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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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

Bureau of the Standing Committee
17-18 June 2026
Strasbourg

Complaint on stand-by: 2022/08

**Possible negative impact of mining activities in Mountain
Baba (Serbia)**

- GOVERNMENT REPORT -

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



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

Number: 003198570 2025 14850 004 007 020 092

Date: 16 April 2026
Belgrade

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

**Subject: Progress report on Complaint No. 2022/08: Complaint on stand-by: Serbia:
Possible Negative Impact of Mining Activities in Mountain Baba**

Dear Ms Siino,

With reference to the request of the Secretariat of the Bern Convention dated 17 July 2025, pertaining to **Complaint No. 2022/08: Complaint on Stand-by: Serbia: Possible Negative Impact of Mining Activities in Mountain Baba**, on behalf of the Ministry of Environmental Protection, we hereby inform you of the following:

In accordance with the Decision of the Bureau of the Bern Convention, the Ministry of Environmental Protection, in its official capacity as the competent authority responsible for monitoring the implementation of the Bern Convention in the Republic of Serbia, submitted Request for a Statement on the aforementioned complaint (No. 003198570 2025 14850 004 007 020 092 dated 4 August 2025) to the competent authorities and institutions, namely: the Ministry of Construction, Transport and Infrastructure, the Ministry of Mining and Energy, the Institute for Nature Conservation of Serbia, as well as the relevant sectors of the Ministry of Environmental Protection.

Based on the responses received from the aforementioned authorities and institutions, regarding Complaint No. 2022/08 **referring to the alleged threat of possible negative impacts of mining activities on Mountain Baba**, we hereby inform you of the following:

1. The Ministry of Construction, Transport and Infrastructure reported that it does not conduct any activities related to the preparation of spatial plans for special purpose areas, as prescribed under Article 21, item 2 of the Law on Planning and Construction („Official Gazette of the Republic of Serbia”, Nos. 72/2009, 81/2009 – corrigendum, 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 and 62/2023) referring to the area concerned.

The aforementioned mines are regulated by spatial and urban planning documents falling within the competence of the local self-government.

Furthermore, reference is made to Article 33 of the Law on Planning and Construction, which stipulates that spatial and urban planning documents must be harmonized, so that a planning document of a lower hierarchical order must be consistent with a planning document of a higher hierarchical order.

2. The Ministry of Mining and Energy reported that, other than the previously submitted statements provided to the Secretariat, there is no subsequent information or activity that fall within the scope of work of this Ministry.

3. The Institute for Nature Conservation of Serbia reported that, during the period between the two reporting intervals, it received an application from the company „Kruševacput” JSC, based in Kruševac, requesting the issuance of nature protection conditions for geological research of limestone as a technical and construction stone (material) at „Lešje” location near the town of Paraćin.

The Institute further noted that, for the location in question, a Decision on nature protection conditions (Ref. 03 No. 021-215/4 of 13 February 2024) had already been issued and was valid at the time the application of „Kruševacput” JSC was submitted, as well as the Opinion on the fulfillment of requirements (Ref. 03 No. 021-215/7 of 26 March 2024).

In accordance with the regulations governing nature protection, it was established that the locations in question **do not fall within a protected area**.

4. The Ministry of Environmental Protection performs tasks in the field of strategic environmental assessment, environmental impact assessment and environmental inspection in the area concerned.

- The Republic Environmental Protection Inspection of the Ministry of Environmental Protection (hereinafter: the Inspection) carries out regular inspection supervision at quarry sites on Mount Baba, within the territory of the Municipality of Paraćin.

1) Mining activities at the open pit „Krajinji Rid”

On 30 January 2025, the Republic Environmental Protection Inspection conducted a follow-up inspection at the location of the „Krajinji Rid” quarry in order to verify compliance with the ordered measures relating to the obligation to monitor ambient air quality and environmental noise levels during the operation of the „Krajinji Rid” quarry. The inspection established that the supervised entity had carried out monitoring of environmental noise levels; however, the second measurement of ambient air quality within the zone of influence of the „Krajinji Rid” quarry in cadastral municipality Klačevica had not been conducted.

Given that the supervised entity, Transkop Export-Import LLC Paraćin, failed to implement all prescribed environmental monitoring measures set out in the Decision granting consent to the updated Environmental Impact Assessment Study, the Republic Environmental Protection Inspection, acting within its statutory powers and pursuant to Article 51, paragraph 1, item 3 and paragraph 2 of the Law on Environmental Impact Assessment, filed an economic offence complaint against the aforementioned legal entity and the responsible person within the legal entity with the City Public Attorney’s Office in Kragujevac, under No. 002052065 2024 14850 007 013 042 001 of 7 February 2025.

City Public Attorney’s Office in Kragujevac adopted Decision No. KP 59/25 of 28 August 2025, by which, **pursuant to Article 2, paragraph 2 of the Law on Economic Offences, the filed economic offence complaint was dismissed** on the grounds that „it does not constitute an economic offence, notwithstanding that it contains the elements of such an offence as defined by law, since it represents conduct of negligible social harmfulness of minor significance, and

due to the insignificance or absence of harmful consequences it cannot be deemed an economic offence within the meaning of the applicable legislation”.

On 9 September 2025, the Republic Environmental Protection Inspection carried out a regular inspection of the quarry „Krajnji Rid,” operated by the company Transkop Export-Import LLC Paraćin, in accordance with the conditions and measures set out in the updated Environmental Impact Assessment Study for the limestone exploitation project for use as technical and construction stone at the open-pit mine „Krajnji Rid,” cadastral parcels Nos. 793/1, 793/2, 793/3, 793/4, 793/5, 793/6 and 793/7, cadastral municipality Klačevica, belonging to the territory of the Municipality of Paraćin. In connection with this inspection, the Inspection Report (No. 003700812 2025 14850 008 012 383 014 of 17 September 2025) was drawn up which established that no irregularities had been identified.

2) Mining activities at the open pit „Lešje”

Up to the present day, i.e., as of the drafting of this progress report, the first-instance authority has not been informed, nor has it received the decision of the second-instance authority adjudicating the appeal lodged by the company „Kruševacput” JSC against the first-instance Decision No. 918-480-501-00102/2022-18 of 28 September 2022.

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

Sincerely,

MINISTER

Sara Pavkov

Annex I



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

No: 003457645 2025 14810 006 000 016 012

Date: 29.08.2025

22-26 Nemanjina Str

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada Str
11000 Belgrade

Subject: Statement on Complaint No. 2022/08. Complaint under monitoring: Possible negative impact of mining activities in Mountain Baba

Dear Sir or Madam,

By your letter No. 003198570 2025 14850 004 007 020 092, by which the decision of the Bureau of the Bern Convention at the Council of Europe is forwarded concerning the consideration of the Report on Complaint No. 2022/08: New Complaint: Serbia: Possible negative impact of mining activities on Mountain Baba, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 17.07.2025. In accordance with the decision of the Bureau, it is necessary to specify the harmonization of Spatial Plans of higher and lower order within the legal framework of the Republic of Serbia, pursuant to the allegations from the report submitted by the complainant. The Bureau also requested a submission of detailed updated information regarding the Decision related to the Lešje mine and the Complaint of the company managing the mine, as well as an update on the results of the inspection supervision for all four mines, and other inspections carried out in the period 2023-2025, particularly in the Krajnji Rid mine.

Hereby, we inform you that the Ministry of Construction, Transport and Infrastructure does not carry out activities on the preparation of Spatial Plans for areas of special purpose, which are under Article 21, item 2 of the Law on Planning and Construction ("Official Gazette of RS", Nos. 72/2009, 81/2009 - correction, 64/2010 - CC, 24/2011, 121/2012, 42/2013 - CC, 50/2013 - CC, 98/2013 - CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021, and 62/23) in the concerned area. The aforementioned mines are covered by

Spatial and Urban Planning documents that fall under the competence of the local self-government.

We also draw attention to the provisions of Article 33 of the Law on Planning and Construction ("Official Gazette of RS", Nos. 72/09, 81/09 - correction, 64/10 - CC, 24/11, 121/12, 42/13 - CC, 50/13 - CC, 132/14, 145/14, 83/18, 31/19, 37/19 - other law, 9/20, 52/21, and 62/23, hereinafter: Law) which stipulates that Spatial and Urban Planning documents must be harmonized, so that a planning document of a lower hierarchical order must comply with the planning document of a higher hierarchical order.

Planning documents must comply with the Spatial Plan of the Republic of Serbia.

Respectfully,

MINISTER

Aleksandra Sofronijević

Annex II



Republic of Serbia

MINISTRY OF MINING AND ENERGY

Number: 003457684 2025 14820 000 000 016 012

Date: 15 August 2025

MINISTRY OF ENVIRONMENTAL PROTECTION

Sara Pavkov, Minister of Environmental Protection

22-26 Nemanjina St
Belgrade

Dear Ms Pavkov,

In accordance with your request No. 003198570 2025 14850 004 007 020 092 dated 4 August 2025, regarding the submission of an updated report from the Ministry of Mining and Energy concerning Complaint No. 2022/08: New Complaint: Serbia: Possible negative impact of mining activities in Mountain Baba, we hereby inform you of the following:

Following a review of official records, the Ministry of Mining and Energy noted that reports containing the requested information were previously submitted to the Ministry of Environmental Protection through official communications: No. 001930740 2024 14820 007 000 000 001 dated 24 July 2024, No. 000423749 2023 14820 002 000 000 001 dated 5 January 2024 and No. 310-02-01027/2023-02 dated 2 June 2023. At present, there are no further updates or additional activities falling within the scope of work of the Ministry of Mining and Energy.

Sincerely,

MINISTER

Dubravka Đedović Handanović

To be delivered to:

- Addressee;
- Archive.

Annex III**INSTITUTE FOR NATURE CONSERVATION OF SERBIA**

35 Japanska Street, 11070 Novi Beograd

03 No. 025-840/5

Date: 10 March 2026

MINISTRY OF ENVIRONMENTAL PROTECTION**Section for Ecological Network and Appropriate Assessment**

Department for Protected Areas, Geodiversity and Ecological Network

Sector for Nature Protection

11070 Novi Beograd

1 Omladinskih Brigada Street

Your reference no.: 003198570 2025 14850 004 007 020 092 of 04.08.2025

You addressed the Institute for Nature Conservation of Serbia, 35 Japanska Street, 11070 Novi Beograd, with a Request filed under reference 03 No. 025-840/4 of 7 August 2025 seeking a statement regarding „*Complaint No. 2022/08, Serbia, Possible negative impact of mining activities on Mount Baba*“, for the purpose of providing a response to the Secretariat of the Bern Convention, Council of Europe.

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

- In relation to the aforementioned request, during the period between the two reporting intervals, specifically from 1 September 2025 until the date of this notification, the Institute received an application from “KRUŠEVACPUT” JSC, Kruševac, Jasički put bb, 37000 Kruševac, for the issuance of nature protection conditions concerning geological research of limestone as technical and construction stone at the “Lešje” site near Paraćin;
- In its response, the Institute stated that for the location in question, a Decision on Conditions of Nature Protection had already been issued under reference 03 No. 021-215/4 of 13 February 2024, which was valid at the time the application of JSC „KRUŠEVACPUT“ was submitted, as well as an Opinion on the fulfillment of conditions under reference 03 No. 021-215/7 of 26 March 2024;
- There have been no other requests submitted to the Institute, nor any acts issued on the subject matter, up to the date of issuance of this notification.

ACTING DIRECTOR

Aleksandra Došlić

Delivered to:

- Addressee
- Records Office – 2 copies



Annex IV

**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION
Department for Environmental Control and
Precaution**

No: Official Communication/2026

Date: 23 March 2026

Subject: Report concerning Complaint No. 2022/08: Complaint on stand-by: Serbia: Possible Negative Impact of Mining Activities in Mountain Baba

Mining Activities in Mountain Baba

On the basis of a regular inspection carried out, the Republic Environmental Protection Inspection of the Ministry of Environmental Protection ordered the supervised entity, Transkop Export-Import LLC Paraćin, to conduct, no later than 31 December 2024, a second measurement of ambient air quality within the zone of influence of the “Krajinji Rid” quarry in Klačevica, as well as one environmental noise measurement under conditions of maximum operational capacity of the “Krajinji Rid” quarry in Klačevica near Paraćin, all in accordance with the prescribed measures set out in the updated Environmental Impact Assessment Study and in Decision No. 353-02-713/2020-03 of 3 July 2020, by which the competent Ministry granted consent to the said Study.

On 30 January 2025, the Republic Environmental Protection Inspection conducted a follow-up inspection at the location of the “Krajinji Rid” quarry in order to verify compliance with the ordered measures relating to the obligation to monitor ambient air quality and environmental noise levels during the operation of the “Krajinji Rid” quarry in Klačevica near Paraćin. The inspection established that the supervised entity had carried out monitoring of environmental noise levels; however, the second measurement of ambient air quality within the zone of influence of the “Krajinji Rid” quarry in Klačevica had not been conducted. Given that the supervised entity, Transkop Export-Import LLC Paraćin, failed to implement all prescribed environmental monitoring measures set out in the Decision granting consent to the updated Environmental Impact Assessment Study, the Republic Environmental Protection Inspection, acting within its statutory powers and pursuant to Article 51, paragraph 1, item 3 and paragraph 2 of the Law on Environmental Impact Assessment, filed an economic offence complaint against the said legal entity and the responsible person within the legal entity with the City Public Attorney’s Office in Kragujevac, under No. 002052065 2024 14850 007 013 042 001 of 7 February 2025.

City Public Attorney’s Office in Kragujevac adopted Decision No. KP 59/25 of 28 August 2025, received at the records management office of the Administration for Joint Services of Republic Bodies on 9 September 2025, by which, pursuant to Article 2, paragraph 2 of the Law on Economic Offences, the filed economic offence complaint was dismissed on the grounds that “it does not constitute an economic offence, notwithstanding that it contains the elements of such an offence as defined by law, since it represents conduct of negligible social harmfulness of minor significance, and due to the insignificance or absence of harmful consequences it cannot be deemed an economic offence within the meaning of the applicable legislation.”

On 9 September 2025, the Republic Environmental Protection Inspection carried out a regular inspection of the quarry “Krajinji Rid,” operated by the company Transkop Export-Import LLC Paraćin, in accordance with the conditions and measures set out in the updated Environmental Impact Assessment Study for the limestone exploitation project for use as technical and construction stone at the open-pit mine “Krajinji Rid,” cadastral parcels Nos. 793/1, 793/2, 793/3, 793/4, 793/5, 793/6 and 793/7, cadastral municipality Klačevica, belonging to the territory of the Municipality of Paraćin, for which consent was granted by the Ministry of Environmental Protection by Decision No. 353-02-713/2020-03 of 3 July 2020. In the course of the inspection procedure, for which Inspection Report No. 003700812 2025 14850 008 012 383 014 of 17 September 2025 was prepared, no irregularities were established. Mountain Baba is not a protected area.

Mining activities: “Lešje“ open-pit mine

Up to the present day, i.e., as of the drafting of this notification, the first-instance authority has not been informed, nor has it received the decision of the second-instance authority adjudicating the appeal lodged by the company “Kruševacput“ JSC against the first-instance Decision No. 918-480-501-00102/2022-18 of 28 September 2022.

In a letter received by e-mail on 31 August 2023, Corridors of Serbia Ltd. asked the Institute for Nature Conservation of Vojvodina Province for a clarification of the requirements it had issued in Sub-items 2) and 3) of the Decision No. 03 020-3709/6 of 24 January 2022 (unified procedure number ROP-MSGI-37164-LOCH-2/2021), concerning the corridor functionality protection measures.

By inspecting the request and the accompanying documentation, as well as the Institute’s documentation, the following facts have been ascertained:

1) Sub-item 3.3. of the Decision concerns the bridge structure, which must ensure the passability of the Danube riverbank under the bridge to all wildlife species. The sentence “The width of the horizontal area suitable for movements of game during periods of mean water level should be at least 4 m, and its height at least 4 m” refers to the situation after the completion of the bridge, i.e. during its exploitation, and is not obligatory in all phases of construction.

Explanation:

In the relevant section of the Danube River, movement is the only way to ensure exchange of genetic materials between wildlife populations from spatially segregated habitats. Due to a lack of large-scale seasonal migrations, temporary reductions of the passability of the ecological corridor during the construction of the bridge will not have significant consequences on the status of wildlife populations for which the survival of the ecological corridor is otherwise vitally important.

2) Sub-item 2.2. of the Decision defines the measure for preservation of the highest possible level of ecological corridor functionality (in this case, the Danube River coastal zone) during the execution of the works: “In all phases of construction and landscaping, preserve the existing natural vegetation within the boundaries of the habitats of strictly protected and protected species and the ecological corridor.”

Explanation:

2.1. The construction site area, as an artificial area, is a barrier which most species

instinctively avoid, using remnants of natural vegetation for migration. By preserving the continuity of natural vegetation, primarily the grass zone and the bushes along the riverbank, shelter is provided for migrating wildlife species, and their movements along the Danube are directed. Due to the above, the best solution is to preserve the vegetation belt (minimum width 4-5 m) along the very riverbank, thus ensuring the functioning of the migration route during low and mean water levels.

- 2.2. According to available data, in addition to small species, such as amphibians (frogs) and reptiles (turtles, snakes, lizards), small mammals also move in the coastal zone, e.g. hedgehog, shrews, rodents and small predators (weasel, beech marten, fox), badger; exceptionally, wild boar may appear as well. It needs to be emphasized that even the species which are good swimmers (e.g. frogs) use land for migration wherever possible.
- 2.3. The proposed use of a reinforced concrete grid with 15x15 cm openings in a fence which separates the construction site from the Danube riverbank, may facilitate movements of individual animals which find themselves in the construction site area. By placing the aforementioned grid, 1-3 m long, at every 30 m along the fence, return of these individuals into the coastal vegetation belt will be facilitated.

Sincerely,

Acting Director

(stamp and signature)

Željka Jeličić Marinković, PhD

Delivered to:

- Applicant
- Archive
- Documentation