Strasbourg, 15 September 2026 **T-PVS/Files(2026)2022/06_gov_rev**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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

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Bureau of the Standing Committee
7-9 April 2026
Strasbourg

Possible file: 2022/06

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

- GOVERNMENT REPORT -

Document prepared by the
Ministry of Environmental Protection, Serbia

Update report for the Autumn Bureau Meeting

Republic of Serbia MINISTRY OF ENVIRONMENT AL PROTECTION
No.: 002643943 2026 14850 004 000 020 092
Date: 22 July 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. 2022/06: Possible File, Serbia: Bosilegrad and Homolje

Dear Ms Siino,

In regard to the Decision of the Bureau of the Standing Committee of the Bern Convention pertaining to Complaint No. 2022/6: Possible File: Serbia: Bosilegrad and Homolje, transmitted by the Secretariat of the Bern Convention on 13 May 2026, the Ministry of Environmental Protection, acting as the competent authority responsible for overseeing the implementation of the Bern Convention in the Republic of Serbia, has requested statements on the aforementioned Complaint from the relevant 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 - Republic Water Directorate, the Institute for Nature Conservation of Serbia, the Municipal Assembly ofBosilegrad and the Municipal Assembly of Zagubica, as well as instructed competent Departments within the Ministry of Environmental Protection to deliver relevant reports.

I Having regard to the information received from the aforementioned authorities and institutions, and pertaining to the part of the Complaint relating to the potential adverse impact of mining activities in Bosilegrad, we hereby inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure reported that it does not possess the requested data and is not conducting any activities related to the preparation of spatial plans for special purpose areas at the Novo Tlamino-Karamanica (Dukat) location. The referenced mines are covered by spatial and urban planning documents falling under the competence of local self-government units.

2. The Ministry of Mining and Energy (hereinafter: the Ministry) reported that it granted an Approval of the Exploitation Field (i.e. mining license) to the company ,,Bosii Metal" LLC from Bosilegrad for the ore deposits ,,Podvirovi" and ,,Popovica-Cvonjev Kamen". It further noted that, in accordance with the provisions of the Law on Mining and Geological Exploration (,,Official Gazette of the Republic of Serbia", Nos. 101/15, 95/18 - other law, and 40/21), there is no statutory obligation to submit the final decision of the Ministry of Environmental Protection on the Environmental Impact Assessment Study in order to obtain the aforementioned approval.

Upon a review of the official records, the Ministry stated, by letter No. 001930702 2024 14820 007 000 000 001 dated 25 October 2024, that the referenced approval stipulates that the holder of the authorization may not commence the exploitation and processing of mineral raw materials at the approved exploitation field until it obtains the approval for construction of the mining facilities and conducting the mining works.

The Ministry further noted that the request did not specify what additional information was required regarding the Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia until 2040, with projections until 2050 (adopted by the National Assembly on 23 April 2026).

The Ministry further stated that there is no active mine in the Novo Tlamino-Karamanica (Dukat) area. At the referenced location, the Ministry has granted approvals for applied geological exploration to the company Medgold Istrazivanja LLC from Belgrade, specifically:

(I) geological exploration of copper (Cu), gold (Au), lead (Pb), zinc (Zn), silver (Ag), and molybdenum (Mo) in the Surlica-Dukat area, valid until 7 May 2027; and

(2) geological exploration of copper (Cu), gold (Au), lead (Pb), zinc (Zn), silver (Ag), and molybdenum (Mo) in the Donje Tlamino area, valid until IO December 2027.

3. The Ministry of Agriculture, Forestry and Water Management - Republic Water Directorate submitted information regarding mining-related activities provided by the company ,,Bosil-Metal" LLC.

4. The Institute for Nature Conservation of Serbia (hereinafter: the Institute) reported that, with regard to the environmental impact of the ,,Surlica Dukat" project in the Novo Tlamino-Karamanica (Dukat) area, it does not hold any new information.

The Institute also holds no additional information concerning the approval for the exploitation field at the ore deposits ,,Podvirovi" and ,,Popovica".

5. The Municipal Assembly of Bosilegrad reported that it has been continuously monitoring surface waters within the territory of the Municipality of Bosilegrad since 2021. In 2026, monitoring is also being conducted on the Karamanica River at a point located 300 metres downstream from the mine. The analyses are to be conducted by the accredited laboratory of the Institute for Occupational Safety a.d. Novi Sad, pursuant to decisions issued by the Accreditation Body of Serbia and the Ministry of Agriculture, Forestry and Water Management - Republic Water Directorate, authorizing the performance of physicochemical and microbiological analyses of waste, surface, and groundwater, as well as water sampling.

The results of all measurements are available on the official website of the Municipality of Bosilegrad at the following link: http://www/bosilegrad.org/sr/Monitoring.aspx.

6. The Ministry of Environmental Protection with regard to the environmental impact assessment, hereby reports that the procedure for the review of the Environmental Impact Assessment Study concerning the ,,Podvirovi-Karamanica" mine reconstruction project is currently in progress.

The Republic Environmental Protection Inspection in the Ministry, reported that it does not possess any new information relative to the previous report dated 12 February 2026.

II Having regard to the statements received from the aforementioned authorities and institutions, and pertaining to the Complaint concerning the potential adverse impact of mining activities in Bosilegrad, we hereby inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure stated that the Government of the Republic of Serbia adopted the Regulation on the Adoption of the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kucaj Mountains (,,Official Gazette of the Republic of Serbia", No. 33/2024). The Ministry further noted that the Report on the Strategic Environmental Impact Assessment of the Spatial Plan for the Special Purpose Area of the Tourist Destination of the Kucaj Mountains forms an integral part of the Documentation Basis. The aforementioned Report has received official approval from the Ministry of Environmental Protection and is attached to the present Report.

Pertaining to the area concerned, the Government of the Republic of Serbia has adopted the Decision on the Preparation of the Spatial Plan of the Special Purpose Area for Gold Exploitation in the ,,Potaj - Cuka -Tisnica" Exploration Area (,,Official Gazette of the Republic of Serbia", No. 64/2021), as well as the Decision on the Preparation of the Spatial Plan of the Special Purpose Area ,,Coka Rakita" Ore Deposit in the Crni Yrh Region (,,Official Gazette of the Republic of Serbia", No. 101/2025). The development of draft versions of both plans is currently in progress. The competent authority in charge of the preparation of such plans in the Republic of Serbia is the Agency for Spatial and Urban Planning of the Republic of Serbia, in accordance with the provisions of Article 166g of the Law on planning and Construction (,,Official Gazette of the Republic of Serbia", Nos. 72/2009, 8 I /2009 - corr., 64/20 IO-CC, 24/20 I I, 121/2012, 42/2013 - CC, 50/2013 - CC, 98/2013 - CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019, 9/2020, 52/2021, 62/2023, and 91/2025).

2. The Ministry of Mining and Energy stated that the requested information does not fall within its jurisdiction.

3. The Ministry of Agriculture, Forestry and Water Management - Republic Water Directorate stated that since the last reporting period it issued Water Conditions No. 005069944 2025 14843 00 I 325 024 (dated March 2, 2026). These conditions were issued during the early public review for the draft Spatial Plan for the Special Purpose Area of the “Coka Rakita” Ore Deposit, located in the Crni Yrh Region of the Zagubica Municipality.

4. The Institute for Nature Conservation of Serbia (hereinafter: the Institute) stated that, with regard to the mitigation measures of adverse impacts envisaged by the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kucaj Mountains, as well as the environmental impact assessment of geological research of mineral resources in the territory of the Municipality of Zagubica, particularly in the immediate vicinity of future areas of European significance (Veliki Krs and Stal, Homolje and Kucaj-Beljanica), all mitigation measures are envisaged in the Expert Basis Ref. 03 No. 020-772/6 of 11 July 2023, issued by the Institute as the act on nature protection requirements for the preparation of the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kucaj Mountains, based on request by the Ministry of Environmental Protection.

With regard to the potential impact of the Spatial Plan of the Special Purpose Area of the ,,Coka Rakita" Ore Deposit in the Crni Yrh Region on protected species and habitats, as well as the corresponding mitigation measures of adverse impacts, the Institute has no new information. The mitigation measures addressing the adverse impacts are set out in the Decision on Nature Protection Requirements (Ref. 03 No. 1627/2 of 14 May 2026) for the Preparation of the Spatial Plan of the Special Purpose Area of the ,,Coka Rakita" Ore Deposit in the Crni Yrh Region.

5. The Municipal Assembly of Zagubica stated that mining activities are being carried out in the territory of the Municipality of Zagubica in accordance with the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kucaj Mountains (,,Official Gazette of the Republic of Serbia", No. 33/2024) and the Spatial Plan of the Municipality of Zagubica (,,Official Gazette of the Municipality ofZagubica", No.2/2011). Geological surveys of mineral resources conducted in certain parts of the municipality are in compliance with the aforementioned planning documents.

The Municipal Assembly further stated that it does not possess information regarding the impact mitigation measures outlined in the Kucaj Mountains Spatial Plan, nor does it hold data on the environmental impact assessments for geological mineral exploration within the Zagubica Municipality.

6. The Ministry of Environmental Protection hereby reports that it issued the Decision (No. 353-02-00020/2023-04 dated 13 July 2023) on nature protection requirements for the preparation of the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kucaj Mountains.

Please find enclosed copies of the aforementioned documents translated into English.

We look forward to your response, and we would like to thank the Bureau in advance for its highest consideration of this Report.

Sincerely,

STATE SECRETARY

Dragana Ostojic

Annex I – Report by the Ministry of Construction

Republic of Serbia
MINISTRY OF CONSTRUCTION,
TRANSPORT AND INFRASTRUCTURE
Number:00298003 2026 14810 006 001 051 001
Date: 19 June 2026
22-26 Nemanjina St., Belgrade
S.Č.

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada St.
11 000 Belgrade

SUBJECT: Request for a progress report on Complaint No. 2022/6: Possible File: Serbia: Bosilegrad and Homolje
REFERENCE: Your No. 002643943 2026 14850 004 000 020 092 dated 05 June 2026

To Whom It May Concern,

By the letter referenced above, the Decision of the Standing Committee of the Bern Convention regarding the consideration of the Report on Possible File No. 2022/6: Serbia: Bosilegrad and Homolje, which had been delivered to the Ministry of Environmental Protection by the Secretariat of the Bern Convention on 13 May 2026, has subsequently been forwarded to the Ministry of Construction, Transport and Infrastructure.

Having regard to the assertions contained in the request concerning the Bosilegrad area, namely the information on the mine in the Novo Tlamino - Karamanica (Dukat) area, we hereby inform you that the Ministry of Construction, Transport and Infrastructure does not hold the requested data and does not undertake activities related to the preparation of spatial plans for special purpose areas in the area concerned, in accordance with the Article 21, item 2 of the Law on Planning and Construction ("Official Gazette of the Republic of Serbia", Nos. 72/2009, 81/2009 – corr., 64/2010 – Constitutional Court decision, 24/2011, 121/2012, 42/2013 – Constitutional Court decision, 50/2013 – Constitutional Court decision, 98/2013 – Constitutional Court decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 – other law, 9/2020, 52/2021, 62/23 and 91/25) (hereinafter: the Law). The aforementioned mines are covered by spatial and urban planning documents falling under the competence of local self-government units.

The Bureau has also requested information regarding activities in the Homolje mountain area.

In accordance with the above, we inform you that, pertaining to the area concerned, the Government of the Republic of Serbia has adopted the Regulation on the Adoption of the Spatial Plan of the Area of the Special Purpose Tourist Destination of the Kučaj Mountains ("Official Gazette of the Republic of Serbia", No. 33/2024) (hereinafter: the Regulation). One copy of this Regulation has been deposited for permanent custody with the Ministry of Environmental Protection, in accordance with Article 5 of the aforementioned Regulation.

An integral part of the Documentation Basis is the Report on the Strategic Environmental Impact Assessment of the Spatial Plan for the Special Purpose Area of the Tourist Destination of the Kučaj Mountains, for which the consent of the Ministry of Environmental Protection has been obtained. This consent is attached to the present report. Article 6 of the aforementioned Regulation prescribes that the Documentation Basis shall be permanently kept by the Agency for Spatial and Urban Planning of the Republic of Serbia.

Furthermore, pertaining to the area concerned, the Government of the Republic of Serbia has adopted the Decision on the Preparation of the Spatial Plan of the Special Purpose Area for Gold Exploitation in the "Potaj - Čuka -Tisnica" Exploration Area ("Official Gazette of the Republic of Serbia", No. 64/2021), as well as the Decision on the Preparation of the Spatial Plan of the Special Purpose Area "Čoka Rakita" Ore Deposit in the Crni Vrh Region ("Official Gazette of the Republic of Serbia", No. 101/2025). The development of draft versions of both plans is currently in progress. The competent authority in charge of the preparation of such plans in the Republic of Serbia is the Agency for Spatial and Urban Planning of the Republic of Serbia, in accordance with the provisions of Article 166g of the Law.

Sincerely,

Обрађивач предмета: Светлана Чеперковић, дипл.пр.п	
Лице које врши контролу: Светлана Чеперковић, дипл.пр.п	
Лице које врши контролу: Предраг Матовић, в.д. помоћник министра	

MINISTER

Aleksandra Sofronijević

Annex II – Report by the Ministry of Mining and Energy

Republic of Serbia
MINISTRY OF MINING AND ENERGY
Number: 001930702 2024 14820 007 000 000 001
Date: 10 June 2026

MINISTRY OF ENVIRONMENTAL PROTECTION
Sara Pavkov, Minister of Environmental Protection

22-26 Nemanjina St.
11000 Belgrade

Dear Minister Pavkov,

By letter No. 002643943 2026 14850 004 000 020 092 of 5 June 2026, you submitted to the Ministry of Mining and Energy the decision of the Bureau of the Standing Committee of the Bern Convention concerning the consideration of the Report on Complaint No. 2022/06: Possible File: Serbia: Bosilegrad and Homolje, requesting an additional progress report on the referenced complaint. In accordance with the aforementioned letter, we hereby inform you as follows:

I In relation to Bosilegrad:

1. With regard to the approval issued by the Ministry of Mining and Energy to the company Bosil-Metal LLC, Bosilegrad, granting an exploitation field on the ore deposits Podvirovi and Popovica – Cvonjev Kamen, we inform you that the provisions of the Law on Mining and Geological Exploration (“Official Gazette of the Republic of Serbia”, Nos. 101/2015, 95/2018 – other law, and 40/2021) do not prescribe an obligation to submit a “final decision of the Ministry of Environmental Protection on the Study on Environmental Impact Assessment ” for the purpose of issuing the referenced approval.

Following a review of the official records of the Ministry of Mining and Energy, it has been confirmed that, by letter No. 001930702 2024 14820 007 000 000 001 of 25 October 2024, the Ministry informed you that the “Rreferenced approval stipulates that the holder may not commence exploitation or preparation of mineral raw materials within the approved exploitation field until authorization has been obtained for the construction of mining facilities and the execution of mining works”.

Apart from this matter, on which we have already provided our statement, no new activities have been undertaken, nor is there any new information concerning mining operations at the aforementioned site.

2. Furthermore, it is not clear which additional information is being requested in relation to the Strategy for the Management of Mineral and Other Geological Resources in the Republic of Serbia for the period until 2040, with projections until 2050. With regard to the aforementioned Strategy, we inform you that it was adopted by the National Assembly of the Republic of Serbia on 23

April 2026.

3. We would like to take this opportunity to inform you that there are no active mines in the Novo Tlamino – Karamanica (Dukat) area. At the referenced location, the Ministry has granted approvals to the company Medgold Istraživanja LLC, Belgrade, for applied geological explorations, namely: (1) approval for geological explorations of Cu, Au, Pb, Zn, Ag and Mo in the Surlica – Dukat area, valid until 7 May 2027; and (2) approval for geological explorations of Cu, Au, Pb, Zn, Ag and Mo in the Donje Tlamino area, valid until 10 December 2027.

II In relation to the Homolje mountain area, we would like to inform you that the requested supplements do not fall within the competence of the Ministry of Mining and Energy.

Sincerely,

STATE SECRETARY

/s/ Sonja Vlahović

Annex III – Report by the Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate

MINISTRY OF AGRICULTURE,
FORESTRY AND WATER MANAGEMENT
- Republic Water Directorate -
No.: 002948544 2026 14843 001 000 000 001
Date: 17 June 2026
B e l g r a d e

MINISTRY OF ENVIRONMENTAL PROTECTION

BELGRADE, Omladinskih brigada 1

SUBJECT: Request for progress report on Complaint No. 2022/6: Possible file: Serbia: Bosilegrad and Homolje

To Whom It May Concern,

With reference to your request submitted to the Ministry of Agriculture, Forestry and Water Management by letter No.: 002643943 2026 14850 004 000 020 092 of 5 June 2026, we would like to inform you that since the conclusion of the previous reporting period, the Republic Water Directorate issued Water conditions No.: 005069944 2025 14843 001 001 325 024 dated 2 March 2026 within the framework of the early public review procedure for the preparation of the Spatial Plan for the Special Purpose Area (SPSPA) of the "Čoka Rakita" ore deposit, situated in the Crni Vrh area, Municipality of Žagubica.

Please find enclosed information on the activities related to the mine construction submitted to the Ministry of Agriculture, Forestry and Water Management by LLC BOSIL-Metal d.o.o.

Sincerely,

Acting Director
/s/ Maja Grbić, BA LLB

Mining Company
BOSIL-METAL LLC, BOSILEGRAD

To: MINISTRY OF AGRICULTURE,
FORESTRY AND WATER MANAGEMENT
Republic Water Directorate
Water Inspection

INFORMATION on the
activities referring to the BOSIL-METAL LLC mine construction

Since the beginning of 2022, no production activities or exploration works have been carried out at the mine; however, work has been undertaken on the preparation of design and technical documentation, as follows:

1. The Main Mining Design for the construction of the mine, including a wastewater treatment plant, has been completed and has successfully passed technical inspection.
2. The preparation of the Environmental Impact Assessment Study is presently in progress. As a prerequisite for its development, a comprehensive hydrogeological study is being conducted.
3. Operational staff are carrying out the maintenance of shaft chambers, together with the pumping out of pit water and its discharge into settling tanks, in accordance with the approved Design.
4. In December 2025, we received a Decision on the mining field expansion, issued based on the Water Conditions of 9 January 2025.
5. On 26 March 2026 we submitted the Report on State of Environment developed by Bosil-Metal LLC in 2025, which we hereby enclose with this communication.

All technical solutions contained in the Main Mining Design for the mine construction were developed in accordance with current regulations and SEVESO standards, as well as comprehensive monitoring measures established for environmental protection purposes.

In Bosilegrad,

Date: 17 June 2026

Director
/s/ Miodrag Vukajlović, B.Sc. in Mining Engineering

Mining Company
BOSIL-METAL LLC, BOSILEGRAD

To: Ministry of Agriculture and Water Management
Republic Water Directorate
Group for Water Acts, Analytical Affairs and
Water Standards
Bulevar umetnosti 2/A
11070 Novi Beograd

SUBJECT: **Report on state of environment in 2025 by LLC Bosil-Metal d.o.o.**

1. Brief description of activities during the specified period

In 2025, Bosil-Metal LLC was primarily conducting activities focused on the following:

- Mining and geological exploration at the Podvirovi ore deposit, based on the approved Mining Design for the exploration of solid mineral resources of Pb-Zn ore in the Karamanica area near Bosilegrad;
- Reclamation of the disposal site where the intermediate product was deposited as a by-product generated from the processes conducted in the Pilot plant in which technological tests of flotation ore processing from the Podvirovi ore deposit were conducted;
- Supporting technical documentation (i.e. Technical inputs) was prepared and provided to the design engineers for the preparation of the Main Mining Design and the Environmental Impact Assessment Study.

2. Review of environmental protection activities in 2025 included the following:

- A contract was signed with the Public Health Institute of Vranje for testing the quality of wastewater in the creek Bezimeni Potok, specifically 150 m upstream and 250 m downstream from the mine. These tests were carried out on a quarterly basis throughout the year.
- Hazardous and non-hazardous waste was disposed of in purpose-built storage facilities.
- Regular cleaning of the settling pond water on the Level 4 and Level 5 of the Podvirovi ore deposit was carried out.
- Cleaning of the stormwater catch basin was carried out at the mine site.
- A Study on Environmental Impact Assessment of Mine Operations was prepared, based on the Main Mining Design (MMD) for the exploitation of Pb-Zn-Cu ore from the Podvirovi and Popovica ore deposits, and submitted to the Ministry of Environmental Protection.

3. Proposal of financial resources to be invested in environmental protection:

No.	Type of works	Amount in RSD
1.	Waste water testing	243,864
2.	Preparation of the Environmental Impact Assessment Study	720,000
3.	Reclamation	/
4.	Settling pond cleaning	1,350,000
	Total funds	**2,313,864**

In Bosilegrad, 26 March 2026

Director
/s/ Miodrag Vukajlović, B.Sc. in Mining Engineering

Annex IV – Report by the Institute for Nature Conservation of Serbia

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. 025-4043/17
Date: 3 July 2026

MINISTRY OF ENVIRONMENTAL PROTECTION
11070 NOVI BEOGRAD
1 Omladinskih Brigada Street

Your reference No.: 002643943 2026 14850 004 000 020 092 of 5 July 2026

You addressed the Institute for Nature Conservation of Serbia with Request Ref. 03 No. 025-4043/16 of 5 June 2026 requesting a report within Institute's scope of competence concerning "*Complaint No. 2022/6: Possible File: Serbia: Bosilegrad and Homolje*" based on the Decision of the Bureau of the Standing Committee of the Bern Convention (hereinafter: the Bureau), as received by the Ministry of Environmental Protection from the Secretariat of the Bern Convention, dated 13 May 2026.

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), and in accordance with your request, the Institute hereby informs you as follows:

- In relation to Bosilegrad and the Bureau's request to the competent authorities to harmonize the necessary procedures and approvals for the exploitation field on the mineral deposits Podvirovi and Popovica, including measures for nature conservation and environmental protection, and for the purpose of informing the Bureau on the further development of the relevant procedures, the Institute has no additional information;
- In relation to the Bureau's request for additional information concerning the adoption of the Draft Strategy for the Management of Mineral and Other Geological Resources until 2040, with projections until 2050, the Institute hereby submits, as an attachment, Opinion Ref. 03 No. 021-1782/2 of 11 June 2025 on the Draft Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections until 2050, as well as the Draft Report on the Strategic Environmental Assessment of the Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections until 2050;
- With regard to the Bureau's concern about the quality of surface waters downstream from the mine, this matter does not fall within the competence of the Institute;
- With regard to the Bureau's request concerning the environmental impact of the "Surlica DUKAT" project in the Novo Tlamino – Karamanica (Dukat) area, the Institute does not have any new information;
- With regard to the Homolje mountain area and the Bureau's request for information on the mitigation measures of negative impacts envisaged by the Spatial Plan for the Special Purpose

Area of the Tourist Destination of the Kučaj Mountains, as well as on the environmental impact assessment of geological explorations of mineral resources in the territory of the Municipality of Žagubica, particularly in the immediate vicinity of the future Natura 2000 areas (Veliki Krš and Stol, Homolje and Kučaj–Beljanica), all mitigation measures are provided in the expert basis Ref. 03 No. 020-772/6 of 11 July 2023, issued by the Institute and referring to the Act on Nature Protection Conditions for the preparation of the Spatial Plan for the Special Purpose Area of the Tourist Destination of the Kučaj Mountains, which is herewith submitted as an attachment;

– With regard to the Bureau's request for information on the possible impact of the Spatial Plan for the Special Purpose Area of the Čoka Rakita ore deposit in the Crni Vrh region on protected species and habitats, as well as on the corresponding mitigation measures of negative impacts, including a cartographic representation of the spatial distribution of species protected under the Bern Convention, the Institute has no new information. The mitigation measures of negative impacts are set out, as already indicated, in the Decision on Nature Protection Conditions for the preparation of the Spatial Plan for the Special Purpose Area of the Čoka Rakita ore deposit in the Crni Vrh region, Ref. 03 No. 021-1627/2 of 14 May 2026, which is herewith submitted as an attachment.

ACTING DIRECTOR
Aleksandra Došlić

Enclosed herewith:

- Opinion on the Draft Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections until 2050, and the Draft Report on the Strategic Environmental Assessment of the Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections until 2050, No. 021-1782/2 of 11 June 2025;
- Expert basis for the Act on Nature Protection Conditions for the preparation of the Spatial Plan for the Special Purpose Area of the Tourist Destination of the Kučaj Mountains, No. 020-772/6 of 11 July 2023.
- Decision on Nature Protection Conditions for the preparation of the Spatial Plan for the Special Purpose Area of the Čoka Rakita ore deposit in the Crni Vrh region, No. 021-1627/2 of 14 May 2026.

Delivered to:

– Addressee
– Records Office – 2 copies

Annex V – Report by the Municipality of Bosilegrad

Republic of Serbia
MUNICIPALITY OF BOSILEGRAD
Municipal Administration
Environmental Protection Service
No.: 501-39-8/2024
23 June 2026
BOSILEGRAD

Ministry of Environmental Protection
Omladinskih brigada 1, SIV III
11070 Novi Beograd/Serbia
Ms Snežana PROKIĆ

SUBJECT: Submission of Information

Dear Madam,

With reference to your letter No: 002643943 2026 14850 004 000 020 019 of 5 June 2026 requesting a statement on Complaint No. 2022/06 concerning the possible negative impact of mining activities in Bosilegrad, we hereby inform you as follows:

The Municipality of Bosilegrad has been continuously monitoring surface waters in the Bosilegrad area since 2021; in 2026, continuous monitoring will also be carried out on the Karamanica River, at a point located 300 meters downstream from the Bosil-Metal mine in the village of Karamanica.

The testing will be carried out by the laboratory of the Institute for Occupational Safety (Institut zaštite na radu a.d.), Novi Sad, accredited by the decision of the Accreditation Body of Serbia and the decision of the Ministry of Agriculture, Forestry and Water Management, Republic Directorate for Water, for performing physicochemical and microbiological testing of wastewater, surface water and groundwater, as well as for water sampling (surface water, ground water and wastewater).

All samples in which physicochemical parameters have been tested to date comply with the values prescribed by the Regulation on Emission Limit Values for Pollutants in Surface and Ground Waters and Sediments, Including the Deadlines for their Attainment (*Official Gazette of the Republic of Serbia*, No. 50/2012). They also comply with the values prescribed by the Rulebook on Hazardous Substances in Water (*Official Gazette of the Republic of Serbia*, No. 31/1982) for Classes I and II.

All previous measurement results are available on the official website of the Municipality of Bosilegrad at the following link: http://www.bosilegrad.org/sr/Monitoring.aspx

Sincerely,

ENVIRONMENTAL PROTECTION SERVICE
Environmental Advisor

/s/ Mikica Vasilev, B.SC. in Environmental Engineering

MAYOR OF THE MUNICIPALITY OF BOSILEGRAD

/s/ Vladimir Zaharijev

Annex VI – Report by the Ministry of Environmental Protection

Republic of Serbia
Ministry of Environmental Protection
SERBIAN ENVIRONMENTAL PROTECTION AGENCY

Number: 325-01-00008/42/2026-02
Belgrade, 24 July 2026

MINISTRY OF ENVIRONMENTAL PROTECTION
2 Bulevar Mihajla Pupina Blvd.
11070 BELGRADE
Dragana Ostojić,
State Secretary

Subject: Request for a progress report concerning Complaint No. 2022/6: Possible case: Serbia: Bosilegrad and Homolje

Further to your Request No. 002643943 2026 14850 004 000 020 092 dated 5 June 2026, we hereby inform you that the Serbian Environmental Protection Agency, as the administrative authority responsible for the implementation of state monitoring of the quality of surface water and groundwater in the territory of the Republic of Serbia, carries out **water quality testing of the Dragovištica River at the Ribarce monitoring station (border monitoring station).** Water sampling was conducted on a monthly basis in accordance with the Annual Water Status Monitoring Programme for 2026 (*The Official Gazette of the Republic of Serbia*, No. 22/2026). Enclosed with this official letter, please find the results (Excel format) of the physicochemical and chemical analyses performed on samples of water from the Dragovištica River in 2026.

Based on the results obtained from the physicochemical and chemical analyses of the water of the Dragovištica River, we are also providing you with a comment regarding the prescribed limit values for Class II surface water quality, pursuant to the Regulation on Limit Values of Pollutants in Surface Water and Groundwater and Sediment and the Deadlines for Their Achievement, (*The Official Gazette of the Republic of Serbia*, No. 50/2012), and the Regulation on Limit Values for Priority and Hazardous Substances Polluting Surface Water and the Deadlines for Their Achievement (*The Official Gazette of the Republic of Serbia*, No. 24/2014).

Analysis of the test results established that, during 2026, there were no changes in the organoleptic properties of the water (colour, odour and visible waste matter). The values of the general physicochemical parameters and suspended solids were within the prescribed limit values for Class II surface water quality.

The values of total metals — iron (Fe), zinc (Zn), copper (Cu), manganese (Mn), boron (B), chromium (Cr) and arsenic (As) — as well as the values of dissolved metals — nickel (Ni), cadmium (Cd), mercury (Hg) and lead (Pb) — were within the prescribed limit values for Class II surface water quality.

Enclosure: as stated in the text

DIRECTOR

Stefan Simeunović

(*illegible signature)*

Round seal of the Ministry of Environmental Protection, Serbian Environmental Protection Agency, Belgrade affixed hereto

E-mail: Offce@sepa.gov.rs; 10a Žabljačka Street, 11000 Belgrade; Phone: 011 63 56 788;
http://www.sepa.gov.rs; Republic of Serbia Fax: 011 2861077

Annex VII – Report by the Municipal Assembly of Žagubica

Republic of Serbia
MUNICIPALITY OF ŽAGUBICA
Mayor
No.: 002973248 2026 08192 002 000 381 007
Date: 24 June 2026
Žagubica

Republic of Serbia
MINISTRY OF ENVIRONMENTAL PROTECTION

11000
BELGRADE
Nemanjina 22-26

Subject: Response to your request for reporting on Complaint No. 2022/06, regarding monitoring the possible negative impact of mining activities in the Homolje Mountain region.

Dear Sir/Madam,

Regarding the request of the Ministry of Environmental Protection number 002643943 2026 14850 004 000 020 092 dated 5 June 2026 (received on 18 June 2026), concerning the progress report on Complaint No. 2022/06, we hereby inform you as follows:

As concerns the area within the territory of the Municipality of Žagubica where the respective mining activities are carried out, the applicable planning documents are the Spatial Plan for the Special Purpose Area of the Kučaj Mountains Tourist Destination (*Official Gazette of the Republic of Serbia, No. 33/2024*) and the Spatial Plan of the Municipality of Žagubica (*Official Gazette of the Municipality of Žagubica*, No. 2/2011). Geological surveys of mineral resources conducted in certain parts of the municipality are in compliance with the aforementioned planning documents.

Exploratory work and the exploitation of mineral resources fall exclusively within the competence of state authorities.

Since the Bureau of the Bern Convention, the Council of Europe, requested information on the mitigation measures provided under the Spatial Plan for the Special Purpose Area of the Kučaj Mountains Tourist Destination, as well as the assessment of the environmental impact of geological explorations of mineral resources in the territory of the Municipality of Žagubica, we hereby inform you that the Municipality of Žagubica has no new information to report. Specifically, the Municipality has not undertaken any studies, reports, or similar analyses concerning environmental risks in the Homolje area arising from mining activities, nor has it received any such documentation from competent state authorities, either prior to or since the submission of our last report.

Sincerely,

Mayor of Žagubica
/s/ Safet Pavlović

Republic of Serbia
Ministry of Environmental Protection
No. 005172638 2025 14850 004 000 016 012
Date: 12th February 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: Progress Report on Complaint No. 2022/06: Possible Case: Serbia: Possible negative impact of mining activities in Bosilegrad and Mt. Region of Homolje

Dear Ms Siino,

Regarding the decision of the Standing Committee of the Bern Convention in relation to the Complaint No. 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and mountainous region of Homolje, adopted on the 45th session of the Standing Committee in the period from 8th to 12th December 2025, the Ministry of Environmental Protection, in its capacity of the competent authority in charge of monitoring implementation of the Bern Convention for the Republic of Serbia, has submitted requests for opinion in relation to this Complaint to competent authorities and organizations: 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,the Institute for Nature Conservation of Serbia, the Agency for Environmental Protection, the Municipal Assembly of Bosilegrad and the Municipal Assembly of Žagubica including competent sectors of the Ministry of Environmental Protection.

I On the grounds of the opinions received from aforementioned authorities and organizations, and in relation to the part of the Complaint relating to possible negative impact of mining activities in Bosilegrad, we are hereby informing you of the following:

1. The Ministry of Construction, Transport and Infrastructure has informed that the aforementioned mines are covered by the documents in competence of the local self-administration units and no initiative has been launched in the sense of drafting of a spatial plan of special purpose area for this area.

2. The Ministry of Mining and Energy has informed that they have approved to the company „Bosil-metal" Ltd. From Bosilegrad the exploitation field on the mineral deposits „Podvirovi" and „Popovica-Conjev Kamen". This approval defines that the holder of the approval cannot start the exploitation and preparation of the mineral resource on the approved

exploitation field until they have secured approval for construction of mine facilities and for execution of mining works.

They have informed that on 30th December 2025, the Government adopted the Proposal of the Strategy for Management of Mineral and Other Geological Resources until 2040, with Projections until 2050 and submitted the latter to the National Assembly of the Republic of Serbia for its consideration and adoption in accordance with Article 12 of the Law on Mining and Geological Explorations („Official Gazette of the Republic of Serbia", No. 101/15, 95/18 - other law. 40/21),

3. The Ministry of Agriculture, Forestry and Water Management - Republic Water Directorate has informed that the republic water inspectors (Hereinafter: Water Inspection), on 2nd December 2025, carried out regular field inspection control at the monitored operator „Bosil-metal" Ltd from Bosilegrad, on which occasion they have prepared the protocol no. 004600607 2025 14843 003 002 329 009 from 5th December 2025. In the course of the inspection control, it has been established that no works on the extraction of ore from the mineral deposits „Podvirovi" are taking place nor on the transport of the ore by means of the mine carts to the receiving area at the plateau in front of the mine shaft entrance on the horizon V.

In this protocol the Water Inspection has drawn attention of the monitored operator „Bosil-Metal" Ltd. to the following and has warned him of the following:

- to abstain from excavation of ore from the deposits „Podvirovi" and „Popovica" on the territory of Karamanice, the Municipality Bosilegrad, as well as from ore processing and disposal of flotation tailings, that is, to abstain from any works that may harm water regime, including catchment of water from the catchment area and discharge of waste waters, without having obtained the water rights, that is, the water permit;
- to submit the request for water permit upon drafting of the main mining project for expansion of the exploitation field of the mine „Bosil-Metal" on the mineral deposits "Podvirovi" and „Popovica-Conjev Kamen" on the territory of Karamanica near Bosilegrad for exploitation of the copper (Cu), lead (Pb) and zinc (Zn) ores from the mineral deposits „Podvirovi" and „Popovica", including for the plant for processing of the ore and flotation tailings pit, and to do the same for facilities and works for which the water permit is mandatory, as well as to submit the request for water permit in accordance with the regulations (the condition under number 4.48 from the water conditions no: 003092052 2024 14843 001 001 325 025 from 9th January 2025)
- to secure, as appropriate, special water conditions for purpose of drafting of technical mining projects, regulating in detail conditions for facilities and works related to water supply, drainage, storage of mine tailings, purification and the discharge of purified water into the recipient, managing the accumulation and tailings dam and so on. (Condition under no. 4.47 from water conditions no: 003092052 2024 14843 001 001 325 025 from 9th January 2025)
- That the provisions of Article 122 of the Water Law („Official Gazette of the Republic of Serbia", No. 30/10, 93/12, 101/16 and 95/18), prescribe that the water permit determines the manner, conditions and volumes of waste water use, manner and conditions of discharge of waste waters, storage and discharge of hazardous and other substances which may pollute water, as well as other conditions for other works affecting the water regime.

4. The Institute for Nature Conservation of Serbia (Hereinafter: The Institute) has informed that they have responded to the inquiry of a citizen-journalist, submitted by email in relation to the "decision on closing of the mine "Podvirovi-Karamanica" near Bosilegrad". Via the same channel, the Institute has submitted the Response 03 No: 030-4746/1 from 12th December 2025.

Due to unfavourable weather conditions, the Institute has not undertaken planned field investigation on the mentioned localities in order to examine the state of affairs of natural wealth and possible impact of the mining activities undertaken so far.

5. The Environmental Protection Agency has informed that, in its capacity of the administrative authority, they are in charge of monitoring the quality of surface and ground

water on the territory of the Republic of Serbia and that they conduct **testing of the quality of water in the River Dragovištica on the profile Ribarice (long profile).**

Analysis of the test results confirmed that during 2024 there were no changes in the organoleptic properties of water (smell, colour and visible waste substances). The obtained values of general physical and chemical parameters and suspended substances were in accordance with the prescribed threshold values for class I and II of the quality of surface water, save for the samples from 24th March and 24th November 2025, wherein certain breach of threshold have been confirmed in the sense of orthophosphate (PO4-P) which was in accordance with the class III of the quality of surface water and in the sense of phosphorous (P) which was in accordance with class III of the quality of surface water. The value of suspended substances breached the threshold value for class I and II of the quality of surface water.

The value of total metals– iron (Fe), zinc (Zn), copper (Cu), manganese (Mn), boron (B), chromium (Cr), arsenic (As), as well as the values of suspended metals - nickel (Ni), cadmium (Cd), mercury (Hg) and lead (Pb), fluctuated within the prescribed limits for class I and II of the surface water quality. Higher value in the sense of the content of total iron was also confirmed (class IV): 1705.0 mg/l (24th November 2025).

6.The Municipal Assembly of Bosilegrad has informed that they are continuously monitoring surface water on the territory of the Municipality Bosilegrad since 2021. During 2025, the Karamanica River was monitored 300 meters downstream from the mine by taking samples on 18th February, 21st May, 24th August and 20th November 2025. The tests were carried out by the accredited laboratory Institut za zaštitu na radu jsc. Novi Sad.

All samples wherein physical and chemical parameters were tested comply with the values for class I and II of water quality, prescribed by the Regulation on Threshold Values of Pollutants in Surface and Ground Water and Sediment and the Deadlines for their Reaching („Official Gazette of the Republic of Serbia", No. 50/12) and with the values prescribed in the Regulation on Hazardous Substances in Water („Official Gazette of the Republic of Serbia", No. 31/82).

All measurements carried out so far can be found on the official website of the Bosilegrad Municipality on the following link: http://www/bosilegrad.org/sr/Monitoring.aspx.

7. The Ministry of Environmental Protection (hereinafter: Ministry), regarding environmental impact assessment, has reported that the procedure of considering amendments to the Environmental Impact Assessment Study for the project of exploitation of the Pb, Zn, Cu ores from the mineral deposits „Podvirovi" and „Popovica" on the territory of Karamanica (Hereinafter: The Study) is ongoing.

The company, „Bosil-Metal", Ltd. from Bosilegrad, as the project leader, submitted the amended Study, including are processing plant and flotation tailings pit in January 2025. After consideration of the amended Study, the Technical Committee concluded that they could not give their consent to the mentioned study, because it failed to specify sufficiently comprehensive research (for purpose of the Study and/or project) which would plan for the measures of mitigating the impact that the project could have on the quality of surface and ground water, soil, the impact of the project on the biodiversity and on protected species and areas, nor did it provide sufficient analysis of transboundary impact of the project. The composition of the surface water and expected changes in the composition of ground water arising from exploitation, and the related construction of the waste water treatment plant, were not defined nor were the possible inflow of water in the mining towns or the total quantities of fresh water needed for the works at the same time maintaining the biological minimum, taken into consideration. Furthermore, no forecast of the flood wave was provided in case of breaking of the dam, nor were the working areas designed in accordance with the water conditions. The general response measures in case of accident were not provided either; therefore, we have asked the project leader to amend the Study accordingly. Inter alia, the water conditions have been requested issued by the competent authority as well as the nature conservation conditions.

Acting on the aforementioned request of the Ministry from July 2025, which was received by the project leader on 29th August 2025, the project leader submitted, in September 2025, the notification claiming that they were working hard to correct the Study. The project leader claimed that, considering the big amount of objections, and in particular due to the fact that certain objections required additional tests which did not depend on the project leader nor the developer of the Study, therefore they were asking for extension of the deadline for alignment of the Study with the objections of the technical committee, and simultaneously submitted the supplement - water conditions from 2025 issued by the Ministry of Agriculture, Forestry and Water Management.

In October 2025, the Ministry received the memo with the reply of the Faculty of Mining and Geology and the request for extension of the deadline by at least 6 months, thus allowing for preparation of a better-quality study, which was in interest of all stakeholders.

Regarding the objections related to complex hydro-geological investigations and assessment of risk from catastrophes, they claimed that additional time was needed to obtain relevant data and carry our comprehensive analyses.

Bearing in mind that the project leader has not fully supplemented the Study in accordance with the requirements of the Ministry (technical committee), nor has he submitted legally valid conditions, nor final environmental protection conditions; therefore, proceeding from the regulations governing general administrative procedure as well as the procedure for giving consent to the Study, the Ministry has not been able to reach the final decision at this point in this procedure.

The Republic Environmental Protection Inspection has informed that, after they have completed the latest inspection control in July 2024 and adopted decision on suspension of the inspection control in December 2024, the company „Bosil-Metal" Ltd. from Bosilegrad continued to monitor surface water of the Bezimeni Stream on two locations, namely: at 150 m above the settling basin of the horizons IV and V and at 250 m below the settling basin of the horizons IV and V through the authorized legal entity, the Public Health Institute in Vranje, and regularly submit reports electronically on tests to the Republic Environmental Protection Inspection.

The last submitted report relates to the fourth quarter of 2025. In accordance with the Report on compliance of the submitted reports on testing of surface waters for the Bezimeni Stream carried out for the third and fourth quarter of 2024 and all four quarters of 2025, on the grounds of the comparison of the results of examined parameters with the threshold values of the emissions referred to in the subordinate legislation in force, the examined samples had no effect on the quality of the water recipient, that is, the results of the examined parameters of the surface water were in compliance with the requirements of the subordinate legislation in force. The last report on testing of surface waters - the Bezimeni Stream, for fourth quarter of 2025, which was carried out after the previous Report concerning the Complaint No. 2022/6 from November 2025, also confirmed that the examined sample had no effect on the quality of water recipient, that is, that the results of the examined parameters of the surface water were in compliance with the requirements of the subordinate legislation in force.

The inspection control performed in July 2024 concluded that, in the course of the mining works on the mineral deposits of the mine „Podvirovi", tailings were generated, representing inert rock material and, in accordance with the protective measures referred to in Chapter 7 of the Environmental Impact Study, the recommended treatment is its disposal in the vicinity of the entrance on the horizons IV and V. According to the previous inspection controls of the mine „Podvirovi" on the horizon IV, there are no more mining activities and all tailings that were disposed of at the plateau in front of the horizon IV have been used and transferred to be used for the construction of the dam for storage of intermediate products in the vicinity of pilot plant. The tailings pit at the horizon V has been levelled and the pilot plant has been constructed on the site.

Having completed the latest inspection control in July 2024, the Republic Environmental Protection Inspection has not carried out further inspection controls due to the lack of grounds for further proceedings.

II On the grounds of the opinions received from the aforementioned authorities and organizations, in relation to this Complaint related to possible negative impact of mining activities on the Mt. region of Homolje, we are informing you of the following:

1. The Ministry of Construction, Transport and Infrastructure has informed that the Government of the Republic of Serbia has adopted the Decision on development of the Spatial Plan for Special Purpose Area for „Čoka Rakita" mineral deposits in the region of Crni Vrh („Official Gazette of the Republic of Serbia",No. 101/2025).

They have also referred to the provisions of Article 33 of the Law on Planning and Construction („Official Gazette of the Republic of Serbia", No. 72/2009, 81/2009 - corr., 64/2010 - the CC Decision, 24/2011, 121/2012, 42/2013 - the CC Decision, 50/2013 -the CC Decision, 98/2013 - the CC Decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021, 62/23 and 91/25), which prescribes that the spatial and urban planning documents shall be harmonized, so that the document regulating a smaller area shall be in accordance with the document regulating a larger area.

2. The Ministry of Mining and Energy has informed that they do not have any new information in relation to mining activities in the Mt. region of Homolje.

3. The Institute for Nature Conservation of Serbia has informed that, at the request of the Agency for Spatial and Urban Planning of the Republic of Serbia for issue of conditions for nature conservation in view of drafting of the Spatial Plan of the Special Purpose Area of the Mineral Deposits „Čoka Rakita" in the region of Crni Vrh, they have provided appropriate Notification 03 No: 021-4765/1 from 15th December 2025.

On the grounds of the Request of the Ministry of Environmental Protection for issue of technical information for the writ on the nature conservation conditions in view of drafting of the Spatial Plan for Special Purpose Area of the mineral deposits „Čoka Rakita", the Institute has provided the latter in the form of the File No: 020-62/2 from 26th January 2026.

4. The Municipal Assembly of Žagubica has informed that on the territory of the Municipality Žagubica, mining activities are taking place in accordance with the Spatial Plan for Special Purpose Area of the Tourist Destination Mt. Kučaj („Official Gazette of the Republic of Serbia", No. 33/24) and the Spatial Plan of the Municipality Žagubica („Official Gazette of the Municipality Žagubica", No. 2/11) and that the execution of geological explorations of the mineral resources in certain parts of the municipal territory is not contrary to the planning documents in force.

5.The Ministry of Environmental Protection has informed that they do not have any new information in relation to mining activities in the Mt. region of Homolje.

Please, find enclosed the copies of the aforementioned documents with translation into English.

We look forward to your response, and we would like to thank the Bureau in advance for its highest consideration of this report.

Sincerely,

STATE SECRETARY

Dragana Ostojić

Republic of Mining and Energy Report

The Republic of Serbia
Ministry of Mining and Energy
No. 001930702 2024 14820 007 000 000 001
Date: 19th January 2026

Ministry of Environmental Protection
Sara Pavkov, minister of environmental protection

Nemanjina 22-26
11000 Belgrade

Dear Ms Pavkov,

In the memo no. 005172638 2025 14850 004 000 *016* 012 from 14th January 2026, you have submitted to the Ministry of Mining and Energy, the decision of the Standing Committee of the Bern Convention regarding **deliberation** on the Appeal No. 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and Vlasina region of Homolje, on the 45th Session of the Standing Committee in the period from 8th to 12th December 2025.

In the aforesaid memo you state that "the Standing Committee expresses concerns due to detected irregularities in the sense of incompliance in areas in the vicinity of both mines as well as concern due to their irreversible negative impact on the flora, fauna and inhabitants in the area downstream from the mines", and that, in accordance with the mentioned, you request from the Ministry of Mining and Energy the progress report from its area of competence.

Having checked the official records of the Ministry of Mining and Energy, we have established that the Ministry submitted, by means of memos no. 001930702 2024 14820 007 000 000 001 from 25th October 2024, 21st January 2025, 13th June 2025 and 13th November 2025, complete information regarding mining activities on aforementioned localities to your ministry.

Regarding your previous memo from 13th November 2025, we are informing you that the Ministry provided approval to the company Bosil-metal Ltd. From Bosilegrad for the exploration field of the mineral deposits Podvirovi and Popovica-Cvonjev kamen. The mentioned approval defines that the holder of the approval cannot start the exploitation and preparation of the mineral resource on the approved exploitation field until they have secured approval for construction of mine facilities and for execution of mining works.

In addition to the aforementioned, we are hereby informing you that there are no new activities, i.e., new information regarding mining activities on the aforesaid localities.

Respectfully,

State Secretary,
Sonja Vlahović

Ministry of Construction, Transport and Infrastructure Report

Republic of Serbia
The Ministry of Construction,
Transport and Infrastructure
No:000217895 2026 14810 006 000 051 001
Date: 23rd January 2026
Nemanjina street no. 22-26, Belgrade
S.Č.

MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih Brigada street no. 1
11000 Belgrade

Subject: Request for the report on progress in relation to the Appeal no. 2022/6: Possible file: Serbia:
Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje
Reference: Your number: 005172638 2025 14850 004 000 016 012 from 14th January 2026.

Dear Sirs,

In your memo, of the aforementioned number, you have submitted the Decision of the Standing Committee of the Bern Convention in relation to deliberation on the Appeal no. 2022/6: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 22nd December 2025.

Bearing in mind the earlier established negative impacts and the alleged high risk from further serious and potentially irreversible transboundary consequences arising from mining - from exploration to exploitation and processing - the Standing Committee informed that the appeal remained in the status of possible file and requested the reports on progress to be submitted to the Bureau for its session in spring of 2026.

The Standing Committee requested new information from competent authorities in relation to all procedures related to expansion of the mines “Podvirovi” and “Popovica” on the territory of Karamanice near Bosilegrad.

We are hereby informing your that the Ministry of Construction, Transport and Infrastructure is not conducting any activities on the development of the spatial plans of the special purpose areas prescribed by Article 21 Item 2 of the Law on Planning and Construction (The Official Gazette of the RS, No. 72/2009, 81/2009 - corr., 64/2010 - CC decision, 24/2011, 121/2012, 42/2013 - CC decision, 50/2013 - CC decision, 98/2013 - CC decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - as amended, 9/2020, 52/2021, 62/23 и 91/25) (Hereinafter: the Law) in the area in question. The mentioned mines are covered by the documents related to spatial and urban planning in competence of the Local Self-Government Units.

The Bureau also requested information in relation to mountainous area of Homolje.

In accordance with the aforementioned, we are informing your that the Government of the Republic of Serbia has adopted the Regulation on development of the spatial plan of the special purpose area of the Beljanica-Kučaj natural good (The Official Gazette of the Republic of Serbia No. 98/2014) and the Regulation on development of the spatial plan of the special purpose area of the tourist destination of the Kučaj Mountains (The Official Gazette of the Republic of Serbia, no. 33/2024) for the area in question. In addition, for the mentioned area,

the Government has adopted the Decision on development of the Spatial plan of the special purpose area for gold exploitation on the exploration area “Potaj-Čuka-Tisnica” (The Official Gazette of the Republic of Serbia, no. 64/2021), as well as the Decision on development of the Spatial plan of the special purpose area for the Čoka Rakita mineral deposits in the Crni Vrh region (The Official Gazette of the Republic of Serbia, no. 101/2025).

The authority responsible for development of the plans in competence of the Republic of Serbia is the Agency for Spatial and Urban Planning of the Republic of Serbia in accordance with Article 166 g of the Law.

We are also referring to the provisions of Article 33 of The Law which prescribe that the spatial and urban planning documents shall be harmonized, so that the lower-level plans shall be in accordance with the higher-level plans.

Planning documents shall be in accordance with the Spatial Plan of the Republic of Serbia.

Respectfully,

Case officer: Svetlana Čeperković, SPE	
Person in charge of control: Svetlana Čeperković, SPE	
Person in charge of control: Predrag Matović, acting assistant to minister	

MINISTER

Aleksandra Sofronijević

Ministry of Agriculture, Forestry and Water Management Report

Republic of Serbia
The Ministry of Construction,
Transport and Infrastructure
No:000217895 2026 14810 006 000 051 001
Date: 23rd January 2026
Nemanjina street no. 22-26, Belgrade
S.Č.

MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih Brigada street no. 1
11000 Belgrade

Subject: Request for the report on progress in relation to the Appeal no. 2022/6: Possible file: Serbia:
Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje
Reference: Your number: 005172638 2025 14850 004 000 016 012 from 14th January 2026.

Dear Sirs,

In your memo, of the aforementioned number, you have submitted the Decision of the Standing Committee of the Bern Convention in relation to deliberation on the Appeal no. 2022/6: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 22nd December 2025.

Bearing in mind the earlier established negative impacts and the alleged high risk from further serious and potentially irreversible transboundary consequences arising from mining - from exploration to exploitation and processing - the Standing Committee informed that the appeal remained in the status of possible file and requested the reports on progress to be submitted to the Bureau for its session in spring of 2026.

The Standing Committee requested new information from competent authorities in relation to all procedures related to expansion of the mines “Podvirovi” and “Popovica” on the territory of Karamanice near Bosilegrad.

We are hereby informing your that the Ministry of Construction, Transport and Infrastructure is not conducting any activities on the development of the spatial plans of the special purpose areas prescribed by Article 21 Item 2 of the Law on Planning and Construction (The Official Gazette of the RS, No. 72/2009, 81/2009 - corr., 64/2010 - CC decision, 24/2011, 121/2012, 42/2013 - CC decision, 50/2013 - CC decision, 98/2013 - CC decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - as amended, 9/2020, 52/2021, 62/23 и 91/25) (Hereinafter: the Law) in the area in question. The mentioned mines are covered by the documents related to spatial and urban planning in competence of the Local Self-Government Units.

The Bureau also requested information in relation to mountainous area of Homolje.

In accordance with the aforementioned, we are informing your that the Government of the Republic of Serbia has adopted the Regulation on development of the spatial plan of the special purpose area of the Beljanica-Kučaj natural good (The Official Gazette of the Republic of Serbia No. 98/2014) and the Regulation on development of the spatial plan of the special purpose area of the tourist destination of the Kučaj Mountains (The Official Gazette of the Republic of Serbia, no. 33/2024) for the area in question. In addition, for the mentioned area,

the Government has adopted the Decision on development of the Spatial plan of the special purpose area for gold exploitation on the exploration area “Potaj-Čuka-Tisnica” (The Official Gazette of the Republic of Serbia, no. 64/2021), as well as the Decision on development of the Spatial plan of the special purpose area for the Čoka Rakita mineral deposits in the Crni Vrh region (The Official Gazette of the Republic of Serbia, no. 101/2025).

The authority responsible for development of the plans in competence of the Republic of Serbia is the Agency for Spatial and Urban Planning of the Republic of Serbia in accordance with Article 166 g of the Law.

We are also referring to the provisions of Article 33 of The Law which prescribe that the spatial and urban planning documents shall be harmonized, so that the lower-level plans shall be in accordance with the higher-level plans.

Planning documents shall be in accordance with the Spatial Plan of the Republic of Serbia.

Respectfully,

Case officer: Svetlana Čeperković, SPE	
Person in charge of control: Svetlana Čeperković, SPE	
Person in charge of control: Predrag Matović, acting assistant to minister	

MINISTER

Aleksandra Sofronijević

Municipality of Žagubica Report

Republic of Serbia
MUNICIPALITY OF ŽAGUBICA
President of the Municipality
Number: IV-01-38-312/26

Date: 05 February 2026
Ž a g u b i c a

Republic of Serbia

MINISTRY OF ENVIRONMENTAL PROTECTION

11000 B E L G R A D E
22-26 Nemanjina Street

Subject: Response to Your Request regarding Complaint No. 2022/06, concerning the possible negative impact of mining activities in the Homolje mountain region

To Whom It May Concern,

With reference to the request of the Ministry of Environmental Protection No. 005172638 2025 14850 004 000 016 012 dated 14 January 2026 (received on 28 January 2026), regarding Complaint No. 2022/06, we hereby inform you of the following:

As regards the territory of the Municipality of Žagubica, where the mining activities in question are being conducted, the applicable planning documents are the Spatial Plan of the Special Purpose Area of the Tourist Destination of the Kučaj Mountains ("Official Gazette of the Republic of Serbia", No. 33/24) and the Spatial Plan of the Municipality of Žagubica ("Official Gazette of the Municipality of Žagubica", No. 2/11). Geological exploration of mineral resources in the concerned parts of the municipality's territory is in compliance with the aforementioned planning documents and does not constitute a contradiction thereto.

Exploration works and exploitation of mineral resources fall exclusively within the competence of state authorities.

As regards the alleged negative impact and the supposed high risk of serious transboundary consequences arising from mining activities in the territory of the Municipality of Žagubica, the Bureau of the Bern Convention at the Council of Europe has decided that the complaint shall remain under consideration as a possible case. In this respect, and as we have already informed you, the Municipality of Žagubica has no new information to provide. The Municipality has never undertaken any studies, reports, or similar documentation concerning environmental endangerment in the Homolje region due to mining activities, nor has it ever received such reports, studies, or documentation from any competent state authority, either in the past or at present.

Sincerely,

President of the Municipality of Žagubica

Safet Pavlović

Municipality Bosilegrad - Municipal Administration Report

The Republic of Serbia
Municipality Bosilegrad
Municipal Administration
Environmental Protection Service
No. 501-39-7/2024

20th January 2026 BOSILEGRAD

Subject: Delivery of information

Dear Madam,

Ministry of Environmental Protection,
Omladinskih Brigada Street 1,
SIV III, 11070, NOVI
BEOGRAD/SERBIA

Ms. Snežana Prokić

Regarding your document no. 005172638 2025 14850 004 000 016 012 from 14th January 2026 wherein you are requesting an opinion regarding the Appeal no.2022/06 in relation to possible negative impact of mining activities in Bosilegrad, we are hereby informing you of the following:

The Municipality Bosilegrad continuously monitors the surface waters on the territory of the Municipality Bosilegrad since 2021, and during 2025 we have also carried out continuous monitoring of the Karamanica River 300 meters downstream from the mine Bosil-metal in s.Karamanica, taking samples on 18th February 2025, 21st May 2025, 24th August 2025 and 29th November 2025.

The examinations are carried out by the accredited laboratory *Institut za zaštitu na radu* jsc. Novi Sad on the grounds of the decision of the Accreditation Body of Serbia and the decision of the Ministry of Agriculture, Forestry and Water Management, the Republic Water Directorate, for examining physical and chemical and microbiological waste water, surface and ground waters, as well as for sampling of water (surface, ground and waste).

In all samples where physical and chemical parameters have been examined, the values were in compliance with the Decision on Threshold Values of Pollutants in Surface and Ground Waters and Sediments and the Deadlines for Their Reaching (The Official Gazette of the Republic of Serbia, no. 50/2012) and have met the requirements regarding values as referred to in the Rulebook on Hazardous Substances in Water (The Official Gazette of the Republic of Serbia, no. 31/82) for I and II class.

All measurements carried out so far can be found on the official website of the municipality on the following link:
http://www.bosilegrad.org/sr/Monitoring.aspx

Respectfully,

ENVIRONMENTAL PROTECTION SERVICE
Environmental protection advisor
Mikica Vasilev, B.Sc. Env. Eng

PRESIDENT
OF THE MUNICIPALITY
Vladimir Zaharijev

The Institute for Nature Conservation of Serbia Report

the Institute for Nature Conservation of Serbia
03 No. 025-4043/13
10.2.2026.

MINISTRY OF ENVIRONMENTAL PROTECTION
DIVISION FOR ECOLOGICAL NETWORKS AND ACCEPTABILITY ASSESSMENT
Department for protected areas, geodiversity and ecological network
Sector for nature protection
11070 Novi Beograd
Omladinskih brigada str. 1

You have addressed the Institute for Nature Conservation of Serbia, 11070 Novi Beograd, Japanska str. No 35, in your Request 03 No. 025-4043/12 from 16th January 2026 asking for opinion regarding *"Appeal No. 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad in the region of Mt. Homolje"* in view of providing answer to the Standing Committee of the Bern Convention in the Council of Europe.

Having checked the Central Register of Protected Natural Goods and the information system on nature conservation maintained by the Institute for Nature Conservation (Hereinafter: The Institute), and in accordance with your request, the Institute hereby informs you of the following:

- On the grounds of the Request of the Directorate General for Human Rights and the Rule of Law - Directorate for Social Rights, Health and Environment of the Secretariat of the Bern Convention from 29th October 2025, the Institute had submitted the requested information to the Ministry of Environmental Protection of the Republic of Serbia (Notification - File 03 No. 025-4043/11 from 13th November 2025);
- Since then, and in relation to the mentioned subject, the Institute has provided appropriate response to the request for access to information of public importance submitted by the Earth Thrive Association - File 03 No. 030-4269/2 from 17th November 2025;
- Regarding the inquiry of a citizen - journalist, submitted by e-mail related to the "Decision on closing of the mine "Podvirovi-Karamanica" near Bosilegrad", the Institute has submitted the Response 03 No. 030-4746/1 from 12th December 2025 by the same channel;
- At the request of the Agency for Spatial and Urban Planning of the Republic of Serbia for issue of the conditions for nature conservation in view of drafting of the Spatial Plan of the Special Purpose Area of the Mineral Deposits "Čoka Rakita" in the region of Crni Vrh, the Institute has provided appropriate Notification 03 No. 021-4765/1 from 15th December 2025;
- Regarding the same request, the Institute has submitted to the Ministry of Environmental Protection the Notification 03 No. 021-4765/3 from 14th January 2026;
- Regarding the request of a citizen for access to information of public importance in relation to granting of nature conservation conditions for applied geological explorations in the region "Potaj-Čuka-Tisnica", the Institute has provided the Response 03 No. 030-4/3 from 19th January 2026;

- On the grounds of the Request of the Ministry of Environmental Protection for issue of for the technical information for the writ on nature conservation conditions in view of drafting of the Spatial Plan for Special Purpose Area of the Mineral Deposits "Čoka Rakita", the Institute has provided the latter in the form of the File 03 No. 020-62/2 from 26th January 2026;
- In respect of the above technical information, the Institute has submitted to the Ministry of Environmental Protection the Notification 03 No. 020-219/2 from 2nd February 2026;
- There were no other incoming requests nor issued documents on the grounds of such in respect of this subject matter until the day of receipt of this Notification;
- Due to unfavourable weather conditions, the Institute has not been able to undertake planned field investigation on the mentioned localities in order to examine the state of affairs of natural wealth and possible impact of the mining activities undertaken so far.

Acting director

Aleksandra Došlić

Submitted:
-Requestor
-Archive 2x

Environmental Protection Agency Report

Republic of Serbia
Ministry of Environmental Protection
ENVIRONMENTAL PROTECTION AGENCY

Number: 325-01-00008/04/2026-02
Belgrade, 21 January 2026

Republic of Serbia
MINISTRY OF ENVIRONMENTAL PROTECTION

Dragana Ostojić
State Secretary

Bulevar Mihajla Pupina 2
11070 BEOGRAD

Subject: Progress Report concerning the Appeal No. 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the region of the Homolje Mountains

In accordance with your Request No. 005172638 2025 14850 004 000 016 012 of 14 November 2026, we hereby inform you that the Serbian Environmental Protection Agency, as the administration body in charge of implementing state monitoring of surface water and groundwater quality in the territory of the Republic of Serbia, is **testing the water of the Dragovištica river at the Ribarce profile (limit profile)**. Water sampling has been conducted monthly, in accordance with the Annual Water Status Monitoring Programme for 2025 (*The Official Gazette of the Republic of Serbia*, No. 26/2025). Please find attached to this letter the results (in the PDF format) of the physico-chemical and chemical analyses of water samples taken from the Dragovištica river in 2025.

On the basis of the results of physico-chemical and chemical analyses in the water of the Dragovištica river, we hereby also send you our comment concerning the prescribed limit values for Class II of surface water quality (*Regulation on limit values of pollutants in surface and ground waters and sediments, and deadlines for achieving them, The Official Gazette of the Republic of Serbia, No. 50/2012, Regulation on limit values of priority and priority hazardous substances that pollute the surface waters and deadlines for their achievement, The Official Gazette of the Republic of Serbia, No. 24/2014*).

Through an analysis of the test results, it has been ascertained that there were no changes in the organoleptic characteristics of water (colour, scent and visible waste materials) in 2025. The resulting values of general physico-chemical parameters and suspended solids corresponded to the prescribed limit values for Class I and Class II of surface water quality, except in the following samples, where the following exceedances were ascertained:

- sample (date 24 March 2025): the value of orthophosphate (PO_4-P) corresponded to Class III of surface water quality;

- sample (date 24 November 2025): the value of orthophosphate (PO_4-P) and total phosphorus content (P) corresponded to Class III of surface water quality; the value of suspended matter deviated from the prescribed limit value for Class I and Class II of surface water quality.

The total metal content values of iron (Fe), zinc (Zn), copper (Cu), manganese (Mn), boron (B), chromium (Cr), arsenic (As), as well as the values of metal solutions of nickel (Ni), cadmium (Cd), mercury (Hg) and lead (Pb), were within the prescribed limit values for Class I and Class II of surface water quality. An increased value was found for the total iron content Fe (Class IV): 1705 µg/1 (24 November 2025)

Attachment: as stated above

Director:
(stamp and signature)
Stefan Simeunović

Environmental Protection Sector for Monitoring and Preventive Action in the Environment Report

Republic of Serbia
Ministry of
Environmental Protection
Sector for Monitoring and Preventive Action
in the Environment
No. Official/2026
Date: 23rd January 2026

Subject: Report concerning the Appeal No. 2022/6: Possible negative impact of mining activities in Bosilegrad in the mountainous area of Homolje (addendum), in relation to deliberation on the appeal of the Standing Committee of the Bern Convention on its 45th session held in the period from 8th to 12th December 2025.

Mining activities in Bosilegrad

As mentioned in the previous Report of the Republic Inspection of Environmental Protection of the Ministry of Environmental Protection, from November 2025 - Report concerning the Appeal No. 2022/6: "Possible negative impact of mining activities in Bosilegrad", considering that the mining activities related to exploitation of led-zinc ore on the locality of the mine "Podvirovi" Karamanica have been finalised according to the project, to which the consent was provided for the Environmental Impact Assessment Study by the competent authority, the Republic Inspection of Environmental Protection, in accordance with Article 101(1) of the Law on General Administrative Procedure (The Official Gazette of the RS, No. 18/16, 95/18 - authentic interpretation and 2/23 - Constitutional Court), has adopted the decision no.: 002159148 2024 14850 007 013 042 001 from 17th December 2024 suspending the procedure of inspection control in accordance with the annual and operational plan of inspection control for 2024, over the monitored subject Bosil-Metal Ltd., Bosilegrad, Georgi Dimitrova street no. 74, in the case no. 002159148 2024 14850 007 013 042 001, because of the lack of conditions necessary for further proceedings.

After the last inspection control carried out in July 2024 and adoption of the decision on suspension of inspection control proceedings in December 2024, „Bosil-Metal" Ltd. Bosilegrad, continued with the monitoring-examination of the surface water of the Bezimeni stream on two measuring points: At 150 m above the settling basin of the horizons IV and V and at 250 m below the settling basin of the horizons IV and V through the authorized legal entity, the Public Health

Institute in Vranje, and regularly submitted reports on exploration to the Republic Environmental Protection Inspection electronically. The last submitted report refers to the fourth quarter of 2025. In accordance with the Report on the Compliance of the submitted reports on examination of surface waters for the Bezimeni Stream carried out for the third and fourth quarter of 2024 and all four quarters of 2025, on the grounds of the comparison of the results of examined parameters with the threshold values of the emissions referred to in the subordinate legislation in force, the examined samples had no effect on the quality of the water recipient, that is, the results of the examined parameters of the surface water were in compliance with the requirements of subordinate legislation in force. The last report on examination of surface waters - the Bezimeni Stream, for fourth quarter of 2025, which was carried out after the previous Report concerning the Appeal No. 2022/6 from November 2025, also confirmed that the examined sample had no effect on the quality of water recipient, that is, that the results of the examined parameters of the surface water were in compliance with the requirements of the subordinate legislation in force. The Report of the accredited laboratory issued on the grounds of the subordinate legislation of the Republic of Serbia governing the mentioned examinations: Regulation on threshold values of pollutants in waters and deadlines for their reaching (The Official Gazette of the RS, No. 67/11, 48/12 and 1/16), Regulation on emission threshold values for pollutants in surface waters and sediments and deadlines for their reaching (The Official Gazette of the RS, No. 50/12, Part II, articles 4 and 5, Annex 1, Table1) and the Rulebook on the manner and conditions for measuring the quantities and examining the quality of waste water and the contents of reports on performed measurements (The Official Gazette of the RS, No. 18/24), the Rulebook on parameters of ecological and chemical status of surface waters and parameters of chemical and quantitative status of ground waters (The Official Gazette of the RS, No. 74/11) and Rulebook on the Determination of Surface and Groundwater Bodies (Official Gazette of the RS, No. 96/10)

The inspection control performed in July 2024 concluded that in the course of mining works on the site of the mine Podvirovi, tailings are generated representing inert rock material and in accordance with the protective measures referred to in Chapter 7 of the Study, the recommended treatment is its disposal in the vicinity of the entrance on the horizons IV and V. On the grounds of previous inspection controls of the mine Podvirovi on the horizon IV there are no more mining activities and all the tailings disposed of at the plateau in front of horizon IV have been used and transferred to be used for construction of the dam for storage of intermediate products which is in the vicinity of the pilot plant. The tailings pit at the horizon V has been levelled and the pilot plant has been constructed on the site.

After the last inspection control carried out in July 2024, the Republic Environmental Protection Inspection has not done further inspection controls (there were no grounds for proceedings), and in accordance with the findings of the Republic Environmental Protection Inspection, the company “Bosil-Metal” Ltd, Bosilegrad, by means of the Decision of the Ministry of Mining and Energy, no. 310-02-00908/2023-02 from 3rd August 2023, has been approved to conduct mining activities in accordance with the mining project for exploration of solid mineral raw materials of Pb–Zn ore on the territory of Karaminica near Bosilegrad, at the exploitation field no. 515 which is located on the territory of the Municipality Bosilegrad. In accordance with the given consent, in relation to removal/rehabilitation of the tailings pit, we are informing your that Article 153 Paragraph 1 of the Law on Mining and and Geological Exploration (The Official Gazette of the RS, no. 101/2015, 95/2018-as amended and 40/2021) prescribes that „The holder of exploitation shall in the course and upon finalization of exploitation works no later than one year from the date of finalization of works in the areas where mining works were completed, carry out a reclamation of the land fully in accordance with the technical project of technical and biological reclamation, that is a constituent part of the main or supplementary mining project.“. Furthermore, Article 16 Paragraph 1 and 2 of the Law on Environmental Protection (The Official Gazette of the RS, No. 135/2004, 36/2009, 36/2009-as amended, 72/2009-as

amended, 43/2011-decision of the CC, 14/2016, 76/2018, 95/2018-as amended, 95/2018-as amended and 94/2024-as amended) prescribes that "A legal and natural person that degrades the environment shall be obliged to rehabilitate and remediate the degraded environment, in compliance with the project of rehabilitation and remediation. The Ministry shall provide consent for rehabilitation and remediation projects referred to in Paragraph 1 of this Article, except for the rehabilitation and remediation projects for mining facilities."

Mining activities in the mountainous area of Homolje

As mentioned in the previous report of the Republic Environmental Protection Inspection of the Ministry of Environmental Protection, from November 2025 - the Report concerning Appeal No 2022/6 "Possible negative impact of mining activities on the mountainous area Homolje", related to the locality Čoka Rakita, the Republic Environmental Protection Inspection carried out the last extraordinary field inspection of the company "DPM Avala" Ltd, Belgrade on 29th August 2024, which company is conducting geological explorations on the locality Čoka Rakita on the exploration area 2535, locality DPDD024, on the grounds of the memo of the Ministry of Interior of the Republic of Serbia, the Police Station in Žagubica, and on the grounds of the complaint of the activists, a group of citizens "Rendžeri istočne Srbije" from 28th August 2024. The inspection control established that on 28th August 2024 in the course of conducting exploration activities on the locality Čoka Rakita on the exploration area 2535, locality DPDD024, a smaller quantity of drilling fluid has been released into the Dumitrov Stream.

With all due respect to the decisions of the Standing Committee, the allegations of the Standing Committee of the Bern Convention stated on its 45th session held in the period from 8th to 12th December 2025 remain unclear, which committee has in fact "expressed grave concern due to high concentrations of heavy metals in the drilling fluid and due to use of illegal chemical substances negatively affecting water plants and fish population downstream from the exploration area in Homolje and called for suspension of the activities causing this pollution, especially due to incorrect management of contaminated drilling fluid and has requested careful and regular monitoring of the situation".

The Report of the Republic Environmental Protection Inspection of the Ministry of Environmental Protection, from November 2025 - the Report concerning the Appeal No. 2022/6: "Possible negative impact of mining activities on the mountainous area of Homolje", has not mentioned that the company "DMP Avala" Ltd, Belgrade used illegal chemical substances, therefore remains unclear on the basis of which data has the Standing Committee of the Bern Convention reached such conclusion. Furthermore, the stated allegations of the Standing Committee of the Bern Convention that there were high concentrations of heavy metals in the drilling fluid, as well as there had been irregular management of contaminated drilling fluid, are contrary to the Report of the Republic Environmental Protection Inspection of the Ministry of Environmental Protection from November 2025 - the Report concerning the Appeal No. 2022/6.

Namely, in the course of inspection control, it has been established that the controlled economic operator has behaved responsibly after the accident and immediately suspended the works and undertook the measures in accordance with the Decision of the Institute for Nature Conservation of the Republic of Serbia no. 03 -021-1737/4 from 29th May 2024, by immediately hiring authorised person for purpose of water sampling. Regarding the sampling carried out and the Report on examination of waste waters no. 14082951 from 4th September 2024 drafted by ANAHEM Ltd. Belgrade as a legal person authorised for measuring quality of waste water, it should be taken into consideration, and in view of more complete overview of situation and reaching of conclusion, that this water sample was not compared with the previous water analyses-„zero" data (measurements), nor with the subsequent examinations of the water samples carried

by the controlled economic operator DPM Avala. Furthermore, in view of more complete overview of situation and reaching of the conclusion, it should be born in mind that the natural level of all exceeded values is extremely high, however in the particular report drafted by ANAHEM Ltd., Belgrade the results have been obtained by means of sampling immediately after the accident; timing of sampling coincided with extreme draught characterized by more pronounced retention of water in the stream and somewhat higher water temperature levels, therefore the increased values of metal in water can be interpreted as a reflection of the composition of rocks in the wider area of the aforementioned locality and of related porphyry-type of mineralization, which is known for this area and described in the geological literature.

The exceeding of the threshold values related to parameters indicating organic pollution (BOD5, HPK, ammonium ion, orthophosphates, total phosphorus, TOC), downstream and upstream from the accident point, can be related to the decomposition of organic matter in water (the presence of leaves, branches etc. was very high, and it is unspoilt nature). The concentrations are on the rise downstream, which can be caused by natural processes, the length of retention of water in the stream whose flow is lower due to draught and the temperature is very hight for a longer period of time. Significantly higher concentration of suspended matter is probably the consequence of release of drilling fluid and turbidity which persisted at the sampling point due to depressions, larger volume and weak outflow. Moreover, it is important to point out that no traces of hydrocarbons have been detected in the water sample, the measured values were close to detection limits and significantly below the threshold values. When it comes to “Irregular management of contaminated drilling fluid”, the economic operator has immediately, due to occurrence, released the clean water through the water plumbing system to clean the drilling fluid in the stream.

Furthermore, regarding the allegations “that the Standing Committee of the Bern Convention Bureau reiterated its call for the Respondent Party to continue cooperation with Bulgarian authorities, bearing in mind the high risk of transboundary heavy water pollution”, we are informing you that the Republic of Bulgaria is significantly removed from the locality of Homolje (locality Čokaj Rakita is in the area of Žagubica and 100 kilometres away from Bulgaria, Romania is closer), whereas the Danube serves as a natural boundary with Bulgaria (and Romania) and the River Lipa (the Dumitrov Stream) belongs to the Pek River basin (Black Sea basin) which flows into the Danube at Veliko Gradiste (border with Romania), so the allegations of the Standing Committee of the Bern Convention Bureau regarding the "high risk of transboundary heavy water pollution" are indeed unclear.

Respectfully,