ref. 03 No. 023-4542/4 of 13 January 2026) on nature protection conditions for the preparation of the Forest Management Plan for the management unit „Jadar” for the period 2026–2035.

For the purpose of preparing the nature protection conditions for the drafting of the aforementioned Forest Management Plan, the Institute carried out a field inspection of the relevant management unit in the period from 8 to 10 December 2025, after which the corresponding nature protection conditions were prescribed.

In relation to this matter, the Institute, upon a request for access to information of public importance submitted by the association „Protect Jadar and Rađevina“, provided an appropriate Response (Ref. 03 No. 030-1030/2 of 3 April 2026).

The association „Protect Jadar and Rađevina“ subsequently submitted to the Institute a new request for access to information of public importance (Ref. 03 No. 030-1514/1 of 14 April 2026). At the time of drafting this Notification, the case is still under consideration.

5. The Ministry of Environmental Protection informed that, at the request of „Rio Sava Exploration“ LLC Belgrade, dated 27 August 2024, it issued a Decision (No. 002541265 2024 of 15 November 2024) determining the scope and content of the Environmental Impact Assessment Study for the project of underground exploitation of the lithium and boron ore deposit „Jadar“, on cadastral parcels within the cadastral municipalities of Gornje Nedeljice, Brnjac, Veliko Selo, Jarebice, Slatina, Stupnica, and Šurice, in the City of Loznica, covering subzones 1A and 1B – the mining activity zone.

The Ministry of Environmental Protection emphasizes once again that the Request for Determining the Scope and Content of the Environmental Impact Assessment Study for the project of underground exploitation of the lithium and boron ore deposit „Jadar“ constitutes a phase in the environmental impact assessment procedure (Article 6 of the Law on Environmental Impact Assessment („Official Gazette of the Republic of Serbia“, Nos. 135/04 and 36/09), which precedes the phase of decision-making on granting consent to the Environmental Impact Assessment Study.

Once the Decision on Determining the Scope and Content of the Environmental Impact Assessment Study issued by the Ministry becomes final, the project proponent, in this case „RIO SAVA EXPLORATION“ LLC, is required to prepare the Study in which all potential environmental impacts will be examined, together with the measures to eliminate or mitigate such impacts. The Study shall include a description of possible significant impacts of the project on the environment, comprising both qualitative and quantitative presentations of potential changes during project implementation, regular operation and in case of accidents. It shall also provide an account of impacts and corresponding measures for their elimination or mitigation arising from waste disposal, land and water use, potential effects on the health of the local population, impacts on biodiversity, as well as the social aspects expected from the potential realization of the project. These issues will be elaborated in detail in the Environmental Impact Assessment Study, based on the Decision on the Scope and Content of the Study.

As the procedure regarding the appeals against the Decision on the Scope and Content of the Environmental Impact Assessment Study is still ongoing, the mentioned Decision has not yet become final. A total of 7,133 appeals have been lodged with the competent second-instance authority, namely the Administrative Commission of the Government, and not with the Administrative Court. Against the decision of the second-instance authority, i.e., the decision of the Administrative Commission of the Government, an administrative dispute may be initiated by filing a lawsuit before the Administrative Court.

The section of the Law on Environmental Impact Assessment concerning access to information, public participation in decision-making and the right to legal protection in environmental matters has been fully harmonized with the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.

By means of the new Law on Environmental Impact Assessment, which entered into force on 6 December 2024, the provisions of Directive 2011/92/EU of the European Parliament

on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU, have been transposed.

Awaiting your reply, we hereby extend our appreciation to the Bureau in advance for the thorough and highest consideration of this report.

Sincerely,

MINISTER

Sara Pavkov



**Republic of Serbia
MINISTRY OF CONSTRUCTION,
TRANSPORT
AND INFRASTRUCTURE**

No: 003441342 2025 14810 006 000 020 092

Date: 01.09.2025

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada Str
11000 Belgrade

SUBJECT: Statement regarding Complaint No. 2021/7: Complaint on monitoring: Serbia: Alleged threat to fauna species and protected areas due to the proposed construction of a lithium mine in the Jadar River Valley.

Dear Sir or Madam,

In reference to your letter No. 002965334 2024 14850 004 008 000 001 and the Decision of the Bureau of the Standing Committee of the Bern Convention at the Council of Europe regarding Complaint No. 2021/7: Complaint on monitoring: Serbia: Alleged threat to fauna species and protected areas due to the proposed construction of a lithium mine in the Jadar River Valley, which the Secretariat of the Bern Convention submitted to the Ministry of Environmental Protection on 17.07.2025, you requested a statement regarding the mentioned complaint.

In accordance with the stated, we inform you that the Government of the Republic of Serbia, at the proposal of the Ministry of Construction, Transport and Infrastructure, has adopted the **Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar"**, which was published in the "Official Gazette of the Republic of Serbia" No. 26, dated 13 March 2020.

Pursuant to Article 35, paragraph 2 of the Law on Planning and Construction ("Official Gazette of RS", Nos. 72/09, 81/09 - correction, 64/10 - CC, 24/11, 121/12, 42/13 - CC, 50/13 - CC, 98/13 - CC, 132/14, 145/14, 83/18, 31/19, 37/19 - other law, 9/20, and 52/21), and Article 42, paragraph 1 of the Law on the Government (Official Gazette of RS", Nos. 55/05, 71/05 - correction, 101/07, 65/08, 16/11, 68/12 - CC, 72/12, 7/14 - CC, 44/14, and 30/18 – other law), the Government has adopted the **Regulation on the Termination of the Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar"** (Official Gazette of RS", No. 8 dated 20 January 2022).

By the Decision of the Constitutional Court No. I Uo - 39/2022 ("Official Gazette of the Republic of Serbia", No. 59/2024), it was established that the Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar" ("Official Gazette of RS", No. 8/2022), is not in compliance with the Constitution and the Law. The Regulation ceased to be valid on the day of publication of the Decision of the Constitutional Court I Uo - 39/2022 in the "Official Gazette of the Republic of Serbia" on 12 July 2024.

The Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar" ("Official Gazette of RS", No. 26/2020) has begun to be applied again as of the date of entry into force of the Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar" ("Official Gazette of RS", No. 60/2024) on 17 July 2024.

We also inform you that the General Secretariat has submitted to this Ministry a request of the Constitutional Court for providing a response to the allegations from the Proposal for initiating a procedure for the assessment of constitutionality and legality of the Regulation on the Adoption of the Spatial Plan for the Special Purpose Area for the Implementation of the Project for the Exploitation and Processing of the Jadarite Mineral "Jadar" ("Official Gazette of RS", No. 60/24), by which it was requested for a consent regarding the prepared draft response, from the Ministry of Agriculture, Forestry and Water Management, the Ministry of Environmental Protection, the Ministry of Mining and Energy, and the Republic Secretariat for Legislation to be obtained. In this regard, the mentioned ministries have been provided with a draft response prepared by this ministry, as well as the act of the General Secretariat and the request of the Constitutional Court with the submitted proposal and complete case files, for the purpose of providing their opinion on the draft response.

Respectfully,

MINISTER
Aleksandra Sofronijević



Republic of Serbia

MINISTRY OF MINING AND ENERGY

Number: 003441351 2025 14820 000 000 020 092

Date: 14 August 2025

MINISTRY OF ENVIRONMENTAL PROTECTION

Sara Pavkov, Minister of Environmental Protection

22-26 Nemanjina St
Belgrade

Dear Ms Pavkov,

By official correspondence No. 003198399 2025 14850 004 007 020 092, dated 1 August 2025, you submitted to the Ministry of Mining and Energy the decision of the Bureau of the Standing Committee of the Bern Convention concerning Complaint No. 2021/7: Complaint on stand-by: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley. As outlined in the submitted document, you have requested a progress report from the Ministry of Mining and Energy within the relevant scope of its responsibilities.

Following a review of official records, the Ministry of Mining and Energy noted that reports containing the requested information were previously submitted through official communications No. 001930629 2024 14820 007 000 000 001 dated 4 April 2025, 310-02-01722/2022-02 dated 27 December 2022, 30 January 2023, 30 May 2023, 15 December 2023, 24 July 2024 and 25 October 2024. At present, there are no further updates or additional activities falling within the Ministry's scope of work.

Sincerely,

MINISTER

Dubravka Đedović Handanović

To be delivered to:

- Addressee;
- Archive.



Republic of Serbia
MINISTRY OF AGRICULTURE
FORESTRY AND WATER MANAGEMENT
- Republic Water Directorate -
No: 003418719 2025 14843 000 000 051 001
Date: 22 August 2025
B e l g r a d e

MINISTRY OF ENVIRONMENTAL PROTECTION

BELGRADE, 1 Omladinskih brigada St.

SUBJECT: Request for Report on Complaint No. 2021/7: Complaint on stand by: Serbia:
Alleged threat to fauna species and protected sites due to the proposed
construction of a lithium mine in the Jadar River Valley

To Whom It May Concern,

In accordance with the request submitted to the Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, by letter No. 003198399 2025 14850 004 007 020 092 dated 01 August 2025, we hereby inform you of the following:

The Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia, in accordance with the provisions of the Law on Waters ("Official Gazette of the Republic of Serbia", Nos. 30/2010, 93/2012, 101/2016, 95/2018 and 95/2018 - other law), issued Water Conditions No. 002323353 2024 14843 001 001 325 024 on 21 August 2024, pertaining to the procedure for the preparation and development of technical documentation - Feasibility Study and Mining Projects for the Underground Exploitation of Lithium and Boron Deposits - "Jadar", located on cadastral parcels within the Cadastral Municipalities of Gornje Nedeljice and Slatina, on the territory of the City of Loznica, with the aim of preserving the water regime.

In addition to the technical and other requirements that the investor is obliged to fulfill during the planning and construction of mining works and facilities, and which may permanently, periodically or temporarily affect the water regime, the issued Water Conditions also prescribe the development of the following:

1. A hydrologic and hydraulic model of the water regime, including analytical and graphical representation of flood zones for high-water conditions of the Drina, Jadar, Korenita and Stupnica rivers, for designated return periods $Q_{1\%}$ and $Q_{0.1\%}$;
2. A groundwater hydro-dynamic model based on the results of exploratory works;
3. A study on the potential impact of the project on the water source of the planned regional water supply system in Mačva and Srem;
4. A study concerning torrential flood risk assessment, including the definition of possible scenarios;

5. A study on the impact of mining wastewater and all wastewater generated during the exploitation process and other activities foreseen under the Jadar project;
6. An analysis of completed exploratory works and their impact on the environment, including presentation of results relating to the “zero state” of surface and groundwater quality.

Sincerely,

ACTING DIRECTOR
Maja Grbić, LL.B

INSTITUTE FOR NATURE CONSERVATION OF SERBIA

35 Japanska Street, 11070 Novi Beograd
Phone: 011 2093 801 Fax: 011 2098 867
www.zzps.rs

03 No. 025-4046/9
Date: 17 April 2026

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 NOVI BEOGRAD
1 Omladinskih Brigada Street

Your reference No.: 003198399 2025 14850 004 007 020 092 of 1 August 2025

You addressed the Institute for Nature Conservation of Serbia with Request Ref. 03 No. 025-4046/6 of 7 August 2025, followed by Urgent Reminder submission No. 03 Ref. 025-4046/7 of 1 April 2026, seeking a report within Institute's scope of competence concerning "*Complaint No. 2021/7: Complaint on stand-by: Serbia: Alleged threat to fauna species and protected sites due to the proposed construction of a lithium mine in the Jadar River Valley*" for the purpose of submitting a response to the Secretariat of the Bern Convention, the Council of Europe.

Based on the review of the Central Register of Protected Natural Assets and the Nature Protection Information System maintained by the Institute for Nature Conservation of Serbia (hereinafter: the Institute), the Institute hereby informs you as follows:

- The Institute, in response to the previous Request Ref. 03 No. 025-4046/4 submitted Notification Ref. 03 No. 025-4046/5 of 23 April 2025;
- For the purpose of drafting the nature protection conditions in relation to the Forest Management Plan for the management unit "Jadar" for the period 2026–2035, the Institute's specialist associates conducted a field inspection of the respective forest management unit from 8 to 10 December 2025, after which the relevant nature protection conditions were prescribed (Decision Ref. 03 No. 023-4542/4 of 13 January 2026);
- In relation to this matter, the Institute, upon a request for access to information of public importance submitted by the association "Protect Jadar and Rađevina", provided an appropriate Response (Ref. 03 No. 030-1030/2 of 3 April 2026);
- The association "Protect Jadar and Rađevina" subsequently submitted to the Institute a new request for access to information of public importance (Ref. 03 No. 030-1514/1 of 14 April 2026). At the time of drafting this Notification, the case is under processing;
- No other requests were submitted to the Institute, nor were any acts issued on the basis thereof in relation to the subject complaint, up to the date of issuance of this Notification.

ACTING DIRECTOR
Aleksandra Došlić

Enclosed herewith:

- Notification Ref. 03 No. 025-4046/5,
- Decision Ref. 03 No. 023-4542/4,
- Response Ref. 03 No. 030-1030/2.

Delivered to:

- Addressee
- Records Office – 2 copies

REPUBLIC OF SERBIA
INSTITUTE FOR NATURE CONSERVATION OF SERBIA
NOVI BEOGRAD, JAPANSKA NO. 35
Telephone: +381 11 2093-802; 2093-803

Pursuant to the Article 9 of the Law on the Nature Protection (*Official Gazette of the Republic of Serbia*, Nos. 36/09, 88/10, 91/10 - as amended, 14/16, 95/18 - state law and 71/21), Regulation on the Ecological Network (*Official Gazette of the Republic of Serbia*, No. 102/10) and Article 136 of the Law on General Administrative Procedure (*Official Gazette of the Republic of Serbia*, nos. 18/16, 95/18 - authentic interpretation, 2/23 - CC), resolving upon request number 789 of 25 November 2025, as well as amendments to the requests of 28 November 2025 and 9 December 2025, of the Rio Sava Exploration d.o.o. - Beograd, for the issuance of nature protection conditions for the preparation of the Basic Forest Management Plan for the "Jadar" management unit for the period 2026-2035, the Institute for Nature Conservation of Serbia, Head of Office MSc Danko Jovic, under the Decision 02 no. 012-1189/1 of 1 April 2025, on 13 January 2026, under 03 No. 023-4542/4, issues the following:

DECISION
on
Nature Protection Conditions

1. The subject area of the "Jadar" management unit is not located within the protected areas for which a protection procedure has been carried out or initiated in accordance with the Law on Nature Protection.
2. The area of the aforementioned management unit is not located within the spatial scope of ecologically significant areas and ecological corridors of international significance within the ecological network of the Republic of Serbia, as per Annexes 1 and 2 of the Regulation on Ecological Network. The subject area is partially located within the potential Natura 2000 area of the European Ecological Network called "Korenita".
3. In the immediate vicinity of the "Jadar" management unit passes the Korenita River, which is a habitat for the following nationally and internationally strictly protected species: Spined Loach (*Cobitis elongata*), Danubian Spined Loach (*Cobitis elongatoides*, listed in the Regulation as *Cobitis taenia*), Balkan Spined Loach (*Sabanejewia balcanica*), Danube Gudgeon (*Romanogobio uranoscopus*) and Kessler's Gudgeon (*Romanogobio kessleri*), Noble Crayfish (*Astacus astacus*) and Thick-Shelled River Mussel (*Unio crassus*), as per Annex 1 to the Regulation on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (the *Official Gazette of the Republic of Serbia* nos. 5/10, 47/11, 32/16 and 98/16) and the Law on Ratification of the Convention on the Conservation of European Wild Flora and Fauna and Natural Habitats (*Official Gazette of the FRY - International Treaties*, No. 11/01).

Pursuant to items 1, 2 and 3 of the Decision hereof, the following nature protection conditions shall be issued:

- 1) The preparation of the Basic Forest Management Plan for the "Jadar" management unit shall be carried out in accordance with the Law on Forests (the *Official Gazette of the Republic of Serbia*, nos. 30/10, 93/12, 89/15 and 95/18 - state law) and other valid legal acts;
- 2) In relation to the Rulebook on the Basic Forest Management Plan, detailed design of forest management, recording of executed works and the forest chronicle (the *Official Gazette of the Republic of Serbia*, No. 18/24), within the general wording of the Basic Forest Management Plan for the "Jadar" management unit, it is necessary to additionally prepare the following:
 - Detailed textual presentation of the habitats and forest stands;
 - Presentation of health condition;
 - Status of protected natural assets;
 - Plan for improving the condition of special natural values and rarities;
 - Plan for the rehabilitation of damaged soil, forest roads, and trails;

3) It is necessary to carry out habitat type mapping in accordance with the provisions of the Regulation on criteria for selection of habitat types, on habitat types, sensitive, endangered, rare, and priority habitat types for protection, and on protection measures for their conservation (*Official Gazette of the Republic of Serbia*, No. 35/10), for parts of the departments(sections 1/3 and 1/g) of the forest management unit “Jadar” which overlap with the potential Natura 2000 area of pSCI “Korenita”. Measures

to be taken to preserve priority forest habitats comprise the following:

- Preserve species significant for the type of habitat;
- Prohibited is the introduction of alien (allochthonous) species and genetically modified organisms;
- Ensure appropriate measures for the conservation of endangered and rare wild species, as well as monitor their status on the regular basis (monitoring);
- While performing the final cutting of larger forest areas, wherever possible and appropriate, leave small uncut areas;
- Preserve the edges of the forests to the fullest possible extent;
- Ensure the extension of the bucking maturity of domestic species of trees in view of the physiological life of the individual species and the health condition of the forest community;
- Practise the use of certified biological means to protect plants;
- Afforestation, where habitat conditions allow, shall be carried out using the autochthonous tree species in proportions that reflect the natural composition, applying close-to-nature methods;

4) It is necessary to record and present strictly protected and protected species of plants, animals, and fungi in accordance with the Regulation on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi, as well as tree species belonging to the category of rare, relict, endemic, and endangered species;

5) The Basic Management Plan shall stipulate that it is prohibited to perform any work that may cause water turbidity for more than 3 days and/or whose intensity may adversely affect aquatic organisms;

6) Activities and works that may endanger the aquatic life of the Korenita River, as well as the destruction and disturbance of wild species and cause the destruction or degradation of their habitats, are prohibited;

7) The Basic Forest Management Plan must be of an integral nature, starting from the commitment to ensure sustainable development-the principle of continuity in the management of the overall forest potential within this forest management unit.

8) A higher level of planning must be achieved in the Basic Management Plan, derived from the adopted European criteria and guidelines for sustainable forest management, necessary for maintaining, conserving, and increasing biodiversity in forest ecosystems;

9) Define and delineate areas that are geodiversity- and biodiversity-valuable and rare, which would be precious for monitoring vegetation succession, and which mainly contain forest communities with rare and legally protected species;

10) During forest inventory, use the prescribed surveying method. In order to achieve the required accuracy, on the overall depending on the degree of forest stand homogeneity, it is necessary, wherever required, install the additional “standard sample plots” where surveying will be carried out;

11) It is necessary to select and label the most valuable stands in which the values of taxation elements indicate the degree of preservation, quality, and productive capacities of the habitat, explaining their fundamental value;

12) When planning surfaces, predict under the protective measures the preservation and improvement of natural and semi-natural elements in accordance with the landscape and vegetation characteristics of the area;

13) Natural regeneration should be a priority and should be covered in detail in the textual part of the Basic Plan;

14) When planning afforestation or assisting natural regeneration, whether by planting seedlings or sowing seeds, where appropriate, priority should be given to domestic species of local provenance that are well adapted to habitat conditions;

15) Stands should be delineated based on taxation elements, especially according to the degree of

- preservation, drying, structure and degree of weed infestation;
- 16) It is necessary to record all dendroflora species that represent relicts and endemics, describe their locations and habitats, and determine appropriate management measures;
 - 17) It is necessary to present, in the chapter "Forest condition by tree species," the presence of "admixed" tree and shrub species that are not included in the tabular section. In the textual part of the Basic Forest Management Plan, all identified "admixed" species shall be listed with both their common and Latin names;
 - 18) Management objectives shall be directed toward improving the condition of stands, which implies enhancing forest conditions through regular management practices—cultivation procedures and measures (regulating composition and mixture, releasing offsprings etc.), improving quality and health condition, method of tending and cultivation priorities, regeneration methods, special protection of forest edges, and similar;
 - 19) The method of forest management shall be defined and adapted to all present forest management types, that is, they should be such as to improve and preserve the diversity of both horizontal and vertical stand structures.
 - 23) During the surveying, invasive woody species shall be identified, and through the forest management planning process their removal and/or control of spread to adjacent areas shall be provided for;
 - 21) The retention and mapping of trees containing the registered natural cavities and hollows shall be planned, as these are important for the nesting of cavity-nesting birds (some species from orders of owls, woodpeckers, and songbirds);
 - 22) Record and map in the database the nests of birds of prey with diameter of 40 cm and above, on the trees. In cooperation with the Institute for Nature Conservation of Serbia and other scientific and professional institutions, identify the bird species that nest and, where necessary, implement the protection and conservation measures for trees and nesting sites;
 - 23) The retention of seed trees shall be planned (particularly habitat trees), allowing them to complete their natural life cycle spontaneously (dead trees, hollow trees, and especially rare tree species), in the quantity and spatial distribution as is necessary (minimum 5 trees/ha) to ensure biodiversity, while taking into account potential effects on health and the stability of forest and surrounding ecosystems;
 - 24) Plan the conservation of water springs, stream and river beds, along with riparian vegetation;
 - 25) Any potential seed stands shall be identified, and appropriate cultivation measures shall be prescribed.
4. Prior to the adoption of the Basic Forest Management Plan for the "Jadar" management unit, it is necessary to obtain an opinion from the Institute for Nature Conservation of Serbia on compliance with the conditions set out in this Decision.
 5. This Decision shall not exempt the applicant from the obligation to obtain other conditions, permits, and consents prescribed by the positive regulations.
 6. For any other works/activities in the subject area or amendments to the planning documentation, a new application must be submitted.
 7. If the applicant does not commence the works and activities for which this Decision was issued within two years from the date of delivery of this Decision, they shall be obliged to submit a request for the issuance of a new Decision.
 8. The applicant is exempt from paying the fee for submitting a request for the issuance of nature protection conditions and the fee for issuing the professional basis for the preparation of the decision on nature protection conditions, pursuant to the Law on Republic Administrative Fees (the *Official Gazette of the Republic of Serbia*, Nos. 43/03, 51/03, 61/05, 5/09, 54/09, 50/11, 93/12, 65/13-state law, 83/15, 112/15, 113/17, 3/18-as amended, 86/19, 90/19-as amended, 144/20, 138/22, 92/23, 94/24, 55/25 and Matched dinar amounts from the tariff of Republic administrative fees 59/24, 63/24, 94/24 и 55/25) -Tariff no. 186a; Note - paragraph 3, item 7).

Explication

Company Rio Sava Exploration d.o.o. – Belgrade addressed the Institute for Nature Conservation of Serbia by a request filed under 03 no. 023-4542/1 of 25.11.2025, as well as the amendments to the request filed under 03 no. 023-4542/2 of 28.11.2025 and 03 no. 023-4542/3 of 9.12.2025 for the issuance of nature protection conditions for the preparation of the Basic Forest Management Plan for the “Jadar” management unit, for the period 2026-2035.

Based on the submitted request, it was determined that Rio Sava Exploration d.o.o. - Beograd, plans to prepare the Basic Forest Management Plan for the "Jadar" management unit (departments 1 and 2), which are located within the Podrinje - Kolubara forest area. The forest user is Rio Sava Exploration d.o.o. - Beograd. Enclosed to the request, the shp files were submitted showing the position of the subject management unit. The Basic Forest Management Plan is an operational planning document for the management of forests of this management unit for the period from 2026 to 2035.

Based on an inspection of the Central Register of Protected Natural Assets and the documentation of the Institute for Nature Conservation of Serbia, it has been determined that the management unit in question is not located within protected natural assets. However, it is partially situated (sections 1/3 and 1/g) within a potential Natura 2000 area of the European Ecological Network of significance for the conservation of natural communities – the pSCI “Korenita”. (<https://daphne.sk/Natura2000SerbiaSCI/pSCIs 1 .php>).

Within the scope of the “Jadar” management unit, coppice stands of black locust (*Robinia pseudoacacia* L.) are predominantly represented, most commonly aged between 3 and 10 years. Among the more valuable forest types, forests of pedunculate oak and hornbeam (*Carpino-Quercetum roboris*) are present on semigley, brown alluvial, podzol, leached brown forest soils and similar soil types.

Of the protected herbaceous species, butcher’s broom (*Ruscus aculeatus* L.) is present in section 2/a, and broad-leaved butcher’s broom (*Ruscus hypoglossum* L.) in section 2/h of the “Jadar” management unit.

The Korenita River represents a habitat for nationally and internationally strictly protected species, namely the following: Spined Loach (*Cobitis elongata*), Danubian Spined Loach (*Cobitis elongatoides*-synonymous with *Cobitis taenia*), Balkan Spined Loach (*Sabanejewia balcanica*), Danube Gudgeon (*Romanogobio uranoscopus*) and Kessler’s Gudgeon (*Romanogobio kessleri*), Noble Crayfish (*Astacus astacus*), Thick-Shelled River Mussel (*Unio crassus*) and European Beaver (*Custor fiber*), in accordance with Annex 1 to the Regulation on the proclamation and protection of strictly protected and protected wild species of plants, animals and fungi as well as the Law on the Ratification of the Convention on the Conservation of European Wild Flora and Fauna and Natural Habitats.

Based on the established natural characteristics of the area and insight into the submitted documentation, it is estimated that the preparation of the Basic Forest Management Plan for the “Jadar” management unit for the period 2026-2035 can be realized from the point of view of the goals of nature conservation, adopted regulations and documents.

Based on all of the above, it was decided as a disposition of this Decision.

Instructions on legal remedy: An appeal may be filed against this Decision to the Ministry of Environmental Protection within 15 days from the date of receipt of this Decision. The complaint shall be submitted to the Institute for Nature Conservation of Serbia, with proof of payment of the Republic administrative fee to the amount of 610.00 dinars to the current account no. 840-0000031395845-78, reference number 7401379251 at the model 97.

HEAD OF OFFICE

/Signature illegible/

Msc Danko Jović

The position of the "Jadar" management unit in relation to elements of nature of particular significance.

Delivered to:

- Addressee
- Archives (2 copies)