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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
Strasbourg, 8-12 December 2025

Bureau of the Standing Committee
18-20 June 2025
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 -

*Document prepared by
the Ministry of Environmental Protection of the Republic of Serbia*



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

No: 001550768 2025 14850 004 001 000 001

Date: 28 April 2025.

Belgrade

**Council of Europe
Biodiversity Department
Secretariat of the Bern Convention
F-67075 Strasbourg
Mr Mikaël POUTIERS
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 Mr Poutiers,

On behalf of the Ministry of Environmental Protection, and in reference to the Request of the Secretariat of the Bern Convention dated 20 December 2024, 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, we would like to inform you of the following:

In accordance with the Decision of the Standing Committee of the Bern Convention, the Ministry of Environmental Protection, acting as the competent authority monitoring the implementation of the Bern Convention in the Republic of Serbia, has formally sought input from relevant governmental bodies and organizations. To this end, a Request for Statement (No: 001550768 2025 14850 004 001 000 001, dated 27 March 2025) has been submitted to the Ministry of Construction, Transport and Infrastructure, the Ministry of Mining and Energy, the Institute for Nature Conservation of Serbia, along with an internal report prepared by the Ministry of Environmental Protection.

In accordance with the reports received from the aforementioned authorities and organizations (please find enclosed the translated copies of the aforementioned documents), we would like to provide the following information:

1. The Ministry of Construction, Transport and Infrastructure has informed that the Government, upon the proposal of the Ministry of Construction, Transport and Infrastructure, adopted 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. 26/2020).

By the Decision of the Constitutional Court IYo-39/2022 („Official Gazette of the Republic of Serbia”, No. 59/2024), it was established that the Decree Revoking 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. 8/22) is not in compliance with the Constitution and legislation of the Republic of Serbia. The Decree ceased to be valid as of the date of publication of the Decision of the Constitutional Court dated 12 July 2024.

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 („Official Gazette of the Republic of Serbia”, No. 26/2020) was reinstated and came into effect on the date of enforcement of the Decree on the Application 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 has stated that, following a review of official records, no new information or activities within its area of responsibility have arisen concerning the complaint in question, beyond what was already included in its previous response submitted to the Secretariat of the Bern Convention on 31 October 2024.

3. The Institute for Nature Conservation of Serbia has stated that there is no new information beyond what was provided in its response of 31 October 2024, which included all relevant documentation. Furthermore, the Institute has not conducted any additional research or monitoring of the fauna, flora, or vegetation in the area of the proposed mine and its surroundings since the submission.

4. The Ministry of Environmental Protection, acting upon a request submitted by „Rio Sava Exploration” LLC Belgrade on 27 August 2024, issued a Decision (No. 002541265 2024, dated 15 November 2024) defining the scope and content of the Environmental Impact Assessment Study for the underground exploitation project of the lithium and boron deposit „Jadar”.The project area includes cadastral parcels within the municipalities of Gornje Nedeljice, Brnjac, Veliko Selo, Jarebice, Slatina, Stupnica, and Šurice, in the City of Loznica, specifically within subzones 1A and 1B – the designated mining activity zones, in accordance with the **Spatial Plan for the Special Purpose Area for the Implementation of the „Jadar” Project of Exploitation and Processing of Jadarite Mineral**.

A total of 7,133 appeals have been submitted against the issued Decision, and a second-instance administrative procedure is currently ongoing.

We thank the Bureau in advance for the highest consideration of this report and look forward to your response.

Sincerely,

MINISTER

Sara Pavkov



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

No.: 001712461 2025 14810 000
000 000 001

Date: 11 April 2025
10a Kralja Milutina St
Belgrade

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada
11000 Belgrade

Subject: Statement 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 reference to your letter No. 002965334 2024 14850 004 008 000 001, dated 21 October 2024, addressing the Decision of the Bureau of the Bern Convention, the Council of Europe, regarding Complaint No. 2021/7/6 - Statement 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, we acknowledge your request for a statement regarding the aforementioned complaint.

We hereby inform you that the Government, upon the proposal of the Ministry of Construction, Transport and Infrastructure, adopted 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**. The Decree was published in the Official Gazette of the Republic of Serbia, No. 26 of 13 March 2020.

Based on Article 35, Paragraph 2 of the Law on Planning and Construction (“Official Gazette of the Republic of Serbia”, Nos. 72/09, 81/09 – corrigendum, 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 Government (“Official Gazette of the Republic of Serbia”, Nos. 55/05, 71/05 – corrigendum, 101/07, 65/08, 16/11, 68/12-CC, 72/12, 7/14-CC, 44/14, and 30/18-other law), the Government adopted the **Decree Revoking the Decree on Determining the Spatial Plan for the Special Purpose Area for the Implementation of the “Jadar” Project for the Exploitation and Processing of Jadarite Mineral** (“Official Gazette of the Republic of Serbia”, No. 8 of 20 January 2022).

By the Decision of the **Constitutional Court** IYo-39/2022 (“Official Gazette of the Republic of Serbia”, No. 59/2024), it was established that the Decree Revoking 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. 8/22) is not in compliance with the Constitution and legislation of the Republic of Serbia. The Decree ceased to be valid as of the date of publication of the Decision of the Constitutional Court IYo-39/22 in the Official Gazette of the Republic of Serbia, namely 12 July 2024. 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. 26/2020) was reinstated and came into effect on the date of enforcement of the Decree on the Application 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), namely 17 July 2024.

Yours sincerely,

MINISTER

Aleksandra Sofronijević



Republic of Serbia

MINISTRY OF MINING AND ENERGY

Number: 001930629 2024 14820 007 000 000 001

Date: 04.04.2025

MINISTRY OF ENVIRONMENTAL PROTECTION

Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

22-26 Nemanjina Str.
Belgrade

Dear Ms Vujović,

By official correspondence No. 001550768 2005 14850 004 001 000 001, dated 27 March 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 within the relevant scope of its responsibilities.

Following a review of official records, the Ministry of Mining and Energy confirms that reports containing the requested information were previously submitted through official communications No. 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

03 No. 025-4046/5
23 April 2025

INSTITUTE FOR NATURE CONSERVATION
Japanska 35, 11070, Novi Beograd 011 2093 801 011 2093 867
www.zzps.rs PIB106844260 MB17799561

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 NOVI BEOGRAD
1 Omladinskih brigada St

Pursuant to your request, submitted to the Institute for Nature Conservation of Serbia, 11070 Novi Beograd, 35 Japanska St, under the reference number 001550768 2025 14850 004 001 000 001 dated 27 March 2025, and filed by the Institute under the reference number 03 No. 025-4046/3 dated 31 March 2025, a report has been requested within the Institute's scope of work regarding "*Complaint Number: 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*". The report is to be provided for the purpose of responding to the Secretariat of the Bern Convention, Council of Europe.

By reviewing the Central Register of Protected Natural Assets and the Information System on Nature Protection maintained by the Institute for Nature Conservation of Serbia (hereinafter referred to as: the Institute), we inform you as follows:

- The Institute has, in response to an identical request, issued Notification No. 03 025-4046/2 dated 22 October 2024;
- In the meantime, the Institute has not conducted any specific research or monitoring of fauna, flora, and vegetation components in the area of the planned future mine and its surroundings;
- No other requests related to this subject matter have been submitted to the Institute, nor have any related documents been issued by the Institute up to the date of issuance of this Notification.

Acting DIRECTOR

Aleksandra Došlić