



Strasbourg, 15 February 2024

T-PVS/Files(2024)44

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

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**Standing Committee**

44<sup>th</sup> meeting  
Strasbourg, 2-6 December 2024

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**Bureau of the Standing Committee**

10-12 September 2024  
Strasbourg

**New complaint: 2022/08**

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

**-GOVERNMENT REPORT-**

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

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**Republic of Serbia**  
**MINISTRY OF**  
**ENVIRONMENTAL PROTECTION**  
No.: 001818377 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. 2022/08: New Complaint: Serbia: Possible negative impact of mining activities in Mountain Baba**

Dear Mr. Poutiers,

In regard to the request of the Secretariat of the Bern Convention of 6 October 2023, concerning **Complaint No. 2022/08: New Complaint: Serbia: Possible negative impact of mining activities in Mountain Baba**, 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 and to the Municipal Assembly of Paraćin, including the competent sectors of the Ministry of Environmental Protection.

**Pursuant to the obtained statements of the previously mentioned bodies and organisations (please find enclosed the translated copies), in relation to Complaint concerning the possible negative impact of mining activities in Mountain Baba, we would like to inform you of the following:**

1. **Quarry ‘Lešje’ of the economic operator JSC Kruševac put a.d. Kruševac** – Ministry of Environmental Protection adopted in 2019 the **Decision on approval of the Environmental Impact Study of the project for exploitation of limestone as technical and building stone at the open-cast mine ‘Lešje’**, to which Conditions for nature conservation issued by the Institute for Nature Conservation of Serbia were enclosed.

JSC Kruševac put a.d. has the **approval of the Ministry of Mining and Energy for the exploitation of mineral resources** – limestone in the deposit ‘Lešje’.

**The Mining Inspection** of the Ministry of Mining and Energy performed inspection supervision of the supervised economic operator, Kruševac put a.d., whereby **two measures were ordered**, that: The supervised entity is required to appoint two persons for performing expert supervision in the exploitation area No. 616-Lešje, and to develop blasting logs in accordance with the applicable mining regulations.

*The Republic Environmental Inspector of the Ministry of Environmental Protection carried out in July 2022 non-routine inspection supervision at the Lešje Quarry site and adopted again the **Decision on the prohibition of exploitation of limestone in the open-cast mine 'Lešje' on cadastral parcel No. 108/1 in the territory of the Cadastral Municipality KO Plana in the Municipality of Paraćin in September 2022**, until the conditions from the Decision on the approval of the Environmental Impact Study are met and the measures carried out.*

*Company Kruševac put a.d., Kruševac, filed an appeal in October 2022 to a second-instance body on the decision adopted by the Republic Environmental Inspector. The appeal consideration procedure conducted by the second-instance body of the Ministry of Environmental Protection is underway, and until a final decision is adopted by the second- instance body, the execution of the abovementioned decision of the Republic Environmental Inspector is postponed.*

*In accordance with the abovementioned, the Quarry 'Lešje' is active, and the Republic Environmental Inspection shall continue, after the adoption of the final decision by the second- instance body, the procedure of execution of the decision from September 2022.*

## **2. Quarry 'Krajnji Rid' of the economic operator Transkop eksport-import DO Paraćin**

– The Ministry of Environmental Protection adopted in 2020 the **Decision on approval of the Environmental Impact Study of the project for exploitation of limestone as technical and building stone at the open-cast mine 'Krajnji Rid'**, on cadastral parcels Nos. 793/1, 793/2 and 793/3.

The economic operator Transkop eksport-import has the **approval of the Ministry of Mining and Energy for the exploitation of mineral resources** – limestone in the deposit 'Krajnji Rid'.

*In the area of the open-cast mine 'Krajnji Rid', the Republic Environmental Inspection performs regular inspection supervision. The last inspection supervision was carried out in October 2023, for the purpose of controlling the actions in regard of previously imposed administrative measures related to the order to perform two air quality control measurements from 2023 in the Quarry 'Krajnji Rid' impact area, in accordance with the prescribed measures for environmental protection under the updated Environmental Impact Study of the project for exploitation of limestone as technical and building stone at the open-cast mine 'Krajnji Rid', on cadastral parcels Nos. 793/1, 793/2, 793/3, 793/4, 793/5, 793/6 and 793/7, Cadastral Municipality Klačevica in the territory of the Municipality of Paraćin, for which the Ministry of Environmental Protection adopted the Decision on approval in 2020.*

*On that occasion it was established that the **supervised economic operator acted in accordance with the ordered administrative decision, i.e. that it carried out through an authorised legal person two air quality control measurements in 2023, in the Quarry 'Krajnji Rid' impact area.***

**The Republic Environmental Inspection plans to carry out regular inspection supervision in Q3 2024** with the economic operator Transkopeksport-import DOO Paraćin at the active Quarry 'Krajnji Rid' site.

3. **Quarry 'Srpska fabrika stakla'** – Company Srpska fabrika stakla, Paraćin, began exploitation in 1983. This Company has the **approval of the Ministry of Mining and Energy for the exploitation of mineral resources** – limestone in the deposit 'Plana'. However, this plant was bankrupt until the end of 2022, after which it was sold. During the bankrupt period, minimum discontinuous operation was maintained. After sale in March 2023, the bigger furnace was shut down, and in March 2024 the smaller furnace was shut down as well; since then, **there has been no production activity** in the factory, which has been established during the inspection supervision carried out by the Republic Environmental Inspection. Furthermore, it has been established that in the last three years there was no blasting, or exploitation of limestone in the quarry, but only a crushing plant worked from time to time for crushing and grinding of already excavated limestone quantity, in order to keep production to a minimum.

We would like to inform you that the Republic Environmental Inspection, in the presence of the representatives of the Institute for Nature Conservation of Serbia, in March 2023, made a tour of part of the area of Mountain Baba, acting on a petition of the Citizens' Association 'Odbranimo planinu Babu' (Let's Defend Mountain Baba). The petition related to the 'killing of protected and strictly protected fauna species due to the impact of the Quarry, i.e. open-cast mine 'Lešje', and founding remains of dead animals'. The Expert of the Institute for Nature Conservation of Serbia established that in the mentioned

area dry meadows formed on carbonate soils are found, and that on the mentioned mountain there are no special habitats of strictly protected and protected wild fauna species.

We have been informed by the Ministry of Mining and Energy that the said Ministry has also issued an **approval for geological exploration** to Edelweiss Mineral Exploration d.o.o. Beograd (exploration of copper, gold and an accompanying elements association in the exploration field Donja Mutnica) and Kruevacput a.d. (exploration of limestone in the exploration field Leñe).

**The Institute for Nature Conservation of Serbia** has stated that, on the basis of an inspection of the Central Register of Protected Natural Assets and the Institute's documentation, it **does not have any new data** relative to the declaration which was submitted as a part of the documentation with the previous Report of the Ministry of Environmental Protection, i.e., it does not have any new data on the distribution and status of the existing or new recorded wild species and habitat types in the said area.

We have been officially notified by the Ministry of Construction, Transport and Infrastructure that, in accordance with the Law on Planning and Construction, a Spatial Plan of the Special Purpose Area is developed for areas that require a specific organizational, usage, and protection regime, the projects of importance for the Republic of Serbia, as well as for areas designated by the Spatial Plan of the Republic of Serbia, or other spatial plan, as areas that require development of the Spatial Plan of the Special Purpose Area. This particularly includes areas with potential mineral resource exploitation. **Given that there are no new Approvals for exploitation of mineral resources, the Spatial Plan of the Special Purpose Area for the Exploitation on Baba Mountain is not being developed at present, nor has any official Decision been made regarding the development of such a Plan.**

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 1

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

**No. 337-00-00049/1/2023-04**

**Date: 18 December 2023**

**Nemanjina 22-26, Beograd**

**MINISTRY OF ENVIRONMENTAL PROTECTION**

11070 Beograd  
Omladinskih brigada

**Subject: Reply to the Request for a report concerning the Appeal No. 2028/08 :New  
Appeal: Serbia: Possible negative impact of mining activities on the Baba Mountain**

To Whom It May Concern,

As regards your letter sent on 17 November 2023, from the scope of the Department for Spatial and Urban Planning within the Ministry of Construction, Transport and Infrastructure, we would like to hereby inform you of the following:

Pursuant to Article 21, point 2) of the Law on Planning and Construction (*Official Gazette of the Republic of Serbia*, Nos. 72/2009, 81/2009 – corr., 64/2010 – CC decision, 24/2011, 121/2012, 42/2013 – CC decision, 50/2013 – CC decision, 98/2013 – CC decision, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 – as amended, 9/2020, 52/2021 and 62/2023) (hereinafter: Law): a Spatial Plan of the Special Purpose Area shall be adopted for areas which require a special regime for arranging spatial regulation, exploitation and protection, projects of importance for the Republic of Serbia, or areas designated in the Spatial Plan of the Republic of Serbia or another spatial plan, and in particular for:

2) areas where exploitation of mineral substances is possible;

**In accordance with the above, the Spatial Plan of the Special Purpose Area for Exploitation of the Baba Mountain is not in development; the Decision on the development of such a Plan has not been adopted; and, accordingly, it is not to be found in the Ministry of Construction, Transport and Infrastructure.**

**The Decision on the approval of the exploitation of mineral substances shall be issued by the Ministry of Mining and Energy on the basis of the Law on Mining and Geological Research (*Official Gazette of the Republic of Serbia*, Nos. 101/2015, 95/2018 and 40/21).**

Sincerely,

MINISTER

Goran Vesić

ANNEX 2



**Republic of Serbia**

**MINISTRY OF MINING AND ENERGY**

No.: 001930740 2024 14820 007 000 000 001

Date: 24 July 2024

**MINISTRY OF ENVIRONMENTAL PROTECTION**

Irena Vujović, Deputy Prime Minister and Minister of Environmental Protection

Nemanjina 22-26,  
11000 Belgrade

Dear Ms. Vujović,

In reference to your request No.: 001818377 2024 14850 004 008 000 001 of 5 June 2024, for submission of an updated report of the Ministry of Mining and Energy concerning Complaint No. 2022/08: New Complaint: Serbia: Possible negative impact of mining activities in Mountain Baba, we would like to inform you of the following:

By inspecting the official record, it has been established that the Ministry of Mining and Energy submitted with its letters No.: 310-02-01027/2023-02 of 2 June 2023 and 000423749 2023 14820 002 000 000 001 of 5 January 2024, a report in accordance with this subject and the request of your Ministry. As we have informed you in the report in question: 'We have not received the coordinates of the requested site in your request, since the site was characterised as on 'Mountain Baba'. The Ministry can provide you with more precise information after obtaining the coordinates of the respective site'.

As far as the mining activities in Mountain Baba are concerned, we would like to inform you that the following approvals have been issued from the scope of work of the Ministry of Mining and Energy:

1. With regard to the exploitation of mineral resources in the respective area, we would like to inform you of the following:

- JSC Kruševac put a.d. has the approval for the exploitation of mineral resource: Limestone in deposit Lešje;
- LLC Transkop eksport-import d.o.o., Paraćin, has the approval for the exploitation of mineral resource: Limestone in the deposit 'Krajnji Rid';
- Company SRPSKA FABRIKA STAKLA DOO PARAĆIN has the approval for the exploitation of mineral resource: Limestone in the deposit 'Plana'.

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

JSC Kruševac put a.d. — 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: That the supervised entity is required to appoint two persons for performing expert supervision in the exploitation area No. 616-Lešje; and to develop blasting logs in accordance with the applicable mining regulations.

Sincerely yours,

MINISTER

/s/ Dubravka Djedović Handanović

Delivered to:

- Addressee;
- Archive.

## Annex 3

INSTITUTE FOR NATURE  
CONSERVATION OF SERBIA

03 No. 025-2355/

**MINISTRY OF ENVIRONMENTAL PROTECTION**Omladinskih brigada no. I  
11070 Novi Beograd*Your reference: 001818377 2024 14850 004 008 000 001 of 5 June 2024*

The Institute for Nature Conservation of Serbia received your request registered under 03 no. 025-2355/1 of 14 June 2024 for the supplement to the report on progress on the Complaint No. 2022/08: „*New Complaint: Possible negative impact of mining activities on Baba mountain*“.

With reference to your request related to the text of the Decision of the Bureau of the Bern Convention in the Council of Europe regarding the Complaint number: 2022/08 of 6 October 2023, 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 the of mining activities on Baba mountain, we would like to inform you of the following:

- 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 on 25 July 2023 (Case-file 03 No. 025-1174/2; Your Ref. No.: 337-00-00049/2023-04 of 8 May 2023);
- In its own data base, 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 conducted any research or monitoring of wild species and habitat types under Annexes II and III of the Bern Convention in the mentioned areas where mining activities are carried out.

Based on 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.

HEAD OF LEGAL, PERSONNEL  
AND GENERAL AFFAIRS

Goran Drmanović

as per Decision 02 No. 012-1 164/6 of  
24 July 2024



Attachment:

- Answer to the Complaint no. 2022/08: „*New Complaint: Possible negative impact of mining activities on Baba mountain*“ (03 no. 025-1174/2 of 25 July 2023; Your Ref. no: 337-00-00049/2023-04 of 8 May 2023)

Cc:

- The Applicant  
- Archive