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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Standing Committee

46th meeting,
7-11 December 2026,
Strasbourg

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Bureau of the Standing Committee

22-24 September 2026,
Strasbourg

Possible File: 2022/06

Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)

- REPORT BY THE COMPLAINANT -

Document prepared by
Earth Thrive, King's College Legal Clinic,
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Update for 2026 autumn Bureau

7th September 2026

Bern Convention - Complaint No. 2022/06 - Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region

Seventh report

Dear members of the Bureau,

Thank you for the opportunity to contribute with our Report on the latest status of our Complaints regarding the mining activities in Bosilegrad and the Homolje Mt region in Serbia.

Please find below our 2 joint reports for the Autumn 2026 meeting of the Bureau:

The Complainants wish to express their sincere gratitude for the invaluable opportunity provided by the on-the-spot appraisal to present the available evidence from both Bosilegrad and Homolje, and to enable the delegation to meet local activists, affected residents and their representatives and hear their concerns directly. We greatly appreciate this constructive engagement and look forward to continued cooperation aimed at ensuring the full and effective implementation of the Bern Convention.

Bosilegrad

Since the Bureau's previous meeting, several important developments have taken place concerning the proposed Bosil Metal mining project.
The Government's latest report does not explain why the Environmental Impact Assessment procedure and the mining approval process **continue** despite the final Decision of the Institute for Nature Conservation of Serbia of 30 January 2025[1] prohibiting the planned mining activities at the Podvirovi and Popovica deposits. More in Annex I.
It is concerning that, on 2 December 2025, the Ministry of Mining and Energy approved Exploitation Field No. 678 for the Podvirovi and Popovica–Conjev Kamen deposits in favour of Bosil-Metal d.o.o, even though the Institute for Nature Conservation of Serbia had previously issued a final decision finding that the planned activities were not permitted in that area, thereby calling into question the purpose and justification of adopting such an act.[2]
It remains entirely unclear how these parallel procedures can continue once the competent nature conservation authority has concluded that the proposed mining activities are not permissible.
Another important development concerns the judicial review of the Institute's decision.[3] Following a Freedom of Information request submitted by Earth Thrive. More in Annex II.
The Government's latest report further states that the Republic Environmental Protection Inspectorate suspended the inspection procedure in December 2024 and has not carried out any further on-site inspections since July 2024. More in Annex III.
The Complainants further note that all reports of the water analysis made by Institute of Public Health Vranje specify the same sampling coordinates, **located approximately 40 kilometres from the mine**,

[1] Decision of the Institute for Nature Conservation of Serbia No. 801-1/2025 of 3 February 2025.
[2] Decision of the Ministry of Mining and Energy No. 002332413 2024 of 2 December 2025.
[3] Administrative Court of the Republic of Serbia, Notification No. Su II-17a 36/26, 7 May 2026, confirming that the company initiated administrative proceedings on 12 August 2025, registered as Case No. U 7480/25.

which raises serious questions as to the relevance of those results for assessing the environmental impacts of the mining activities.
Also, The Serbian Environmental Protection Agency also carried out sampling at the **Ribarci** monitoring station, located approximately **26 km by road from the Podvirovi mine** .
For all these reasons, the Complainants **strongly support and are grateful** to the Chair for the proposal he put forward during the OSA round-table meeting on 11 August 2026, that independent analysis be conducted to produce results that both parties can regard as reliable.

ON-THE-SPOT APPRAISAL: BORDER INCIDENT

The on-the-spot appraisal in Bosilegrad was scheduled to begin with a meeting with local activists at the Cultural and Information Centre in Bosilegrad. Dimiter Kumanov and Dr Valentin Vinkov Yanev were among those expected to attend. Both encountered difficulties at the Serbian border. Mr Kumanov was delayed for a considerable time but was eventually allowed to enter. Dr Yanev, however, was refused entry at the Ribarci border crossing on 11 August 2026. Decision No. 8/2026 states **that the refusal was based on a negative security-related risk assessment under Article 15(1)(8) of the Law on Foreigners[4]**, but provides no further factual explanation. As a result, Dr Yanev was prevented from attending the meeting with the Bern Convention mission. Dr Yanev monitors the health of residents in the Bosilegrad area, with particular attention to the incidence of cancer and its possible connection with the pollution of water, soil and air. His testimony would therefore have been important for providing the mission with a more complete picture of the potential effects of mining-related pollution on the local population.
Feasibility Study Prepared Before the Required EIA Decision
The Feasibility Study underpinning the 2025 approval was prepared six months before the legally required EIA scoping decision, calling into question the lawfulness of the entire approval process. More in Annex IV.[5]

Homolje

Since the Bureau's previous meeting, several important developments have taken place concerning the geological exploration activities in Homolje.

1. GEOLOGICAL EXPLORATION WITHOUT THE REQUIRED WATER ACTS

One of the most important developments since the Complainants' previous report to the Secretariat of the Bern Convention concerns the **WATER ACTS that the companies belonging to the Dundee Precious Metals Group have never held.**
The law permits geological exploration for a maximum of eight years. However, companies belonging to the same corporate group have carried out geological exploration in Homolje since 2008, which is almost twenty years. The Serbian Business Registers Agency records show common ownership despite changes in company names, holders of exploration rights and the division of the original exploration area.
The Government should therefore explain how the eight-year limit under Article 39 of the Law on Mining and Geological Exploration has been respected and how the cumulative environmental effects of almost twenty years of exploration have been assessed.
Against this important background, we now return to the central issue of the water acts.
The Complainants repeatedly requested information from the competent authorities as to whether water acts had been issued to DPM Avala and Crni Vrh Resources for the abstraction and use of water during geological exploration in the Municipality of Žagubica. The authorities' responses show that the companies had not even applied for such acts.
One such response was issued by the Ministry of Agriculture, Forestry and Water Management,

[4] Decision No. 8/2026 on the refusal of entry to Dr Yanev at the Ribarci border crossing, dated 11 August 2026.

[5] Law on Mining and Geological Explorations of the Republic of Serbia, Article 70(2)(1) ("Official Gazette of the Republic of Serbia", Nos. 101/2015, 95/2018 – other law, and 40/2021).

Republic Water Directorate on 17 June 2024. We single out this response because, only eleven days later, **the water inspector recorded that Crni Vrh Resources did not possess a water permit**[6] defining the manner and volume of water abstraction from a watercourse for exploration works at Čoka Rakita. In the inspection record of 28 June 2024, the inspector expressly identified the absence of a water permit as an established illegality.

The company challenged the inspector's finding.[7] It argued that geological exploration did not fall within the scope of the Water Law and that water acts were therefore not required. The company consequently sought official interpretations from the competent water authorities.

Both authorities rejected the company's position and confirmed that water conditions were required for the activities in question.

On 12 September 2024, the **Public Water Management Company "Srbijavode"**[8] stated that the activities involved the abstraction and use of water, as well as the possible discharge of used water, and that water conditions therefore had to be obtained.

On 3 March 2025, **the Republic Water Directorat**e[9] confirmed the same position. It explained that Article 117(1)(39) of the Water Law applies to other structures and works which may temporarily, periodically or permanently cause changes to, or otherwise affect, the water regime.

The significance of these interpretations is huge. **They confirm that the Water Law applies to the abstraction and use of water during geological exploration.** Put simply, companies belonging to the same corporate group have carried out exploration across Homolje for almost two decades, while the competent authorities have provided no evidence that the appropriate water acts were obtained for the use of water during those activities.

Following these interpretations, the company itself changed its position. On 18 March 2025, only fifteen days after the Republic Water Directorate issued its interpretation, Crni Vrh Resources applied for water conditions for the Čoka Rakita exploration area. In its application, the company expressly relied on both interpretations.

According to the documentation available to the Complainants, the water conditions have still not been issued, while the exploration works and use of water continue. This means that, at the time of writing, the company continues to carry out exploration and use water without conditions through which the competent authority would first assess the effects on the water regime and determine the manner and limits of water use.

The procedure for obtaining the required acts revealed a serious administrative gap. Srbijavode instructed the company to request water conditions from the Municipality of Žagubica through the integrated permitting procedure. The Municipality replied that this procedure applies when location conditions for the construction of structures are issued and is not applicable to geological exploration. When the company again sought instructions, Srbijavode maintained that water conditions were mandatory but did not identify another procedure through which they could be obtained.

This created an administrative circle, the competent authorities confirmed that water conditions were required but failed to provide an effective procedure through which they could be obtained.

It therefore remains unclear whether and how this issue will be resolved. More importantly, it remains unexplained on what legal basis the exploration works were approved and carried out before the required water acts had been obtained.

The relevant documentation was also not disclosed to the Complainants in a timely manner. On 3 November 2025, Earth Thrive requested all water acts and related documentation concerning DPM Avala and Crni Vrh Resources. At that time, Earth Thrive was unaware that the competent authorities had already issued the above interpretations. Had the documents been disclosed on time, the

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[6] Record of Inspection No. 001991510 2024 14843 003 003 042 002, Ministry of Agriculture, Forestry and Water Management, Water Inspection – Loznica Department, dated 28 June 2024, concerning the inspection carried out on 25 June 2024 at the Crni Vrh site in the Municipality of Žagubica.

[7] Response of the Public Water Management Company "Srbijavode" to the request for access to information of public importance, No. 11/201, dated 18 November 2025

[8] Response of the Public Water Management Company "Srbijavode" No. 11/158, dated 3 September 2026.

[9] Response of the Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate No. 3882793 2026 14843 001 004 041 001, dated 28 August 2026.

Complainants would have immediately informed the Bureau.
It also remains unexplained why the Government did not disclose these facts in its earlier reports to the Bureau.
The response from Srbijavode is dated 18 November 2025 but was not delivered until 2 March 2026 [10] almost four months later and only after the Complainants had appealed to the Commissioner for Information of Public Importance and Personal Data Protection because of the authority's failure to respond. In other words, a response which, according to the date appearing on the document itself, had already been prepared was not sent to the Complainants for several months.
The delayed response included the very documents showing that both competent water authorities had already confirmed the obligation to obtain water conditions and that the company had subsequently applied for their issuance.
Unaware that these interpretations already existed, Earth Thrive requested an official interpretation from the Ministry of Mining and Energy on 16 January 2026. It asked whether water conditions had to be obtained before exploration approvals were issued and what effect their absence had on the legality of the approvals already granted.[11]
It remains unexplained why the response dated 18 November 2025 was withheld until 2 March 2026. This is not merely a failure to comply with the statutory time limit. The withheld documentation already contained answers directly relevant to the same legal question that Earth Thrive, unaware of those documents, subsequently submitted to the Ministry of Mining and Energy.
The Complainants therefore respectfully invite the Bureau to request the Government of Serbia to explain on what legal basis these activities were approved and carried out without the required water acts, whether those acts have since been issued, and how it will ensure that any further use of water complies with the Water Law.

2. CRIMINAL COMPLAINT CONCERNING THE DISCHARGE OF DRILLING FLUIDS[12]

On 5 May 2026, the Complainants submitted a criminal complaint to the Basic Public Prosecutor's Office in Petrovac na Mlavi against Crni Vrh Resources d.o.o. on suspicion of the criminal offences of environmental pollution and environmental damage, following the discharge of drilling fluids into a stream flowing into the Valja Saka River on 26 April 2026.[13]More in Annex I.

3. CHEMICAL PRODUCTS USED DURING DRILLING

The Government's latest report further states that it remains unclear on what basis the Standing Committee referred to the use of illegal chemical substances during the exploration activities and asserts that such findings are not supported by the inspection report. However, the inspection report of 2 September 2024 contains relevant findings regarding the chemical products used during drilling. In particular, on page 4, the Inspector records that the Safety Data Sheets (MSDS) for chemical products used by GEOPS, REFLEX and TECHNOFOR were not prepared in accordance with the Serbian Law on Chemicals and its implementing legislation. The report further notes that, out of twelve chemical products manufactured by AMC Europe GmbH, four were classified as hazardous to the aquatic environment, including aquatic organisms and algae. These findings are directly relevant to the concerns raised before the Bureau and should not be disregarded.[14]

4. NATURE CONSERVATION CONDITIONS FOR ČOKA RAKITA

Through a Freedom of Information request, the Complainants obtained the underlying correspondence concerning the nature conservation conditions for the Čoka Rakita Spatial Plan. While the Government

[10] Response of the Public Water Management Company "Srbijavode", No. 11/201, dated 18 November 2025, but transmitted to the Complainants only in March 2026, enclosing copies of the water acts issued to DPM Crni Vrh d.o.o. and DPM Avala d.o.o. Belgrade.
[11] Request for an official interpretation, submitted to the Ministry of Mining and Energy on 16 January 2026.
[12] Criminal complaint submitted to the Basic Public Prosecutor's Office in Petrovac na Mlavi on 5 May 2026
[13] Response of the Prosecutor's Office concerning the status of proceedings KTR 193/26.
[14]https://drive.google.com/file/d/1KdyEfANpHIRLbI4sRjT5dQVRRGdis-WH/view?usp=drive_link

Report mentions that these documents exist, it does not disclose their substance. In particular, it omits that the Institute considered part of the planning area to fall within the proposed Kučaj–Beljanica National Park, that the protection measures set out in the relevant protection study therefore apply, and that the matter was referred to the Ministry of Environmental Protection as the competent authority. The Government Report also does not clarify whether the Ministry ultimately issued the required nature conservation conditions and, if so, what measures they contained[15]

5. EIA SCREENING FOR GEOLOGICAL EXPLORATION IN HOMOLJE

Under Articles 3, 4, 5(1)(2) and 12(1)–(2) of the Serbian Law on Environmental Impact Assessment, read together with List II, Item 15(4)–(5) of the EIA Regulation, the extensive geological exploration programme in Homolje must be considered as a whole, including its cumulative effects and potential impacts on the proposed Kučaj–Beljanica National Park and the ecological network. **Accordingly, the companies were required, at a minimum, to submit an EIA screening request covering the entire project.**

However, despite approximately twenty years of exploration and more than 1,500 boreholes, no such request was ever submitted. In its response of 6 April 2026, the Ministry of Environmental Protection expressly confirmed that the companies had submitted no applications under either the former or the current EIA Law and that no EIA screening decisions had therefore been issued.[16]

Bosilegrad case ANNEX

ANNEX I Nature-Protection Decision

The Institute concluded that the proposed activities **were not permissible** because the project area forms part of the Ecological Network "Golemi Vrh (95)", the internationally important bird area (IBA) "Dukat", and includes the only known Serbian habitat of four endangered fish species of the Aegean basin. Nevertheless, instead of explaining the legal consequences of this final and binding nature protection decision, the Government merely reports further extensions of the EIA procedure and the approval of an exploitation field for the same deposits.

ANNEX II Judicial Review

The Administrative Court confirmed that Bosil Metal has filed an administrative lawsuit challenging the Decision of the Ministry of Environmental Protection of 23 June 2025, which upheld the Institute for Nature Conservation's Decision of 30 January 2025 prohibiting the proposed mining activities. This confirms that the final nature-protection decision is currently the subject of judicial review. However, the Government failed to disclose the existence of these court proceedings in its latest report to the Bureau, despite their direct relevance to the legal status of the project and the implementation of the Institute's decision.

ANNEX III Inspection and Monitoring

At the same time, the report includes the 2025 monitoring results of the Serbian Environmental Protection Agency which recorded orthophosphate (PO4-P) corresponding to Class III (24 March 2025), orthophosphate (PO4-P) and total phosphorus corresponding to Class III, suspended solids

[15] https://drive.google.com/drive/u/1/folders/1eJ4ET22GP5Qf-zO9I0tfVEmsSqYwC_ox

[16] Response of the Ministry of Environmental Protection of the Republic of Serbia to Earth Thrive's request for access to information of public importance, No. 001867851 2026, dated 6 April 2026.

exceeding the limit values for Class I and II waters, and total iron (Fe) reaching 1,705 µg/l (Class IV) in the sample collected on 24 November 2025. The Complainants respectfully request the Bureau to ask the Government to clarify whether the Republic Environmental Protection Inspectorate considered these official monitoring results.

ANNEX IV Legal Non-Compliance

According to the Ministry of Mining and Energy's decision of 2 December 2025, the Feasibility Study for the exploitation of the Podvirovi and Popovica–Conjev Kamen deposits was prepared in May 2021. However, the decision determining the scope and content of the Environmental Impact Assessment Study was issued only on 26 November 2021[17].

Article 70(2)(1) of the Law on Mining and Geological Explorations, both as applicable at the relevant time and as currently in force, requires this decision to be obtained **before** the Feasibility Study is prepared. In this case, it was issued approximately six months later. This raises serious concerns as to whether the Feasibility Study, and consequently the documentation underlying the approval of the exploitation field in 2025, complied with the legally prescribed procedure.

Homolje case ANNEX

ANNEX I

The complaint was supported by photographs, GPS coordinates, witness evidence and information indicating that the works were being carried out without the required water permits. Following the Complainants' request for information on the status of the proceedings, the Prosecutor's Office confirmed[18] that the complaint had been registered under reference **KTR 193/26** and that, on 28 May 2026, it had instructed the Žagubica Police Station to collect the necessary information and interview witnesses. At the time of the Prosecutor's reply, the police report had not yet been submitted to the Prosecutor's Office.

[17] Environmental Impact Assessment Study for the exploitation of Pb, Zn and Cu ore from the Podvirovi and Popovica deposits, February 2024, available here. The Decision determining the scope and content of the EIA Study, No. 353-02-2039/2021-03 of 26 November 2021, is reproduced on PDF p. 377.

[18] Response of the Prosecutor's Office concerning the status of proceedings KTR 193/26.

Update for 2026 spring Bureau

17th February 2026

Bern Convention - Complaint No. 2022/06 - Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region

Sixth report

Dear members of the Bureau,

Thank you for the opportunity to contribute with our Report on the latest status of our Complaints regarding the mining activities in Bosilegrad and the Homolje Mt region in Serbia.

Please find below our 2 joint reports for the Spring 2026 meeting of the Bureau:

Update on Complaint No. 2022/06: Serbia: Possible negative impact of mining activities in Bosilegrad region, Serbia

13 February 2026

Abstract

This report by the Complainants updates Complaint No. 2022/06. Despite the prohibition of implemented planned activities at "Podvirovi" and "Popovica" deposits on 30 January 2025 by the Institute for Nature Conservation of Serbia, the Ministry of Environmental Protection has continued its Environmental Impact Assessment process with Bosil Metal. This study was returned for revision and permitting further extensions, while the Ministry of Mining and Energy confirmed that an administrative process concerning exploitation approval remains ongoing. The continuation of these procedures raises concerns as to legal certainty and the practical effect of Nature protection determinations. Transboundary risks remain significant. Water conditions were issued on 9 January 2025, despite the requirement for consent from the competent Bulgarian authority and the continued validity of the 1958 Bulgaria-Yugoslavia bilateral agreement. Given the hydrological connection to downstream aquifers utilised in Bulgaria, the risk of cross-border contamination still exists. Material discrepancies continue between independent expert sampling conducted near the mine and official monitoring data. Measurements at the "Ribarce" monitoring point do not capture conditions at the pollution source, and sediment and tailings analyses fall outside the Agency's analytical scope. Limited sampling frequency and privately financed testing further weaken confidence in the objectivity and completeness of the monitoring regime. Ahead of the proposed roundtable, this report renews the request for an on-the-spot appraisal and coordinated sampling at previously tested locations, in order to ensure methodological comparability and transparency. Finally, we draw attention to an additional threat to species in the form of the "Dukat" site in the area and would ask the government provides a response in relation to damage from that mine, given the scale of exploration activities in the "Novo Tlamino" project area.

(1) Status of the mine

As of 30 January 2025, the Institute of Nature Conservation has prohibited mining activities at the "Podivirovi" and "Popovica" deposits.[19]

Despite this, as highlighted in our previous report, the Ministry of Environmental Protection has continued its Environmental Impact Assessment process with Bosil Metal. The Environmental Impact Assessment Study for the exploitation at the "Podvirovi" and "Popovica" deposits has been returned for revision for the second time, and an extension has been sought to complete outstanding research. Given the prohibition on activity by the Institute of Nature Conservation, we have submitted a request for the cessation of the Environmental Impact Assessment procedure to the Ministry of Environmental Protection. Furthermore, the Ministry of Mining and Energy informed that 'Bosil Metal' LLC has submitted a request for approval for exploitation of the "Podvirovi" site, with the administrative process for this request ongoing.[20]

The Republic Water Directorate further reported that water conditions have been issued to Bosil Metal LLC on 9 January 2025 in the procedure for the preparation of technical documentation for mining projects at the "Podvirovi" and "Popovica" deposits. However, under point 4.3 of the water conditions, it is necessary to obtain the consent of the competent authority of the Republic of Bulgaria for the implementation of the project. The Republic Directorate for Water reports that a Draft Agreement between the Government of the Republic of Serbia and the Government of the Republic of Bulgaria on the sustainable management of transboundary waters has been prepared.[21] Given that the existing 1958 Agreement between Bulgaria and Yugoslavia is still in force, both States must ensure that they act in conformity with their existing obligations under the treaty..[22] A prospective or unpublished instrument cannot suspend, dilute, or justify non-compliance with existing treaty obligations, which must be interpreted harmoniously with any new agreement. Moreover, there is a significant risk of transboundary pollution. This would occur via contaminants from the site entering a waterway that recharges an underground aquifer 5km downstream, which serves as a natural reservoir used by Bulgaria for agricultural irrigation purposes.

We note that the Environmental Protection Agency conducts monthly water quality measurements of the Dragovistica River at the Ribarce monitoring point, with results generally complying with the prescribed limits.[23] However, as these measurements are taken at Ribarce, a site not directly affected by the source of pollution, they have limited relevance and do not accurately reflect the impact of the mine on the river and its species. This emphasizes the need for on-the-spot appraisal at the same sites from which the Complainant's expert, Dr Michael Chadwick, conducted his test. It should also be noted that the water quality analyses in Bosilegrad are conducted only four times per year and are financed by a

[19] Ministry of Environmental Protection, "Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government Report November 2025), page 2.

[20] Ministry of Mining and Energy, "Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government Report November 2025), Annex 3, page 9.

[21] Ministry of Mining and Energy, "Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government Report November 2025), page 3.

[22] No. 5228 Agreement concerning water-economic questions between the government of the Federal People's Republic of Yugoslavia and the Government of the People's Republic of Bulgaria. From page 112, accessed <https://treaties.un.org/doc/Publication/UNTS/Volume%20367/v367.pdf>

[23] Ministry of Mining and Energy, "Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government November 2025), page 3.

private company, the Institute for Occupational Health a.d. Novi Sad.[24] While this arrangement does not necessarily render the results inaccurate, it raises questions regarding the lack of institutional independence and diminishes confidence in the objectivity and reliability of the monitoring process and results.

(2) Roundtable and On the Spot Appraisal

We respectfully repeat our request for Dr Michael Chadwick to join the on-the-spot appraisal of the mining site in conjunction with the roundtable, in order to conduct further sampling and analysis. We propose this to take place in mid May due to snowfall in the region making testing difficult beforehand. This time of year would be most likely to provide clear results on the impact of the mine.

Additionally, we request that testing is done at the same locations where the Chemical Institute of Belgrade and Dr Michael Chadwick conducted their research as this would allow for accurate comparison of the results. The Environmental Protection Agency recognised that hazardous tailings and waste disposal facilities involve sample types that fall outside the analytical scope and jurisdiction of the Environmental Protection Agency's laboratory operations, which provides further insight into the discrepancy between the parties' reported pollution levels at the site.[25]

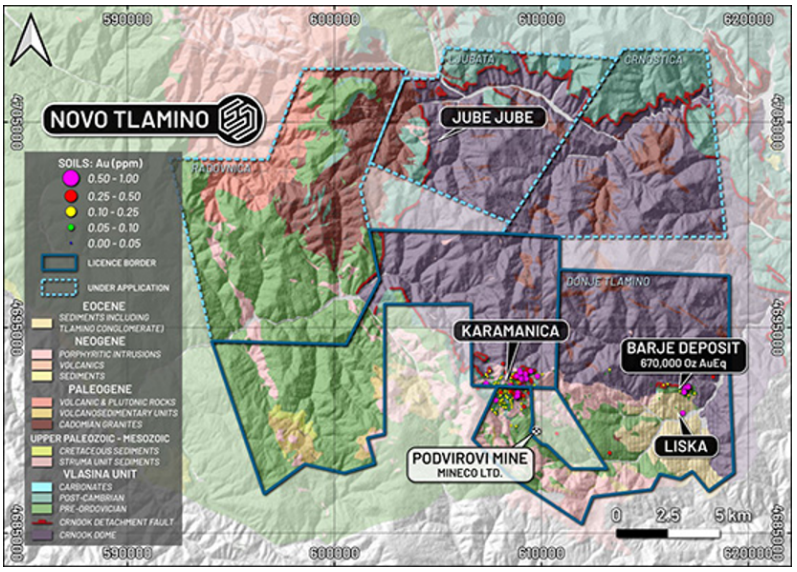
(3) Additional Concerns

An additional concern is the operation of another mine in the Novo Tlamino-Karamanica (Dukat) area. The government's response to the Bureau omits this location, creating the impression that all requests have been met and that no mining approvals have been issued. This is accurate only for the Podvirovi-Karamanica site. The Dukat location has been entirely excluded from the government's response, despite potentially being more significant in the area concerned.

Electrum Discovery, a Canadian-registered company, is developing two projects. The project of concern, Tlamino Gold, is in the municipality of Bosilegrad. The scale and positioning of this project has become clearer when considered alongside the surrounding licensed areas. The Bosilegrad project map shows that the existing small-scale Mineko project, which has caused significant pollution, is now surrounded by a new exploration license and several large mining projects. Notably, one new license is named "Surlica DUKAT", referring to a mountain designated as an Important Bird Area (IBA).[26] This raises concerns about the adequacy of the Environmental Impact Assessment procedure and indicates a failure by the Serbian government to properly consider the impacts of mining on the rights of Nature in the Bosilegrad region. The Complainants request further information on the environmental impact of these overlapping projects.

Appendix:
Map showing proximity of Mineco Ltd Podvirovi Mine and the Karamanica Prospect, part of the new Novo Tlamino Project by Electrum Discovery.

[24] Municipality of Bosilegrad, " Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government Report November 2025), Annex 6, page 14-15.
[25] Ministry of Mining and Energy, "Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region (Serbia)" (Government Report November 2025), page 3.
[26] Electrum Discovery, News Update posted 18 July 2024, accessed <https://electrumdiscovery.com/electrum-discovery-extends-geochemical-footprint-and-confirms-new-gold-targets-at-the-karamanica-prospect-at-novo-tlamino/ >



Homolje case: Earth Thrive, Cuvari Homolja / Homolje protectors, Mlavska Vojska / Mlava river army & Earth Law Center organisations

CASE SUMMARY:

As stated in our previous reports, and as already queried by the Bureau, the government does not seem to have any apparent environmental criteria in issuing mining exploration licences which is evident not only in the ongoing but in the two new licences being issued to a Canadian company in the vicinity of the already disputed mine in Bosielgrad and proposed mine in Homolje.

This and existing licences go against the national and international laws on Nature protection as well as Emerald network rules and the basic biological needs of healthy, uncontaminated and connected habitats and corridors.

The laboratory analysis of the soil and sediment samples collected directly from a tank containing tailings slurry and in two further locations, indicate the presence of active and spatially widespread heavy metal contamination. Given that we have been querying and pointing out to the tailings slurry and drill holes water and soil contamination for years, this is yet another clear indicator of the government's disregard for the most basic of safeguarding and protective measures as well as respect of law.

Furthermore, the government has refused to provide us with the document containing spatial spread of the protected species under the Bern Convention despite being directed to do so by the Bureau last year stating that they 'do not have it' which we find extremely difficult to believe. So our central question remains: on what environmental basis does the government keep issuing any licences, much less mining exploration ones then?

The state, through normative and planning solutions, is not ensuring effective implementation of Nature protection measures, but de facto derogates them by reducing the scope of protected areas, despite formally retaining or increasing the degree of protection

Our respectful request for the immediate cessation of mining exploration works and Nature harming remains.

Potential breaches of Articles: 1.2, 2, 3.2, 4.1, 4.2, 4.3, 5, 6 b,c,d, 7.1, 11.1.a

I Yet further allowance of exploration activities in regions inhabited by protected and endangered species

Although the state itself recognized the importance of preserving this area, some species of migratory birds, amphibians and reptiles, the state issues permits for exploration.

During the field tour by local residents and Nature protectors, the presence of the long-tailed owl (Strix uralensis), **one of the rarest owls in Serbia**, was recorded. Its presence is also confirmed by the Institute for Nature Protection of Serbia.[27] This is yet another reason to not conduct any damaging activities in the region, which very much includes mining explorations as conducted by the Canadian company with the approval of the government. More in Annex 1.

II Licences encroach officially protected areas or are in their immediate proximity disrupting the ecological connectivity of the habitat

Potential breaches of Articles: 4.1, 4.2 & 4.3
"The proposed project of mining exploration and the opening of a gold mine east of Žagubica, in the area between the massifs of Homolje and Beljanica, is in some places only one kilometer from the already established internationally important areas for birds, future NATURA 2000 areas (Veliki krš and Stol, Homolje and Kučaj - Beljanica)." (BPSSS, 2022)[28]

"Ecological connectivity is an essential part of Nature. It is necessary for the functionality of ecosystems, is key for the survival of wild animals and plant species and is crucial to ensuring genetic diversity and adapting to climate change across all biomes and spatial scales. While not being a new conservation topic, ecological connectivity has not been effectively reflected or implemented in the global biodiversity strategy that concluded in 2020." (CMS, 2025)[29] More in Annex II.

III Endangerment of strictly protected habitats & species (annex II)
Potential violation of Articles 4.1, 4.2, 6b & 6c

There is evidence presented to the Bureau that strictly protected species of lynx and bats have habitats in this area. However, with the construction of access roads for exploration activities, wildlife habitats and corridors (ecological) have been destroyed or cut off, due to increased traffic, light and noise pollution is present and prey availability may be reduced accordingly.
Even harassment is prohibited - which means that the noise from machinery (light) itself is harassment, a change in the water regime is a change in habitat conditions.
More in Annex III.

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[27] GOVERNMENT REPORT 2023. Institute for Nature Protection, page 10. https://rm.coe.int/files14-2023-serbia-mining-activities-in-bosilegrad-and-in-the-homolje/1680aa9065 accessed 15.12.2025. 11:0 5h

[28] The Bird Protection and Study Society of Serbia (BPSSS), Treba li da bude rudnik zlata na istražnom prostoru „Potaj čuka – Tisnica" kod Žagubice? – Društvo za zaštitu i proučavanje ptica Srbije accessed 19.01.2026. 09:37h

[29] Convention on the Conservation of Migratory Species of Wild Animals, Nature Knows No Borders Ecological Connectivity | Convention on the Conservation of Migratory Species of Wild Animals accessed 14.12.2025. 10:10h

IV Detected pollution around tailing slurry ponds and in the immediate vicinity of exploration locations and unsecured abandoned drilling ponds

An expert with PhD in the sciences of physical chemistry, conducted an analysis of the sediment and soil on 03 January 2026. The findings, which can be seen here, indicate the presence of active and spatially widespread heavy metal contamination, with a clearly identified primary source and evidence of contaminant migration into surrounding habitats. The first sample ("Čoka Rakita sediment 01"), collected directly from a tank containing tailings slurry, exhibits extremely elevated concentrations of arsenic (913.22 mg/kg, approximately 21.7 times above the maximum permissible concentration, MPC) and copper (829.16 mg/kg, approximately 7.5 times above the MPC), unequivocally confirming that the tailings slurry constitutes the primary source of highly toxic contamination.
Continued in Annex IV.

Further to that, a member of the Homolje protectors and a local resident, took several pictures recently of unsecured abandoned drilling sites, which is contrary to law and basic safety. The photographs can be seen following this link Abandoned unsecured drilling sites. We demand a response from the government in regard to this and what measures are they taking to inspect, prosecute and prevent this from happening in the future?

V Absence of an Appropriate Assessment in the Preparation of the Spatial Plan for the "Čoka Rakita" Mining Area

The Republic of Serbia is currently preparing the Spatial Plan for the Special Purpose Area of the "Čoka Rakita" mining area in the Crni Vrh region. At the initial stage, the competent authority adopted decisions to prepare the plan, conduct a Strategic Environmental Assessment (SEA), and define its scope and content. However, the SEA scoping decision does not provide for an Appropriate Assessment of impacts on the ecological network or on conservation objectives and site integrity, thereby excluding this key preventive mechanism from the outset of the planning process.

This situation reflects the broader implementation gap surrounding Article 10 of the Serbian Law on Nature Protection, which establishes Appropriate Assessment as a mandatory safeguard for ecological networks in line with the preventive principles of the Bern Convention.
Continued in Annex V

VI Repeated and persistent failure by the government to respond and provide requested public documents:

The Government has so far steadfastly been refusing to provide us with the Spatial map of the species protected under the Bern Convention which they delivered to the Bureau in 2019, despite being directed by the Bureau itself to do so a year ago. We yet again request an insight into those documents as they are absolutely crucial for these Complaint and for protection of Nature in Serbia in general. Further, we have submitted several requests on the official opinion of the legal requirements for the water licences and a several FOIs with regard to this case, none of which were replied to.Continued in Annex VI

VII Protection measures

The state, through normative and planning solutions, does not ensure the effective implementation of Nature protection measures, but de facto derogates them by reducing the scope of protected areas, despite formally retaining or increasing the degree of protection.

Spatial-planning and development documentation is systematically in conflict with the goals and measures of Nature protection, while the regulations in the fields of construction, mining and energy are applied with a predominant effect in relation to the regulations on Nature and environmental protection. This violates the principle of integration of environmental protection into sectoral policies, and the protection of the Emerald area is reduced to a declarative character, without real legal and factual protection.
More in Annex VII

Homolje case ANNEX

Annex I



The long-tailed owl (Ural owl) has a habitat in the zone of the planned mine.

"All birds of prey are protected by national regulations of the Republic of Serbia and international treaties such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES Convention). The long-tailed owl, also known as the Ural owl, is in the category of strictly protected species. This nocturnal bird of prey is a resident of preserved beech and beech-fir forests in mountainous areas, and **is very rare on the territory of the Republic of Serbia with only about 100 breeding pairs**." (Ministry of Environmental Protection 2020)[30]
"Ural owls act as keystone species in mountainous and boreal forests in Europe. Considering this ecosystem service, Ural owls should be effectively protected "[31]

The predominant type of woodland on both licences is **Moesian beech forest (Annex I habitat type**, code **91W0**) which had been identified as **priority habitat for protection because if its fragility and poor and slow ability to regenerate.**[32]
"The species golden eagle (Aquila chrysaetos) and peregrine falcon (Falco peregrinus) are among the most endangered species in the wider area surrounding Homolje region, Local populations or parts of populations of all species found in the area in question are potentially threatened, given the fact that many habitats populated by these species will disappear if the mine is opened."[33] Both are migratory species.

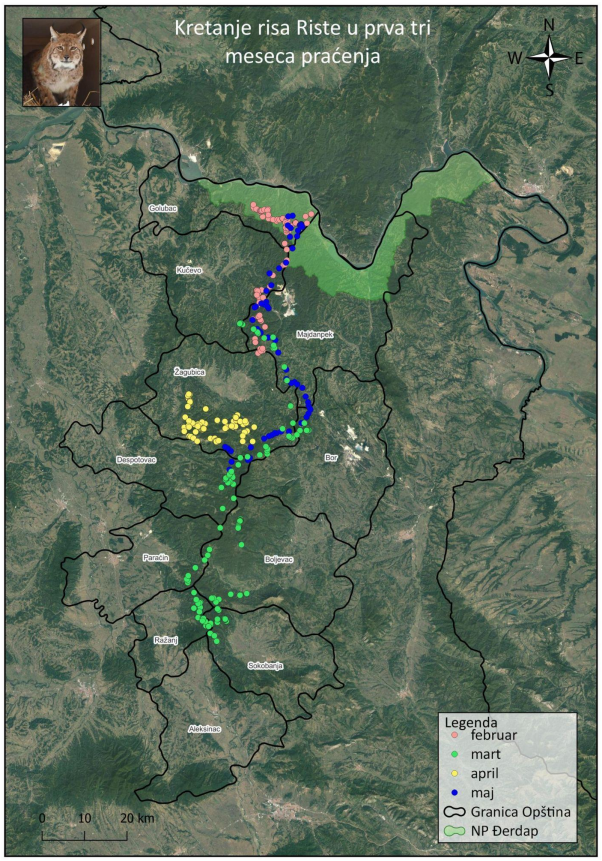
"Furthermore, one should be careful when assessing species threat status, since some of the aforementioned species are facing more threats than others; in addition, certain species' population loss is irreplaceable. This primarily applies to the gold eagle and peregrine falcon occupying the wider area surrounding Homolje region, since the populations of these birds are declining in eastern Serbia and the

[30] Још једна дугорепа сова (Strix uralensis) успешно рехабилитована и враћена у природу | Министарство заштите животне средине accesssed 19.01.2026. 09:01h
[31] **The Ural Owl as a Keystone Species in Interspecific Interactions Among Avian Predators—A Review** by **Łukasz Kajtoch,** Institute of Systematics and Evolution of Animals, Polish Academy of Sciences, 31-016 Krakow, Poland, *Diversity* **2025**, *17*(2), 109; **https://doi.org/10.3390/d17020109**
Submission received: 6 January 2025 / Revised: 24 January 2025 / Accepted: 31 January 2025 / Published: 1 February 2025
[32] Conditions for the protection of Nature – 03 br.021-1289/5 and 03 br.020-4973/3 issued by the Institute for the Protection of Nature on 23/05/2025 and 30.01.2025 respectively
[33] GOVERNMENT REPORT 2023. Institute for Nature Protection, page 15. https://rm.coe.int/files14-2023-serbia-mining-activities-in-bosilegrad-and-in-the-homolje/1680aa9065 accessed 15.12.2025. 11:05h

chances for their recovery are small. On the other hand, species such as partridge, woodcocks and hawks, in addition to being endangered game species, face habitat loss, as well as other challenges."[34]

ANNEX II

A definition for ecological connectivity was developed in 2019, in the context of a series of meetings convened by the CMS Secretariat to identify CMS priorities for the post-2020 Global Biodiversity Framework: Definition: "Ecological Connectivity is the unimpeded movement of species and the flow of natural processes that sustain life on Earth." (CMS, 2025).



Nature needs connectivity of habitats - its natural range - not only isolated "islands" of protection. Species are spread according to ecological conditions, not according to arbitrary government set 'conservation' lines that do not follow Natural rhythm.

"A natural range is not static but dynamic: it can decrease and expand. A natural range can constitute one aspect for the assessment of the conditions of a habitat or species. If the natural range is insufficient in size to allow for the long-term existence of that habitat or species, Member States are asked to define a reference value for a range that would allow for favourable conditions and to work towards this, for instance by fostering expansion of the current range."[35]

The natural range[36] includes areas that are not used permanently by the species: for example, the range of migratory species includes all terrestrial or aquatic areas that a migratory species inhabits, occasionally resides in, crosses or flies over at any time during its normal migration.

ANNEX III LYNX

Picture shows movement of the lynx in the first three months of monitoring through the zone of the planned mine. "Thanks to telemetric monitoring of Lynx Rista, the Faculty of Biology of the University of Belgrade and JP "National Park Đerdap" Donji Milanovac obtained very important information about the behavior of the species in nature, movement patterns and habits, as well as the size of the territory occupied by the individual."

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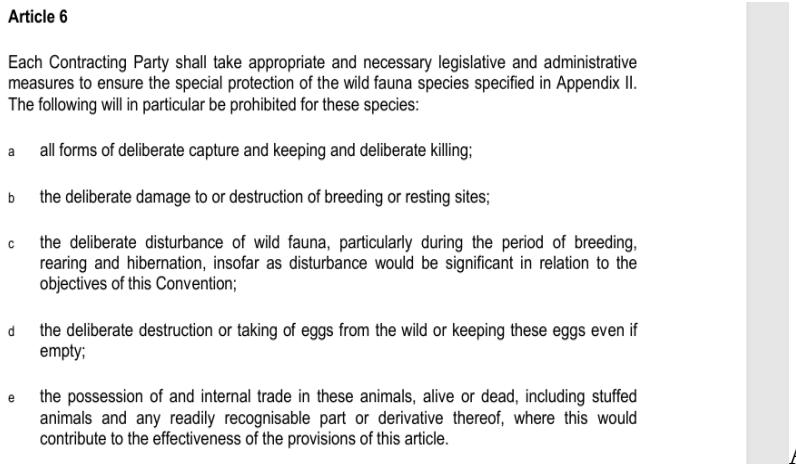
[34] Ibid.

[35] Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (2021/C 496/01) C_2021496EN.01000101.xml accessed 20.11.2025. 09:18h

[36] **Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora,** Article 3. " A coherent European ecological network of special areas of conservation shall be set up under the title Natura 2000. This network, composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II, shall enable the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored at a favourable conservation status in their natural range."

“It was established that Rista had left the area of National park Djerdap by the end of February and during March had crossed the territory of the mountains **Homolje, Beljanica, Kučaj**, Rtanj” [37] **right through the area planned for the mine.**
Lynx Rista is the first individual of Eurasian lynx which is marked with a GPS collar in Serbia. He was marked on February 3 and released into nature, after recovering in the ZOO Bor. In the past four months he traveled over 800 kilometers and crossed territories of 11 municipalities.

"The habitats it moved through are dense beech forests that are exceptionally well-preserved in the Park, which apparently suit it best."



Article 6

Each Contracting Party shall take appropriate and necessary legislative and administrative measures to ensure the special protection of the wild fauna species specified in Appendix II. The following will in particular be prohibited for these species:

a all forms of deliberate capture and keeping and deliberate killing;

b the deliberate damage to or destruction of breeding or resting sites;

c the deliberate disturbance of wild fauna, particularly during the period of breeding, rearing and hibernation, insofar as disturbance would be significant in relation to the objectives of this Convention;

d the deliberate destruction or taking of eggs from the wild or keeping these eggs even if empty;

e the possession of and internal trade in these animals, alive or dead, including stuffed animals and any readily recognisable part or derivative thereof, where this would contribute to the effectiveness of the provisions of this article.

All this violates Article 6 of the Bern Convention, it is forbidden to disturb the habitat of STRICTLY PROTECTED SPECIES, among others lynx / bats.

Serbia, as a signatory state, is obliged to: ensure the continuity of their habitats; prevent fragmentation; prevent the interruption of migration routes and food zones; and ban high-risk projects.

Annex IV
Detected pollution around tailing slurry ponds and in the immediate vicinity of exploration locations
Continued
Of particular concern is the fact that the subsequent destination of the tailings slurry, the manner in which it is treated, and whether legally prescribed waste management and control measures are being implemented remain unknown, indicating a serious regulatory and environmental risk.

The other two samples, collected from soil at a separate location, also show multiple exceedances of the MPC for copper (429.39 mg/kg and 529.61 mg/kg, respectively). Although lower than those measured at the source, these concentrations clearly indicate the migration and spatial dispersion of contamination from the tailings source into the surrounding soil and habitats. In the context of the Bern Convention, this pattern constitutes clear evidence of habitat degradation resulting from anthropogenic pollution.

[37]Movement of the lynx named Rista in the first three months of monitoring ttps://npdjerdap.rs/en/movement-of-the-lynx-named-rista-in-the-first-three-months-of-monitoring/ accessed 21.11.2025. 10:47h

Furthermore, the absence of transparent and verifiable information regarding the handling and management of the tailings slurry reinforces concerns regarding the failure to prevent habitat deterioration and to apply the precautionary principle, thereby posing a significant risk to species and ecosystems dependent on intact terrestrial and aquatic habitats.

Annex V

The provision has remained ineffective in practice because the implementing regulation required for its application — which should have been adopted by the end of 2016 — has never been issued.[38] Moreover, competent authorities have stated in official responses that the provisions on Appropriate Assessment will not be applied until December 2026. Taken together, the failure to adopt the required regulation and the subsequent postponement of its application indicate that this legally prescribed obligation has not been made operational in practice.

As a result, the procedure continues without the assessment required by law, allowing plans affecting ecologically significant areas to proceed without prior compatibility review and leaving a mandatory safeguard without practical effect.

Annex VI

Requests for official opinion and FOIs

On 16 January 2025, we submitted a request to the Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate under Article 80 of the Law on State Administration seeking an official opinion on whether water permits are legally required for geological exploration activities that may affect water regimes or water quality. This followed an official response to our access-to-information request of 15 October 2025 stating that no valid water permits issued to DPM Crni Vrh d.o.o. and DPM Avala d.o.o. existed in official records for the period from May 2024 onward. No reply has been received to date.

Additionally, two appeals were filed due to administrative silence regarding information requests submitted on 3 November. On 15 January 2026, appeals were lodged against Srbijavode for failure to provide water management acts relating to the Crni Vrh operator and against the Ministry of Mining and Energy for failure to provide information on required mining permits. In both cases, authorities failed to respond within statutory deadlines.

ANNEX VII

Reduction of the area of the protected area “Kučaj Beljanica”

Planning solutions are in direct opposition to the measures prescribed in the Conservation Study

[38] https://www.ekologija.gov.rs/lat/saopstenja/sektor-za-zastitu-prirode-i-klimatske-promene/uspostavljanje-sistema-za-primenu-ocene-prihvatljivosti-u-republici-srbiji

When you compare the Draft[39] Spatial Plan of the Republic of Serbia until 2035 - mineral resources thematic map (no.4) with the map of ecologically significant areas in Serbia, it can be seen that high-risk projects are being planned precisely in those ecologically significant areas.

Additionally, relevant studies and reports point to serious and systemic failures in the implementation of the Law on Environmental Impact Assessment in the Republic of Serbia, which further calls into question the legality and effectiveness of state action in the field of Nature protection.

According to the Study[40] in case of proposed NP Kučaj Beljanica: planning solutions are in direct opposition to the protection measures, potentially directly breaching Articles 3.2, 4.1 & 4.2

As the first fact, we point out that although the level of protection has increased, the area that will be under future protection has decreased by almost 50%

Although the first monuments of nature in the area were declared in 1949, it was only in 2013 that the first Conservation study of the Kučaj-Beljanica Nature Park was prepared by the Institute for Nature Conservation of Serbia. The protection procedure was started in 2020, and then this area was supposed to be protected as a Nature Park, with an area of 87,644.00 ha. However during 2022 it was decided to protect this area as a National Park with an area of 45,371.62 ha that will be under protection.

The authors of the Study[41] point out the following facts.
Planning solutions are in direct opposition to the measures prescribed in the Conservation Study.
The adoption of the SPASP[42] Kučajska planina and its implementation would directly threaten the fundamental values (...) which could result in the suspension of the protection procedure.
“Since, contrary to the positive regulations of the Republic of Serbia, the Conservation Study did not serve as a binding documentary basis for the Spatial Plan, the draft of this planning act inevitably led to a gross violation of the measures prescribed by the Study. Namely, numerous planning solutions that this act envisages or confirms due to the threat they pose to the protection of fundamental values on which the "Kučaj-Beljanica" National Park is being established are explicitly prohibited by the Conservation Study.”[43]

Protected areas and ecological significant space – intensive urbanization and exploitation

We quote certain parts of: *Study of cases of endangerment and degradation of protected areas, due to illegal development and implementation of plans and* ***projects initiated by state administration and local self-government bodies.***[44]

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[39] The Spatial Plan of the Republic of Serbia until 2035 is in the adoption procedure. ПРОСТОРНИ ПЛАН РЕПУБЛИКЕ СРБИЈЕ – АГЕНЦИЈА ЗА ПРОСТОРНО ПЛАНИРАЊЕ И УРБАНИЗАМ РЕПУБЛИКЕ СРБИЈЕ 03.02.2026. 09:16h
[40] Reri, 2022. Conversion of Natural Resources Into Profit The "Kučaj-Beljanica" National Park Case Study https://reri.org.rs/wp-content/uploads/2023/05/RERI-Conversion-of-Natural-Resources-Into-Profit-The-Kucaj-Beljanica-National-Park-Case-Study.pdf
[41] Reri, 2022. Conversion of Natural Resources Into Profit The "Kučaj-Beljanica" National Park Case Study https://reri.org.rs/wp-content/uploads/2023/05/RERI-Conversion-of-Natural-Resources-Into-Profit-The-Kucaj-Beljanica-National-Park-Case-Study.pdf
[42] Spatial Plan of the Special Purpose Area
[43] Page 8
[44]Reri, 2024. Protected areas and ecological significant space – intensive urbanization and

“Problems in the protection and sustainable use of protected areas as well as of biodiversity within them most often originate from mutual collisions regulations governing the area of environmental and nature protection with regulations in the field of construction of facilities and infrastructure, mining and energy, tourism and other economic sectors.” (p. 11)
“ A long series of examples of non-transparent adoption of regulations, plans, public policies and reforms, in cooperation with the degree of failure of state and local inspections and executive authorities, does not give hope that these circumstances will change soon” Page 11.
“The mentioned data emphasize the crucial importance of preservation, improvement and expansion of the ecological network, i.e. the establishment of a more efficient, more purposeful and rigorous implementation of the policy of protecting the environment and nature.” (Page 31)
“Contrary to the general view that the Republic of Serbia has an abundance of natural assets and resources, the statistical data presented in this study tell us that the share of protected areas and ecologically significant areas is very low.” (Page 31)

NATURA / EMERALD NETWORK

“**Weak enforcement, competing development priorities, and insufficient institutional commitment continue to undermine biodiversity protection**.
Many existing and potential **Emerald sites remain under severe threat from** large infrastructure and **mining project**s, which are being **prioritised over environmental protection and sustainable development**.
Urgent action is needed to ensure that Emerald Network sites are not merely symbolic designations” (Bankwatch 2025)[45]
“Despite years of announcements, the process of drafting the Regulation on Appropriate Assessment has yet to start.
More than fifteen years of work on establishing Natura 2000 in Serbia has not delivered the planned, expected or the desired results. The process began in 2010 through the project Strengthening Administrative Capacities for Protected Areas in Serbia (Natura 2000) — Twinning Project SR 2007/IB/EN-02, and continued through numerous other projects, mostly supported by the EU and other foreign donors. However, the investments and efforts of the Ministry of Environmental Protection and its affiliated organizations and institutions have never been sufficient. As a result, Serbia currently lacks a functional ecological network.This is despite the transposition of the Habitats Directive, which has created legal obligations for managing the ecological network and the implementation of the appropriate assessment”. (Shadow report, Chapter 27 in Serbia: System error May 2024 – May 2025.)

Acceptability assessment is a procedure that evaluates the possible impact of a strategy, plan, basis, program, project, works or activities on the objectives of preservation and integrity of the area of the ecological network.

Conservation and protection of protected areas must include proactive and preventive measures.

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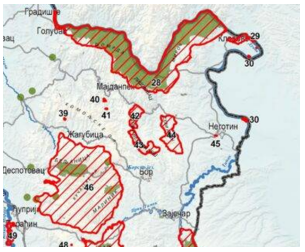
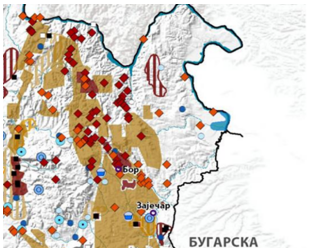
exploitation
Studija slučajeva ugrožavanja i degradacije zaštićenih područja accessed 21.01.2026. 11:20h
[45] Expanding the Emerald Network: Progress and gaps in the Western Balkans - Bankwatch

Serbia, as a future member, has yet to provide its contribution, not only in increasing the area of the network, but also in developing this protection system, which will take place **in parallel with the protection implemented at the national level.**

Necessary precondition for the adequate treatment of the ecological network is spatial planning

"The fulfilment of this requirement implies a continuous multi-year field investigation and engagement of an appropriate number of researchers, as well as the provision of continuous funding sources. Considering that preparing documentation and identifying areas to be included in the ecological network is a continuous process (except for the NATURA 2000 network which has to be established by the date of accession to the European Union) based on spatially confirmed and scientifically provable data on certain habitat types and habitats of the plant and animal species obtained during the field investigations, the preservation of natural heritage within the ecological network is ensured by reserving the area by means of spatial planning documentation. Without this it is difficult or even impossible to predict the survival of species and habitat types with favorable status. In addition to the abovementioned, it is also necessary to establish adequate management, financing and implementation of the protective measures and introduce mechanisms for estimating their acceptability, as an instrument for the conservation of the NATURA 2000 network."[46]





In the meantime, extractivist projects are being developed. How will habitats and species be preserved until Serbia joins the EU?

Spatial Plan until 2035.

What further worries us is the Draft of the Spatial Plan of the Republic of Serbia until 2035, which is **in the adoption procedure**.

When you compare the Spatial Plan until 2035 - mineral resources thematic map no.4 with the map of ecologically significant areas in Serbia, it can be seen that high-risk projects are being planned precisely in those ecologically significant areas.

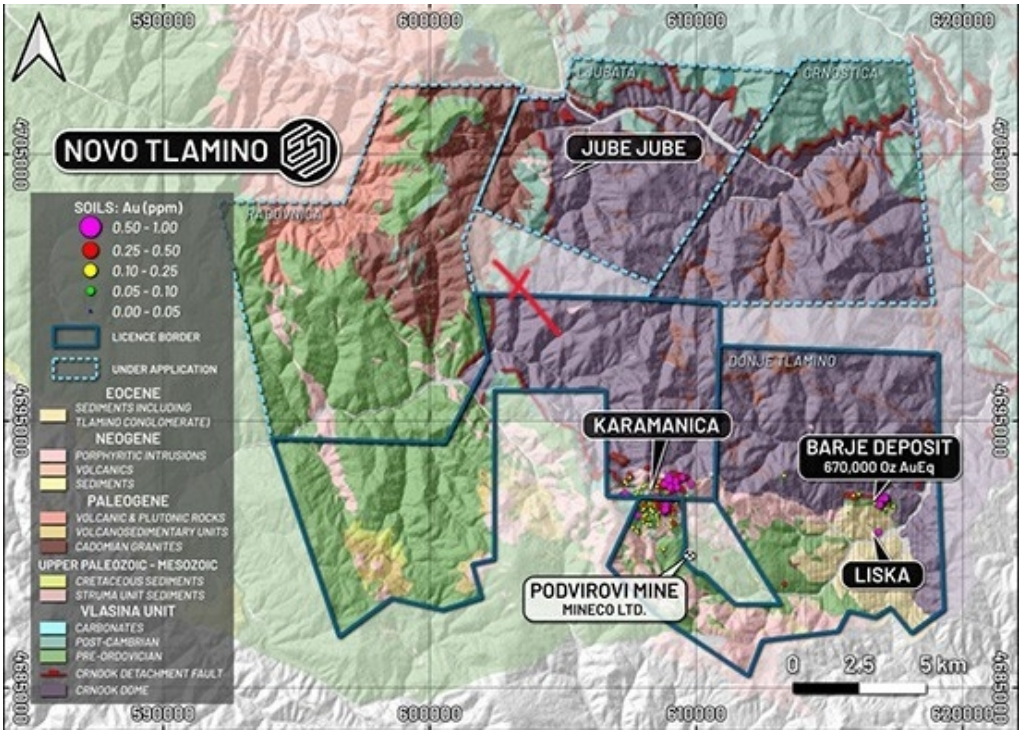
There is an environmental map that is not safe to open.[47]

[46] Dobričić M, Sekulić N, Josimović B, 2017. *Spatial planning and ecological networks in Serbia*, Spatium 2017 Issue 38, Pages: 18-26

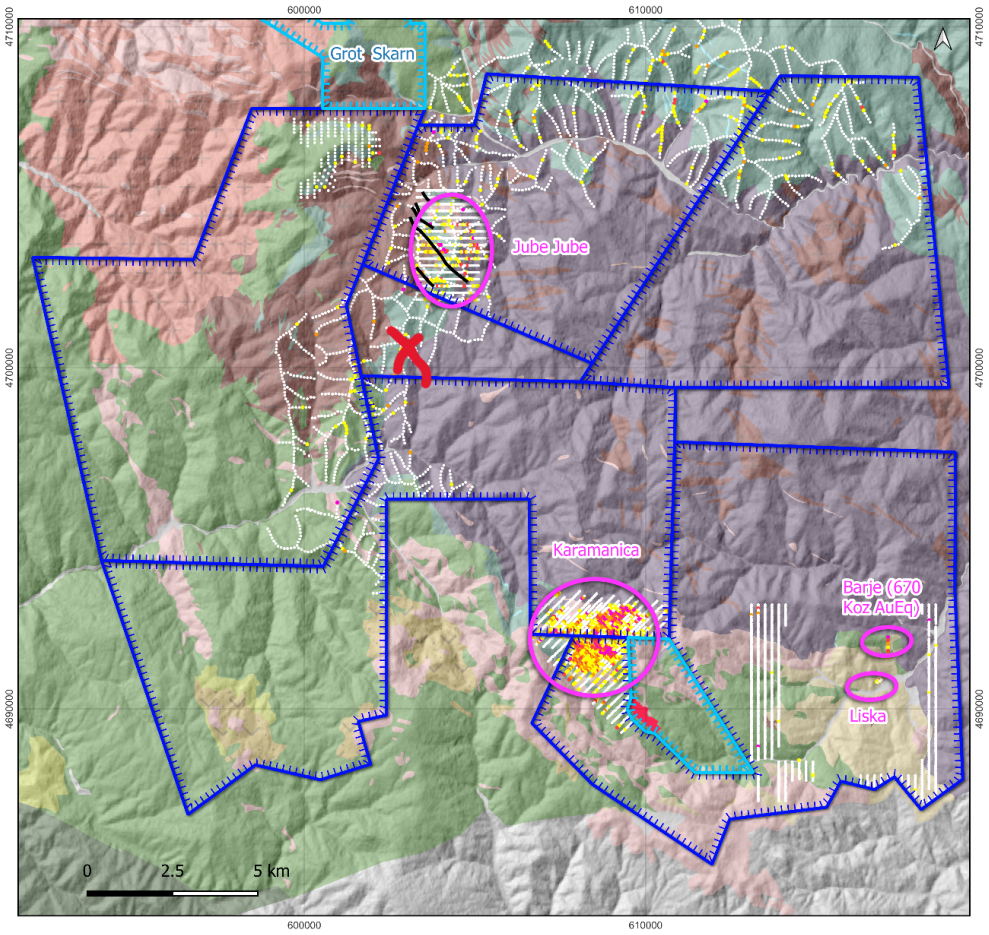
[47] ЈАВНИ УВИД У НАЦРТ ПРОСТОРНОГ ПЛАНА РЕПУБЛИКЕ СРБИЈЕ ОД 2021. ДО 2035. ГОДИНЕ И ИЗВЕШТАЈ О СТРАТЕШКОЈ ПРОЦЕНИ УТИЦАЈА ПРОСТОРНОГ ПЛАНА РЕПУБЛИКЕ СРБИЈЕ ОД 2021. ДО 2035. ГОДИНЕ НА ЖИВОТНУ СРЕДИНУ | Министарство грађевинарства, саобраћаја и инфраструктуре 27.01.2026. 11:14

The first picture is a screenshot of the Ecological network of Republic of Serbia (Bosilegrad area), second picture is, same area in, Spatial Plan until 2035 - mineral resources. Especially if you compare a new license "Novo Tlamino".

New licences in Bosilegrad area, "Novo Tlamino" and "Surlica Dukat" - Mountain Dukat as Important Birds Area.



As can be seen on these maps, the area of the "Podvirovi-Karamanica" mine is surrounded by new projects, so it is not clear how the Ministry of Environmental Protection will protect this precious area and prevent cross-border pollution? Certainly not by allowing an even bigger extractivist project, if we know that "such a small" mine "Podvirovi - Karamanica" (in relation to the new project Novo Tlamino) has caused cross-border pollution.



Source: https://electrumdiscovery.com/electrum-discovery-corp-identifies-new-styles-of-gold-mineralization-on-consolidated-522-square-kilometers-novo-tlamino-project/

All this will directly affect the habitats, but also prevent ecological connectivity as a long-term goal of protection.

Environmental Impact Assessment in Republic of Serbia

“For several years now, the European Commission has pointed out in its annual reports the necessity of improving the impact assessment procedure, public participation in these procedures, stopping the practice of issuing construction permits before agreeing to the impact assessment study and stopping

the practice of dividing projects into smaller units in order to avoid impact assessment or reduce its effects. Despite this, these negative practices are almost the rule rather than the exception."[48]

"Serbia needs to solve the critical shortcomings of the Law on Planning and Construction, including the requirement for public participation and transparency when issuing construction permits, which is already determined in the environmental impact assessment. Also, there should be a practice of issuing construction permits before the environmental impact assessment procedure and dividing projects into several smaller projects that, when viewed individually, do not require an impact assessment procedure. It is necessary to significantly improve the implementation of impact assessments.[49] "[50]

OHCHR about Serbia

During October 2025. The UN Working Group on Business and Human Rights[51] has completed its ten-day visit to Serbia, presenting preliminary findings expressing serious concerns about the impact of business activities on communities, the environment and human rights.

UN experts pointed to a limited number of investigations into alleged human rights violations by companies, weak enforcement of laws in the field of environmental protection. "Serbia must align economic development with human rights and environmental protection".

[48] Reri, 2024. Implementation of the Law on EIA in Republic of Serbia, Page 6. https://reri.org.rs/wp-content/uploads/2024/07/Implementation-of-the-Law-on-Environmental-Impact-Assessment-in-the-Republic-of-Serbia.pdf accessed 23.01.2026. 12:58

[49] European Commission, Republic of Serbia Report for 2023, Brussels 8 November 2023, SWD (2023) 695 final version: https://www.mei.gov.rs/upload/documents/eu_dokumenta/godisnji_izvestaji_ek_o_napretku/izvestaj_ek_23.pdf

[50] Reri, 2024. Implementation of the Law on EIA in Republic of Serbia, Page 15. https://reri.org.rs/wp-content/uploads/2024/07/Implementation-of-the-Law-on-Environmental-Impact-Assessment-in-the-Republic-of-Serbia.pdf accessed 23.01.2026. 13:03

[51] Serbia must align economic development with human rights and environmental protection: UN experts | OHCHR