



Strasbourg, 31 July 2025

T-PVS/Files(2025)2022-6\_gov

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

---

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

---

**Bureau of the Standing Committee**  
16-18 September 2025  
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 July 2025:**

**Republic of Serbia  
MINISTRY OF ENVIRONMENTAL  
PROTECTION**

No: 002342585 2025 14850 004 001 000 001

Date: 24.07.2025

Belgrade

Council of Europe  
Directorate General of Democracy  
Secretariat of the Bern Convention  
F-67075 Strasbourg, France  
Mr. Mikaël POUTIERS,  
Secretary of the Bern Convention

**Subject: Report on Complaint No. 2022/06: Possible Case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region**

Dear Mr. Poutiers,

With reference to the request of the Secretariat of the Bern Convention dated 15 May 2025, concerning Complaint No. 2022/6: Possible Case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region - Joint Complaint, the Ministry of Environmental Protection, as the competent authority overseeing the implementation of the Bern Convention in the Republic of Serbia, has submitted a request for a statement on this complaint to the relevant authorities and organizations: 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 Environmental Protection Agency, the Municipal Assembly of Bosilegrad and the Municipal Assembly of Žagubica, including the competent sectors within the Ministry of Environmental Protection.

**I Based on the statements received from the aforementioned authorities and organizations (translated copies are in the attachment), and regarding the part of the complaint relating to the potential negative impact of mining activities in Bosilegrad, we hereby inform you of the following:**

**1.The Ministry of Construction, Transport, and Infrastructure** has informed that the relevant mines are covered by documents under the jurisdiction of the local self-government.

**2.The Ministry of Mining and Energy** has confirmed that no new developments have been reported regarding the exploitation activities at the "Podvirovi" ore deposit by the company "Bosil Metal" LLC, based in Bosilegrad.

**3.The Ministry of Agriculture, Forestry and Water Management - Republic Water Directorate** has reported that, in accordance with the provisions of the Water Law ("Official Gazette of the Republic of Serbia", Nos. 30/2010, 93/2012, 101/2016, 95/2018 and 95/2018 – other law), it issued water conditions to the company "Bosil Metal" LLC, Bosilegrad, in July 2023, under reference number: 003092052 2024 14843 001 001 325 025, dated January 9, 2025, as part of the procedure for preparing and drafting technical documentation – Main Mining Project for the expansion of the exploitation field boundaries of the "Bosil Metal" mine in the ore deposits "Podvirovi" and "Popovica–Conjev Kamen," located in the Karamanica area

near Bosilegrad, for the purpose of constructing a mine for the exploitation of Cu, Pb, and Zn ores from the "Podvirovi" and "Popovica" deposits, including a processing facility and a flotation tailings disposal site.

Taking into account the transboundary character of the Dragovištica River, a tributary of the Struma River, the issued conditions under item 4.3. stipulate, among other things, that the projected and future artificially established water regime within the mining complex must be harmonized with the water regime of the Dragovištica River in the border section shared with the Republic of Bulgaria, and that the consent of the competent authorities of the Republic of Bulgaria must be obtained for the implementation of the project.

Water consent has not been issued for the aforementioned mining project at the Podvirovi–Karamanica site.

**4. The Institute for Nature Conservation of Serbia** has informed that, following a review of the Central Register of Protected Natural Assets and the Institute's documentation, it has issued a Decision on Nature Protection Conditions (03 No. 021-2941/6 dated 30 January 2025), by which the execution of planned activities in the "Podvirovi" and "Popovica" ore deposits near Bosilegrad is not permitted.

Against the issued Decision of the Institute for Nature Conservation of Serbia, the company "Bosil Metal" LLC from Bosilegrad lodged an appeal, to which the Institute responded with a Statement (No. 03-021-2941/8 dated March 25, 2025), and submitted it to the second-instance authority — the Ministry of Environmental Protection — for further action.

**5. The Environmental Protection Agency** has reported that, as the state authority responsible for conducting national monitoring of the quality of surface and groundwater on the territory of the Republic of Serbia, the Agency conducts **water quality testing of the Dragovištica River at the Ribarce profile (border profile)**. Water sampling is carried on a monthly basis in accordance with the Annual Water Status Monitoring Programme for 2025 ("Official Gazette of RS", No. 26/2025). Accordingly, there is no new data compared to the previous Report of the Ministry, as no increase in dissolved metals has been detected in the Dragovištica River to date.

**6. The Municipal Assembly of Bosilegrad** has been continuously monitoring surface water in the territory of the municipality of Bosilegrad since 2021. In 2025 as well, monitoring of the Karamanica River was conducted 300 meters downstream from the mine, with sampling on 18 February 2025 and 21 May 2025. The test was performed by an accredited laboratory of the Occupational Safety Institute, a.d. Novi Sad.

All samples in which physico-chemical parameters were examined comply with the values prescribed by the Regulation on limit values of polluting substances in surface and groundwater and sediment, and the deadlines for achieving them.

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>.

**7. The Ministry of Environmental Protection**, on 03 January 2025, received the responses of the Company "Bosil Metal" LLC, Bosilegrad to the submitted comments of the Technical Commission and the interested public from the Republic of Serbia and the Republic of Bulgaria, as well as the draft of the revised Environmental Impact Assessment Study for the project of exploitation of Pb, Zn, Cu ore from the "Podvirovi" and "Popovica" deposits in the Karamanica area. After reviewing the amendment to the Environmental Impact Assessment Study, the Technical Commission concluded that consent cannot be given to the subject Study, as investigations of sufficient scope have not been carried out to plan measures for mitigating the impact of the project. The Technical Commission proposed that the subject Environmental Impact Assessment Study (EIAs) be returned for further amendment/revision. The competent authority may, based on the proposal of the Technical Commission, approve an additional deadline for amendments and revisions to the Environmental Impact Assessment Study, in accordance with Article 23, paragraph 3 of the Law on Environmental Impact Assessment, under which the procedure is conducted. Additionally, the Law on General Administrative Procedure defines in Article 11 that a party must be allowed to present its opinion on facts relevant to decision-making in an administrative matter, and in Article 106, paragraph 5, it defines that the procedure may not be concluded until the party is allowed to comment on facts significant for the conduct of the administrative procedure.

In the interest of environmental protection, the local community, as well as international obligations, it is necessary for the Study to be returned for further revision and aligned with the latest legislation and professional standards.

The key deficiencies identified in this expert assessment must be explicitly addressed in order to ensure full compliance with the applicable regulations of the Republic of Serbia and international obligations, thereby safeguarding the environment and public health. Such an approach will ensure that the final decision is firmly



grounded, legally sustainable, and provides a high level of environmental protection—both nationally and transboundary.

Based on all the aforementioned, we inform you that the procedure is still ongoing.

Regarding this complaint, the company “Bosil Metal” LLC informed the Republic Environmental Protection Inspectorate that it had initiated the procedure for obtaining consent for the Environmental Impact Assessment Study for the project of exploitation of Pb, Zn, and Cu ore from the “Podvirovi” and “Popovica” deposits in the Karamanica area near Bosilegrad, and that it suspended exploration and mining activities at this location as of 21 October 2024. As of the date of preparation of this report, exploitation has not resumed at the Karamanica site, pending fulfillment of the environmental impact assessment procedure.

The Ministry, in the second-instance procedure, issued Decision No. 001855655 2925 dated 23 June 2025, rejecting as unfounded the appeal by “Bosil Metal” LLC. from Bosilegrad against the Decision of the Institute for Nature Conservation of Serbia, Belgrade, No. 03 021-2941/6 dated 30 January 2025, and forwarded it to the Institute for further implementation.

**II Based on the statements received from the aforementioned authorities and organizations, regarding this complaint relating to the potential negative impact of mining activities in the Homolje mountain region, we inform you of the following:**

**1. The Ministry of Construction, Transport and Infrastructure** has informed that the Government of the Republic of Serbia adopted the Regulation on the Spatial Plan for the Special-Purpose Area of the Natural Resource Beljanica-Kučaj (“Official Gazette of RS”, No. 98/2014), as well as the Regulation on the Spatial Plan for the Special-Purpose Area of the Tourist Destination Kučaj Mountain Area (“Official Gazette of RS”, No. 33/2024).

It is also noted that, pursuant to Article 33 of the Law on Planning and Construction (“Official Gazette of the Republic of Serbia”, Nos. 72/2009, 81/2009 – correction, 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), spatial and urban planning documents must be harmonized in such a way that a planning document of a lower hierarchical level must conform to the planning document of a higher hierarchical level.

**2. The Ministry of Mining and Energy** has informed that, concerning the Homolje Mountain region, the company Crni Vrh Resources LLC has been approved to conduct applied geological explorations for gold, copper and associated metals at the Potaj Čuka site.

**3. The Ministry of Agriculture, Forestry and Water Management** - Republic Water Directorate reported that no water-related permits have been issued for the site Potaj Čuka in the Homolje Mountain region.

**4. The Institute for Nature Conservation of Serbia** informed that it issued a Decision (03 No. 021-1288/4 dated 10 June 2025) for the issuance of nature protection conditions for the development of Amendments and Supplements (Annex II) to the Project of Applied Geological Exploration of Gold and Associated Metals at the Potaj Čuka site for the period 2023-2026, municipalities of Žagubica and Majdanpek. It was determined that the area in question is not located within a protected area for which protection has been implemented or initiated in accordance with the Law on Nature Protection (“Official Gazette of RS”, Nos. 36/09, 88/10, 91/10 - correction, 14/16, 95/18 - other law, 71/21), nor is it within an ecologically important area of the ecological network of the Republic of Serbia according to the Regulation on the Ecological Network (“Official Gazette of RS”, No. 102/10).

Accordingly, the area is located outside the boundaries of the National Park “Kučaj-Beljanica.”

**5. The Municipal Assembly of Žagubica** informed that mining activities on the territory of the municipality of Žagubica are being carried out in accordance with the applicable planning documentation: The Spatial Plan for the Special-Purpose Area of the Tourist Destination Kučaj Mountain Area (“Official Gazette of RS”, No. 33/24) and the Spatial Plan of the Municipality of Žagubica (“Official Gazette of the Municipality of Žagubica”, No. 2/11). The implementation of geological exploration of mineral resources in certain parts of the municipality’s territory is not contrary to the valid planning documents.

The Municipality of Žagubica received a copy of the Decision on exploration work at the Potaj Čuka site in the Homolje mountain area, issued by the Ministry of Mining and Energy.

6. The Ministry of Environmental Protection reported that, to date, no request has been submitted concerning the mining project at the Potaj Čuka site in the Homolje Mountain area that would fall under the application of the Law on Environmental Impact Assessment ("Official Gazette of RS", Nos. 135/04, 36/09, and 94/24).

Copies of this report, including its English translation, are enclosed.

While awaiting your response, we would like to convey our sincere gratitude to the Bureau for its thoughtful and thorough consideration of this report.

Sincerely,

MINISTER  
  
Sara Pavkov

**Annex 1: Report by Ministry of Construction**



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

No: 002505156 2025 14810 006 000 000 001

Date: 17.06.2025

00 00 00 00 00 00

**MINISTRY OF ENVIRONMENTAL**

**PROTECTION**

1 Omladinskih brigada Str  
11000 Belgrade

**SUBJECT: Request for a report based on Complaint No. 2022/6: Potential case: Serbia:  
Potential negative impact of mining activities in Bosilegrad and the Homolje mountain area**

Dear Sir or Madam,

With Your letter No. 002342585 2025 14850 004 001 000 001, a Request and a Decision of the Bern Convention Bureau in the Standing Committee was delivered regarding the Examination of Progress of the Republic of Serbia based on the Complaint No. 2022/6: Potential case: Serbia: Potential negative impact of mining activities in Bosilegrad and the Homolje mountain area, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 15.05.2025.

The Bureau requested new information from the competent authorities regarding all procedures related to the expansion of the Podvirovi-Karamanica mine and the reconstruction of the same, because of the additional exploitation of the deposit in the territory of the Municipality of Bosilegrad.

The Bureau also requested information about the renewal of drilling permits in the area of the Potaj Čuka site in the Homolje mountain area, which, according to the complainant, has caused a risk of contamination to surface water and karst water bodies, as well as other potential negative impacts due to drainage, noise, and air pollution in the protected area Kučaj-Beljanica.

We hereby inform you that the Ministry of Construction, Transport and Infrastructure does not conduct activities related to the development of Spatial Plans for areas of special use, that are regulated by regulations under the Article 21, item 2, of the Law on Spatial Planning and Construction ("Official Gazette of RS", No. 72/2009, 81/2009 - correction, 64/2010 - decision of CC, 24/2011, 121/2012, 42/2013 - decision of the CC, 50/2013 - decision of the CC, 98/2013 - decision of CC,

132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/23) in the subject area. The aforementioned mines are included in documentation related to urban and spatial planning that falls within the jurisdiction of local self-governments.

We also remind you that the Government of the Republic of Serbia adopted the Regulation on determining the Spatial Plan of the special purpose area of the natural resource Beljanica-Kučaj ("Official Gazette of the RS", No. 98/2014), as well as the Regulation on determining the Spatial Plan of the special purpose area of the tourist destination of the Kučaj Mountains ("Official Gazette of the RS", No. 33/2024).

We also point out the provisions of Article 33 of the Law on Planning and Construction ("Official Gazette of the 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: the Law), which stipulates that spatial and urban planning documents must be adjusted, so that a lower-ranking planning document must comply with a higher-ranking planning document.

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

Sincerely,

**MINISTER**

*Aleksandra Sofronijević*

**Annex 2: Report by Ministry of Mining and Energy**



**Republic of Serbia**

**MINISTRY OF MINING AND ENERGY**

Number: 001930702 2024 14820 007 000 000 001

Date: 13 June 2025

**MINISTRY OF ENVIRONMENTAL PROTECTION**

Sara Pavkov, Minister of Environmental Protection

22-26 Nemanjina St

11000 Belgrade

Dear Ms Pavkov,

By letter No. 002342585 2025 14850 004 001 000 001 dated 27 May 2025, you submitted the Decision adopted by the Standing Committee of the Bern Convention (Council of Europe) to the Ministry of Mining and Energy. The Decision pertains to the review of the Republic of Serbia's progress report on Complaint No. 2022/06: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region.

In the aforementioned letter, you stated the following (quotation from your letter): "new information from competent authorities concerning all procedures related to the expansion of the Podvirovi-Karamanica mine and its reconstruction for further exploitation of mineral deposits in the territory of the municipality of Bosilegrad, as well as information regarding renewed drilling based on a permit at the Potaj-Čuka site in the Homolje mountain region, which may have a negative impact on the protected area of Kučaj-Beljanica", and accordingly, you request that the Ministry of Mining and Energy provide a report within the scope of its competencies.

A review of the official records of the Ministry of Mining and Energy indicates that comprehensive information concerning mining activities at the requested locations was submitted to your Ministry via letter no. 001930702 2024 14820 007 000 000 001 dated 25 October 2024, as well as by letter dated 21 January 2025. In light of this, please be advised that there is no new information regarding the exploitation of the Podvirovi deposit by the company Bosil-Metal Ltd. from Bosilegrad.



In the Homolje mountain region, the company Crni Vrh Resources Ltd., based in Belgrade, has been granted approval to conduct applied geological research for gold, copper and associated metals at the Potaj Čuka site.

Sincerely,

MINISTER

Dubravka Đedović Handanović

Delivered to:

- Addressee
- Records Office (Archive).

**Annex 3: Report by Environmental Protection Agency**

**ENVIRONMENTAL PROTECTION AGENCY**

10a Žabljačka St, 11160 Belgrade, Republic of Serbia

+381(0)11 6356788

[www.sepa.gov.rs](http://www.sepa.gov.rs)

Date: 7 July 2025

**MINISTRY OF ENVIRONMENTAL PROTECTION**

2 Mihajla Pupina Blvd

11 070 BELGRADE

**Subject: Report requested under Complaint No. 2022/06: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region**

Pursuant to your request No. 002342585 2025 14850 004 001 000 001 dated 27 May 2025, we hereby inform you that the Environmental Protection Agency, as the governmental authority responsible for implementing national surface and groundwater quality monitoring in the Republic of Serbia, carries out **water quality testing of the Dragovištica River at the Ribarce location (border profile)**.

Water sampling is conducted on a monthly basis in accordance with the 2025 Annual Water Status Monitoring Programme (“Official Gazette of RS”, No. 26/2025).

As regards surface and groundwater quality, no supplementary data is available beyond the findings outlined in our most recent report, dated January 2025 and enclosed below. Monitoring results to date have not indicated any increase in concentrations of dissolved metals in the Dragovištica River.

In the present context, the primary focus appears to be directed toward the Environmental Impact Strategy, which remains unapproved, as well as the presence of hazardous tailings and waste disposal facilities. Such sample types fall outside the analytical scope and jurisdiction of the Environmental Protection Agency’s laboratory operations. Furthermore, reference has been made to designated ecological zones and the “Dukat” Important Bird Area (IBA), alongside concerns pertaining to

acoustic disturbances and the unregulated discharge of contaminated waters originating from the mining site.

Sincerely,

Stefan Simeunović

Director

Report of January 2025:

The Republic of Serbia

**MINISTRY OF ENVIRONMENTAL PROTECTION**

- Sara Pavkov, State Secretary -

2 Mihajla Pupina Blvd

11 070 BELGRADE

**SUBJECT: Report requested under Complaint No. 2022/06: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region**

Pursuant to your request No. 003593424 2024 14850 004 001 000 001 dated 10 January 2025, we hereby inform you that the Environmental Protection Agency, as the governmental authority responsible for implementing national surface and groundwater quality monitoring in the Republic of Serbia, carries out **water quality testing of the Dragovištica River at the Ribarce location (border profile)**. Water sampling was conducted on a monthly basis in accordance with the 2024 Annual Water Status Monitoring Programme (“Official Gazette of RS”, No. 17/2024).

Please find enclosed the results (in PDF format) of the physico-chemical and chemical analyses of water samples from the Dragovištica River conducted in 2024.

Based on the obtained results of the physico-chemical and chemical analyses conducted on water samples taken from Dragovištica River, we are also providing a commentary in relation to the prescribed limit values for Class II surface water quality (Regulation on Threshold Values for Pollutants in Surface Water, Groundwater and Sediment and Deadlines for Their Achievement, “Official Gazette of RS”, No. 50/2012; Regulation on Threshold Values for Priority and Priority Hazardous Substances Polluting Surface Water and Deadlines for Their Achievement, “Official Gazette of RS”, No. 24/2014).

The analysis of the test results showed that during 2024 there were no changes in the organoleptic properties of the water (color, odor, and visible waste materials). The obtained values of general physico-chemical parameters and suspended solids corresponded to the prescribed limit values for Class I and II surface water quality, except in the sample taken on February 26, 2024, when the pH value corresponded to Class V surface water quality.

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

Zoran Stojanović, MSc in Chemistry  
Department for Instrumental and Chemical Analyses  
Environmental Protection Agency

**Annex 4: Report from Institute from Nature Conservation**

INSTITUTE FOR NATURE CONSERVATION OF SERBIA  
35 Japanska St.  
11070 Novi Beograd  
www.zzps.rs Phone: 011 209 3801 Fax: 011 2093 867 TIN 106844260 CRN 17798561

03 No. 025-4043/9

4 July 2025

**MINISTRY OF ENVIRONMENTAL PROTECTION**

11070 Novi Beograd

1 Omladinskih brigade St

You submitted a request to the Institute for Nature Conservation of Serbia on June 3, 2025, registered under number 03 No. 025-4043/8 dated June 3, 2025, seeking a statement regarding Complaint number: 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt Region for the purpose of providing a response to the Secretariat of the Bern Convention at the Council of Europe. The complaint regarding the alleged consequences of the planned activities in the areas of Bosilegrad and the Homolje Mountains was submitted by the international non-governmental organization "Earth Thrive" in cooperation with Serbian non-governmental organizations "Čuvari Homolja" and "Mlavska vojska," as well as the international non-governmental organization "Earth Law Center" from the United States of America.

Based on the submitted documentation, it has been determined that the requested information pertains to whether the Decision which has been issued by the Institute for Nature Conservation of Serbia regarding the mining and geological works carried out by "BOSIL-METAL" LLC has become legally binding, or – if that is not the case – on the status of the ongoing legal proceedings. It has also been noted that the Secretariat of the Bern Convention expressed concern over the renewed activities (drilling) under the permit for Potaj Čuka in the Homolje region, which have posed a risk of contamination of surface and karst water bodies, as well as other potentially negative impacts due to drainage, noise, and air pollution within the "Kučaj-Beljanica" National Park, a proposed Emerald Site.

Upon reviewing the Central Register of Protected Natural Areas, the Nature Protection Information System maintained by the Institute for Nature Conservation of Serbia, as well as relevant legal regulations, we, acting upon your request, hereby inform you of the following:



- **As concerns Bosilegrad:** In relation to the allegations raised in *Complaint No. 2022/06: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region* – citation “the Bureau was also informed of the Decision issued by the Institute for Nature Conservation of Serbia on the conditions for nature protection, dated 30 January 2025, and of its implications for the planned activities in the areas of Podvirovi and Popovica. These implications pertain to the denial of approval for activities within the Institute’s mandate in that area, which lies within the ecologically important zone of the Ecological Network “Golemi Vrh” (95) and the internationally important bird area “Dukat”. In this context, the Bureau seeks information on whether the Decision of the Institute for Nature Conservation of Serbia

has become binding and, if not, on the status of the ongoing legal proceedings”. With this in mind, please note that the Institute adopted Decision 03 No. 021-2941/6 of 30 January 2025, whereby the execution of the planned activities at the “Podvirovi” and “Popovica” deposits near Bosilegrad was not permitted. The company “BOSIL-METAL” LLC, headquartered at 74 Georgi Dimitrov Street, Bosilegrad, lodged an appeal against the Decision of the Institute for Nature Conservation of Serbia. The Institute issued its Statement in response to the appeal under reference 03 No. 021-2941/8 dated 25 March 2025 and forwarded it to the second-instance authority - the Ministry of Environmental Protection - for further consideration.

- **As concerns Homolje region:** In relation to the allegations raised in *Complaint No. 2022/06: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region* - citation: “the Bureau noted with concern that DPM resumed drilling activities as per permit issued for the Potaj Čuka site, thereby posing a risk of contamination of surface and karst water bodies, as well as other potentially negative impacts due to dewatering, noise and air pollution in the Kučaj–Beljanica National Park, a proposed Emerald site.” The Institute for Nature Conservation of Serbia adopted Decision 03 No. 021-1288/4 dated 10 June 2025, pertaining to issuing conditions for nature protection for the purpose of preparation of Amendments and Supplements (Annex II) to the Project of Applied Geological Research of Gold and Associated Metals at the “Potaj Čuka” site in the period from 2023 to 2026, which is under administrative jurisdiction of the municipalities of Žagubica and Majdanpek. The aforementioned Decision unequivocally established that the area in question does not fall within a protected natural area for which protection has been implemented or initiated in accordance with the Law on Nature Protection (“Official Gazette of the RS”, Nos. 36/09, 88/10, 91/10 – corrigendum, 14/16, 95/18 – other law, 71/21), nor does it form a part of an ecologically important area of the Ecological Network of the Republic of Serbia, as defined by the Regulation on the Ecological Network (“Official Gazette of the RS”, No. 102/10). Accordingly, the site is located outside the boundaries of the “Kučaj–Beljanica” National Park.

EXECUTIVE DIRECTOR

Branka Vujović

As per Decision 02 No. 012-1638/2  
of 24 June 2025

Delivered to:

- Applicant
- Records Office (Archive) x 2

## **Annex 5: Report from the Water Directorate**



**Republic of Serbia**  
**MINISTRY OF AGRICULTURE,**  
**FORESTRY AND WATER MANAGEMENT**

Republic Water Directorate  
No: 003078196 2024 14843 001 000 051 001  
Date: 03.06.2025

**MINISTRY OF ENVIRONMENTAL PROTECTION**

Belgrade, 1 Omladinskih brigada Str

**SUBJECT:** Request for a report based on Complaint No. 2022/6: Potential case: Serbia: Potential negative impact of mining activities in Bosilegrad and the Homolje mountain area

Dear Sir or Madam,

With reference to the request you submitted to the Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, under No. 002342585 2025 14850 004 001 000 001 dated May 27, 2025, we inform you of the following:

The Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia, following the provisions of the Law on Waters ("Official Gazette RS", No. 30/2010, 93/2012, 101/2016, 95/2018 and 95/2018 - other law), issued water conditions No: 003092052 2024 14843 001 001 325 025 dated January 9, 2025, in the procedure for the preparation and development of technical documentation - Main mining projects for the implementation of the project of expanding the boundaries of the exploitation field of the mine "Bosil Metal" in the mineral deposit "Podvirovi" and "Popovica - Coljev Kamen" in the Karamanica area in Bosilegrad for the exploitation of Cu, Pb, Zn ores from the deposit "Podvirovi" and "Popovica", including facilities for ore processing and tailings storage facility, to preserve the water regime.

Considering the transboundary nature of the Dragovištica River, which is a tributary of the Struma River, the issued water conditions under point 4.3 prescribed, among other things, that it is necessary to harmonize the designed, future artificially established water regime at the mine complex with the water regime on the Dragovištica River, in the border section

with the Republic of Bulgaria, i.e., it is necessary to obtain the consent of the competent authorities of the Republic of Bulgaria for the implementation of the project.

The Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management of the Republic of Serbia has not issued any water documents for the location Potaj Čuka in the Homolje mountain area, nor any water consent for the Mining Project of the mine Podvirovi-Karamanica.

Best regards,

**ACTING**  
**Maja Grbić, Legal Expert**

**DIRECTOR**

## **Annex 6: Report from Municipality of Žagubica**



Republic of Serbia  
MUNICIPALITY OF  
ŽAGUBICA  
President of the Municipality  
No: IV-01-38-890/25  
Date: 11.06.2025.

Republic of Serbia  
MINISTRY OF ENVIRONMENTAL PROTECTION

11000 BELGRADE  
22-26 Nemanjina Str.

**Subject: Response to your Request regarding the Complaint No. 2022/06, concerning potential negative impacts of mining activities in the Homolje mountain area.**

Dear Sir or Madam,

Pursuant to the request submitted to the Ministry of Environmental Protection No. 002342585 2025 14850 004 001 000 001 dated 27.05.2025 (received on 06.06.2025), related to the Complaint reporting No. 2022/06, and regarding the renewal of the drilling permit at the location Potaj Čuka in the Homolje mountain area, we hereby inform you of the following:

For the area where mining activities are performed on the territory of the Municipality of Žagubica, the valid planning document is the Spatial Plan for the Area of Special Purpose of the Tourist Destination Kučajske Mountains (“Official Gazette of RS”, no. 33/24) and the Spatial Plan of the Municipality of Žagubica (“Official Gazette of the municipality of Žagubica”, No. 2/11), and in addition to that, the geology research of mineral raw materials exploitation in certain parts of the territory of the Municipality is not opposed to valid planning documents.

Exploration works and exploitation of mineral raw materials are under the jurisdiction of state authorities exclusively.

Regarding the concerns raised from the complaints about mining activities at the location Potaj Čuka causing danger from surface waters and karst water bodies, as well as other potential negative impacts of the drainage, noise, and air pollution on the Kučaj-Beljanica Protected Area, the Municipality of Žagubica has never performed any studies, reports, or similar about



the endangerment of environmental protection in Homolje, nor has to the Municipality of Žagubica been delivered any report, analysis, or similar from the side of the competent state authority.

The decision from the Ministry of Mining regarding the exploration works at the Potaj Čuka location has been delivered to the Municipality of Žagubica.

Best regards,

President of the Municipality of Žagubica  
Safet Pavlović

**Annex 7: Report from Municipality of Bosilgrad**



Republic of Serbia  
MUNICIPALITY OF  
BOSILEGRAD  
Municipal Administration  
***Municipal Environmental  
Protection Administration***  
Number: 501-39-5/2024

**Ministry of Environmental Protection**

Omladinskih brigada 1, SIV III

11070 Novi Beograd/Serbia

**Mrs. Snežana Prokić**

[snezana.prokic@eko.gov.rs](mailto:snezana.prokic@eko.gov.rs)

**SUBJECT: Provision of information**

Dear Madam,

With reference to your document number: 002342585 2025 14850 004 001 000 001 dated 27.05.2025 requesting provision of a Statement on Complaint No. 2022/06, which refers to the negative impact of mining activities in Bosilegrad, we hereby inform you of the following

The Municipality of Bosilegrad has been conducting continuous surface water monitoring within its territory since 2021. In line with this practice, monitoring of the Karamanica River was carried out in 2025. Specifically, water sampling was conducted on 18 February 2025 and 21 May 2025, on a section of the Karamanica River located 300 meters downstream from the Bosil-Metal mine in the village of Karamanica.

The testing is carried out by an accredited laboratory - the Institute for Occupational Safety JSC Novi Sad - which is accredited by the Accreditation Body of Serbia and authorized by decisions of the Ministry of Agriculture, Forestry and Water Management and the Republic Water Directorate to perform physical, chemical and microbiological testing of wastewater, surface water and groundwater, as well as sampling of surface, groundwater and wastewater.

All samples subjected to physico-chemical analysis **comply** with the limit values prescribed by the Regulation on Limit Values of Polluting Substances in Surface and Groundwater and Sediment and on Deadlines for Their Attainment (Official Gazette of the Republic of Serbia, No. 50/2012). Furthermore, the results **meet** the quality standards defined for Class I and II waters under the Regulation on Hazardous Substances in Water (Official Gazette of the Republic of Serbia, No. 31/82).

All data from the measurements are available on the official website of the Municipality of Bosilegrad, at the following link: <http://www.bosilegrad.rs/sr/Monitoring.aspx>

Sincerely,

**MUNICIPAL ENVIRONMENTAL  
PROTECTION ADMINISTRATION**

Advisor for environmental protection

Mikiša Vasilev, B.Sc. Eng. Env.

**PRESIDENT OF THE  
MUNICIPALITY OF BOSILEGRAD**

Vladimir Zaharijev

**Update Report February 2025:**



**Republic of Serbia**  
**MINISTRY OF**  
**ENVIRONMENTAL PROTECTION**  
No.: 003593424 2024 14850 004 001 000 001  
Date: 12 February 2025  
Belgrade

**Council of Europe**  
**Directorate General of Democracy**  
**Secretariat of the Bern Convention**  
**F-67075 Strasbourg, France**  
**Mr. Mikaël POUTIERS**  
**Secretary of the Bern Convention**

**Subject: The Progress Report on Complaint No. 2022/6: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region**

Dear Mr. Poutiers,

In regard to the request of the Secretariat of the Bern Convention of 20 December 2024, concerning Complaint No. 2022/6: Possible file: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region – single complaint, on behalf of the Ministry of Environmental Protection, we would like to inform you of the following:

In accordance with the Decision of the Standing Committee of the Bern Convention adopted at its 44<sup>th</sup> meeting on 2 – 6 December 2024, the Ministry of Environmental Protection, in the capacity of the competent authority for monitoring the implementation of the Bern Convention for the Republic of Serbia, sent a request No.: 003593424 2024 14850 004 001 000 001 of 10 January 2025 for obtaining a report to the competent bodies and organisations, as follows: Ministry of Construction, Transportation and Infrastructure, Ministry of Mining and Energy, Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate, Institute for Nature Conservation of Serbia, Environmental Protection Agency, Municipal Assembly of Bosilegrad and Municipal Assembly of Žagubica, including the competent sectors of the Ministry of Environmental Protection.

**I Pursuant to the obtained reports of the previously mentioned bodies and organisations (please find enclosed the translated copies), in relation to the part of the Complaint concerning the possible negative effect of mining activities in Bosilegrad, we would like to inform you of the following:**

**1. Ministry of Construction, Transportation and Infrastructure** informed that from their scope of work they do not carry out activities on the development of spatial plans for special-purpose areas in the area in question, prescribed under Article 21 item 2 of the Planning and Building Act (*Official Gazette of the Republic of Serbia*, Nos. 72/2009, 81/2009 - correction, 64/2010 – Decision of the Constitutional Court (CC), 24/2011, 121/2012, 42/2013 – Decision of the CC, 50/2013 – Decision of the CC, 98/2013 – Decision of the CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 – other law, 9/2020, 52/2021 and 62/2023).

**2. Ministry of Mining and Energy** informed that there is no new information regarding mining activities at the sites in question compared to previous reporting submitted to the Secretariat of the Bern Convention in the Report of the Ministry of Environmental Protection No. 002964850 2024 14850 004 008 000 001 of 25 November 2024.

**3. Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate** (hereinafter the Water Directorate) reported that it issued on 9 January 2025 water conditions, at request of Company Bosil-Metal d.o.o., Bosilegrad, for the preparation and development of technical documentation – Main mining project for the implementation of the project for expanding the boundaries of the Bosil-Metal mine site in ore deposits Podvirovi and Popovica-Conjev Kamen in the Karamanica area near Bosilegrad, with the aim of construction of the mine for the exploitation of Cu, Pb, Zn ores from Podvirovi and Popovica deposits, including the ore processing plant and tailings dam.

Bearing in mind the transboundary character of the Dragovištica River, which is a tributary of the Struma River, the issued water conditions prescribe that it is necessary to harmonize the designed, future artificially established water regime at the mine complex with the water regime of the Dragovištica River, in the cross-border area with the Republic of Bulgaria, i.e. that it is necessary to obtain the consent of the competent authorities of the Republic of Bulgaria for the project implementation.

In connection with the above, the procedure for issuing water acts defined by the provisions of the Water Law was presented (*Official Gazette of the Republic of Serbia*, Nos. 30/2010, 93/2012, 101/2016 and 95/2018 – other law), which is submitted in its entirety as an annex to the Ministry's Report.

Furthermore, the Water Directorate supported the Decision of the Standing Committee of the Bern Convention on the establishment of cooperation between the two governments on cooperation in the field of water management.

Accordingly, the Water Directorate proposed a Draft Agreement to the Republic of Bulgaria in order to modernize the current agreement and create legal conditions for bilateral cooperation in the field of water management, as well as mechanisms for coordinating the implementation of the EU Water Directives, as well as applicable international conventions and agreements.

**4. Institute for Nature Conservation of Serbia** informed that it has been established, by inspecting the Central Register of Protected Natural Resources and documentation of the Institute, that the Institute issued the Decision on nature protection conditions (03 No. 021-2941/6 of 30 January 2025) for carrying out the planned activities in the Podvirovi and Popovica deposits area near Bosilegrad.

In accordance with the Decision of the Standing Committee of the Bern Convention, the Institute **did not allow** the planned activities to be carried out in the Podvirovi and Popovica deposit area near Bosilegrad within the scope of its work.

In accordance with regulation governing the field of nature protection, it has been established that **the respective area is not found within the protected area**, although it is part



of an ecologically significant area of the Ecological Network of the Republic of Serbia under the name 'Golemi Vrh' (95) and pursuant to the Regulation on the Ecological Network (*Official Gazette of the Republic of Serbia*, No. 102/2010), as well as a part of the internationally important bird area 'Dukat'.

**5. Environmental Protection Agency** reported that testing of the quality of the Dragovištica River water, on the Ribarce profile (boundary profile), was conducted in 2024 on a monthly basis, and that the values of the performed chemical analyses were within the prescribed limit values for surface waters of Class II, except in the sample of 26 February 2024 when the pH value corresponded to Class V for surface water quality.

The values of total metals: Iron (Fe), Zinc (Zn), Copper (Cu), Manganese (Mn), Boron (B), Chromium (Cr), Arsenic, as well as the values of dissolved metals: Nickel (Ni), Cadmium (Cd), Mercury (Hg) and Lead (Pb) were within the prescribed limit values for surface water quality of Class II.

**6. Municipal Assembly of Bosilegrad** has been constantly monitoring surface waters in the territory of the Municipality of Bosilegrad since 2021, and in 2024 continuous monitoring of the Karamanica River was carried out in the length of 300 meters downstream of the Bosil-Metal mine in the Karamanica village. The latest sampling was carried out on 22 November 2024 and the results of all measurements are found on the official website of the Municipality of Bosilegrad at: <http://www.bosilegrad.org/sr/Monitoring.aspx>.

All physical and chemical parameters of tested samples meet the values prescribed under the Regulation on the emission limit values for pollutants in surface and ground waters and sediments and the deadlines for their reaching.

Attached was also a copy of the Notice of temporary suspension of mining and geological works by Bosil-Metal d.o.o., Bosilegrad.

**7. Ministry of Environmental Protection** informed that on 12 November 2024, the Inspection filed a complaint for economic offence against the Company Bosil-Metal d.o.o., Bosilegrad, for failing to comply with the conditions and measures under the decision to approve the Environmental Impact Assessment Study for the Project: Reconstruction of the Podvirovi-Karamanica mine, additional exploration of the deposits by recategorization of the ore reserves, opening of deeper horizons and underground mining of Lead and Zinc ores, with maximum capacity of 90,000 tons of ore annually".

We would also like to inform you that in order to implement the Two-year work programme 2025 and 2026, on the implementation of the Memorandum of Understanding between the Ministry of Environmental Protection of the Republic of Serbia and the Ministry of Environment and Water of the Republic of Bulgaria, an online meeting was held on 2 December 2024 under the working title: Bulgarian-Serbian meeting of experts in the field of strategic check and environmental impact assessment within the Espoo Convention.

Both Parties have agreed to reach timely agreement in the coming period on further steps related to the organisation of expert meetings and meetings of the Joint Commission.

Ministry has received on 3 January 2025 answers of the Company Bosil-Metal d.o.o., Bosilegrad, to observations submitted by the Technical Commission and interested public from the Republic of Serbia and the Republic of Bulgaria, as well as a Draft of the corrected Environmental Impact Assessment Study on USB flash drive. The Ministry forwarded the received documentation and Information on Complaint No. 2022/6 to the members of the Technical Commission for obtaining a statement, i.e. evaluation.

In accordance with the conclusions of the Technical Commission and pursuant to provisions of the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/04, 36/09 and 94/24), the Ministry will make in the coming period a decision related to the Environmental Impact Assessment Study.

**II Pursuant to the obtained reports of the mentioned bodies and organisations related to this Complaint concerning the possible negative impact of mining activities in the Homolje Mt region, we would like to inform you of the following:**

**1. Municipal Assembly of Žagubica** informed that in the Homolje Mt region, conducting geological research of mineral raw materials is not contrary to the Spatial plan of the Municipality of Žagubica.

Regarding the allegations in the Complaint on possible negative impact of mining activities on the environment in the Homolje Mt region, particularly due to water pollution and illegal use of the local water bodies, the Municipal Assembly of Žagubica reported that it had no knowledge of it whatsoever and had never done studies or research on the issue of environmental threats.

**2. Ministry of Environmental Protection** so far has not received any request regarding this Complaint, which relates to the alleged endangerment of habitats in the Homolje Mt region due to the opening of gold mines by the Company Dundee Plemeniti metali.

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

We are looking forward to your response and would like to express our gratitude for the Bureau's time and consideration in this matter.

Sincerely,

DEPUTY PRIME MINISTER  
AND MINISTER



Mrs. Irena Vujović

**Republic of Serbia**  
**MUNICIPALITY OF ŽAGUBICA**  
**President of the Municipality**  
**Number: IV-01-38—243/25**  
**Date: 21 January 2025**  
**Žagubica**

**Republic of Serbia**  
**MINISTRY OF ENVIRONMENTAL**  
**PROTECTION**

11000 BEOGRAD  
Nemanjina 22-26

**Subject: Answer to your Request for a report on the Appeal No. 2022/06 on the monitoring of possible negative impact of mining activities in the area of the Homolje Mountains.**

To Whom It May Concern,

In reference to the request of the Ministry of Environmental Protection No. 003593424 2024 14850 004 001 000 001 of 10 January 2025 (received on 21 January 2025), for reporting on the Appeal No. 2022/06 on the monitoring of possible negative impact of mining activities in the area of the Homolje Mountains, we hereby notify you of the following:

The applicable planning documents for the area where mining activities are carried out in the territory of the Municipality of Žagubica are the Spatial Plan of the Special Purpose Area of the tourist destination 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 Republic of Serbia*, No. 2/11), and the geological explorations of raw minerals in certain parts of the territory of the Municipality are not in contravention with the applicable planning documents.

Exploration works and the exploitation of raw minerals are exclusively within the purview of state authorities.

As regards the indications from the appeal concerning possible negative environmental impact of mining activities in the area of the Homolje Mountains, in particular due to water pollution and illegal use of local water bodies, the Municipality of Žagubica has no knowledge thereof, i.e. the Municipality of Žagubica has never conducted any studies, surveys or anything similar with respect to the endangerment of the environment in Homolje, nor has the Municipality of Žagubica ever received any report, study or anything similar from any competent state authority.

Best regards,

President of the municipality of  
Žagubica  
Safet Pavlović

COMPANY FOR MINING ORE AND OTHER NON-FERROUS METALS

**BOSIL-METAL LLC – BOSILEGRAD**

MINING ORE, EXECUTION OF WORKS, DESIGNING, MARKETING, EXPORT-IMPORT

17540 Bosilegrad, Georgi Dimitrova 74,

Telephone/Fax: 017/878-543, 017/878-955

Current account: 205-111109-53

Komercijalna banka AD Beograd

Registration Number: 20200243

File number:

810/24

Date: 31 October

2024

**MUNICIPALITY OF BOSILEGRAD**

**- Municipal Administration - Department for Urban Planning and Construction  
17540 Bosilegrad, Georgi Dimitrova 82**

**Subject: NOTIFICATION OF A TEMPORARY SUSPENSION OF MINING AND GEOLOGICAL WORKS**

By the Decision of the Ministry of Mining and Energy No. 310—02-00946/2008-06 of 27 November 2008, the Company for mining ore and other non-ferrous metals BOSIL-METAL LLC Bosilegrad, Georgi Dimitrova 74, Registration number 20200243, TIN: 104625461 (hereinafter: Company), exploitation of polymetallic Pb, Zn, Cu is approved at the sites Karamanica and Popovica in the Municipality of Bosilegrad.

The mining works covered by this Decision have been completed, and, on 1 August 2024, the Company submitted a request for an expansion of the exploitation area “Podvirovi” in the vicinity of Bosilegrad, registered in sheet number 515 of the cadastre book of the exploitation area in coordinates further designated in the Feasibility Study for the exploitation of Pb, Zn and Cu ore from the beds “Podvirovi” and “Popovica” in the area of Karamanica in the vicinity of Bosilegrad, and in Annex of the Feasibility Study No. 759/21 of 31 May 2021, and at the same time it initiated a procedure of gaining approval for the “Environmental Impact Assessment Study of the project of the exploitation of Pb, Zn, Cu ore from the beds “Podvirovi” and “Popovica” in the area of Karamanica in the vicinity of Bosilegrad”.

By the Decision of the Ministry of Mining and Energy No. 10-02-00908/2023-02 of 3 August 2023, the Company is approved to execute mining works in accordance with the “Mining Project for exploration of solid raw minerals of the Pb-Zn ore in the area of Karamanica in the vicinity of Bosilegrad, in the exploitation area No. 515, which is located in the territory of the Municipality of Bosilegrad”.

In view of the fact that they had acted upon the aforementioned ongoing requests, the Company suspends all exploration and mining works in the approved exploration and exploitation area until the resolution of these requests, and **in accordance with Article 149**

**of the Law on Mining and Geological Explorations (*Official Gazette of the Republic of Serbia*, Nos. 101/2015, 95/2018 - as amended, and 40/2021) and notifies the competent authorities thereof.**

The Company hereby undertakes that, during the temporary suspension of works, it will maintain the main pit area, facilities and machinery in such a state that they can be approached without any danger, and that it will ensure their regular maintenance in such a manner that will guarantee their security and safety during the re-opening and exploitation.

During the temporary suspension of works, the Company will organise everyday watch duties with a view to checking the implementation of the measures of protection and safety of employees and assets, environmental protection and timely on-the-spot response, and, if needed, i.e. when there have been harmful consequences, it will notify the mining inspector and the authority in charge of the interior thereof without delay.

As regards the measures of safety and health at work, environmental protection, protection against fire and explosions and other measures of protection relating to the execution of mining and geological works which are not regulated by the Law on Mining and Geological Explorations, the Company will apply the provisions of special regulations laying down these measures of protection.

In Bosilegrad, 31 October 2024

Director

(stamp and signature)

Miodrag Vukajlović, Bachelor of Engineering in  
Mining

To be delivered to:

1. Municipal Administration of Bosilegrad - Department for Urban Planning and Construction
2. President of the Municipality of Bosilegrad
3. Archive



Republic of Serbia  
Ministry of Environmental Protection  
**Agency for Environmental Protection**

No. 325-3-00002/2/2025-02  
Belgrade, 27<sup>th</sup> January 2025

Republic of Serbia  
**MINISTRY OF ENVIRONMENTAL PROTECTION**

Sara Pavkov  
State Secretary  
Mihaila Pupina Blvd. 2  
11070 BELGRADE

**Subject: Request for reporting on the Appeal No. 2022/6: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and Vlasina Region of Homolie.**

In accordance with your request No. 003593424 2024 14850 001 000 001 from 10<sup>th</sup> January 2025, we are informing you that the Agency for Environmental Protection, as state administration body competent for monitoring the quality of superficial and underground waters on the territory of the Republic of Serbia, is **conducting the testing of the quality of water in the Dragovitica River on the profile Ribarce (borderline profile)**. The sampling of water was done on a monthly basis in accordance with the Annual Programme for Monitoring Water Status for 2024 (The Official Gazette of the RS, No. 17/2024). Herewith we are attaching the results (PDF format) of the conducted physico-chemical and chemical analysis of water samples taken out of the Dragovitica in 2024.

On the grounds of the results obtained from physico-chemical and chemical analysis of the water from the Dragovitica River, we are submitting also the comment regarding the prescribed limits for Class II quality of superficial water (The Regulation on Limit Values of Pollutants in the Superficial and Underground Waters and Sediment and the Deadlines for their Achievement, The Official Gazette of the RS, No. 50/2012; The Regulation on Limit Values of Priority and Hazardous Substances Polluting Superficial Waters and the Deadlines for their Achievement, The Official Gazette of the RS, No. 24/2014).

- 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). Obtained values of general physico-chemical parameters and suspended substances were equal to prescribed limit values for Class I and Class II quality of superficial water, save for the sample from 26<sup>th</sup> February 2024 when the pH value was equal to Class V quality of superficial 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 prescribed limits for Class II quality of superficial water.

Attachment: As in the text.

Director  
Stefan Simenunović, sing manual and stamp



03 No. 025- 4043/6 30<sup>th</sup> January 2025

INSTITUTE FOR NATURE CONSERVATION OF SERBIA  
Јапанска 35, 11070 Нови Београд тел: 011 2093 801, факс: 011 2093 867  
www.zzps.rs ПИБ 106844260, Матични број 17798561



**MINISTRY OF ENVIRONMENTAL PROTECTION**

Omladinskih brigada str. 1  
11070 Novi Beograd

You have submitted memo to the Institute for Nature Conservation of Serbia filed in the Institute under No. 025-4043/5 from 16<sup>th</sup> January 2025, requesting relevant information and data from the scope of our work, which memo documents the requests from the Report of the Bureau of the Bern Convention in relation to the Appeal No. 2022/6: „Appeal is being monitored: Serbia: Possible negative impact of mining activities in Bosilegrad and the mountain area Homolje.

Insight into the Central Register of Protected Natural Goods and the documentation of the Institute confirmed that the Institute issued the Decision 03 No. 021-2941/6 from 30<sup>th</sup> January 2025 for the execution of activities in the area of deposits “Podvirovi” and “Popovica” near Bosilegrad. The decision was issued in accordance with the Decision of the Standing Committee of the Bern Convention in the Council of Europe on the occasion of the consideration of the Report on progress of the Republic of Serbia in relation to the Appeal No. 2022/6: „Appeal is being monitored: Serbia: Possible negative impact of mining activities in Bosilegrad and mountain area of Homolje, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 20<sup>th</sup> December 2024, wherein it was proposed for the competent authorities to reject the proposal for continuation and expansion of mining activities in this sensitive natural environment and to assess, in an appropriate manner, the existing ones as well as to assess the potential negative impact on the protected species and habitat.

НИ ДИРЕКТОР  
Бранка Вујовић  
По Одлуци 02 бр. 012-1498/7  
од 24.12.2024. године

Executive Director, Branka Vujović, sing manual,  
upon Decision 02 No. 012-1498/7 from 24<sup>th</sup> December 2024

Attachment:  
Decision 03 No. 021-2941/6 from 30<sup>th</sup> January 2025

Delivered:  
- Requester  
- Archive





Republic of Serbia  
 INSTITUTE FOR NATURE CONSERVATION OF SERBIA  
 Novi Beograd, Japanska Str. 35, Tel. +38111/2093-802; 2093-803  
 Fax. +38111 2093-867

The Institute for Nature Conservation of Serbia, Belgrade Institute for Nature Conservation of Serbia (Executive Director, Branka Vujović upon Decision 02 No, 012- 1498/7 from 24<sup>th</sup> January 2024), Japanska Str. 35, on the grounds of Article 9 of the Law on Conservation of Nature (The Official Gazette of the RS, No. 36/2009, 88/2010, 91/2010-correction 14/2016, 95/2018-other law and 71/2021), Article 136 of the Law on General Administrative Procedure (The Official Gazette of the Republic of Serbia, No. 18/2016, 95/2018 - authentic interpretation and 2/2023 - Decision of the CC), acting upon the request No. 576/24 from 26<sup>th</sup> July 2024, submitted by the company "BOSIL-METAL" Ltd. from Bosilegrad, Georgi Dimitrova str. 74, for issue of the deed on requirements for nature conservation needed for drafting of the project documentation for ore exploitation and processing in the deposits "Podvirovi" and "Popovica" on the territory of Karamanica near Bosilegrad, on 30<sup>th</sup> January 2025, under 03 No. 025- 2941/6, issued the following

## DECISION

1. The area for which the drafting of the project documentation for ore exploitation and processing in the deposits "Podvirovi" and "Popovica" near Bosilegrad (Hereinafter: The Project) is planned, is not located within any protected area for which protection procedure has been carried out or initiated. The mentioned area is located in the scope of the ecologically significant site of the ecological network of the Republic of Serbia under the name of Golemi Vrh (95) in accordance with the Regulation on Ecological Network (The Official Gazette of the RS, No. 102/2010), as well as in the scope of the internationally significant site for birds under the name Dukat. The mentioned site is the only known habitat of extremely endangered and endangered 4 types of fish from Aegean Basin in Serbia: Strymon schneider (*Alburnoides strymonicus*), Strumica Barbel (*Barbus strumicae*), Aegean gudgeon (*Gobio bulgaricus*), Aegean Minnow (*Phoxinus strymonicus*), amongst which are also protected species mentioned in the reasoning, and in accordance with the Rulebook on proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (The Official Gazette of RS, No. 5/2010, 47/2011, 32/2016 and 95/2016). Accordingly, the following nature conservation requirements are issued:

1. In the area of the deposits "Podvirovi" and "Popovica" near Bosilegrad, defined in the following coordinates, it is not allowed to execute planned activities:

Point	X	Y
1	4 691 227	7 610 040
2	4 692 986	7 609 949
3	4 692 946	7 611 152
4	4 689 024	7 613 626
5	4 669 026	7 611 914
6	4 690 178	7 610 721
7	4 690 223	7 610 475
8	4 690 582	7 610 078
9	4 690 872	7 609 926

2. The fee for issue of the scientific grounds for issue of the deed on the nature protection requirements in value of 27,400.00 Dinars has been determined in accordance with the Law on Republic Administrative Fees (The Official Gazette of the RS, No. 43/2003, 51/2003, 61/2005, 5/2009, 54/2009, 50/2011, 93/2012, 65/2013-other law, 83/2015, 112/2015, 113/2017, 3/2018 - correction, 86/2019, 90/2019-correction, 144/2020, 138/2022 and the Harmonized Dinar Amounts from the Tariff of the Republic Fees No. 59/2024 and 63/2024) - Tariff number 186a, Item 2. Point 2) Subpoint (2).

## Reasoning

The Nature Conservation Institute of Serbia received on 30<sup>th</sup> July 2024 the request filed under number 021-2941/1 and addendum to request 03 No. 021-2941/5 from 3<sup>rd</sup> October 2024 submitted by the company "BOSIL-METAL" Ltd. from Bosilegrad, for issue of nature conservation requirements needed for drafting of the project documentation for ore exploitation and processing in the deposits "Podvirovi" and "Popovica" on the territory of Karamanica near Bosilegrad.

The following documents were submitted together with the request: Anex 1 of the Feasibility Study for Exploitation of Pb, Zn and Cu Ores in the Deposits "Podvirovi" and "Popovica" on the Territory of Karamanica near Bosilegrad, the Feasibility Study of the Exploitation of Pb, Zn and Cu Ores of the Deposits "Podvirovi" and "Popovica" on the Territory of Karamanica near Bosilegrad - Book I (text) and II (graphic part) from 2019, all prepared by "RdS RGP", Stara kolonija str. 66, 22408 Vrdnik, the Location Information Deed, No, 353-458/24 from 26<sup>th</sup> July 2024 of the Municipality Bosilegrad, copy of the Plan of Cadastral Lot, the Decision 03 No. 020-1125/2 from 17<sup>th</sup> May 2022.

The mentioned activities on ore exploitation and processing in the deposits "Podvirovi" and "Popovica" on the territory of Karamanica near Bosilegrad would be carried out in the area defined in Point 1, Subpoint 1) of this Decision. On the basis of the submitted request and the documentation, it was established that the drafting of the project documentation is done in view of changing the borders of the exploitation field which was defined in the Anex to the Feasibility Study. On the enclosed Situation Map, the exploitation field, flotation plateau and flotation tailing pond is selected.

Insight into the Central Register of Protected Natural Goods and the documentation of the Institute, and in accordance with regulations regulating nature conservation, confirmed that the area is not located within the protected area for which a protection procedure is conducted or initiated, nevertheless it lies within the scope of ecologically significant site of the ecological network of the Republic of Serbia under the name of Golemi Vrh (95) in accordance with the Regulation on Ecological Network (The Official Gazette of the RS, No. 102/2010), as well as within the scope of the internationally significant site for birds under the name of Dukat. The mentioned area is the habitat of strictly protected wild species *Barbus strumicae* (specified as *Barbus cyclolepis*), *Bombina variegata*, *Bufo bufo*, *Lissotriton vulgaris*, *Mesotriton alpestris*, *Triturus macedonicus*, *Salamandra salamandra*, *Pseudepidalea viridis*, *Rana dalmatina*, *Rana greaca*, *Rana temporaria*, *Coronella austriaca*, *Zamenis longissimus*, *Aquila chrysaetos*, *Bonasa*

*bonasia*, *Crex crex*, *Dryocopus martius*, *Ficedula semitorquata*, *Lanius collurio*, *Lullula arborea*, *Picus canus*, *Sylvia nisoria*, *Lutra lutra*, *Vormela peregusna*, *Allogamus auricillis*, *Austropotamobius torrentium*, *Rosalia alpina*, *Morimus funereus*, *Lycaena dispar* and *Unio crassus*, in accordance with articles 73 and 74 of the Law on Conservation of Nature (The Official Gazette of the RS, No. 36/2009, 88/2010, 91/2010-correction, 14/2016, 95/2018 - other law and 71/2021) and the Rulebook on proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (The Official Gazette of RS, No. 5/2010, 47/2011, 32/2016 and 98/2016). In addition to these, the forest area is the habitat of protected species such as: *Barbus balcanicus*, *Barbus meridionalis*, *Rhodeus amarus*, *Canis lupus*, *Cordulegaster heros*, in accordance with the Rulebook on proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (The Official Gazette of RS, No. 5/2010, 47/2011, 32/2016 and 98/2016).

In accordance with the existing data on endangerment of fauna, published in the Red Book on Fauna in Serbia - FISH (2024), Dragovitica with all its tributaries is the only habitat of 4 types of fish of extreme national importance, and which, in accordance with the published publication, belong to the group of endangered taxa. Such as: Strymon schneider (*Alburnoides strymonicus*), Strumica Barbel (*Barbus strumicae*), Aegean gudgeon (*Gobio bulgaricus*), Aegean Minnow (*Phoxinus phoxinus*), and represent endemites of Aegean Basin in Serbia. The species Strymon schneider (*Alburnoides strymonicus*) belongs to the category of extremely endangered taxon (CR), Strumica Barbel (*Barbus strumicae*), Aegean gudgeon (*Gobio bulgaricus*), Aegean Minnow (*Phoxinus phoxinus*), belong to the category of endangered taxa (EN). Strymon schneider (*Alburnoides strymonicus*), Strumica Barbel (*Barbus strumicae*), Aegean gudgeon (*Gobio bulgaricus*) in Serbia have very fragmented scope of spread across the area as well as the surface area of inhabitation, and the number of inhabited locations is smaller than 5 and all are located in the mentioned scope and in the zone of impact of mining activities. For these species the following is assessed: continuous decline of the scope of spread, surface area of inhabitation, scope and quality of habitats and the number of inhabited localities as well as the high risk of extinction in the near future, unless their habitat is protected.

The mentioned area, defined in the Point 1, Subpoint 1) of this Decision, is located within the boundaries of the Proposed Site of Community Importance pSCI "Dukat" - which is a site of strictly protected species - *Maculinea (Phengaris) arion*, *Parnassius mnemosyne* and *Spermophilus citellus*, in accordance with the Directive on Habitats (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). On the other hand, the boundaries of the proposed special protection area pSPA under the name Dukat encompass the habitats of strictly protected bird species *Ficedula semitorquata*, in accordance with the EU regulations - the Directive on Birds (Directive 2009/127/EC of the European Parliament and of the Council on the conservation of wild birds), whose condition must be preserved and improved in the future. This area is identified in accordance with the obligations of the Republic of Serbia in the process of accession to the European Union and it significantly contributes to preservation and renewal of the favourable status of protection for natural habitat types and/or species, and contributes to coherency of European ecological network NATURA 2000.

Legal grounds for adoption of the decision: the Law on Protection of Nature (The Official Gazette of the RS, No. 36/2009, 88/2010, 91/2010-correction, 14/2016, 95/2018 - other law and 71/2021); the Law on Environmental Protection (The Official Gazette of the RS, No. 135/2004, 36/2009, 36/2009 - other law, 72/2009 - other law, 43/2011 - Decision of the CC, 14/2016, 76/2018, 95/2018 and 94/2024 - other law); The Law on Ratification of the Convention on Biological Diversity (The Official Gazette of the FRY - International agreements, No. 11/2001); The Law on Ratification of the Convention on Conservation of European Wild Flora and Fauna and Natural Habitats (The Official Gazette of the Republic of Serbia - International agreements, No. 102/2007); the Regulation on Ecological Network (The Official Gazette of the RS, No. 102/2010), the Rulebook on proclamation and protection of strictly protected and protected wild species of plants, animals and fungi (The Official Gazette of the RS, No. 5/2010, 47/2011, 32/2016 and 98/2016).

On the basis of all of the above, it was decided as in the enacting terms of this decision.

Legal remedy: An appeal can be lodged against this decision to the Ministry of Environmental Protection within 15 days from the day of receipt of the decision. The appeal shall be submitted in writing or delivered orally on the record in the Nature Conservation Institute of Serbia, with a proof of previous payment of the administrative fee in the amount of 590.00 Dinars on the current account no. 840-0000031395845-78, reference number 7401379251, model 97.



Executive Director, Branka Vujovic, sing manual

Delivered:

Requester

Archive

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

No:000110265 2025 14810 006 000  
000 001

Date: 4.02.2025.  
Kralja Milutina  
10a, Belgrade

**MINISTRY OF ENVIRONMENTAL PROTECTION**

Omladinskih brigada 1  
11 000 Belgrade

SUBJECT: A Statement concerning Complaint No. 2022/06: Possible Negative Impact of Mining Activities in Bosilegrad and the Homolje Mountain Region

Dear Sir/Madam,

In your letter No. 003593424 2024 14850 004 001 000 001, submitting the decision of the Standing Committee to the Bern Convention at the Council of Europe concerning the consideration of the Report on the Progress of the Republic of Serbia under Complaint No. 2022/6: Possible File: Serbia: Possible Negative Impact of Mining Activities in Bosilegrad and the Homolje Mountain Region, which the Ministry of Environmental Protection received from the Secretariat of the Bern Convention on 20 December 2024, you requested a report within our purview for the purpose of providing a report under Complaint No. 2022/6.

We hereby inform you that the Ministry of Construction, Transport, and Infrastructure is not undertaking any activities related to the development of spatial plans of the special purpose areas as prescribed by Article 21, item 2 of the Law on Planning and Construction (Official Gazette of the Republic of Serbia, No. 72/2009, 81/2009 – correction, 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 62/23) in the aforementioned area.

Yours sincerely,

Pursuant to the Prime Minister's decision to exercise the powers of the Minister of Construction, Transport and Infrastructure

No. 119-00-00117/2024 01

dated 25 November 2024

MINISTER FOR PUBLIC INVESTMENTS



**Republic of Serbia**

**MINISTRY OF MINING AND ENERGY**

Number: 001930702 2024 14820 007 000 000 001

Date: 21 January 2025

**MINISTRY OF ENVIRONMENTAL PROTECTION**

Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

Nemanjina 22-26,

11000 Beograd

Dear Ms Vujović,

In your Letter No. 003593424 2024 14850 004 001 000 001 of 10 January 2025, you submitted the Decision of the Council of Europe Standing Committee of the Bern Convention concerning the consideration of the Progress Report of the Republic of Serbia with regard to the Appeal No. 2022/06: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the region of the Homolje Mountains, to the Ministry of Mining and Energy.

In this Letter, you stated that the “Standing Committee has suggested that the competent authorities reject the proposals for a continuation and expansion of mining activities in a sensitive natural environment and to appropriately assess the already existing ones, as well as potential negative impacts on protected species and habitats”, and, in accordance with the above, requested that the Ministry of Mining and Energy submit a report on activities within its purview.

By inspecting the official records, the Ministry of Mining and Energy has ascertained that this Ministry, in its Letter No. 001930702 2024 14820 007 000 000 001 of 25 October 2024, submitted complete information regarding mining activities at the respective sites to the your Ministry. In accordance with the above, we hereby inform you that there are no new activities, i.e., there is no new information concerning mining activities at the respective sites.

Please find attached the answer of the Ministry No. 001930702 2024 14820 007000 000 001 of 25 October 2024.

Yours sincerely,

**MINISTER**

(stamp and signature)

Dubravka Đedović-Handanović

To be delivered to:

- Addressee;
- Archive.



Republic of Serbia  
**MINISTRY OF MINING AND ENERGY**  
Number: 001930702 2024 14820 007 000 000 001  
Date: 25 October 2024

MINISTRY OF ENVIRONMENTAL PROTECTION  
Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

Nemanjina 22-26,  
11000 Beograd

Dear Ms Vujović,

On 23 October 2024, you submitted the Decision of the Standing Committee of the Bureau of the Bern Convention for purposes of information concerning the Appeal No. 2022/06: Possible case: Serbia: Possible negative impact of mining activities in Bosilegrad and in the region of the Homolje Mountains, to the Ministry of Mining and Energy. In accordance with the submitted Letter, we hereby inform you as follows:

By inspecting the official records, it has been ascertained that the Ministry of Mining and Energy, in its Letters of 27 December 2023, 1 March 2024 and 18 June 2024, submitted reports containing the requested information.

We hereby inform you that the company Bosil Metal d.o.o. is conducting exploitation of the lead and zinc ore pursuant to the following applicable decisions:

Decision No. 310-02-00946/2008-06 of 27 November 2008 on the approval of the exploitation area No. 513, and the Decision No. 310-02-00310/2021-02 of 1 July 2022 on the approval an expansion of the exploitation area, beds Podvirovi and Popovica - Conjev Kamen. The deadline from these Decisions has been extended until 1 August 2024.

In its Request of 1 August 2024, the company Bosil Metal d.o.o. launched a request for approval of a new exploitation area, and, on the basis of the submitted request, the Decision No. 310-02-00946/2008-06 of 27 November 2005 on the approval of the exploitation area is practically still in force.

By the Decision No. 310-02-00788/2009-06 of 5 February 2010, Bosil Metal d.o.o. was approved to execute mining works in accordance with the Supplementary Mining Design for the exploitation of the bed Podvirovi-Karamanica, which is still applicable.

Furthermore, in its Letter No. 767/24 of 21 October 2024, Bosil Metal d.o.o. informed the Ministry, in accordance with Article 149 of the Law on Mining and Geological Explorations, that it had temporarily suspended all exploratory and mining works, and that it was undertaking to fulfil all of its legally prescribed obligations during that time.

Please find attached the answer of the Ministry No. 001930702 2024 14820 007 000 000 001 of 18 June 2024, and the Letter of the company Bosil Metal d.o.o. No. 767/24 of 21 October 2024.

Yours sincerely,

MINISTER  
Dubravka Đedović-Handanović



Republic of Serbia  
MUNICIPALITY OF BOSILEGRAD  
Municipal Administration  
*Department of Environmental  
Protection*  
Number: 501-39-4/2024 28  
January 2025  
BOSILEGRAD

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

**SIJBJECT: Submitting information**

Dear Madam,

In reference to your act No. 003593424 2024 14850 004 001 000 001 of 10 January 2025 requesting a statement regarding the Appeal No. 2022/06 concerning possible negative impact of mining activities in Bosilegrad, we hereby notify you of the following:

The Municipality of Bosilegrad was continuously monitoring surface waters in the territory of the Municipality of Bosilegrad in 2021, and in 2024, the Karamanichka River was also continuously monitored 300 meters downstream from the Bosil-metal mine in northern Karamanica.

All samples which were used to test the physical and chemical parameters **meet the requirements** in terms of limit values prescribed in the Regulation on emission limit values for pollutants in surface waters and groundwaters and sediment and the deadlines for reaching them (*Official Gazette. of the Republic of Serbia*, No. 50/2012) and **meet the requirements** in terms of limit values prescribed in the Rulebook on hazardous substances in waters (*Official Gazette. of the Republic of Serbia*, No. 31/82) for classes I and II.

In addition, the latest sampling conducted on 22 November 2024 and the results of the testing are available at the website of the Municipality of Bosilegrad.

All the measurements conducted so far are available at the official website of the Municipality of Bosilegrad at: <http://www.bosilegrad.org/sr/Monitoring.aspx>

Please find attached to this letter a copy of the Notification of a temporary suspension of mining and geological works by the Company for mining ore and other non-ferrous metals Bosil-metal LLC Bosilegrad.

Yours sincerely,

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
*Environmental Advisor*

PRESIDENT OF THE  
MUNICIPALITY OF BOSILEGRAD

(signature)  
Mikica Vasilev, BSc in Environmental  
Engineering

(signature and stamp)  
Vladimir Zaharijev





Republic of Serbia  
MINISTRY OF AGRICULTURE  
FORESTRY AND WATER MANAGEMENT  
- Republic Water Directorate -  
No: 003078196 2024 14843 001 000 051 001  
Date: 12 February 2025  
Belgrade

MINISTRY OF ENVIRONMENTAL PROTECTION

BELGRADE  
1 Omladinskih brigada Str

SUBJECT: Request for Report on Complaint No. 2022/06: Complaint on Stand-by: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt Region

To Whom It May Concern,

In accordance with the request submitted to the Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, by letter No. 003593424 2024 14850 004 001 000 001 dated 10 January 2025, we hereby inform you of the following:

1. The Republic Water Directorate of the Ministry of Agriculture, Forestry, and Water Management of the Republic of Serbia supports the decision of the Standing Committee of the Bern Convention to establish cooperation between the two Governments in the field of water management. The Republic of Serbia is interested in re-establishing cooperation in the field of transboundary waters with the Republic of Bulgaria on a new and quality basis.

The Agreement concerning water-economy questions between the government of the Federal People's Republic of Yugoslavia and the Government of the People's Republic of Bulgaria from 1958 ("Official Gazette of the FPRY", International Treaties, No. 3/63) is outdated in its entirety and requires comprehensive alignment at the governmental level of both countries so as to facilitate bilateral cooperation that is mutually beneficial.

The draft agreement we proposed to the Republic of Bulgaria aims to update and enhance the existing agreement, thus establishing legal conditions for bilateral cooperation in the field of water management. Furthermore, it seeks to implement mechanisms for coordinating the implementation of EU water directives, as well as relevant international conventions and agreements.

2. The procedure pertaining to issuing water acts is defined by the provisions of the Water Law ("Official Gazette of the Republic of Serbia", Nos. 30/2010, 93/2012, 101/2016, 95/2018, and 95/2018 - other law). Accordingly, it is mandatory to obtain water acts for mining works and facilities, with the

competent authority for issuing these acts being the Ministry of Agriculture, Forestry and Water Management, specifically the Republic Water Directorate. These acts are issued during the preparation of technical documentation and are, therefore, not part of the integrated procedure.

As regards the preparation of technical documentation for conducting mining works and constructing mining facilities, water conditions specifically prescribe and define the hydrological characteristics of watercourses in the catchment area in the vicinity of the site where mining activities are being performed. This includes conditions for protecting mining pits from surface and groundwater, methods for using water for sanitary and technological needs, and the regime of exploitation. It also involves conditions and methods for evacuating atmospheric waters, the regime for discharging atmospheric and other waters into the recipient, and guidelines for storing materials containing hazardous substances. Furthermore, it sets permissible emission limit values into the water to protect and preserve the qualitative and quantitative characteristics of surface and groundwater, along with other restrictions aimed at preserving the water regime and water land.

Water conditions are valid for one year, provided that a request for obtaining water consent is not submitted within that period.

Water consent is issued for technical documentation based on which mining works are conducted. This consent verifies that the technical documentation is prepared in compliance with the issued water conditions. The water consent is valid for two years, provided that within this period, approval for exploitation has not been obtained or construction work on mining facilities has not been initiated.

The water permit defines the manner, conditions, and scope of water usage, the manner, conditions, and scope of wastewater discharge, the storage and discharge of hazardous and other substances that may pollute water, as well as the conditions for other activities that affect the water regime.

When issuing the water permit, an Environmental Impact Assessment Study of the project is taken into account, which analyzes and evaluates the quality of environmental factors and their sensitivity in a specific area, as well as the negative impacts of existing and planned activities. It forecasts both adverse and beneficial effects of the project on environmental factors and outlines measures and conditions to prevent, reduce, and eliminate the project's negative environmental and health impacts.

The water permit is issued for a specified period, not exceeding 15 years.

A water permit cannot be issued without preliminary water conditions and water consent. Exceptionally, a water permit may be issued without water conditions and water consent for existing facilities and systems that have an occupancy permit and do not adversely affect the water regime.

The construction of mining facilities and the execution of mining operations are both performed based on a decision approving the construction of mining facilities and/or the execution of mining operations, issued by the Ministry of Mining and Energy or the competent authority of the autonomous province, at the request of the holder of the approval for exploitation and/or the exploitation field. One of the mandatory supporting documents that must be attached to the request is the water consent.

Upon reviewing existing records, it has been noted that requests for the issuance of water permits for the concerned territory have been submitted by the company for the extraction of ores and other non-ferrous metals "BOSIL-METAL" Ltd., Bosilegrad, and the Lead and Zinc Mine "Grot" Ltd., Kriva Feja, municipality of Vranjska Banja, city of Vranje.

2a) The company for the extraction of ore and other non-ferrous metals "BOSIL-METAL" Ltd, Bosilegrad, does not have a valid water consent or water permit.

On 9 January 2025, the Republic Water Directorate of the Ministry of Agriculture, Forestry, and Water Management issued water conditions to “BOSIL-METAL” Ltd. in Bosilegrad. The water conditions pertains to the company’s plans for the extraction of ores and other non-ferrous metals. It allows BOSIL-METAL to draft and develop technical documentation for the Main Mining Project, aimed at expanding the mining field of the “Bosil Metal” mine in the “Podvirovi” and “Popovica – Coljev kamen” ore deposits in the Karamanica near Bosilegrad. This project covers the exploitation of Cu, Pb and Zn ores from these deposits, and includes provisions for an ore processing plant and a flotation tailings disposal facility.

Considering the cross-border nature of the Dragovištica River, a tributary of the Struma River, point 4.3. of the issued water conditions stipulates, among other things, that it is necessary to align the projected, future artificially established water regime at the mining complex with the water regime of the Dragovištica River, at the border section with the Republic of Bulgaria, i.e., it is necessary to obtain consent from the competent authorities of the Republic of Bulgaria for implementation of the project.

2b) On 5 March 2024, the Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management issued a water permit to the Lead and Zinc Mine “Grot” Ltd., Kriva Feja, municipality of Vranjska Banja, city of Vranje, determining the manner and conditions for operating the tailings pond (dam tailings on the flotation tailings disposal site), usage, collection, drainage and treatment of mine waters, as well as the discharge from the drainage system of the mine and flotation tailings into the Seliški Stream, Barska, and Crna rivers, valid until 31 March 2026.

The water permit was issued based on the submitted documentation which included the Environmental Impact Assessment Study for the project of exploitation of lead and zinc ores from the “Vučkovo” and “Kula” deposits as part of the “Grot” - Kriva Feja mine, developed by the Faculty of Mining and Geology, University of Belgrade.

Sincerely,

ACTING DIRECTOR

Maja Grbić, LL.B