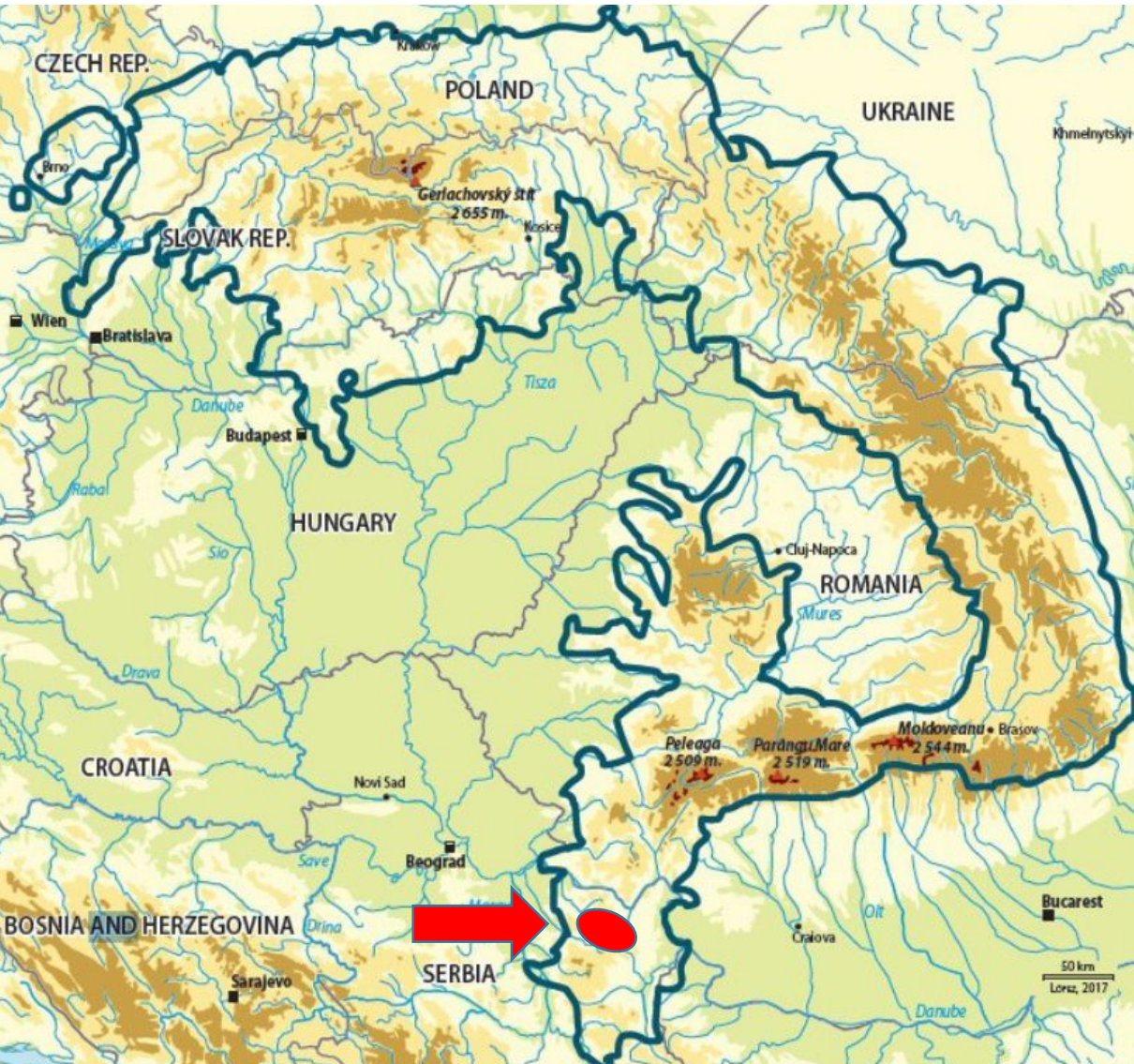


The Nature of Homolje: current and potential future impacts of the Dundee Precious Metals (DPM) mining activities



Homolje: geographical location



Homolje is situated in Eastern Serbia.

It is part of the **Carpathian Mountains**, therefore (nominally) **protected under the Carpathian Convention**

Homolje is one of the few Serbia's **wilderness area** and one of the **top biodiversity hotspots**

143 protected species (57 from the Bern Convention)

(source: Database of the Faculty of Biology, University of Belgrade)

**81 species of birds (74 from the Bern Convention)
out of which 79 are nesting birds**

(source: *Bird protection and study society of Serbia* field work)

**42 Habitat Directive,
7 Bonn Convention,
7 CITES
31 Birds Directive**



Falco peregrinus



Lutra lutra



Eurasian Lynx

Habitats (marine version 2022 & terrestrial version 2021)

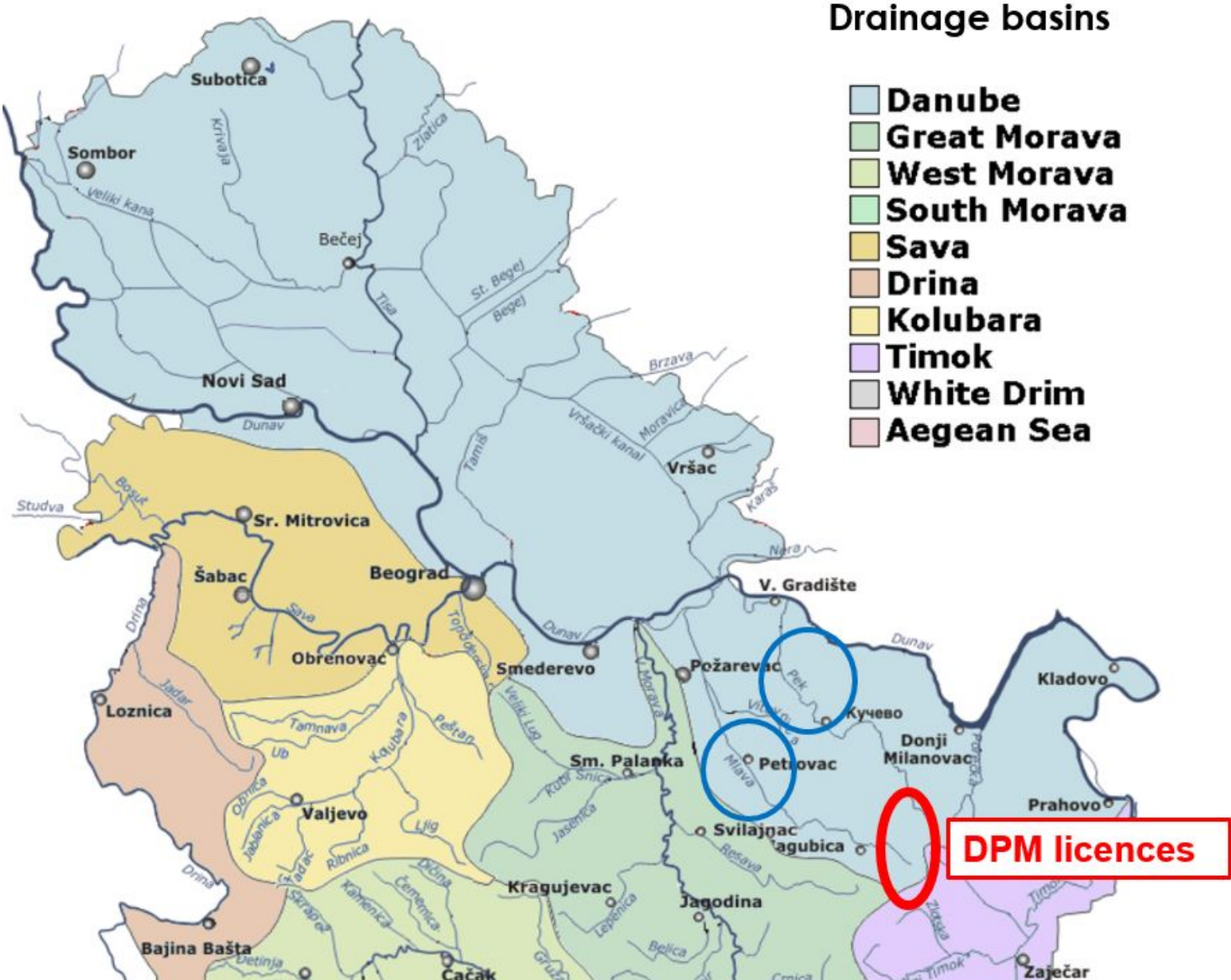
T1962 - Helleno-Moesian Quercus frainetto forests,
T19641 - Helleno-Moesian Quercus petraea forests,
T1E1C3 - Moesian oak-hornbeam forests,
T1E322 - Dacio-Moesian hornbeam forests,
T1F621 - Moesian Fagus-ash-sycamore ravine forests,
T1F622 - Moesian horse-chestnut ravine forests,
U29 - Eastern Mediterranean base-rich scree,
U3322 - Carpatho-Balkano-Rhodopide campion siliceous cliffs,
U3711 - Helleno-Balkan calcicolous chasmophyte communities wetlands, ponds, gorges, and underground springs.

Outstanding karst geomorphology, rich in gorges, caves, karst bridges, and tufa accumulations (biodiversity ecosystems)



Part of the Danube basin (upper catchment area of rivers Mlava and Pek are in the area of the DPM's projects)

Serbia is a signatory of the Danube River Protection Convention



Rich in surface and groundwater, it hosts **three hydrogeological protected sites** 'of extraordinary national importance': **Mlava River Spring, Krupaja River Spring and Homolje intermittent spring.**

Krupaja Spring



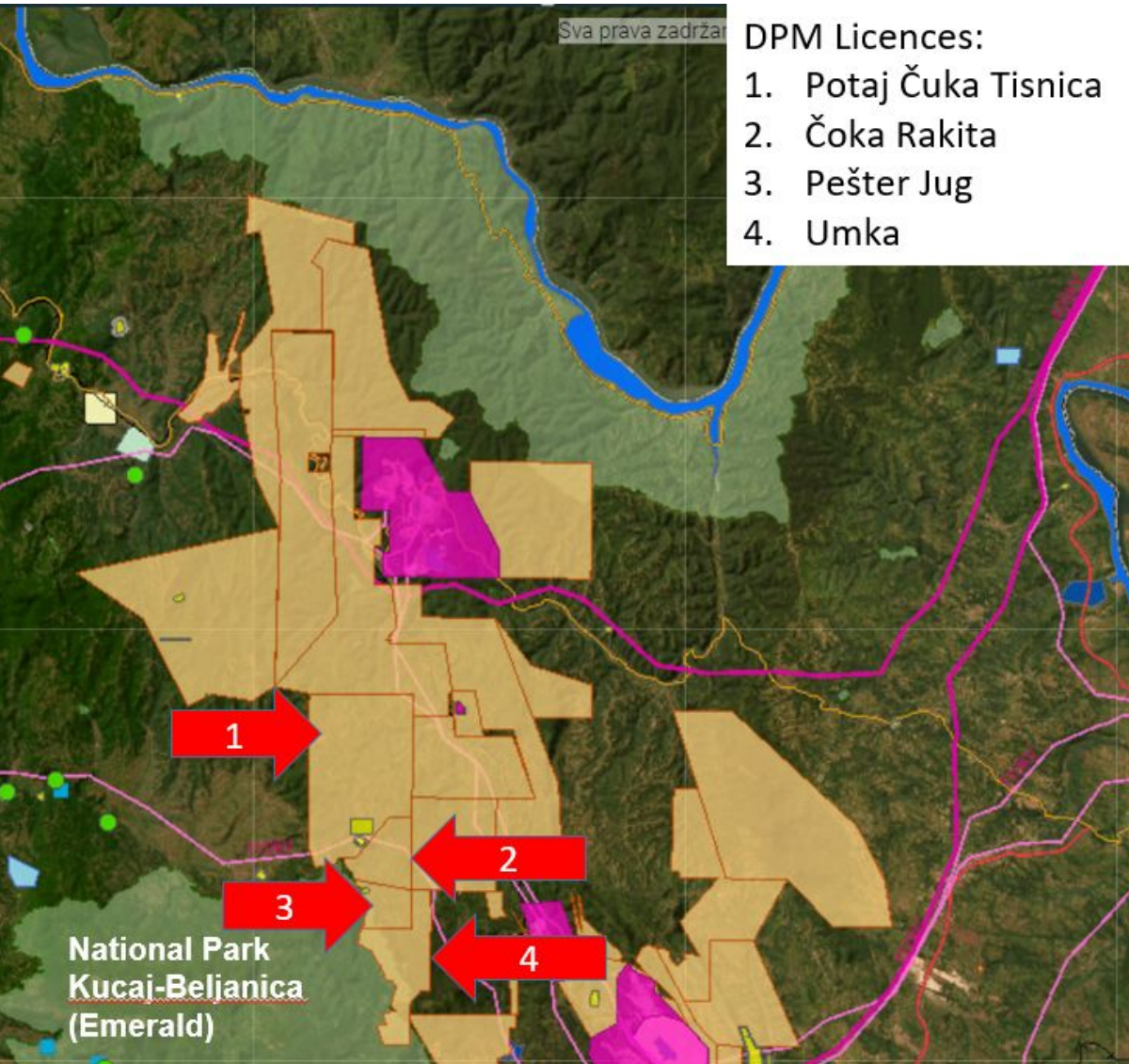
Mlava Spring



Homolje Intermittent spring



DPM in Homolje: present since 2004/5



Repeated re-issuing of **exploration rights** resulted in approx. **1500 drill holes** in Homolje.

Currently, there are **two projects**:

1. **Timok project (on Potaj Čuka – Tisnica licence)** – in the phase of Feasibility Study, but on hold.

2. **Čoka Rakita project (on Čoka Rakita licence)** – exploration phase; PEA published in June 2024

Consequences of the exploration drilling:

1. Drilling platform **soil and vegetation destruction** – regular DPM practice; **top soil not replaced in breach of Serbian legislation**



Consequences of the exploration drilling

2. **Drill holes not closed properly and leaking** (number of cases like this still to be established)



Slika 4. Zagađenje izazvano geološkim istraživanjima, maj 2022. (foto: Marko Ščiban)

Consequences of the exploration drilling

3. **Discharge of the drilling slurry directly into waterbodies and the soil** (contrary to the Serbian legislation requiring these to be treated as a mining waste)



Drilling slur pool: no protective membrane



Drilling slur discharged directly into a stream

Consequences of the exploration drilling:

3. Uncontrolled water extraction from the local streams and rivers, endangering the habitats; at least 6 locations found (DPM does not possess water acts/permission for this)



Stone crayfish being sucked up by a DPM pump (note the missing pincer)



Negligence or accident?

-29.05.2024. **Čoka Rakita 2535** „There was an **accidental leakage** of oil from the water pump used to pump it for the needs exploratory wells DPDD 021“

- 28.08.2024. **Čoka Rakita 2535** on the exploration well DPDD 024 „There was **accidental spillage** of mud from the mud tank. “

-28.08.2024. **Čoka Rakita 2535** on the exploratory well DPDD 021 „There was an **accident mud spills** during drilling, **the remains** of which were observed under the **drilling platform on the forest floor.** “



Република Србија
Министарство заштите животне средине
Сектор за надзор и превентивно деловање у животnoj средини
Одсек за загађења из објеката са интегрисаном дозволом
Број: 002411407 2024 14850 007 003 042 002
Датум: 25.11.2024. године
Немањина 22-26



Трг Републике бр.5.
Смедерево
ГЗ

Иван Милосављевић
УГ РИС Млавска Војска

Поштовани сходно Закону о инспекцијском надзору обавештавам вас да инспекцијски надзор над радом ДПП Авала доо Београд није окончан, јер се очекују додатни извештаји о квалитету воде на месту контаминације.

Као што сте упознати инспекцијски надзор јер обављен дана 29.08.2024. године и тала су утврђене незаконитости:

- дана 29.05.2024. године на локалитетеу Чока Ракита на истражном простору 2535 дошло је до акцидентног пурања уља из пумпе за воду којим је иста припљена за потребе истражне бушотине ДПДД 021.

- дана 28.08.2024. године током извођења истражних радњи на локалитетеу Чока Ракита на истражном простору 2535 на истражној бушотини ДПДД 024 дана дошло је до акцидентног изливања исплаке из резервоара са исплаком.

- 28.08.2024. године на локалитетеу Чока Ракита на истражном простору 2535 на истражној бушотини ДПДД 021 дана 28.08.2024. године дошло је до акцидентног изливања исплаке приликом бушења чији су остаци уочени испод платформе за бушење на шумском земљишту.

Инспектор је након уочавања незаконитости надзираном субјекту наложио мере: достављања извештаја о мерењу квалитета вода у водотоку на месту излива исплаке, као и санацију земљишта.

Након извршеног надзора инспектор је упутно писано обавештење Министарству рударства и енергетике, Сектору за инспекцијски надзор, Одељење геолошке и рударске инспекције као и Министарству пољопривреде, шумарства и водопривреде, Републичкој дирекцији за воде, Одељењу водне инспекције.

Ministry of Environmental Protection,
Sector for **supervision** and preventive action
in the environment; **Department for**
pollution from facilities with an integrated
permit

Violations of Bern Convention Articles

The Government is in breach of at least the following Bern Convention Articles

Each Contracting Party shall take:

3.2: In its planning and development policies and in its measures against pollution, to have regard to the conservation of wild flora and fauna.

4.1: Appropriate and necessary legislative and administrative measures to ensure the conservation of the habitats of the wild flora and fauna species, especially those specified in Appendices I and II, and the conservation of endangered natural habitats.

4.2: In their planning and development policies shall have regard to the conservation requirements of the areas protected under the preceding paragraph, so as to avoid or minimise as far as possible any deterioration of such areas

4.3: Undertake to give special attention to the protection of areas that are of importance for the migratory species specified in Appendices II and III and which are appropriately situated in relation to migration routes, as wintering, staging, feeding, **breeding** or moulting areas

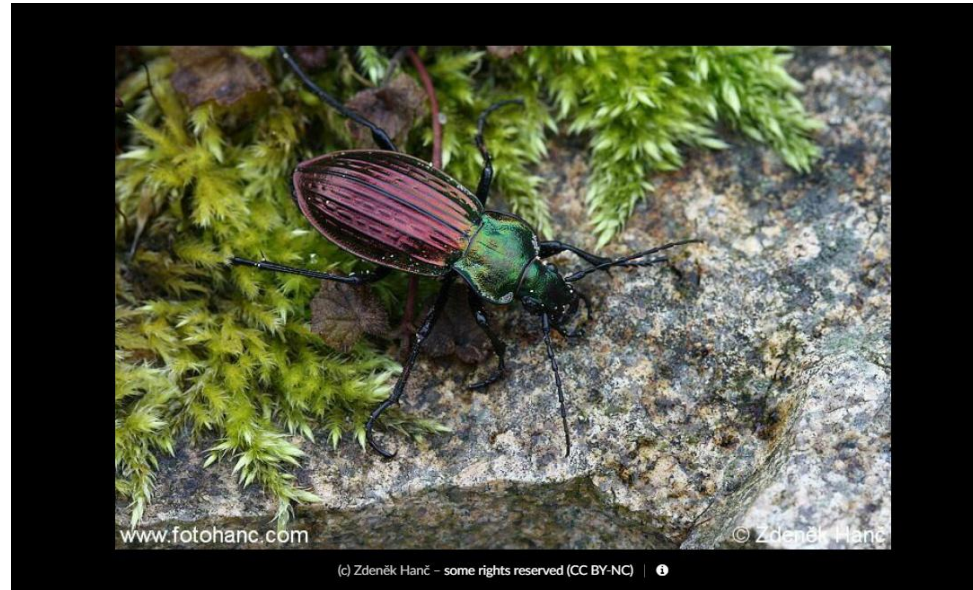
6: Appropriate and necessary legislative and administrative measures to ensure the special protection of the wild fauna species specified in Appendix II. **The following will in particular be prohibited for these species:**

b: the deliberate damage to or destruction of breeding or resting sites;

c: the deliberate disturbance of wild fauna, particularly during the period of breeding, rearing and hibernation, insofar as disturbance would be significant in relation to the objectives of this Convention

Rights of Nature

- Nature destruction from the mining activities breaches the **inherent rights to life and health of protected flora, fauna and habitats**
- Bern Convention recognises an ecocentric approach to protection of species in its preamble – “**intrinsic value**” of wild flora and fauna
- **Article 4(1)** of the Bern Convention requires **States to guarantee the rights of Nature** through appropriate and necessary legislative and administrative measures



Carabus ulrichii ssp. *arrogans*

[More Photos](#)

Carabus (Carabus) ulrichii arrogans Schaum, 1859 -an endemic taxon for eastern Serbia