



Strasbourg, 29 November 2024

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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

44th meeting
Strasbourg, 2-6 December 2024

Complaint on stand-by: 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*

- November 2024 -



Republic of Serbia
MINISTRY OF ENVIRONMENTAL PROTECTION

No.:002964850 2024 14850 004 008 000 001

Date: 25. November 2024.

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. 2022/6: 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 11 October 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, 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 for a statement 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 statements 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 Mining and Energy reported that Company Bosil-Metal LLC exploits reserve of lead a zinc ores pursuant to valid decisions mentioned in the previous Report of the Ministry of Environmental Protection No. 001818484 2024 14850 004 008 000 001 of 30 July

2024. Term of validity of these decisions was extended by decision until 1 August 2024. After this expiration date, Company Bosil-Metal LLC submitted a request with the Ministry of Mining and Energy, thus initiating the approval of a new mine site, and, pursuant to this application, **the decision by which the previously approved mine site remains in force.**

Furthermore, Company Bosil-Metal LLC informed this Ministry on 21 October 2024 that it has temporarily suspended all exploration and mining works, and that it has undertaken to fulfil all legally prescribed obligations during that time.

2. Ministry of Agriculture, Forestry and Water Management – Republic Water Directorate reported that it issued at request of Company Bosil-Metal LLC, in July 2023, water conditions in the procedure 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. Previously issued water conditions in the period 2020–2022 were stated in the Report of the Ministry of Environmental Protection No.: 337-00-00128/2022-04 of 19 January 2023.

Furthermore, they reported that they received on 29 October 2024 a new request from Company Bosil-Metal LLC, Bosilegrad, related to the extension of the validity period of water conditions issued in July 2023, 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.

Besides, it was stated that the Republic Water Directorate of the Ministry of Agriculture, Forestry and Water Management cooperates with the Republic of Bulgaria at the multilateral level within the implementation of the UN Convention on the Protection and Use of Transboundary Watercourses and International Lakes and the Danube River Protection Convention, as well as in the work of the International Commission for the Protection of the Danube River.

They also highlighted that the Republic of Serbia has an interest in re-establishing cooperation in the field of transboundary waters with the Republic of Bulgaria on a quality and new basis. Draft Agreement has been proposed in order to keep the existing agreement in force up to date and create legal conditions for bilateral cooperation in the water management sphere, and mechanisms for the coordination of implementation of EU water directives, as well as international conventions and agreements in force.

3. Institute for Nature Conservation of Serbia reported that Company Bosil-Metal LLC, Bosilegrad, submitted a request for the issuance of conditions for nature conservation related to the expansion of borders of the mine site for the purpose of building a large plant for flotation processing of Cu, Pb, Zn ores from Podvirovi and Popovica deposits in Karamanica area. The request is still being considered.

The Institute also highlighted that in the immediate vicinity of the Karamanica River and the Golema River there are ecologically significant areas as determined by the Regulation on the Ecological Network. The mentioned data, according to their statement, can be the basis for

determining the extent of the possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region.

4. 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.

5. Municipal Assembly of Bosilegrad has been constantly monitoring surface waters in the territory of the Municipality of Bosilegrad since 2021. The latest sampling was carried out on 23 September 2024. 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.

6. Ministry of Environmental Protection, after the public debate on the Environmental Impact Assessment Study of the Project for exploitation of Pb, Zn, Cu ores from Podvirovi and Popovica deposits in Karamanica area in Bosilegrad held on 5 June 2024, received comments and observations which were forwarded to the members of the Technical Commission, established on 8 May 2024, for the evaluation of the respective EIA Study.

After the meeting of the Technical Commission which evaluated the respective EIA Study and the comments of the interested public from the Republic of Serbia and the Republic of Bulgaria, it has been concluded that the EIA Study in this form cannot be accepted. Accordingly, the Ministry sent the observations of the Technical Commission for the evaluation of the Environmental Impact Assessment Study to Company Bosil-Metal LLC, Bosilegrad, to ensure the compliance of the EIA Study with the mentioned observations within 30 days.

The Republic Environmental Inspection carried out, in accordance with the Annual and operative plans of the inspection for 2024, regular field and office inspection on 18 July 2024 in the Podvirovi site in Karamanica area in Bosilegrad. During the inspection process, irregularities in the work of Company Bosil-Metal LLC, Bosilegrad, were identified in terms of failure to implement the Environmental Impact Assessment Programme – Air quality measurement; thus, by the Decision of the Ministry of Environmental Protection of 17 September 2024, an administrative measure to eliminate the established irregularities was imposed.

With regard to this decision, Company Bosil-Metal LLC informed the Republic Environmental Inspection that it has initiated the procedure for obtaining the approval of the Environmental Impact Assessment Study for the Project of exploitation of Pb, Zn and Cu ores from Podvirovi and Popovica deposits in Karamanica area near Bosilegrad, and that it has suspended the exploration and mining works at this site.

During the period of temporary suspension of works, the Company will organise daily on-duty to control the implementation of protection and safety measures for the employees, property, environmental protection and temporary response on the spot, and in case of harmful consequences, the Company will inform the mining inspector, internal affairs authorities and the environmental inspector.

Also, we would like to report that in order to carry out the activities related to 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 on cooperation in the environmental protection sphere, harmonisation of the Two-year work program for 2025 and 2026, including the planned online meeting to be held on 2 December 2024, under the work title: Bulgarian-Serbian Expert Meeting in the Field of Environmental Impact Assessment and Strategic Environmental Assessment (the ESPOO Convention), is also underway.

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


1. Municipal Assembly of Žagubica reported that in the Homolje Mt region there are no issued approvals for the exploitation of mineral raw materials, and that conducting geological research of mineral raw materials is not contrary to the Spatial plan of the Municipality of Žagubica.

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

Coat of arms of the Republic of Serbia

Republic of Serbia

MINISTRY OF MINING AND ENERGY

No. 001930702 2024 14820 007 000 000 001

Dated 25. October 2024

MINISTRY OF ENVIRONMENTAL PROTECTION

Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

Nemanja 22-26,

11 000 Beograd

Esteemed Mrs. Vujović,

On 23. October 2024, you submitted to the Ministry of Mining and Energy the Decision of the Bureau of the Standing Committee of the Berne Convention of an informative nature, which concerns the Complaint number 2022/06, possible case: Serbia: possible negative impact of mining activities in Bosilegrad and in the region of Homolje mountain. In line with the submitted, please be informed as follows:

By insight into the official records, it was stated that the Ministry of Mining and Energy has delivered the reports that included the required information, in the letters dated 27 December 2023, 1 March 2024, and 18 June 2024. Please be informed that the Bosil Metal d.o.o. business entity carries out the exploitation of the lead and zinc ore reserves pursuant to the following valid Decisions:

- Decision no. 310-02-00946/2008-06 dated 27 November 2008 approving the mine site no. 515, as well as the Decision no. 310-02-00310/2021-02 dated 1 July 2022, approving the expansion of the mine site, the deposits of *Podvirovi* and *Popovica – Conjev kamen*. The term under this Decision has been extended by the Decision until 1 August 2024.
- By request of 1 August 2024, the Bosil Metal business entity filed a request for the approval of the new mine site and the Decision was made based on the filed request, no. 310-02-00946/2008-06 of 27 November 2008, approving the mine site, which Decision is practically still in effect.

Under the Decision no: 310-02-00788/2009-06 dated 5 February 2010, the business entity Bosil Metal d.o.o. was approved the execution of mining works according to the DRP of exploitation of *Podvirovi-Karamanica*, which Decision is still valid.

Furthermore, in the letter no. 767/24 dated 21 October 2024, the business entity Bosil Metal has, in line with the Article 149 of the Law on Mining and Geological Explorations, informed the Ministry that it has temporarily suspended all the exploration and mining works and that it shall undertake to fulfil all legally prescribed obligations during that period.

Please find enclosed herewith the response of the Ministry no. 001930702 2024 14820 007 000 000 001 dated 18 June 2024 as well as the letter of the business entity Bosil Metal d.o.o. no 767/24 dated 21 October 2024.

Best Regards,

Minister

Deliver to:

/signed by hand, signature illegible/

Dubravka Đedović Handanović

/the official blue seal of the Ministry of Mining and Energy with the coat of arms affixed/

- Addressee
- Archive

Coat of arms of the Republic of Serbia,
Republic of Serbia,
MINISTRY OF MINING AND ENERGY
No. 001930702 2024 14820 007 000 000 001
Dated 18 June 2024

/affixed registration stamp of the
registration office/
Administration for Joint Services of the
Republic Bodies
REGISTRATION OFFICE – 1090
RECEIVED ON 25.07.2024
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MINISTRY OF ENVIRONMENTAL PROTECTION

Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

Nemanja 22-26,
11000 Beograd

Dear Mrs. Vujović,

By letter no. 001818484 2024 1 4850 004 008 000 001 dated 3 June 2024, you submitted to the Ministry of Mining and Energy the Decision of the Bureau of the Standing Committee of the Berne Convention on the Complaint No. 2022/6: Complaint under monitoring: Serbia, possible negative impact of mining activities in Bosilegrad and mountain region of Homolje. In line with the subject Decision of the Bureau, the Complaint is under the procedure of further monitoring and consideration of the additional information in order to eliminate the possible impact of mining activities on the relevant areas.

By insight into the official records, it was stated that, in the letters dated 27 December 2022 and 1 June 2023, the Ministry has submitted the requested report on the issued approvals within the scope of their competence, for the requested locations, pursuant to the letter of Your Ministry.

By insight into the Complaint and the Decision of the Bureau, it was stated that there were no clear coordinates of the area-locality to which the Compliant related.

1. As for the exploitation of mineral raw materials in the area near the state border, on the territory of the municipality of Bosilegrad, please be informed as follows:
 - As we have already informed you in the letter no. 310-02-01812/2022 of 27 December 2022, the business entity Bosil Metal d.o.o. carries out the exploitation of the lead and zinc ore reserves on the territory of the municipality of Bosilegrad. On the expended part of the EP (for which the term under the Decision is expiring on 1 August 2024), the entity has submitted in 2023 the exploration project (for the period from 2023 until 2026) and linked to that project, they delivered the Mining Project of exploration of solid mineral raw materials that was approved under the Decision no 310-02-00908/2023-02 of 3 August 2023, and that shall last until the end of explorations, i.e. until 2026

The Mining Inspection performed extraordinary inspections of the supervised entity.

2. The Bosil Metal d.o.o. - An inspection was carried out over the business entity and a record was compiled on that occasion. The record ordered two measures prohibiting the execution of mining works of the Pilot plant for technological tests of flotation processing of lead, zinc and copper ores on the mine site number 515 - *Podvirovi* and measures prohibiting dumping of middlings from the flotation process of lead, zinc and copper ores outside of the boundaries of approved mine site no. 515 - *Podvirovi*.

Best Regards,

Minister

Deliver to:

- Addressee
- Archive

/signed by hand, signature illegible/
Dubravka Đedović Handanović
/the official blue seal of the Ministry of Mining
and Energy with the coat of arms affixed/

/logo of the business entity/	BUSINESS ENTITY FOR THE EXTRACTION OF ORES AND OTHER COLOURED METALS <i>BOSIL METAL</i> D.O.O BOSILEGRAD ORE EXTRACTION, WORKS EXECUTION, DESIGN, MARKETING, EXPORT- IMPORT	17540 Bosilegrad, Georgi Dimitrova 74; Tel/Fax: +381 17 878 543, +381 17 878-955 Account No.: 205-111109-53 Commercial Bank AD Beograd Corporate ID No.: 20200243 Code of activity: 0729 Taxpayer's No.: /illegible/ Received: 24.11.2024 /affixed registration stamp of the registration office, wording illegible/ /handwritten data, wording illegible/ /affixed registration stamp of the Ministry, wording illegible/
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Reference No.: 767/24
 Date: 21 October 2024

Ministry of Mining and Energy
 Section for Geology and Mining
Mining Department – MINING INSPECTION
 1 Omladinskih Brigada Str.,
 11070 Novi Beograd
 Tel/fax: +381 11 311 00-21; 285-6-155

RE: INFORMATION ON TEMPORARY SUSPENSION OF MINING AND GEOLOGICAL WORKS

Under the Decision of the Ministry of Mining and Energy no: 310-02-00946/2008-06 of 27 November 2008, the business entity for extraction of ores and other coloured metals BOSIL-METAL DOO Bosilegrad, Georgi Dimitrova 74, Corporate ID No. 20200243, Taxpayer's No.: 104625461 (hereinafter: the business entity) has been approved the exploitation of the polymetallic Pb, Zn, Cu ores at the locality of Karamanica and Popovica, the municipality of Bosilegrad.

The mining works under the specified Decision have been terminated and the business entity has submitted, on 1 August 2024, the request for the expansion of the *Podvirovi* mine site near Bosilegrad, recorded in the Foil no 515 of the Mine Sites Cadastre Book within the coordinates more specifically marked in the "Feasibility Study of exploitation of Pb, Zn and Cu ores from the deposits of *Podvirovi* and *Popovica* on the area of Karamanica near Bosilegrad" and in the Annex to the Feasibility Study no. 759/21 of 31 May 2021. Simultaneously, the business entity commenced a procedure of procurement of consent to the "Environmental Impact Assessment Study for the Project of Exploitation of Pb, Zn, Cu ores from the deposits of *Podvirovi* and *Popovica* on the area of Karamanica near Bosilegrad".

Under the Decision of the Ministry of Mining and Energy no: 310-02-00908/2023-02 of 3 August 2023, the business entity has been approved consent to execute the mining works according to the "Mining Project for exploration of solid mineral raw materials of the Pb-Zn ores on the area of Karamanica near Bosilegrad, on the mine site 515, located on the territory of the municipality of Bosilegrad."

Having in mind that the procedures for the above requests are ongoing, the business entity shall suspend all the exploration and mining activities on the approved exploration area and mine site until the completion of such procedures shall inform the competent authorities thereof **pursuant to the provisions of the 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).**

During the period of temporary suspension, the business entity shall undertake to maintain the main mining space, plant and machinery in such a condition as to allow the passage through them with no hazards, and that they shall provide for the regular maintenance of the mentioned main mining space, plant and machinery in a way that guarantees their security and safety at the reopening and reexploitation.

During the period of temporary suspension, the business entity shall organize daily duties in order to control the implementation of the measures for the protection and security of employees and property, environmental

protection measures and timely response on the spot, and if necessary, that is, in the event of occurrence of any adverse effects, promptly inform the mining inspector and the police authority thereof.

For the occupational health and safety, environmental protection, fire and explosion protection measures and other protective measures relating to the execution of mining and geological works, that have not been regulated under the Law on Mining and Geological Explorations, the business entity shall apply the provisions of the special regulations governing such protective measures.

In Bosilegrad, on 21 October 2024

Director

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/affixed stamp of the business entity, wording illegible/

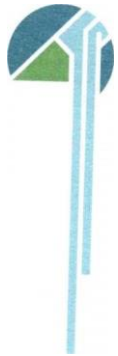
Miodrag Vukajlović, Grad.Mining Engineer

Deliver to:

1. Ministry of Mining and Energy
 - Mining Inspection
 - Geological Inspection
2. Ministry of Environmental protection – Inspection
3. Ministry of the Interior
4. Archives

INSTITUTE FOR NATURE CONSERVATION OF SERBIA

Japanska 35, 11070 Novi Beograd, Telephone: + 011 2093 801, Fax: + 011 2093 867
www.zzps.rs TIN: 106844260, ID No. 17798561



03 No. 025-4043/2
22 October 2024

MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih brigada 1
11070 Novi Beograd

The Institute for Nature Conservation of Serbia received your request registered in the Institute under 03 No. 025-4043/1 of 17 October 2024, for submitting a statement regarding the Report of the Bureau of the Bern Convention on the Complaint No. 2022/06: '*Complaint on stand: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region*'.

By inspecting the Central Register of Protected Natural Resources and the Institute's documentation, it has been found that for the respective sites, the Institute does not have any new data compared to our answer to the Complaint submitted to you on 28 December 2022 (Case-file 03 No. 025-4042/2; Your Ref. No.: 337-00-00128/2022-04 of 15 November 2022);

Within its documentation, the Institute has a register of applications submitted for carrying out geological explorations and mine exploitation works that we provide to you on this occasion. Also, please find enclosed to this letter the Analysis of biodiversity elements in the form of a Table of Species within and in immediate vicinity of the Karamanička River and the Golema River areas, maps of ecological areas according to the Decree on the Ecological Network, Natura 2000 area, identified in the project of development of Natura 2000 inventory in Serbia, as well as the areas of the verified ecological network, on which the Institute has been working since 2024, which is also the final proposal of ecological areas in the territory of the Municipality of Bosilegrad. The submitted data can be a base for comprehending the extent of mining activities in Bosilegrad and the Homolje Mt region.

EXECUTIVE DIRECTOR

/s/ Branka Vujović

*As per Decision 02 No. 012-1498/4
of 27 September 2024*

Cc:

- The Applicant
- Archive



Republic of Serbia
Ministry of Environmental Protection

No.: 325-01-00002/15/2024-02
Belgrade, 12 November 2024

ENVIRONMENTAL PROTECTION AGENCY

Republic of Serbia
MINISTRY OF ENVIRONMENTAL
PROTECTION
Ms. Sara Pavkov
State Secretary
Bulevar Mihajla Pupina 2
11070 BELGRADE

Subject: Information on the water quality status of the Karamanička River and the Popovska River, downstream of the Podvirovi and Popovica Mines in the Karamanica area, Municipality of Bosilegrad

- The Environmental Protection Agency as the state administration body responsible for conducting state monitoring of the quality of the surface and ground waters in the territory of the Republic of Serbia, does not conduct testing of the quality of water of the Karamanička River and the Popovska River downstream of the Podvirovi and Popovica Mines in the Karamanica area, Municipality of Bosilegrad, i.e. these rivers are not covered by the Regulation on Determining Annual Water Status Monitoring Programmes. The mentioned rivers are found within the Basins of the Golema Reka River, the Bistarska River, i.e. the Dragovištica River.
- The Environmental Protection Agency, in the observed area, conducts **testing of the quality of the Dragovištica River water, on the Ribarce profile (boundary profile)**. The sampling of water is performed on a monthly basis in accordance with the Annual programmes of monitoring the status of surface and ground waters.
- The results of the performed chemical analyses on the content of heavy metals in the water of the Dragovištica River for the period **2023 and 2024**, compared to the prescribed limit values for surface waters of Class II (*Regulation on emission limit values for pollutants in surface and ground waters and sediments and the deadlines for their reaching, Official Gazette of the Republic of Serbia, No. 50/2012; Regulation on limit values of priority substances and priority hazardous substances polluting surface waters, and the deadlines for their reaching, Official Gazette of the Republic of Serbia, No. 24/2014*). Higher values for the **total iron content Fe (Class III) were found: 612.0 µg/l** (29 June 2023), while in 2024, no exceedances of total iron (Fe) were recorded. The value of the total heavy metals: Zinc (Zn), Copper (Cu), Manganese (Mn), Boron (B), Chromium (Cr), Arsenic (As), as well as the values of the dissolved heavy metals: Nickel (Ni), Cadmium (Cd), Mercury (Hg) and Lead (Pb), were within the prescribed limit values for surface waters of Class II quality.

Attachment: Data on the quality of the Dragovištica River water for the period 2023 and 2024

Sincerely,

DIRECTOR
/s/ Stefan Simeunović

Republic of Serbia
Ministry of Environmental Protection
Department for Environmental Supervision and Preventive Action
Section for Pollution from Facilities with an Integrated Permit
Number: 002159148 2024 14850 007 013 042 001
Date: 17 September 2024
Nemanjina 22-26

In accordance with the Articles 36 and 37 of the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/04 and 36/09), Article 37, paragraph 1 of the Law on Inspection Supervision (*Official Gazette of the Republic of Serbia*, Nos. 36/15, 44/18 - as amended and 95/18) and Article 136, paragraph 1 of the Law on General Administrative Procedure (*Official Gazette of the Republic of Serbia*, Nos. 18/16, 95/18 – authentic interpretation and 2/23 - CC), the national Minister of Environmental Protection, Department for Environmental Supervision and Preventive Action, Marina Đorđević, official identity card 072, under the procedure of regular field and desk supervision of the supervised entity Bosil-Metal DOO Bosilegrad, Georgi Dimitrova 74, Bosilegrad, in the case No. 002159148 2024 14850 007 013 042 001, hereby adopts the following:

DECISION

The supervised entity Bosil-Metal DOO Bosilegrad, Georgi Dimitrova 74, Bosilegrad, is hereby **ORDERED** to do the following for the mine “Podvirovi” - Bosilegrad in the territory of the Municipality of Bosilegrad:

I Implement an environmental impact monitoring programme in such a scope and with such deadlines as defined in the Decision of the Ministry of Environmental Protection, No. 353-02- 10192008-02 of 8 June 2009 on the approval of the Environmental Impact Assessment Study of the project of reconstruction of the mine “Podvirovi” - Karamanica, further exploration of the bed through a recategorization of the mine of mineral reserves, opening deeper horizons and underground exploitation of the lead-zinc ore, with a maximum quality of 90,000 tonnes of ore per year, as laid down in Chapter 8 of the said Study, namely:

1) monitor, through an authorised legal entity, air quality by measurement of total deposits or suspended particles, as well as concentrations of heavy metals lead and cadmium, in accordance with the Regulation on monitoring conditions and air quality requirements (*Official Gazette of the Republic of Serbia*, Nos. 11/10, 75/10 and 63/13),

2) monitor, through an authorised legal entity, air quality by measurement of environmental noise in accordance with the Rulebook on methods for noise measurements, contents and form of the report on environmental noise measurement (*Official Gazette of the Republic of Serbia*, No. 139/22).

Deadline: 60 (sixty) days from the date of receipt of the Decision

II The supervised entity Bosil-Metal DOO Bosilegrad, Georgi Dimitrova 74, Bosilegrad, shall be obliged to notify the national Environmental Inspectorate about the enforcement of this Decision and to submit proofs thereof within 8 (eight) days from the expiry of the deadline for the execution of measures imposed by the enacting terms of this Decision.

Statement of the reasons

Under the procedure of conducting regular, field and desk supervision, starting from 18 July 2024, with respect to checking if the supervised entity is acting in accordance with the Law on Environmental Impact Assessment and its by-laws, according to measures and requirements from the Decision of the Ministry of Environment and Spatial Planning No. 353-02-1019/2008-02 of 8 June 2009, as well as according to the measures and requirements from the Environmental Impact Assessment Study of the project of reconstruction of the mine “Podvirovi” - Karamanica, further exploration of the bed through a recategorization of the mine of mineral reserves, opening deeper horizons and underground exploitation of the lead-zinc ore, with a maximum quality of 90,000 tonnes of ore per year, the national Environmental Inspector of the Republic of Serbia has found and stated in the Records No. 002159148 2024 14850 007 013 042 001 of 7 August 2023, that it was illegal that the supervised entity Bosil-Metal DOO Bosilegrad, Georgi Dimitrova 74, Bosilegrad:

1 In 2023 and 2024, has not implemented the environmental monitoring programme as defined in Chapter 8 of the said Study, namely: air quality monitoring by measurement of total deposits or suspended particles, as well as concentrations of heavy metals lead, zinc and cadmium.

2 In 2023 and 2024, has not implemented the environmental monitoring programme as defined in Chapter 8 of the said Study, namely: measurement of environmental noise at various times of day.

The national Environmental Inspector has ascertained these facts by directly inspecting the conduct of the activity by the supervised entity, as well as by field supervision of facilities, checking the existing business documentation of the supervised entity, and on the basis of a statement by a person who was present during the inspection.

The Inspection Record No. 002159148 2024 14850 007 013 042 001 of 7 August 2024 was compiled on the actions conducted as a part of the inspection procedure and the findings of fact.

Article 24, paragraph 2 of the Law on Environmental Impact Assessment (*The Official Gazette of the Republic of Serbia*, Nos. 135/04 and 36/09) prescribes that the decision granting approval for an Environmental Impact Assessment Study shall primarily determine the measures and requirements to offset, prevent or reduce adverse effects of the project on the environment.

In accordance with Article 36 of the Law on Environmental Impact Assessment, an environmental inspector's right and duty shall be to determine if the obligation of the project developer from the decision on the approval for an Environmental Impact Assessment Study has been fulfilled.

In accordance with Article 37 of the Law on Environmental Impact Assessment, an environmental inspector shall have the powers to order the fulfilment of the requirements and implementation of the measures defined in the decision on the approval for an Environmental Impact Assessment Study.

Starting from the findings of fact and the cited legal provisions, it was decided as in the enacting terms of this Decision.

An appeal filed against this Decision shall postpone its enforcement pursuant to Article 39, paragraph 2 of the Law on Inspection Supervision (*Official Gazette of the Republic of Serbia*, Nos. 36/15, 44/18 - as amended, and 95/18).

INSTRUCTION ON LEGAL REMEDY

An appeal against this Decision may be submitted to the Ministry of Environmental Protection of the Republic of Serbia within (15) fifteen days from the date of notification about this Decision. An appeal against this Decision shall postpone its enforcement. Such an appeal shall be submitted in two identical copies, with an administrative fee in the amount of 590.00 RSD, paid through this authority (account number 840-742221843-57, model 97, reference number 50-016) into the Budget of the Republic of Serbia.

Deliver to:

1. Supervised entity
2. Case file

Environmental Inspector of the
Republic of Serbia

Marina Đorđević



Republic of Serbia
MUNICIPALITY OF BOSILEGRAD

Municipal Government

Environmental Protection Service

No.: 501-39-3/2024

28.10.2024

BOSILEGRAD

Ministry of Environmental Protection

1 Omladinskih Brigada Str., SIV III

11070 Novi Beograd/Serbia

Mrs. Snežana PROKIĆ

RE: Submission of information

Dear madam,

With regard to your act no. 002964850 2024 14850 004 008 000 001 dated 21 October 2024, by which you require a report on Complaint No. 2022/6 which relates to a possible negative impact of mining activities in Bosilegrad, please be informed as follows:

The spatial plan of Bosilegrad Municipality with the Strategic Environmental Impact Assessment with technical and graphical documentation is available at the website of the Central Registry of Planning Documents of the Ministry of Construction, Traffic and Infrastructure, the website of the Municipality of Bosilegrad and in the "Official Gazette of the Town of Vranje" no. 8/2013.

In the current spatial plan of the municipality of Bosilegrad, the area around the existing Karamanica mine has been marked as a metal deposit; However, the plan does not specifically define the area for the expansion of mining and construction of flotation. This purpose requires carrying out of new spatial and urban planning in accordance with the Law on Planning and Construction.

For the above reason, the Municipal Assembly of Bosilegrad has adopted a Decision on Conditions for Exploration and Exploitation of Mineral Raw Material on Territory of Municipality of Bosilegrad ("Official Gazette of the Town of Vranje" no. 18/21). This decision stipulates that exploration and exploitation of mineral raw materials on the territory of the municipality of Bosilegrad may be carried out provided the preparation of the relevant planning documents in accordance with the Law on Planning and Construction and the Law on Mining.

The Municipality of Bosilegrad has been continuously monitoring the surface waters on the territory of the Municipality of Bosilegrad since 2021, within which the measurements are also being done of the Karamanica River, 300 meters downstream from the Bosil-Metal mine in **s.** Karamanica.

All the samples where the physical and chemical parameters were tested **meet** the values prescribed under the Regulation on Limit Values of Pollutants in Surface and Groundwater and Sediment and on Deadlines for Their Achievement ("Official Gazette of the Republic of Serbia" no. 50/2012) and **meet** the values prescribed by the Regulation on Hazardous and Harmful Substances in Water ("Official Gazette of the Republic of Serbia" no. 31/82) for class I and II.

Moreover, the latest sampling done on 23 September 2024 and the results of testing are also presented on the website of the Municipality of Bosilegrad.

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

Best regards,

ENVIRONMENTAL PROTECTION SERVICE President of the Municipality of Bosilegrad

Environmental Affairs Associate Vladimir Zaharijev

Mikica Vasilev, grad. engineer of environmental
protection

/Official round seal of Municipality of Bosilegrad with Coat of Arms in the middle/



COMPANY FOR MINING ORE AND OTHER
NON-FERROUS METALS

BOSIL-METAL d.o.o.
BOSILEGRAD

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

17540 Bosilegrad, Georgi
Dimitrova 74, Telephone/Fax
017/878-541, 017/878-915
Current account: 205-1111 **09-55**
Komercijalna banka AD Beograd
Registration Number: 20200243
Activity code: 0729
PIB: 104625461

File number: 769/24

Date: 21 October 2024

Ministry of Environmental Protection

Department for Environmental Supervision and Preventive Action

Section for Integrated Pollution - Pčinja Administrative District

National inspector Marina Đorđević -

VRANJE, Kralja Aleksandra Karađorđevića 2

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

The Decision of the Ministry of Mining and Energy No. 310-02-00946/2008-06 of 27 November 2008 approved the exploitation of polymetallic Pb, Zn, Cu ore at the sites Karamanica and Polovica, Municipality of Bosilegrad, to the Company for mining ore and other non-ferrous metals BOSIL-METAL DOO Bosilegrad, Georgi Dimitrova 74, Registration Number 20200243, TIN: 104625461, hereinafter: Company.

The mining works covered by this Decision have been completed, and the Company submitted an application 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, number 759/21 of 31 May 2022, 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. 310-02-00908/2023-02 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 have 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. 101/2105, 95/2018 - as amended, and 40/2021*), 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, the authority in charge of the interior, and the environmental inspector 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, 21 October 2024

Director

Miodrag Vukajlović, Bachelor of Engineering in Mining

Deliver to:

1. Ministry of Energy and Mining
 - Mining Inspection Department
 - Geological Inspection Department
2. Ministry of Environmental Protection–Inspectorate
3. Ministry of the Interior
4. Archive



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

No.: 000487862 2023

Date: 8 November 2024

Nemanjina 22-26

Belgrade

BOSIL - METAL D.O.O. BOSILEGRAD

**Georgi Dimitrova 74
17540 Bosilegrad**

Subject: Observations of the Technical Commission related to the evaluation of the Environmental Impact Assessment Study

Pursuant to Article 23 of the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/2004, 36/2009) and the Report of the Technical Commission (established in accordance with Article 22 of the Law on Environmental Impact Assessment) for the evaluation of the Environmental Impact Study related to the Project of exploitation of Pb, Zn and Cu ores from Podvirovi and Popovica deposits in the Karamanica area near Bosilegrad (including the ore processing plant and tailings dam), as the competent body for the issuance of the EIA Study approval, we would like to inform you that the respective is not completely done in accordance with the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/2004, 36/2009). Upon detailed consideration of the submitted EIA Study, accompanying documentation and submitted comments of the interested public from the Republic of Serbia and the Republic of Bulgaria, the Technical Commission considers that, in line with the observations set out below, the study should be revised and supplemented.

Observations relate to the following:

GENERAL OBSERVATIONS

1. The respective EIA Study has not provided enough answers for all types of impacts and alternatives when the offered technical solutions are in question, as well as the missing solutions, primarily as regards the following: The results of the Pilot ore processing plant and the SEVESO installation classification based on the quality of rough flotation tailings; site for the disposal of flotation tailings from the Pilot plant; necessary measures for the high tailings dam management; alternatives related to necessary maintenance or rehabilitation of the hydrotechnical tunnel.
2. A slightly confusing description of the existence and use of the Explosives storage, so that an analysis of the potential impact is also questionable.
3. No importance has been attached to the need, at least with a quality explanation, why the construction of the wastewater treatment plant is unnecessary, since the Golema River basin flows toward Bulgaria. Due to this gap, a number of organizations and associations from the Republic of Bulgaria have responded, pointing to the transboundary effect. Transboundary effect has not been analysed in detail, despite the given guidelines

in the decision of the Ministry of Environmental Protection determining the scope and content of the Environmental Impact Assessment Study.

4. Postoperative monitoring has been defined without additional document that the local self-government has been informed that upon completion of the closure phase of the mine, the mine and the tailings dam will be handed over to the local self-government and the inhabitants of the surrounding area for further management and use.

DETAILED OBSERVATIONS

1. Chapter 2. Site description. Rulebook on the content of the Environmental Impact Assessment Study clearly defines the content of the Study. Thus, in Information about the required surface area of land in square meters (m²),...
2. Statutory regulations need updating (“Regulation on limit values of air pollutant emissions (*Official Gazette of the Republic of Serbia*, Nos. 71/10, 6/11 - correction);“
3. Figure 2.2. The Figure is illegible, and the name of the Figure does not match the image shown.
4. Map in Figure 2.8 is illegible, and the map in Figure 2.9 is also illegible.
5. In the description of the source of water supply (in Chapter 2), no distance from the deposits and the planned mining works to the source of water supply is specified.
6. The distance of inhabitants / residential buildings from the tailings dam, mine plateau, pit entrance, plant ventilator, should be specified in EIA Study.
7. The conditions of the Institute for Nature Conservation of Serbia have expired. The investor should submit a new application for new conditions to be implemented in the Study.
8. For the necessary analyses, the respective EIA Study had the results related to the exploitation and processing lead and zinc ores available from the previous period. The question is why were not all the obtained results necessary for risk assessment used. In this case, the conclusions would not be based on the assessed values, but credible data. Primarily for the operation and results of the Pilot processing plant. It is also necessary to include these analyses and re-classify the SEVESO installation.

The EIA Study developer mentions on page 81 that during the exploitation of the Podvirovi deposit, for the processing needs of the lead and zinc ores from the pit, in 2017, a semi-industrial Pilot plant of small capacity and experimental type, was constructed. With the completion of the ore excavation works in the Podvirovi deposit in 2022, the Pilot plant for ore processing stopped working. It is necessary to present a table on the amounts of the processed ore and tailings and chemical composition of the plant waste? Why this information was not used as a supplement to classification of the future SEVESO installation, otherwise based on assumptions? Where this waste was disposed of at the time because it is not even mentioned in the text?

9. Chapter 3.15. Ventilation of underground mining site, it has not been explained whether the air for ventilation is purified, nothing has been said about the removal of air from the mine, whether it is purified. We know that this air is filled with dust particles with the presence of heavy metals, combustion products in diesel engines, oxidation products due to blasting, etc.
10. Drinking water supply. In the text, at first, it was said that the employees would use the bottled drinking water. However, „At the elevation k+1250 (Pilot plant plateau) there is a drinking water supply system”. Please explain. Chapter 4.5. Water supply alternatives, ”Drinking water and water for other purposes, hygiene maintenance of the workers, kitchen needs, etc., will be provided from the public water supply

system. Drinking water may also be bottled, while the other necessary amount will be supplied in water tanks.“ It is not clear how the mines will be supplied with water, quantity, quality,...

11. On page 3-64: “An open, unlined channel with a rectangular cross-section is designed, which should be excavated with construction machinery in the existing terrain. According to the existing geologic maps, terrain in which the channel should be constructed (except the surface layer 1-1.5 m deep) is composed of slate“. It is not enough to define geology on the basis of a map, but it is necessary to carry out a detailed mapping in order to determine the composition of the base, and possible construction of an impermeable base.
12. There is no project solution for the collection of atmospheric waters from the mine plateau and their purification at the separator-settling tank. Roads, storage facilities, plateaus, manipulative areas, racks, etc. should be of waterproof material resistant to petroleum and petroleum products with adequate slope towards atmospheric sewage, through which the water is drained to the separator- settling tank.
13. Conditionally clean atmospheric waters should be directed to the surrounding terrain, recipient (Water conditions 4.21.). The Project foresees directing to the settling tank. This should be changed.
14. Draining of excavations, gravity drainage is foreseen... nothing is foreseen for purification. Later on, in the “Projected status of mine drainage“, there is a description of the reception pool settling tank, but there are no data on physical and chemical characteristics of the mining waters. What kind of water will be discharged into the Bezimeni Stream?
15. Chapter 3.2.2. Exploitation of the Podvirovi deposit, and Chapter 3.2.3. Exploitation of the Popovica deposit – Conjev Kamen, I think it needs to be presented more rationally. Describe the ”Ventilation of underground mining site“, “drainage of underground mining site“, etc. for the Podvirovi deposit, and show only the difference for the other deposit, so as not to repeat almost the same text.
16. For the purpose of the flotation tailing dump, it is necessary to construct a high tailings dam.

On page 371 there is a Situation Plan which clearly shows the total planned height of the dam (lower elevation 1060 m, and upper elevation 1095 m) of 35 m. Beside this initial dam, two more protective dams: 10 m and 12 m high will be constructed.

On page 134, the technology of the dam construction was mentioned, as well as the standards which served as the basis for the design.

Within the Chapter: Accidents in the mining facilities, on page 298, it is stated that technical measures, i.e. their observance in the tailing dump construction, are at the same time prevention measures from the environmental protection aspect. In this section, adequate standards and regulations should be mentioned again. The Investor, much less the Developer, cannot take from these regulations only those Measures that are good for them, but the whole set of measures foreseen for the technical observation of high dams. This observation and measures are to be applied not only on the dam itself, but in the downstream area as well. As a little help, it is about the already mentioned Rulebook No. 31-7303/1 1980 (SRPS U.C5.020 1980 Design of embankment dams and hydrotechnical embankments – Technical conditions), and Rulebook on technical observation of high dams (*Official Gazette of the SFRY*, No. 7 from 1966). The measures prescribed in these rulebooks must be an integral part of Measures in the mentioned chapter.

17. The content of heavy metals in sediment is the indicator of historical pollution, but also the current pollution if it happens. Has the project developer tested the quality of the sediment within the zero state? If he has not carried out these tests, they should be carried out.
18. There is no water balance for the project, the capacity of the lime milk preparation plant.
In Chapter 3.3.7. of the EIA Study it reads as follows: “At the entrance to the tunnel there will be a grille with a door (Figure 3.33). At the exit of the tunnel there will be a grille with a door as well (Figure 3.34),

but an outlet structure will be made as well, at the end of which crushed stones will be placed. The outflow into the Karamanica River will be arranged as reinforced concrete outlet structure, 3 m wide and 2 m high.

The installation of grilles on outflow from the tunnel is not in accordance with water conditions. The installation of grilles can lead to clogging of the tunnel.

19. Hydrotechnical tunnel issues

On page 168 it is stated as follows: "... for the protection of the tailings system from accidents due to the arrival of high waters, a safety overflow spillway structure (SOS) – total length of 81 m, connected to the tunnel for the diversion of the Karamanica River, is foreseen, through which, in emergency situations, excess water is discharged from the tailings pond." Does the EIA Study developer think that the water of this quality can go directly to the basin? This question is the direct consequence of the developer's statement on page 242 as follows: "... that the greatest potential impact of the tailings dam is the leakage under the tailings dump due to defects on the geomembrane. Leakage of water and infiltration in the soil and ground waters have not been analysed in more detail within the available technical documentation. Leakage can result in the change in quality of underground waters in the area of the planned tailings dam and in the area downstream of the tailings dump, more specifically in the alluvion of the Golema River, as well as in the very river flow."

On page 292 it is stated as follows: "... At the exit of water from the Karamanica River tunnel, it is necessary to foresee an outlet structure as well as the protection of the bottom and slopes of the watercourse, which must not have negative impact on the water regime, sediment transfer, etc.". If the basis for the preparation of the EIA study is a developed GRP, in which project should these measures be incorporated?

In the event that it is necessary to carry out maintenance of a hydrotechnical tunnel that is planned for a length of 1170 m, as mentioned on page 168 (on page 139, construction of a tunnel of total length $L = 995$ m is foreseen) or rehabilitation of its part due to tunnel collapse, are any special measures foreseen for such purpose? What is the exact length of the hydrotechnical tunnel, from the description or calculation?

20. Clarifying doubts as regards the site and measures for transport and storage of explosives and explosive substances.

On page 87, it is stated that the other servicing facilities, bearing in mind the vicinity of the terrain surface area, are located within the mine infrastructure facilities, i.e. mine grounds on the terrain surface area... *inter alia*, storage facility of explosives and explosive substances and storage facilities for fuels, oils and lubricants. The question is, where is the explosives storage facility located, on the surface (page 87), in the pit (pages 277, 353), or the explosives will be delivered in quantities needed for one blasting immediately before the very blasting process (page 307)?

21. The issue of wastewater treatment needs to be further clarified. A quality response and supplementary info can eliminate uncertainties and reduce environmental risks, thereby mitigating transboundary concerns related to this project.

EIA Study developer on page 170 states the following: "... or impose the need to build a more complex wastewater treatment plant before it is discharged to local recipients."; and on page 290: "... For the discharged water, adequate purification should be provided."; while on the page where the Measures are in accordance with the nature conservation conditions, i.e. page 294: "... EIA Study should foresee suitable measures for the prevention and rehabilitation of negative impacts of the mine and the processing plant on the environment (rehabilitation and recultivation of the terrain, making a protective belt of greenery, wastewater treatment at least up to the level of water quality of the recipient, etc.)."

Find answers for 'more complex', 'adequate' and 'suitable' wastewater treatment plant! If the investor has not understood the problem or realized the importance of the construction of this plant, it does not mean that it should be accepted.

22. Conditionally clean atmospheric waters should be directed to the surrounding terrain, recipient (Water conditions 4.21.). The Project foresees its directing towards the settling tank. This should be changed.
23. In Tables 5.12. and 5.13. it is necessary to provide a source of reference values, as well as for which class of water the reference values are given; and when commenting on the results, it is stated that the samples 'correspond to the regulations', but it should be written to which criteria.
24. The Dragovištica River, from its source to Bosilegrad is classified under Class I watercourse, meaning that its tributaries belong to Class I, and should be observed as such.
25. In Tables 5.14 to 5.18 there is no explanation for '***'
26. In Table 5.23, the source for MAC (Maximum Allowed Concentrations) and reference values is not specified according to statutory regulations.
27. In 2020, air quality testing was carried out east of the tailings site. What was the direction of the wind at that moment? To the west of the tailings there are also residential buildings. For the measurement of air quality in 2022, the position of the measuring point is not given.
28. Chapter "5.9. Buildings, immovable cultural property, archaeological sites and ambient units" considers protection and existence of cultural property. In this Chapter, buildings and ambient units that may be affected by the project should be mentioned.
29. In Chapter 5.10, landscape on the planned location of the installation should be described. It could be seen that the site is found immediately beside the road, beside the bridge, and that it will be visible to a large number of people, etc.
30. No analyses of the impact of mining operations and facilities on the water regime and *vice versa* have been made. Hydrogeological studies should be carried out in order to assess the impact of the planned works on the ground and surface waters.
31. Atmospheric waters from the tailings dam, according to water conditions, should be treated on the settling tank-separator, and are not supposed to go to the mining water collector.
32. No regime for the Popovska River has been determined, or the impact on the respective in case of abstraction of water for the mine needs.
33. No regime for the Bezimeni Stream has been determined, or the impact on the respective in case of abstraction of water for the mine needs.
34. In power substation Rudnik (Mine), two transformers will be installed... what kind of transformers are planned, what kind of cooling is provided?
35. Table 6.9. Sources of noise,... Why does not the Table include noise made by compressors?
36. Table 6.12. Assessment of water quality of the Bezimeni Stream...Why isn't there lead in the results? Generally, the watercourse is more polluted upstream than downstream of the polluter, how it is explained?
37. It is necessary to explain the issues related to transport, storage and necessary measures for the use of sulphuric acid in the mineral raw material preparation process.

EIA Study developer mentioned on page 129 in Table 3.23. types of reagents, consumption and dosing site, where particular attention should be paid to the use of NaCN and sulphuric acid because they can, by their very nature, endanger the environment.

On page 131, the developer states that “... *Bosil-Metal Flotation will be a relatively large consumer of sulphuric acid, and that although it is not found on the lists of hazardous substances, special care is needed to avoid spillage and endangering the environment. Especially careful planning should be done when acid renewal is in question, in order to minimise its amounts in the storage facilities, i.e. these amounts should be at the level of weekly consumption.*”

In accordance with these statements, the classification of the SEVESO installation depends on the logistics and dynamics of supply of the Mine with hazardous reagents. As far as its reliability is concerned, it should probably be included in this option in the risk assessment.

In the Chapter Environmental Impact Assessment in case of an accident, on page 352, it may also be necessary to add an accident with a tanker truck with sulfuric acid, since it will be brought to the mine on a weekly basis.

38. How drainage will be carried out during the construction of the tunnel for the diversion of the Karamanica River?
39. Chapter 6.6.4. does not show the effect of metals in suspended particulates on the population. What is the meaning of the sentence: “Monitoring has shown that there are no significant exceedances in the content of heavy metals in PM suspended particulates (ANAHM DOO, Belgrade, 2020)” from the aspect of the impact of these metals on the population?
40. It should be investigated whether at the intended location of flotation in the riverbed of the Karamanica River, watershed recharge by the aquifer is carried out, and if this is the case, how will it affect the flotation plant.
41. There is no project solution for the closure of the mine, thus the impact of the mine closure on the environment cannot be assessed.
42. In the EIA Study, the following is not analysed: Possible causes of erosion, possible subsidence of the terrain during underground exploitation, landslides, rockfall, etc., as well as the measures for their prevention and rehabilitation.
43. In Chapter 6.9, The impact of a change in land use on a particular population (population engaged in farming) has been assessed as high. Is it possible to better explain this impact?
44. How will the transport for the mine needs affect the quality of air along the transport roads?
45. Podvirovi and Popovica adit portal plateaus and the location of the main ventilator plateau have not been described, Portal plateaus should be with a concrete base and technical sewerage with the oil and grease separator, according to environmental protection conditions and water conditions.
46. Postoperative monitoring has been presented without foundation.

In the Chapter Proposal for postoperative monitoring on page 327, the EIA Study developer states as follows: *with the “... Completion of the closure stage, activities and obligations of the investor cease, and the closed mine and the tailings dam shall be handed to the local self-government and population of the surrounding area for further management and use. Monitoring programme and dynamics are shown in Table 9.4. Monitoring should be carried out by an authorised firm at the expense of the local self-government..., etc.”*

Statutory regulations governing the abovementioned must be stated! Is it necessary to inform the local self-government with this: That a private company has income and takes profits, the state is paid a fee for the use of mineral resources, and they should pay for 30 years the observation of a closed mine to some authorized company? Is there a risk that this part will not be carried out? Is there a danger to the environment then?

47. Is there going to be only flotation or also exploitation on the site Serafimova Vodenica?

Chapter 5.4.1. Surface water status: In the shown results for watercourses, there are data on the concentrations of selected heavy metals, but it is not mentioned that the watercourse, "Figure 2. The Golema River near the settlement called Omatica (7 October 2018.)" is completely ruined, covered with residue from the ore processing process, as mentioned in the observations of Eko Krajište. I believe that the author of the study should demand from the project developer to carry out all necessary protection measures, so that the foreseen mine would not repeat the mistakes and omissions from the previous probationary period. More attention needs to be paid to characteristics – quality of the sediment and in accordance with the results, strict environmental protection measures against discharge of sludge contaminated with heavy metals ordered.

48. What is the stability of the tailings dam slope and how is it calculated?

49. It is necessary to assess the risk of a further increase in the amount of suspended drift in the Bistarska River and the Karamanica River as the consequence of the planned activities.

50. Is the Popovska River at risk of drying up due to the planned intervention?

51. How will acidic mine water be treated if necessary?

52. Where is the assessment of the risks and impacts of diversion of the Karamanica River? Where is the description and location of the upper layers in the Popovska River and the Karamanica River flow zone?

53. In Table 6.16 the diversion of the Popovska River is mentioned, and in another place (pages 10-31) channelisation. These are not the same procedures, and it is necessary to explain what it is about and how it is foreseen.

54. It remains unclear what the purpose of the so-called Pilot plant will be after commissioning of the plant in the site Serafimova Vodenica?

55. In the EIA Study, further attention should be paid to the radioactivity of the terrain, especially if we take into account data on the presence of uranium in the Bosilegrad area.

56. In Chapter 7.3., no possible consequences of the explosion in the explosives storage facility in the mine are mentioned.

57. In Chapter 7.5., the number of people who may be at risk in the event of an accident is not mentioned.

58. In Chapter 7.7, sources of criteria for the accident assessment are not mentioned.

59. Measures and solutions for transport, storage and handling hazardous and harmful substances are not mentioned.

60. As a preventive measure of protection against accidents, there is no obligation for the operator to develop the Accident Notification Project, mark flood zones in case of an accident, etc.

61. EIA Study does not explicitly specify that the operator shall develop the Accident Prevention Policy.

62. In the event of an accident, the measures in the event of an explosion are not mentioned.

63. In Chapter 8.2.3. *Accidents in the mining facilities*, as a protective measure against possible sudden ground water flooding, the following is stated: “Construction of drainage wells from the mine workings in order to lower the ground water level“. In this case, it is necessary to take into account the use of pumps in underground workings.
64. No air protection measures are given when filling and emptying the lime silo. A bag filter should be installed on the silo, which will be regularly maintained and its operation monitored; also, monitoring of air emissions should be provided on the respective.
65. Chapter 8.3.3. Water protection. Here we have repeated descriptions of the technological process, although they should be found in Chapter 3. Furthermore, the possibility of replacing sodium cyanide with sodium bisulphite is mentioned, which should be found in Chapter 4. Alternatives. If there are positive experiences in the use of bisulphite, instead of cyanide, why the EIA Study does not require cyanide substitution?
66. Chapter 8.3.4. Measures for the protection of flora and fauna, “With the aim of sustainable exploitation of mineral wealth, the company is obliged to carry out conservation measures on a voluntary basis in accordance with standards and professional codes governing the practice in the private sector...“ EIA Study should prescribe measures to be observed by the project developer, and not to make recommendations that, in the end, the developer may not implement at all.
67. Chapter 9.3. – Is it necessary to monitor PCBs in the surface water and soil? Is there any equipment in the site which contains PCBs?
68. In the ground water, it is necessary to monitor the consumption of potassium permanganate in the stage of mine construction and operation.
69. In the monitoring program, monitoring of powdery substances on the lime silo should be added.
70. In the surface water, it is necessary to monitor BOD and COD during the work of the mine.
71. Surface waters need to be monitored at least quarterly. Surface waters sampling points do not have to be that far from the mine facilities. Downstream from the mine facilities, surface water is analysed in the zone after 95% mixing.
72. It is necessary to monitor the quality of the Bezimeni Stream, the Karamanica River, the Popovica River and the Golema River sediments after the mine facilities, in accordance with the Regulation on emission limit values for pollutants in surface and ground waters and sediments and the deadlines for their reaching (*Official Gazette of the Republic of Serbia*, No. 50/12).
73. Soil monitoring should be planned in accordance with the Rulebook on the list of activities that may cause soil pollution and degradation, the procedure, data content, deadlines and other requirements for soil monitoring (*Official Gazette of the Republic of Serbia*, No. 102/20).
74. The Project developer is obliged to take into consideration the observations submitted by associations and organisations from the Republic of Serbia and the Republic of Bulgaria: Eko Krajište, Bosilegrad; Eko Surdulica, Surdulica; Balkanka, Sofia, Republic of Bulgaria; Kyustendil Municipality, Republic of Bulgaria; *Initiative Committee Malko Belovo, Belovo, Republic of Bulgaria*, and Association for the Initiative Committee of the Villages of Gornoslav, Dolnoslav, Cherven, Oreshets and Dobrostan, Republic of Bulgaria.
75. Respond to all objections in an exhaustive manner, and be sure to indicate the places (pages, tables, etc.) in the EIA Study where corrections have been made.

FINAL EVALUATION

On the basis of insight and analysis of the submitted Environmental Impact Assessment Study for the Project of exploitation of Pb, Zn and Cu ores from Podvirovi and Popovica deposits in the Karamanica area near Bosilegrad, the impact on the environment has been discussed in great detail by the Study developer.

The comments given are primarily related to the shortcomings of the bases the developer had at his disposal or the absence of the respective; thus, certain conclusions were made on the basis of recommendations and estimates, and not valid values.

What could have been done, however, was that when considering the relevant parts of the EIA Study, different information and data for those parts should not have been presented, whether in facilities or plants and installations.

The gap in the EIA Study is that, as the authors also point out, the lack of data on biological parameters of surface waters, which was not determined before the start of any work. Now the ecological status of surface waters can be determined, and it is expected that it will be done, but it cannot be compared with the previous status. Otherwise, the composition of bacterial communities, both faecal and saprophytic, is of far less importance in the case of such works.

Indication in the classification, i.e. categorisation of the flotation plant and tailing dump, without a complete analysis, in the lower-tier SEVESO installation, should not prevail.

Special attention must be paid to accident prevention measures for the tailings dam, hydrotechnical tunnel, as well as the need for the wastewater treatment plant.

On the basis of the abovementioned, it is necessary to correct the EIA Study in accordance with the observations made, pursuant to Article 23 paragraph 3 of the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/2004, 36/2009). The time limit for submission of the completed EIA Study is 30 days. If you do not submit a complete application for approval of the Environmental Impact Assessment Study for the respective project, this authority shall act in accordance with Article 59 of the Law on General Administrative Procedure (*Official Gazette of the Republic of Serbia*, No. 18/16) and Article 9 of the Law on Environmental Impact Assessment, i.e. the application will be rejected as incomplete.

STATE SECRETARY
As per Authorisation Decision
No. 001747986 2024
of 24 May 2024

Aleksandar Dujanović

Delivered to:

- Archive
- Project developer

- July 2024 -



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

No.: 001818484 2024 14850 004 008 000 001

Date: 30 July 2024

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: Progress Report on Complaint No. 2022/06: Complaint on stand: 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 15 April 2024, concerning Complaint No. 2022/06: Complaint on stand: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region – single complaint, 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 for a statement to the competent bodies and organisations, as follows: Ministry of Construction, Transportation and Infrastructure, Ministry of Mining and Energy, Institute for Nature Conservation of Serbia, Municipal Assembly of Bosilegrad and Municipal Assembly of Žagubica, including the competent sectors of the Ministry of Environmental Protection.

I Pursuant to the obtained statements 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 impact of mining activities in Bosilegrad, we would like to inform you of the following:

1. Company Bosil-Metal d.o.o., Bosilegrad, performs exploitation of lead and zinc ores from the deposits “Podvirovi” and “Popovica” in the Karamanica area, Municipality of Bosilegrad. Regarding the fulfilment of obligations concerning environmental protection, the Company implements all environmental protection measures under the approved Environmental Impact Study for the “Podvirovi-Karamanica” Mine Reconstruction Project, approved by the Ministry of Environment and Spatial Planning in 2009. Pursuant to the carried out field and office supervision and established factual situation by the Republic Environmental Inspection, the Ministry of Environmental Protection established in July 2023 that no illegalities were found in the activities of the supervised facility. The Republic Environmental Inspection plans, in accordance with the Annual and Operational Plans of the inspection supervision for 2024, to carry out a regular inspection supervision in Q3 2024.

2. To the Company Bosil-Metal in 2021, **operation of the Pilot plant for technological testing of the flotation processing of Pb-Zn ores from deposits “Podvirovi” and “Popovica” was prohibited**, given the expiry of three years for the use of this plant. The Mining Inspection prohibited the execution of mining works of the Pilot plant for technological testing of the flotation processing of lead, zinc and copper ores, in the exploitation area No. 515 – ‘Podvirovi’ and disposal of intermediate products derived from the flotation process of lead, zinc and copper ores outside the boundaries of the approved exploitation area No. 515 – ‘Podvirovi’.

3. As regards the **expansion of the exploitation field**, we would like to inform you that the **geological exploration project for the period from 2023 to 2026** was submitted to the **Ministry of Mining and Energy in 2023**, as well as the **Mining Project for the Exploration of Solid Mineral Raw Materials**. Additionally, the aforementioned **Mining Project for the Exploration of Solid Mineral Raw Materials** was granted approval in August 2023 and as such will be in effect until the conclusion of exploration activities, specifically until 2026.

The **Ministry of Environmental Protection adopted the decision determining the scope and content of the Environmental Impact Study for the project of exploitation of Pb, Zn and Cu ores from the deposits “Podvirovi” and “Popovica” in the Karamanica area** near Bosilegrad (including the ore processing plant and the flotation tailings disposal site) in November 2021.

The Ministry of Environmental Protection carried out through notification **transboundary consultations with the Republic of Bulgaria**, i.e. its Ministry of Environment and Water. The notification contained information on the planned project. To the Ministry of Environmental Protection comments were sent by the Minister of Environment and Water of the Republic of Bulgaria indicating that this Ministry decided to participate in the transboundary EIA procedure for the new project of Bosil-Metal, Bosilegrad.

In the Decision determining scope and content of the Study, it has been ordered to the Project Developer to particularly elaborate in the Environmental Impact Study all possible potential impacts on the surface and ground waters in the territory of the Republic of Bulgaria. The Ministry of Environmental Protection accepted all useful information on the possible potential impacts of the activities of the planned mining and processing complex on the environment in potentially affected areas: Surface and ground waters, secondary pollution as well as possible potential impacts on the water protection areas. **All possible potential impacts will be considered in detail in the Environmental Impact Study of the respective project, in order to determine adequate and binding measures for the protection of the environment and human health.** In the Environmental Impact Study, Environmental Monitoring Programme and Environmental Audit Programme will be defined. Furthermore, the Project Developer will have to form a **special monitoring service**, which will in cooperation with laboratories, accredited and responsible for the monitoring quality, prepare materials for the consideration and control of the results obtained. Pursuant to the obtained results and perceived trends, the same service shall propose the correction of the monitoring plan.

The **Environmental Impact Study** was delivered to the Ministry of Environmental Protection on **25 December 2023**. In its letter of 16 January 2024, the Ministry required supplement of the Study, which was delivered on 22 April 2024 and included translated copies into Bulgarian language.

Pursuant to the Law on Environmental Impact Assessment (*Official Gazette of the Republic of Serbia*, Nos. 135/04 and 36/09) and the Rulebook on public insight, presentation and public discussion about the Environmental Impact Study (*Official Gazette of the Republic of Serbia*, No. 69/05), the **Ministry organised public insight, public presentations and public discussion on the mentioned Study.**

In accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (ESPOO), **Environmental Impact Study with translation into**

Bulgarian language became publicly available on the official website of the Ministry of Environmental Protection on 24 April 2024.

Public discussion and presentation of the respective Environmental Impact Study was held in Bosilegrad on 5 June 2024.

On 1 July 2024, in accordance with the provisions of the ESPO Convention, the opinion of the Ministry of Environment and Water of the Republic of Bulgaria concerning the respective Study was delivered.

Comments and observations on the Study, submitted by Civil Society Organisations to the Ministry of Environmental Protection, either directly or through the Ministry of Environment and Water of the Republic of Bulgaria, **were forwarded to the members of the Technical Committee for the assessment of the respective Study, established on 8 May 2024, and will be the subject of discussion at the next meeting.**

In view of all of the above, you will be informed of the details of the Study in a timely manner, upon completion of the approval process.

With regard to the issue of the quality of water in the mine vicinity, we would like to inform you that **regular testing of the quality of water, air and sludge by the authorised organisations is carried out four times a year** (Institute of Public Health Vranje - Centre for Hygiene and Human Ecology, etc.), whose findings and expert opinions are duly delivered to the Ministry and Inspection bodies. The results of absolutely all test show that at the site and **in the vicinity of the Pilot plant, there was no exceedance of the maximum permissible values for any of the analysed samples.** An exception are the results downstream of the works, which indicate the presence of bacteria and microorganisms, at concentrations that are twice as high in these samples in comparison with the samples in front of the site, which is most probably the result of the activities of the local population (cattle grazing, direct release of sewerage into the stream).

Furthermore, the Municipality of Bosilegrad carries out continuous **monitoring of the surface waters in the territory of the Municipality of Bosilegrad**, including the Karamanica River, 300 meters downstream of the Bosil-Metal mine in the Karamanica area. Measurements of physico-chemical parameters meet the values prescribed under the Regulation on emission limit values for pollutants in surface and ground waters and sediments and the deadlines for their reaching (*Official Gazette of the Republic of Serbia*, No. 50/2012) and **satisfy the values for Class I and Class II**, prescribed under the Rulebook on hazardous substances in water (*Official Gazette of the Republic of Serbia*, No. 31/82). The results of these measurements are found on the official website of the Municipality of Bosilegrad at: <http://www/bosilegrad.org/sr/Monitoring.aspx>

Furthermore, testing of the quality of water of **the Dragovištica River, on the Ribarice profile** (on the border with Bulgaria) is carried out by the Environmental Protection Agency. The testing was performed in **2022, 2023 and 2024**, and the results of chemical analyses were compared with the limit values for **Class II quality of the surface waters**, which has a **good ecological status** – the values of physico-chemical parameters do not exceed the values that affect the ecosystem functionality and development of the community corresponding to the given status, while biological parameters indicate a low level of change caused by human activity, and deviate slightly from the values usual for the given type of surface waters in undisturbed conditions. Over 100 parameters were tested, from the basic ones, like the suspended particles quantity, total hardness, the amount of dissolved oxygen and total amount of dissolved salts, to the analysis of the heavy metal concentration (zinc, copper, manganese, boron, arsenic, mercury, chromium, nickel, cadmium, lead...), biocidal compounds and their isomers (atrazine, chlordane, kinuron and others). **Of all tested parameters, only slight elevated values for the total iron content were found in 2022 and 2023, while in 2024, no exceedances of any parameter were recorded.**

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

According to the previous report, in Homolje Mt region, **there are no approvals issued for the exploitation of mineral resources**. In the last report of the Ministry of Mining and Energy, enclosed to this document, it is stated **that there are only approvals for the performance of applied geological explorations**, for the following Companies: Crni Vrh Resources d.o.o. Belgrade (geological explorations of gold and accompanying metals in the exploration fields Potaj Čuka, Čoka Rakita and Pešter South) and DPM Avala d.o.o. Belgrade (geological explorations of gold and accompanying metals in the wider area of Homolje Mt and in the exploration field Umka).

Regarding the Company “Dundee Precious Metals”, mentioned in the complaint of the Civil Society Organisations, we would like to inform you that so far, this Company has not submitted any request to the Ministry of Environmental Protection related to the application of the Law on Environmental Impact Assessment.

The Municipality of Žagubica stated that Performing geological explorations of mineral resources is not contrary to the Spatial Plan of the Municipality of Žagubica (*Official Gazette of the Municipality of Žagubica*, No. 2/11). Furthermore, it has been stated that in the General Regulation Plan of the Wind Farm Area ‘VE Crni Vrh’ in the territory of the Municipality of Žagubica (*Official Gazette of the Municipality of Žagubica*, Nos. 26/21 and 27/21) mining activities are not foreseen.

The Institute for Nature Conservation of Serbia stated that after having insight into the Central Register of Protected Natural Resources and other documents, the Institute **does not have any new data** on distribution and status of the existing or newly recorded wild species and habitat types in the respective area compared to the statement enclosed as part of the documentation to the previous report of the Ministry of Environmental Protection.

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



Irena Vujović

Annex I – Report by the Ministry of Construction, Transport and Infrastructure

Annex II - Report by the Ministry of Mining and Energy

Annex III - Report by the Institute for Nature Conservation of Serbia

Annex IV - Report by the Municipal Assembly of Bosilegrad

Annex V - Report by the Municipal Assembly of Žagubica

Annex I – Report by the Ministry of Construction, Transport and Infrastructure*Coat of Arms*

Republic of Serbia
MINISTRY OF CONSTRUCTION,
TRANSPORT AND INFRASTRUCTURE
Sector for spatial planning and urban planning
Number:001902542 2024 14810 006 000 000 001
Date: 17th June 2024
Kralja Milutina Street 10a, Belgrade

Rectangular stamp attached hereto:
The Administration for Joint Services of
the Republic Bodies
Records management office 1056
Received on: 25th June 2024
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MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih brigada 1
11 000 Belgrade

SUBJECT : Response to Complaint number 2022/06: Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje

Dear Sir/Madam,

By your letter number 001818484 2024 14850 004 008 000 001 regarding the Decision of the Council of Europe's Berne Convention Bureau on Complaint No. 2022/6: New complaint: Serbia: Possible negative impact of mining activities in Bosilegrad and mountainous area of Homolje, submitted to the Ministry by the Council of Europe's Bern Convention Secretariat on 15th April 2024, you requested response to the subject matter complaint.

The subject matter complaint consolidates two complaints: Complaint referring to the possible negative impact of mining activities in Bosilegrad and Complaint referring to the possible negative impact of mining activities in the mountainous area of Homolje.

We hereby inform you that the Ministry of Construction, Transport and Infrastructure does not carry out activities related to the preparation of spatial plans for special purpose areas, stipulated in Article 21, item 2 of the Law on Planning and Construction ("Official Gazette of RS", no.72/2009, 81/2009 - corrigendum, 64/2010 - SC decision, 24/2011, 121/2012, 42/2013 - SC decision, 50/2013 - SC decision, 98/2013 - SC decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/23) in the aforementioned area.

Respectfully,

ACTING SECRETARY OF THE MINISTRY
VOJKAN TOMIĆ, *signed, signature illegible*
Per procuration of the Minister
No. 001587809 2024 14810 010 006 000 001
of 7th May 2024

Delivered to:

- The addressee
- Archive

A round seal attached hereto: content illegible

Annex II - Report by the Ministry of Mining and Energy



Republic of Serbia
MINISTRY OF MINING AND ENERGY
No.: 001930702 2024 14820 007 000 000 001
Date: 18 June 2024

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

Nemanjina 22-26,
11000 Belgrade

Dear Ms. Vujović,

Enclosed to your letter No.: 001818484 2024 14850 004 008 000 001 of 3 June 2024, you submitted to the Ministry of Mining and Energy the Decision of the Bureau of the Standing Committee of the Bern Convention on Complaint No.: 2022/6: Complaint on stand: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region. According to the respective decision of the Bureau, the Complaint is in the process of further monitoring and consideration of additional information in order to avoid the possible impact of mining activities in the respective region.

By inspecting the official record, it has been established that the Ministry submitted with its letters of 27 December 2022 and 1 June 2023 the required report on the issued approvals from its scope of work on the respective sites in accordance with your Ministry's letter.

By insight into the very Complaint, but also the Decision of the Bureau, it has been established that there are no clear coordinates of the area-site to which the Complaint relates.

1. As far as the exploitation of mineral resources in the vicinity of the state border area is concerned, in the territory of the Municipality of Bosilegrad, we would like to inform you of the following:

- As we have informed you in the letter No.: 310-02-01812/2022-02 of 27 December 2022, in the territory of the Municipality of Bosilegrad, Company Bosil-Metal d.o.o. performs exploitation of the lead and zinc ores. For the extended part of the exploitation area (for which the deadline under the decision expires on 1 August 2024) a research project was submitted in 2023 (for the period 2023 — 2026), and related to this project also the Mining project on the exploration of solid mineral resources approved by Decision No. 310-02-00908/2023-02 of 3 August 2023 and lasts as long as the research is ongoing, i.e. until 2026.

The Mining Inspection performed non-routine inspection supervision of the supervised entity:

2. Bosil-Metal d.o.o. — An inspection was carried out over the economic operator and on that occasion a record was made. In the record, two measures were ordered as follows: Prohibition of the Pilot Plant mining operations for technological testing of flotation processing of the lead, zinc and copper ores, in the exploitation

area No. 515 — Podvirovi; and the measure prohibiting the disposal of intermediate product deriving from the process of flotation of lead, zinc and copper ores outside the boundaries of the approved exploitation area No. 515 — Podvirovi.

Sincerely yours,

MINISTER
/s/ Dubravka Djedović Handanović

Delivered to:

- Addressee;
- Archive.

Annex III - Report by the Institute for Nature Conservation of Serbia

Rectangular stamp: ADMINISTRATION FOR JOINT SERVICES OF THE
REPUBLIC BODIES: 16 July 2024 - 480/04

INSTITUTE FOR NATURE CONSERVATION OF SERBIA

03 No. 025-2353/2
9 July 2024

MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih brigada 1
11070 Novi Beograd

Your Ref. No.: 001818484 2024 14850 004 008 000 001 of 3 June 2024

The Institute for Nature Conservation of Serbia received your request registered under 03 No. 025-2353/1 of 14 June 2024, for the supplement to the report on progress on the Complaint No. 2022/06: '*Complaint on stand: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region*'.

In reference to your request related to the text of the Decision of the Bureau of the Bern Convention in the Council of Europe, for the purpose of making a statement regarding the Complaint No. 2022/06 of 15 April 2024, related to the obligation of Contracting Parties signatories of the Bern Convention to protect habitats and species throughout their territory, i.e. to submit information on the implementation of actions for the protection of species and habitats under Annexes II and III of the Bern Convention, which could be endangered due to mining activities in Bosilegrad and in the Homolje Mt. region, we would like to inform you as follows:

- By inspecting the Central Register of Protected Natural Resources and the Institute's documentation, it has been found that for the respective sites, the Institute does not have any new data concerning the answer to the Complaint submitted to you on 28 December 2022 (Case-file 03 No. 025-4042/2; Your Ref. No.: 337-00-00128/2022-04 of 15 November 2022);
- In its own database, the Institute does not have any new data on distribution and status of the existing or newly recorded wild species and habitat types in the respective area;
- According to the Natural Resource Protection Plan 2024, and because of pre-defined commitments, the Institute has not carried out research or monitoring of wild species and habitat types under Annexes II and III of the Bern Convention in the areas where mining activities are performed.

On the basis of the aforementioned, we would like to inform you that the Institute for Nature Conservation of Serbia has no new available data relevant for the supplement to the report on progress on the Complaint No. 2022/06.

Acting DIRECTOR
/s/ Marina Šibalić

Enclosure:

Answer to Complaint No. 2022/06: Complaint on stand: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region' (03 No. 025-4042/2 of 28 December 2022; Your ref. No.: 337-00-00128/2022-04 of 15 November 2022);

Cc:

- The Applicant
- Archive



INSTITUTE FOR NATURE CONSERVATION OF SERBIA

Current account No.: 840-518664-16 opened with the Treasury Administration + TIN 106844260 + Reg. No.: 17798561 +
Business activity code: 9104

HQ 11070
Novi Beograd
Japanska 35
Tel: 011 20 93 800
011 20 93 801
Fax: 011 20 93 887
beograd@szps.rs

03 No. 025-4042/2

Date: 28 December 2022

MINISTRY OF ENVIRONMENTAL PROTECTION

11070 NOVI BEOGRAD
Omladinskih brigada 1

OFFICE IN NIŠ
18000 NIŠ
Vođe Karadjordje 14
Tel/Fax: 018 523 448
018 523 449
nis@szps.rs

Acting upon your request No. 337-00-00128/2022-04 of 15 November 2021, registered in the Institute under 03 No. 025-4042/1 on 28 November 2022, related to 'Complaint No. 2022/6: New complaint: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region', in order to provide the answers to the Secretariat of the Bern Convention in the Council of Europe, the Institute for Nature Conservation of Serbia hereby establishes as follows:

PRISTINA
WORK UNIT
11070 Novi Beograd
Japanska 35
Tel: 011 20 93 800
011 20 93 801
Fax: 011 20 93 887
beograd@szps.rs

- 'Complaint No. 2022/6: New complaint: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region' integrates two complaints:

1. The respective Complaint No. 1 related to possible negative impact of mining activities in Bosilegrad, filed by the International NGO 'Earth Thrive' in collaboration with the Association 'EkoKrajište' from Bosilegrad; King's College Legal Clinic, from London (United Kingdom), and 'Balkanika' from Sofia (Bulgaria). The Complainants state that the mining activities in the Karamanica ore field violate the provisions of the Bern Convention.
2. The respective Complaint No. 2 related to the possible negative impact of mining activities in the Homolje Mt region, filed by the International NGO 'Earth Thrive', in collaboration with NGOs 'Mlavska vojska' and 'Čuvari Homolja' and International NGO 'Earth Law Center' from the United States of America.
The Complainants state that the approval for the construction of a mine in the Homolje Mt region within the Timok Gold Project, implemented by the Canadian Company 'Dundee Precious Metals' (DPM), would violate the provisions of the Bern Convention.

By insight into the Central Register of Protected Natural Resources and the information system on environmental protection kept by the Institute for Nature Conservation of Serbia, and in accordance with your request, the Institute would like to inform you of the following:

To Question No. 2. of Complaint No. 1: Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention potentially affected? (Mentioned in Appendices II and VI of this Complaint), the answer is as follows:

- representatives of wild fauna and habitat types in Appendices II and VI of this Complaint are essential elements of biodiversity of Bosilegrad and its surroundings as well as Serbia in general. Habitat types mentioned in Annex I of Resolution 4 of the Bern Convention, mentioned in Appendices, are present in the wider surroundings of the site in question (Mountain Dukat and

Dragovištica River with tributaries). In the very research area and immediate surroundings, two types of habitats have been recorded, frequent in the territory of Serbia: Moesian beech (*Fagus moesiaca*) and silicate minerals. The Institute took this fact into account when issuing acts on conditions for nature conservation for geological research in the Karamanica area;

- Amphibian and reptile species are potentially endangered bearing in mind that their life is connected to water surfaces into which the wastewater will be released (amphibians due to their reproductive cycle, but also snakes: the grass snake and the dice snake because of food). Beside habitat destruction, in general, the important factors are also the intersection of migratory routes due to construction of infrastructure (roadkill), habitat fragmentation leading to the isolation of certain parts of the population into smaller enclaves (metapopulation), which in the long run may be threatened with extinction;
- For the mammal species mentioned in Appendix VI of the Complaint, the following has been established:
 - According to available data of the Institute for Nature Conservation of Serbia, the following species: Schreibers' Bent-wing Bat (*Miniopterus schreibersii*), Common Noctule (*Nyctalus noctula*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*), Lesser Horseshoe Bat (*Rhinolophus hipposideros*), Savi's Pipistrelle (*Hypsugo savii*), Barbastelle Bat (*Barbastella barbastellus*), Greater Myotis (*Myotis myotis*), Steppe Mouse or Mound-building Mouse (*Mus spicilegus*), Balkan Lynx (*Lynx lynx martinoi*) and Red Deer (*Cervus elaphus*), do not inhabit the respective Karamanica mine area or the surrounding wider area;
 - Species, such as: Northern White-breasted Hedge (*Erinaceus roumanicus*), European Mole (*Talpa europaea*), European Hare (*Lepus europaeus*), Red Squirrel (*Sciurus vulgaris*), Edible Dormouse or Fat Dormouse (*Glis glis*), Red Fox (*Vulpes vulpes*), European Pine Marten (*Martes martes*), European Badger (*Meles meles*), European Wildcat (*Felis silvestris*), Wild Boar (*Sus scrofa*) and Roe Deer (*Capreolus capreolus*) are found on the list of Appendix III of the Bern Convention, and have a 'protected wild fauna species' status at the national level accordingly. These are species relatively widely distributed in the territory of Serbia. The respective area is not considered to be of particular importance for the Favourable Conservation Status for any of the mentioned species;
 - Gray Wolf (*Canis lupus*) species is found on the list of Appendix II of the Bern Convention; in the process of accession and adoption of the provisions of the Bern Convention, Serbia expressed reservations concerning the strict protection of this species; thus, at the national level, this species has the 'protected wild species' status accordingly. The wolf is relatively widely distributed in the territory of Serbia, with stable and slightly positive (upward) population trends. The respective area is not an area of particular importance for maintaining the Favourable Conservation Status in Serbia;
 - Other mentioned rodent species do not have a special status neither within the provisions of the Bern Convention or at the national legislation level;
- Bird species: Semicollared Flycatcher (*Ficedula semitorquata*) mentioned in Appendix IV of the Complaint, is a species with the westernmost boundary of the global area of distribution in southern and eastern parts of Serbia. Valleys of the Rivers Pčinja, Vlasina, Jerma, Stara Planina Mt and Jastrebac Mt are the only sites where this rare species nests. The assessed size of population at the national level is 100 to 150 bird pairs (The Red Book of the Fauna in Serbia 3. Birds). Category of threatened species is Near Threatened (NT). This species prefers mature deciduous forests (Mountain Beech with other deciduous trees). The basic risk factors for this species are devastation of

deciduous forest, excessive opening of forest complexes and removal of rotten and damaged trees where this species nests. Upon having insight into the Institute's database, it has been established that the Semicollared Flycatcher is registered in the Municipality of Bosilegrad, in the basin of the Bresnička River, tributary of the Dragovištica River in the Cadastral Municipality K.O. Mlekominici;

On the other hand, BirdLife International in collaboration with the Serbian partners in 2020, declared new Important Bird Areas (IBA) at the international level for the birds in Serbia, where Dukat is IBA as well. During the implementation of IPA 2016 Project: EU for Serbia - Continued support to implementation of Chapter 27 in the area of nature protection (NATURA 2000), IBA Dukat was proposed as pSPA044 - Dukat (surface area of 42,468 ha). Recorded values can be seen at the following link: <https://daphne.sk/Natura2000Serbia/pspa044f.html>

To Question No. 3: What might be the negative effects for the specie/s or habitat/s involved?, we would like to note as follows:

In the period 2006 – 2021, the Institute issued seven acts prescribing conditions for nature conservation for geological research in the Karamanica area near Bosilegrad, where, beside conditions for the protection and conservation of wild flora and fauna and their habitats, conditions for the prevention of the pollution of water, air and soil were mentioned.

To Question No. 4: Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, the answer is as follows:

Under the Habitats Directive are the following species:

- Gray Wolf (*Canis lupus*) and the European Wildcat (*Felis silvestris*) - Annex II, IV; The European Pine Marten (*Martes martes*) - Annex V.;
- Eight bird species: The Black Woodpecker (*Dryocopus martius*), The Grey-headed Woodpecker (*Picus canus*), Corncrake (*Crex crex*), Wood Lark (*Lullula arborea*), The Red-backed Shrike (*Lanius collurio*), Barred Warbler (*Sylvia nisoria*), The White-backed Woodpecker (*Dendrocopos leucotos*), Hazel Grouse (*Bonasa bonasia*) and Semicollared Flycatcher (*Ficedula semitorquata*) are found in Annex I to the Birds Directive;
- Five species: The Common Quail (*Coturnix coturnix*), Semicollared Flycatcher (*Ficedula semitorquata*), The Golden Eagle (*Aquila chrysaetos*), Corncrake (*Crex crex*) and Barred Warbler (*Sylvia nisoria*) are found in Annex II of the Convention on Migratory Species of Wild Animals (Bonn Convention);
- As well as nine species in Annex II of the Bern Convention (strictly protected species): The Golden Eagle (*Aquila chrysaetos*), The black Woodpecker (*Dryocopus martius*), The Grey-headed Woodpecker (*Picus canus*), Corncrake (*Crex crex*), Wood Lark (*Lullula arborea*), The Red-backed Shrike (*Lanius collurio*), Barred Warbler (*Sylvia nisoria*), The white-backed Woodpecker (*Dendrocopos leucotos*) and Semicollared Flycatcher (*Ficedula semitorquata*), and
- Two species in Annex III of the Bern Convention (protected species): Hazel Grouse (*Bonasa bonasia*), The Common Quail (*Coturnix coturnix*).

The Institute had in mind these facts when issuing acts on conditions for nature conservation for geological research in the Karamanica area near Bosilegrad.

To Question No. 2 of the Complaint No. 2: Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention potentially affected?, and mentioned in Appendix IV of this Complaint, the answer is as follows:

- Types of habitats mentioned in Appendix VI: List of Threatened Habitats covered with EUNIS habitats classification of this Complaint, are of importance for the whole Homolje Mt region and for the whole of Serbia; however, not all mentioned types are found inside the research areas where geological research was carried out or is still carried out. The Institute had in mind these facts when issuing acts on conditions for nature conservation for geological research and activities on the Homolje Mt;
- Amphibian and reptile species are potentially endangered bearing in mind that their life is connected to water surfaces into which the wastewater will be released (amphibians due to their reproductive cycle, but also snakes: the grass snake and the dice snake because of food). Beside habitat destruction, in general, the important factors are also the intersection of migratory routes due to construction of infrastructure (roadkill), habitat fragmentation leading to the isolation of certain parts of the population into smaller enclaves (metapopulation), which in the long run may be threatened with extinction;
- For the mammal species mentioned in Appendix VI of the Complaint, the following has been established:
 - According to available data of the Institute for Nature Conservation, the species: Steppe mouse or Mound-building Mouse (*Mus spicilegus*) does not inhabit the area of the planned mine, or wider surroundings;
 - Species, such as: Northern White-breasted Hedge (*Erinaceus roumanicus*), European Mole (*Talpa europaea*), European Hare (*Lepus europaeus*), Red Squirrel (*Sciurus vulgaris*), Edible Dormouse or Fat Dormouse (*Glis glis*), Red Fox (*Vulpes vulpes*), European Pine Marten (*Martes martes*), European Badger (*Meles meles*), European Wildcat (*Felis silvestris*), Wild Boar (*Sus scrofa*), Red Deer (*Cervus elaphus*) and Roe Deer (*Capreolus capreolus*) are found on the List of Appendix III of the Bern Convention, and have a 'protected wild fauna species' status at the national level accordingly. These are species relatively widely distributed in the territory of Serbia. The Homolje Mt region is an important habitat of the Red Deer (*C. elaphus*) and part of a much wider area in the eastern part of Serbia. The very mining zone and the respective area are not considered to be of particular importance for the Favourable Conservation Status for any of the mentioned species;
 - Lynx (*Lynx lynx*) is also found on the List of Appendix III of the Bern Convention and has a 'protected wild fauna species' status at the national level accordingly. The Homolje Mt. region is found within a much wider area in the eastern Serbia. The very mining zone is not considered to be of particular importance for the Favourable Conservation Status for any of the mentioned species;
 - Species: Grey Wolf (*Canis lupus*) and Brown Bear (*Ursus arctos*) are found on the list of Appendix II of the Bern Convention. In the process of accession and adoption of the provisions of the Bern Convention, Serbia expressed reservations concerning the strict protection of the wolf species; thus, at the national level, this species has the 'protected wild species' status accordingly. It is relatively widely distributed in the territory of Serbia, with stable and slightly positive (upward) population trends. The Homolje Mt region is an important wolf habitat in the eastern Serbia, although the mining zone is not considered to be an area of particular importance for the Favourable Conservation Status in Serbia. The Brown Bear has the status of a 'strictly protected wild species'. The Homolje Mt region is currently an area of occasionally spotted and recorded presence of individuals of Brown Bear. The mining zone of the planned mine is not

considered to be of particular importance for the Favourable Conservation Status of this species in Serbia;

- Bat species: Schreibers' Bent-wing Bat (*Miniopterus schreibersii*), Common Noctule (*Nyctalus noctula*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*), Lesser Horseshoe Bat (*Rhinolophus hipposideros*), Savi's Pipistrelle (*Hypsugo savii*), Barbastelle Bat (*Barbastella barbastellus*), Greater Myotis (*Myotis myotis*), are found on the List of Appendix II of the Bern Convention. At the national level, they have the status of a 'strictly protected wild species'. Although the eastern Serbia region is an area of high diversity in the bat fauna, the very mining zone is not considered to be of particular importance for the Favourable Conservation Status of species in Serbia or the species endangerment factor;
 - The other mentioned rodent species do not have a special status neither under the provisions of the Bern Convention nor under the national legislation.
- Bird species mentioned in Question 2 and found on the list at the link in the Complaint do not match up to a great extent and many species mentioned in the text box are connected to major water surfaces and navigable waterways that do not exist in the Homolje Mt region. On the other hand, many common bird species found on the list, like the representatives of the crow family, are most numerous in Serbia; thus, their survival in Serbia as well as in the surrounding regions is not at all in question. Of course, among the most endangered species of the wider region are The Golden Eagle (*Aquila chrysaetos*) and The Peregrine Falcon (*Falco peregrinus*), although these species are not mentioned on the list at the link found in the Complaint, so that these species most probably have not been detected in the research area of the mining site. Local populations or parts of populations of all species in the region are potentially endangered, bearing in mind that many habitats used by these species will disappear should the mine is open. Specifically, the submitted list of 82 bird species, includes 6 endangered species at the national level: Partridge, Turtledove, Eagle Owl, The Short-toed Snake Eagle, Goshawk and The White-backed Woodpecker. In the category of vulnerable species (VU according to IUCN) are as follows: Partridge (*Perdix*), Turtledove (*Streptopelia turtur*) and The White-backed Woodpecker (*Dendrocopos leucotos*) and near threatened (NT according to IUCN) are Goshawk (*Accipiter gentilis*) and Eagle Owl (*Bubo bubo*) and The Short-toed Snake Eagle (*Circaetus gallicus*). Furthermore, caution should be exercised when analysing the threat of the abovementioned species, since not all of them are affected with the same intensity, and for some species it is not possible to compensate for the loss. First of all, we have in mind The Golden Eagle and The Peregrine Falcon in the wider region, with most weakened populations in the eastern Serbia, whose capacity for recovery is low. On the other hand, species like Partridge, The Eurasian Woodcock and Goshawk, beside being endangered hunting species, face, along with the loss of habitat, other challenges as well. All other species from the list mentioned in the Complaint are found in the Red Book of the Fauna in Serbia 3. Birds, and are marked as the last to worry about.

To Question No. 3: What might be the negative effects for the specie/s or habitat/s involved?, we would like to note as follows:

In the period from 2006 to present, the Institute issued numerous acts related to geological research and extraction of ore elements in the Homolje Mt region, in which, beside conditions for the protection and conservation of wild flora and fauna, conditions for the prevention of pollution of water, air and soil are mentioned.

To Question No. 4: Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, the answer is as follows:

Under the Habitats Directive are the following species:

- Species and habitat types mentioned in the Complaint No. 2 are of importance for the whole Homolje Mt region and for the whole of Serbia; however, not all mentioned types are found inside the research areas where geological research was carried out or is still carried out. The Institute had in mind these facts when issuing acts on conditions for nature conservation for geological research and activities in the Homolje Mt region;
- Gray Wolf (*Canis lupus*) and Brown Bear (*Ursus arctos*), Lynx (*Lynx lynx*) and The European Wildcat (*Felis silvestris*) - Annex II, IV; The European Pine Marten (*Martes martes*) - Annex V;
- Schreibers' Bent-wing Bat (*Mimiopterus schreibersii*), Common Noctule (*Nyctalus noctula*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*), Lesser Horseshoe Bat (*Rhinolophus hipposideros*), Savi's Pipistrelle (*Hypsugo savii*), Barbastelle Bat (*Barbastella barbastellus*), Greater Myotis (*Myotis myotis*) – Annex II, IV;
- Bird species found in Annex I of the Birds Directive and mentioned in the List are as follows: Hazel Grouse (*Bonasa bonasia*), Eagle Owl (*Bubo bubo*), The European Nightjar (*Caprimulgus europaeus*), The Short-toed Snake Eagle (*Circaetus gallicus*), The White-backed Woodpecker (*Dendrocopos leucotos*), The Black Woodpecker (*Dryocopus martius*), The Collared Flycatcher (*Ficedula albicollis*), The Red-backed Shrike (*Lanius collurio*), Middle Spotted Woodpecker (*Leiopicus medius*), Wood Lark (*Lullula arborea*), The European Honey Buzzard (*Pernis apivorus*), The Grey-headed Woodpecker (*Picus canus*) and Barred Warbler (*Sylvia nisoria*);
- Species under Annex II of the Bern Convention are as follows: *Accipiter gentilis*, *Accipiter nisus*, *Aegithalos caudatus*, *Anthus trivialis*, *Asio otus*, *Bubo bubo*, *Buteo buteo*, *Caprimulgus europaeus*, *Certhia brachydactyla*, *Circaetus gallicus*, *Dendrocopos leucotos*, *Dendrocopos major*, *Dryobates minor*, *Dryocopus martius*, *Erithacus rubecula*, *Falco subbuteo*, *Ficedula albicollis*, *Hirundo daurica*, *Hirundo rustica*, *Jynx torquilla*, *Lanius collurio*, *Leiopicus medius*, *Luscinia megarhynchos*, *Merops apiaster*, *Motacilla alba*, *Motacilla cinerea*, *Muscicapa striata*, *Oriolus oriolus*, *Otus scops*, *Parus ater*, *Parus caeruleus*, *Parus lugubris*, *Parus major*, *Parus palustris*, *Pernis apivorus*, *Phoenicurus ochruros*, *Phylloscopus collybita*, *Picus canus*, *Picus viridis*, *Regulus regulus*, *Saxicola rubetra*, *Sitta europaea*, *Strix aluco*, *Sylvia atricapilla*, *Sylvia borin*, *Sylvia communis*, *Sylvia curruca*, *Sylvia nisoria*, *Troglodytes troglodytes*;
- Under Annex III of the Bern Convention are as follows: *Bonasa bonasia*, *Corvus corax*, *Cuculus canorus*, *Fringilla coelebs*, *Lullula arborea*, *Passer montanus*, *Perdix perdix*, *Phasianus colchicus*, *Scolopax rusticola*, *Streptopelia turtur*, *Turdus merula*, *Turdus philomelos*, *Turdus viscivorus*.
- On the other hand, BirdLife International in collaboration with the Serbian partners in 2020 declared new Important Bird Areas (IBA) in Serbia, where IBA Homolje is found as well. The area is established due to the presence of the following species: The White-backed Woodpecker (*Dendrocopos leucotos*), The Black Woodpecker (*Dryocopus martius*), The Collared Flycatcher (*Ficedula albicollis*) The Red-breasted Flycatcher (*Ficedula parva*), The Grey-headed Woodpecker (*Picus canus*), Marsh Tit (*Poecile palustris*) and The Ural Owl (*Strix uralensis*). During the IPA 2016 Project: EU for Serbia - Continued support to implementation of Chapter 27 in the area of nature protection (NATURA 2000), this area was proposed as pSPA053 - Kučaj - Beljanica (surface area of 113,913 ha). Key bird species for determining a Special Protection Area are mentioned at: <https://daphne.sk/Natura2000Serbia/pspa053f.html>;

According to the Convention on Migratory Species of Wild Animals (Bonn Convention) in the Homolje Mt region, in Annex II, the following species are found: Schreibers' Bent-wing Bat (*Miniopterus schreibersii*), Common Noctule (*Nyctalus noctula*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*), Lesser Horseshoe Bat (*Rhinolophus hipposideros*), Savi's Pipistrelle (*Hypsugo savii*), Barbastelle Bat (*Barbastella barbastellus*) and Greater Myotis (*Myotis myotis*).

The Institute had in mind these facts when issuing acts on conditions for nature conservation for geological research in the Homolje Mt region.

Acting DIRECTOR
/s/ Marina Šibalić

Cc:

- The Applicant
- Archive x 2

Annex IV - Report by the Municipal Assembly of Bosilegrad



Republic of Serbia
MUNICIPALITY OF
BOSILEGRAD
Municipal Administration
**Municipal Environmental Protection
Administration**
Number: 501-39-2/2024
Date: 22.07.2024
BOSILEGRAD

Ministry of Environmental Protection
1 Omladinskih brigade St, SIV III
11070 Belgrade/Serbia
Ms Snežana PROKIĆ

Subject: Reply to Information Request

Dear Ms Prokić,

With reference to your document number: 001818484 2024 14850 004 008 000 001 of 09.07.2024 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:


Since the delivery of your Request for Information and our reply in the form of an official letter – Letter No. 501-39-1/2024 dated 18 January 2024, no changes have been identified thus far.

Furthermore, we would like to inform you that the Municipality of Bosilegrad has been conducting continuous surface water monitoring within its territory since 2021, including the Karamanica River. The testing is performed on the section of the River Karamanica 300 meters downstream from the Bosil-metal mine in the village of Karamanica. The results of the physical and chemical testing of all samples **comply** with the values specified by the Regulation on limit values of pollutants in surface and underground waters and sediment, as well as the deadlines for their achievement (“Official Gazette of the Republic of Serbia”, No. 50/2012). Additionally, the aforementioned testing results **comply** with the values prescribed by the Rulebook on hazardous substances in water (“Official Gazette of the Republic of Serbia”, No. 31/82) for water hazard classes WHC I and WHC II.

The results of all measurements can be found on the official website of the Bosilegrad municipality at the following link: <http://www.bosilegrad.org/sr/Monitoring.aspx>

Sincerely,

MUNICIPAL ENVIRONMENTAL
PROTECTION ADMINISTRATION
environmental advisor
Mikica Vasilev, MSc in Environmental
Engineering

СЛУЖБА
ЗАШТИТЕ ЖИВОТНЕ СРЕДИНЕ
заветник за послове животне средине

Микица Василев, диплинг. зкс

MAYOR OF BOSILEGRAD
Vladimir Zaharijev

ПРЕДСЕДНИК
ОПШТИНЕ БОСИЛЕГРАД


Владимир Захаријев

Annex V - Report by the Municipal Assembly of Žagubica

Republic of Serbia
MUNICIPALITY OF ŽAGUBICA
President of municipality
Number: IV-01-38-797/2024
Date: 26th June 2024
Žagubica

Rectangular stamp attached hereto:
The Administration for Joint Services of the
Republic Bodies
Records management office - 1033
Received on: 04 July 2024
the rest illegible

Republic of Serbia
MINISTRY OF ENVIRONMENTAL PROTECTION

11000 BELGRADE
Nemanjina 22-26

SUBJECT: Reply to your request for reporting on the Complaint number 2022/06, on monitoring possible negative impact of mining activities in the mountainous area of Homolje

Dear Sir/Madam,

As regards the request of the Ministry of Environmental Protection, number 001818484 2024 14850 004 008 000 001 of 03rd June 2024 (received on 14th June 2024), for reporting on the Complaint No. 2022/06, on monitoring possible negative impact of mining activities in the mountainous area of Homolje, we inform you of the following:

For a part of the area where mining activities are carried out in the territory of the municipality of Žagubica, the valid planning document is the Spatial Plan of the Municipality of Žagubica ("Official Gazette of the Municipality of Žagubica, No. 2/11), and geological exploration of mineral resources does not contradict the mentioned plan; and for a part of the area where mining activities are carried out in the territory of the municipality of Žagubica, the valid planning document is the General Regulation Plan for the area of wind farm "WF Crni Vrh" in the territory of the municipality of Žagubica ("Official Gazette of the Municipality of Žagubica", no. 26/21 and 27/21) and it does not stipulate any mining activities in the area covered by the plan.

Exploration works and exploitation of mineral resources are exclusively the responsibility of the state authorities (plans adoption, permits issuance, and similar).

On the subject of allegations from complaints about the possible negative impact of mining activities on the environment in the mountainous area of Homolje, the Municipality of Žagubica has no cognisance, i.e. the municipality of Žagubica has never done any studies, elaboration or similar regarding the threat to the environment in Homolje, nor has any report, study or similar ever been submitted to the municipality of Žagubica by any competent state authority.

Sincerely,

President of the municipality of Žagubica
Safet Pavlović
Signed, signature illegible

A round seal attached hereto: The Republic of Serbia, Žagubica, Municipality of Žagubica, Coat of Arms,
President



Republic of Serbia
Ministry of Environmental Protection
ENVIRONMENTAL PROTECTION AGENCY
Number: internal information purposes
Belgrade, 18.07.2024

Subject: Information on the state of water quality in the Karamanica and Popovska Rivers downstream of the “Podvirovi” and “Popovica” Mines, Karamanica Village, Municipality of Bosilegrad

- The Environmental Protection Agency, as an administrative body responsible for the implementation of national monitoring of the quality of surface and underground waters on the territory of the Republic of Serbia, does not conduct water quality testing of the waters of Karamanica and Popovska rivers downstream of the “Podvirovi” and “Popovica” mines, the territory of Karamanica village, Municipality of Bosilegrad. Additionally, these rivers are not included in the Regulation on Determining the Annual Water Status Monitoring Programme. Instead, the rivers belong to the basins of the Golema River, the Bistarska River and the Dragovištica River.
- The Environmental Protection Agency, concerning the aforementioned area, conducts **water quality testing of the Dragovištica River at Ribarce profile (border section of the Dragovištica River course)**. Water sampling and testing was carried out on a monthly basis in accordance with the Annual Water Status Monitoring Programme of surface and underground waters.
- The chemical analyses results of the content of heavy metals in the water of the Dragovištica River **in 2023 and 2024, respectively**, were compared with the prescribed limit values for the II class of surface water quality (*Regulation on limit values of pollutants in surface and underground waters and sediment, and the deadlines for their achievement, Official Gazette of the Republic of Serbia, No. 50/2012; Regulation on limit values of priority substances and priority hazardous substances polluting surface waters, and the deadlines for their achievement, Official Gazette of the Republic of Serbia, No. 24/2014*). Higher values were only identified regarding the **total iron content - Fe (III class): 612.0 µg/l** in 2023 (on the date 29.06.2023), while so far in 2024, the total iron content (Fe) has remained within the prescribed limits. Total heavy metal concentrations - zinc (Zn), copper (Cu), manganese (Mn), boron (B), chromium (Cr), arsenic (As), as well as concentrations of dissolved heavy metals - nickel (Ni), cadmium (Cd), mercury (Hg) and lead (Pb), were found to be within the prescribed limit values for the II class of surface water quality.

Addendum: Water quality data of the Dragovištica River in 2023 and 2024

E-mail: office@sepa.gov.rs
<http://www.sepa.gov.rs>

10a Žabljačka Str., 11000 Belgrade
Republic of Serbia

tel.: 011 63 56 788
fax: 011 2861077

- February 2024 -



**Republic of Serbia
MINISTRY OF
ENVIRONMENTAL PROTECTION**

No: 337-00-00058/2023-04

Date: 23/ 01/ 2024

Belgrade

**COUNCIL OF EUROPE
Directorate General of Democracy and Human Dignity
Secretariat of the Bern Convention
F-67075 Strasbourg, France
Mr Mikaël POUTIERS
Secretary of the Bern Convention**

Subject: The Progress Report on Complaint no. 2022/06: Complaint on stand-by: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje mountain region

Dear Mr Poutiers,

In reference of the request by the Secretariat of the Bern Convention dated 20 April 2023, related to the Complaint no: 2022/ 6: Complaint on stand-by: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje mountain region - collective complaint, submitted by the International non-government organisation Earth Thrive, association Eko-Krajište from Bosilegrad, Kings College Legal Clinic from the United Kingdom, Balkanka association from Bulgaria, Mlavaska Vojska environmental organisation, Čuvari Homolja association and the non-government organisation Earth Law Center, on behalf of the Ministry of Environmental Protection, we would like to inform you about the following:

Pursuant to the above mentioned request, the Ministry of Environmental Protection, in its capacity as the competent authority monitoring the implementation of the Bern Convention for the Republic of Serbia, sent a Request for Statement related to this complaint (no. 337-00-00058/2023-04 dated 11 May 2023) to competent authorities and institutions: Ministry of Construction, Transport and Infrastructure, Ministry of Mining and Energy, Institute for Nature Conservation of Serbia, Bosilegrad Municipal Assembly and Žagubica Municipal Assembly, including competent sectors of the Ministry of Environmental Protection.

Based on the received statements, the following is provided:

1 The Ministry of Mining and Energy in its Statement (no. 337-00-00068 dated 1 June 2023) noted as follows:

1) There are no issued authorisations for carrying out exploitation of mineral deposits in the mountainous area of Homolje.

2) In the territory of the Municipality of Bosilegrad, a business entity Bosil metal d.o.o. (LLC) is carrying out the exploitation of lead and zinc ore reserves pursuant to the following valid decisions: Decision on authorisation of exploitation activities (number: 310-02-00310/2021-02 dated 01 July 2022) and Decision on authorisation of mining operations (number: 310-02-00788/2009-06 dated 5 February 2010) in accordance with the Supplementary Mining Project for the exploitation from Podvirovi ore field - Karamanica. Other information in reference to the mentioned exploitation activity is provided in the previous statement of the Ministry of Mining number 310-02-01812/2022-02 dated 27 December 2022, which was presented in the previous Report of the Ministry of Environmental Protection dated 19 January 2023.

In the territory of Bosilegrad Municipality, the following business entities received authorisation to carry out applied geological research:

- Golden Age Resources d.o.o. (LLC), exploration site Crnoštica, research of Au, Ag, Cu, Pb, Zn;
- Golden Age Resources d.o.o. (LLC), exploration site Ljubata, research of Cu, Au, Pb, Zn, Ag;
- Golden Age Resources d.o.o. (LLC), exploration site Rađovnica, research of Cu, Au, Pb, Zn and Mo; Municipalities of Trgovište, Bosilegrad, Vranje;
- Grot a.d. (Ltd), Kriva Feja, exploration site Ploča, research of Pb and Zn;
- Medgold istraživanja d.o.o. (LLC), Belgrade, exploration site Donje Tlamino, research of Au, Pb, Zn, Ag, Cu and Mo;
- Medgold istraživanja d.o.o. (LLC), Belgrade, exploration site Surlica – Dukat, research of Cu, Au, Pb, Zn, Ag and Mo, Municipalities of Trgovište and Bosilegrad.

3) The Ministry of Mining and Energy carried out the inspection for the area of Bosilegrad, the mining inspector carried out an extraordinary inspection of the supervised business entity Bosil metal d.o.o. (LLC) on the exploitation field number 515 - Podvirovi.

On that occasion, two measures were imposed on the business entity with the aim of eliminating illegality:

- 1) It is prohibited to carry out mining operations of the Pilot plant for technological testing of flotation processing of lead, zinc and copper ore, on exploitation field No. 515 — Podvirovi.
- 2) It is prohibited to dispose of intermediate products which are the result of the flotation process of lead, copper and copper ore outside the limits of the approved exploitation field No. 515 — Podvirovi.

2 The Ministry of Environmental Protection carries out activities within the scope of the assessment and strategic assessment of environmental impact as follows:

In accordance with Article 14 of the Law on Environmental Protection, the Ministry of Environmental Protection adopted a Decision (number 353-02-2039/2021-03 dated 26 November 2021), determining the scope and content of the Environmental Impact Assessment Study of the project of exploitation of Pb, Zn and Cu ore from the “Podvirovi” and “Popovica” deposits in the Karamanica area near Bosilegrad (including the ore processing plant and flotation tailing dump), which forms an integral part of the accompanying documentation submitted to the Ministry of Mining and Energy together with the Exploitation Approval Request.

Based on the issued Decision which determined the scope and content of the Environmental Impact Assessment Study of the sites “Podvirovi” and “Popovica” in the Karamanica area near Bosilegrad, the Impact Assessment Study was not submitted to the Ministry of Environmental Protection for the purpose of granting consent to the same.

In accordance with the decisions of the Joint Commission for Environmental Protection Cooperation set up pursuant to the Memorandum of Understanding between the Ministry of Environmental Protection of the Republic of Serbia and the Ministry of Environmental Protection and Water of the Republic of Bulgaria on cooperation in the field of environment protection as well as the Biannual Implementation Programme of the Memorandum, a working meeting of Serbian and Bulgarian experts was scheduled to take place in Sofia (Republic of Bulgaria) on **26 January 2023** in the field of environmental impact assessment and the strategic environmental impact assessment, including the readiness to participate in the cross-border EIA procedure (environmental impact assessment) for a new project Bosil-metal, Bosilegrad for the purpose of monitoring possible impact of activities on the environment in potentially affected areas, according to the opinions of the Bulgarian institutions and the interested public.

The meeting was cancelled due to the unforeseen circumstances on the part of the Bulgarian party, with understanding and possibility of rescheduling the meeting in the coming period.

Bearing in mind that two parties did not hold meetings during 2023, the Serbian party sent an e-mail to the Bulgarian party on 13 December 2023 and expressed its interest in the continuation of activities on the implementation of the Memorandum of Understanding between the Ministry of Environmental Protection of the Republic of Serbia and the Ministry of Environmental Protection and Water of the Republic of Bulgaria on cooperation in the field of environment protection. The Bulgarian party responded to the Serbian party that in the following period they would submit a proposal for a two-year work plan of the Joint Commission.

3. The Ministry of Construction, Transport and Infrastructure, in Statement No. 350-02-1195/2023-07 of 6 February 2024, as well as in the Statement dated January 2023, stated that the Government of the Republic of Serbia passed a Decision on the Spatial Plan of the special purpose area of gold exploitation in the exploration area "Potaj Čuka – Tisnica" (Official Gazette RS, No. 64/2021).

4 The Institute for Nature Conservation of Serbia submitted the Statement (03 number: 025-1836/2 dated 11 July 2023), in which it asserted that the Institute did not have additional facts in relation to the prior Statement 03 number 025-4042/2 dated 28 December 2022, which was submitted as part of the documentation of the previous report of the Ministry of Environmental Protection.

5 The Municipality of Žagubica submitted its Statement number III-03-351-157/2023 dated 6 June 2023, which asserted that the geological research of mineral deposits at the location in question is not in contradiction to the Spatial Plan of the municipality of Žagubica ("Official Gazette of Žagubica Municipality", No. 2/11).

6 The Municipality of Bosilegrad submitted its Statement number 501-39-1/2024 dated 18 January 2024 which states that the Spatial Plan of the Municipality of Bosilegrad ("Official Gazette of the Municipality of Bosilegrad", No. 8/2013) does not define the area for expanding the exploitation and construction of flotation in the area of the Karamanica mine. Accordingly, it is necessary to carry out new spatial and urban planning for this purpose in accordance with the Law on Planning and Construction.

Based on the above stated, the Bosilegrad Municipal Assembly adopted a Decision on the conditions for the research and exploitation of mineral deposits in the territory of Bosilegrad Municipality ("Official Gazette of the Municipality of Bosilegrad", number 18/21), in which it stated that the research and exploitation of mineral deposits in the territory of the Bosilegrad Municipality may be carried out with the preparation of appropriate planning documents according to the Law on Planning and Construction and the Law on Mining.

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

Whilst looking forward to your response, we wish to thank the Bureau in advance for their thorough consideration of this report.

Sincerely,

MINISTER

Irena Vujović

Annex I – Report by the Ministry of Mining and Energy

Annex II - Report by the Ministry of Construction, Transport and Infrastructure

Annex III Report by the Municipality Bosilegrad

Annex IV Report by the Municipality Zagubica

Annex V Report by the Institute of Environmental Conservation

Annex I – Report by the Ministry of Mining and Energy



**Republic of Serbia
MINISTRY OF MINING AND ENERGY**

Number: 337-00-00068/2023-01

Date: 01/06/2023

MINISTRY OF ENVIRONMENTAL PROTECTION

2 Mihajla Pupina Blvd.
11070 Belgrade

To Whom It May Concern,

On 11/05/2023, you informed the Ministry of Mining and Energy with the letter No. 337-00-0058/2023-04 that the Non-Government Organisation “Earth Thrive”, in cooperation with other associations lodged two complaints concerning the negative impact of mining activities in Bosilegrad and the mountainous area of Homolje.

Upon inspecting the official records, it was established that the Ministry, with the letter No. 310-02-01812/2022-02 from 27 December 2022, submitted the required report on issued approvals on requested locations in accordance with the letter of your Ministry.

In accordance with you latest letter, we are sending you a supplementary report.

1. On the territory of the Municipality of Bosilegrad, a business entity Bosil metal LLC is carrying out the exploitation of lead and zinc ore reserves while there are no issued approvals for the exploitation of mineral reserves in the mountainous area of Homolje.
2. In the territory of Bosilegrad Municipality, the following business entities have permission to carry out applied geological research:
 - Golden Age Resources d.o.o. (LLC), exploration site Crnoštica, research of Au, Ag, Cu, Pb, Zn;
 - Golden Age Resources d.o.o. (LLC), exploration site Ljubata, research of Cu, Au, Pb, Zn, Ag;
 - Golden Age Resources d.o.o. (LLC), exploration site Radovnica, research of Cu, Au, Pb, Zn, Mo; Municipality of Trgovište, Bosilegrad, Vranje;
 - Grot a.d. (Ltd), Kriva Feja, exploration site Ploča, research of Pb, Zn;
 - Medgold istraživanja d.o.o. (LLC), Belgrade, exploration site Donje Tlamino, research of Au, Pb, Zn, Ag, Cu, Mo;
 - Medgold istraživanja d.o.o. (LLC), Belgrade, exploration site Surlica – Dukat, research of Cu, Au, Pb, Zn, Ag, Mo, Municipality of Trgovište, Bosilegrad.

With the previous letter No. 310-02-01812/2022-02 from 27 December 2022, we informed you of the issued approvals for carrying out geological research in the mountainous area of Homolje.

3. In terms of the inspection supervision on requested locations, we inform you as follows:

On the site of Homolje, in the "Potaj čuka - Tisnica" exploration area, the geological inspector of the Republic of Serbia carried out a regular inspection on 06 December 2021. At the time of the inspection, no illegalities or irregularities were identified that would require the imposition of measures to correct them. A new regular inspection supervision is planned in the Annual Plan for 2023.

For the area of Bosilegrad, the mining inspector carried out an extraordinary inspection of the supervised business entity Bosil metal LLC on the exploitation field number 515 - Podvirovi.

Pursuant to the minutes, two measures were imposed on the business entity with the aim of eliminating illegality:

1. It is prohibited to carry out mining works of the Pilot plant for technological testing of flotation processing of lead, zinc and copper ore, on exploitation field No. 515 — Podvirovi.
2. It is prohibited to dispose of intermediate products which are the result of the flotation process of lead, copper and copper ore outside the limits of the approved exploitation field No. 515 — Podvirovi.

Yours sincerely,

MINISTER

Dubravka Đedović

Delivered to:

- The addressee;
- The Archives.

Annex II - Report by the Ministry of Construction, Transport and Infrastructure

**MINISTRY OF
CONSTRUCTION, TRANSPORT
AND INFRASTRUCTURE**

**Department for Spatial and Urban
Planning**

No: 350-02-1195/2023-07

Date: 6 February 2024

10a Kralja Milutina St
Belgrade

MINISTRY OF ENVIRONMENTAL PROTECTION

1 Omladinskih brigada St
11070 Novi Beograd

To Whom it May Concern,

This letter is to inform you that we have received your letter No. 337-00-00058/2/2023-04 dated 10 January 2024 requesting the delivery of the Scope of Work Report pertaining to the “Complaint No. 2022/06: Complaint on stand-by: Serbia: Possible negative impact of mining activities in Bosilegrad and in the Homolje Mt region”. With reference to the aforesaid and in accordance with the competencies of the Department for Spatial and Urban Planning, the Ministry of Construction, Transport and Infrastructure, we hereby inform you that the Government of the Republic of Serbia adopted a Decision on drafting the Spatial plan of the special purpose area of gold exploitation in the exploration area “Potaj Čuka – Tisnica” (Official Gazette RS, No. 64/2021).

Sincerely,

STATE SECRETARY

Aleksandra Sofronijević
As per Minister`s Authorisation
No. 000159170 2024 14810 010 006 000 001
of 29 January 2024

Annex III Report by the Municipality Bosilegrad

Republic of Serbia
MUNICIPALITY BOSILEGRAD
Municipal administration
Environmental protection service
Number: 501-39-1/2024
18.01.2024.
BOSILEGRAD

Ministry of environmental protection
Omladinskih brigada 1, SIV III
11070 New Belgrade/Serbia

Dear Sir/Madam,

Regarding your file number: 337-00-00058/2/2023-04 from 10.04.2024. in which you have requested a statement on a complaint number: 2022/06 related to a possible negative impact of mining activities in Bosilegrad, we inform you that:

Spatial Plan of municipality Bosilegrad with Environmental Impact Assessment (EIA) with textual and graphic documentation can be found on the official website of a Central register of planning documents within a Ministry of Construction, Transport and Infrastructure, an official website of municipality Bosilegrad and („Official Gazette of the City of the Vranje”, No. 8/2013).

In the existing Spatial Plan of municipality Bosilegrad, an area around the existing mine Karamanica is marked as a metal deposit, but within it, there is no specifically defined area for expansion of exploitation and flotation construction. For this matter it is necessary to conduct a new spatial and urbanistic planning according to Law on planning and construction.

For this reason, Assembly of municipality of Bosilegrad has made a Decision on conditions for research and exploitation of mineral raw materials on a territory of a municipality Bosilegrad („Official Gazette of the City of the Vranje”, No. 18/21). In this decision it is said that Research and exploitation of mineral raw materials on a territory of a municipality Bosilegrad can be conducted with the preparation of appropriate planning documents according to Law on planning and construction and Law on mining.

Sincerely,

Environmental protection service,
municipal administration,
Advisor for environmental affairs,
Mikica Vasilev

Head of the
Miodrag Jakimov

Annev IV Report by the Municipality Zagubica

Republic of Serbia
MUNICIPALITY OF ŽAGUBICA
Municipality Administration
Department for Economy and Economic
Development
Number: III-03-351-157/2023
Date:06/06/2023
Žagubica

Republic of Serbia
MINISTRY OF ENVIRONMENTAL PROTECTION
11070 NEW BELGRADE
1 Omladinskih brigada Street, SIV III

Subject: Response to your Request for reporting on Complaint No. 2022/06, on monitoring the possible negative impact of mining activities in the mountainous area of Homolje.

To Whom It May Concern,

With reference to the request of the Ministry of Environmental Protection, No. 337-00-00058/2023-04 from 11 May 2023, for reporting on Complaint No. 2022/06, regarding the negative impact of mining activities in the mountainous area of Homolje, we inform you of the following:

According to the spatial plan of the municipality of Žagubica ("Official Gazette of Žagubica Municipality ", No. 2/11), at the location of the planned mining activities, the geological research of mineral resources is not in contradiction to the said plan, while the exploitation of mineral resources is in the competence of the state authorities (adopting plans, issuing permits, etc.).

In reference to the allegations included in the complaints about the possible negative impact of mining activities in the mountainous area of Homolje on rare fauna and flora species, which may be affected by mining activities at the location in question, the Municipality of Žagubica has no knowledge, i.e. the Municipality of Žagubica has never done any studies, research and similar analysis regarding the rare flora and fauna species in Homolje. In addition, no report, study or similar document by any competent state authority have ever been delivered to the Municipality of Žagubica.

Yours sincerely,

Head of the Department
Radiša Milošević
(*Illegible signature*)

*Round seal of the Department for Economy and Economic Development
of the Municipality of Žagubica affixed hereto.*

Annex V Report by the Institute of Environmental Conservation

03 No. 025-1836/2
**INSTITUTE FOR NATURE CONSERVATION
OF SERBIA**
11.07.2023.
New Belgrade

INSTITUTE FOR NATURE CONSERVATION

Japanska 35, 11070

www.zzps.rs

MINISTRY OF ENVIRONMENTAL PROTECTION

Omladinskih brigada 1
11070 NEW BELGRADE

Your number: 337-00-00058/2023-04 from 11.05.2023.

Subject: The Statement regarding the „Complaint Number 2022/06 : Complaint on stand-by: Republic of Serbia: The possible negative impact of mining activities in Bosilegrad and the mountain region of Homolje”

You submitted a request to the Institute for Nature Conservation of Serbia, registered in the Institute under 03. Number 025-1836/1 from the 19.05.2023., for the Statement regarding the Complaint (which was submitted by the International non-governmental organisation „Earth Thrive“, together with the co-complainants: Assosiation „Eko-Krajište“ from Bosilegrad, Kings College Legal Clinic from London (UK), „Balkanka” Association from Sofia (Bulgaria), the non-governmental organization „Mlavaska vojska” and „Čuvari Homolja” (Serbia) and international non-governmental organisation „Earth Law Center” from the United States of America number: 2022/06: „Complaint on stand-by: Republic of Serbia: The possible negative impact of mining activities in Bosilegrad and mountain region of Homolje”.

Regarding the request of the Bureau of the Bern Convention in the Council of Europe, due to consideration of the Report from the Republic of Serbia about the Complaint number: 2022/06, We inform you that the Institute does not have any additional stating facts in regards to the Statement 03 num. 025-404/2 from 28.12.2022., which We delivered on the 13.01.2023.

DIRECTOR'S VD
Marina Šibalić

Attachement:

-The Copy of the Statement 03 num. 025-404/2 from 28.12.2022.

Delivered to:

-Submitter of the request

- Archive