



Republic of Serbia
Ministry of Environment Protection
22-26, Nemanjina Str.
11000 Belgrade
Serbia

Nº: 353-02-2039/2021-03

Date: 21 July 2021

Mr Asen Lichev
Ministry of Environment and Water
Minister's Cabinet
22 Maria-Luisa Blvd, 1000 Sofia, Republic of Bulgaria

Dear Minister,

In accordance with art. 3 of the Convention on environmental impact assessment in a transboundary context (ESPOO), we hereby notify you that Serbia intends to develop the project „Exploitation of Pb, Zn and Cu ore from the bearings "PODVIROVI" and "POPOVICA" in the area of Karamanica near Bosilegrad“.

We are enclosing the Notification to an affected Party of a proposed activity as required by article 3 and by Decision I/4 of the Parties to the Espoo Convention.

Would you be so kind as to notify us as soon as possible but no later than 6 weeks from the day of the receipt of this notification, if Republic of Bulgaria would like to participate in the EIA procedure.

In the case that your decision is to participate in the procedure, please send the response to the notification, including information on the potentially affected environment, on the activities within the potential affected region etc., in the format required by Decision I/4 of the Parties to the Espoo Convention.

We look forward to accessible cooperation between our two ministries.

Sincerely yours,



CC: Ministry of Foreign Affairs of Serbia

**NOTIFICATION TO AN AFFECTED PARTY OF A PROPOSED ACTIVITY UNDER ARTICLE 3 OF THE CONVENTION
For the Project:
Exploitation of Pb, Zn | Cu ore from the bearings "PODVIROVI" and "POPOVICA" in the area of Karamanica near
Bosilegrad**

1. INFORMATION ON THE PROPOSED ACTIVITY	
(I) Information on the nature of the proposed activity	
Type of the activity proposed	The opening of mines for the exploitation of Pb, Zn and Cu ore from the ore beds "PODVIROVI" and "POPOVICA" within the area of Karamanica near Bosilegrad, the construction of a flotation facility for ore concentration with auxiliary facilities and the construction of a flotation tailings pond.
Is the proposed activity listed in Appendix I to the Convention?	Yes
Scope of proposed activity (e.g. main activity and any/all peripheral activities requiring assessment)	The subject matter project covers the following activities that require an assessment: <ol style="list-style-type: none"> Underground exploitation of the "Podvirovi" and "Popovica" beds to be performed using drilling - blasting works. (The adopted excavation method for the "Podvirovi" bed is with the backfilling of excavated spaces. Excavation using this method is performed in horizontal strips upwards. The "Popovci" bed will be excavated using a sublevel excavation method (Swedish method) with the caving of roof rock). Treatment and disposal of flotation tailings covering the following technological phases: <ul style="list-style-type: none"> Crushing Milling The sequential selective flotation concentration of useful components (Cu, Pb, Zn) that involves the basic flotation, control flotation, and two purifications in each cycle Draining the products of concentration, the selective concentrates of Cu, Pb and Zn, through thickening and filtration, Disposal of flotation tailings
Scale of proposed activity (e.g. size, production capacity, etc.)	Based on certified reserves, plans are for the excavation of ore that would be processed to produce a total of 3,120,000 t of dry ore, i.e. 240,000 t of dry ore annually. The lifetime of exploitation is 13 years. This will produce 1,731,796 m ³ of flotation tailings. According to the defined capacity, 137,295 m ³ tailings space needs to be secured annually.
Scale of proposed activity (e.g. size, production capacity, etc.)	The technology for manufacturing the room for the opening and development of beds is based on drilling-blasting works, with the following work phases: <ul style="list-style-type: none"> Drilling mining boreholes (diesel equipment), Blasting, Loading and transport of blasted material, Ventilation of the head of the work site, and Securing the head of the work site. The technological process of drilling-mining works is based on the following: <ul style="list-style-type: none"> Drilling of blasting boreholes distributed along a fan shape, based on the geometry and parameters of each borehole as defined by the design, The filling of blasting boreholes (mechanised) with the AN-FO explosive mixture, blasting using the "NONEL" method
Description of proposed activity (e.g. technology used)	The purpose of the proposed activity is the valorization of the raw material potential of the mining field Karamanica near Bosilegrad. The plan of the company "Bosi-metal" d.o.o. Bosilegrad is the implementation of the project: "Exploitation of Pb, Zn and Cu ore from the ore beds "Podvirovi" and "Popovica" within the area of Karamanica near Bosilegrad". The plan is based on reserves of 1,500,000 t of lead and zinc ore, with copper and gold content, along with C2 category reserves. This represents a good basis for continued exploration and running of activities, and simultaneously ensures work for miners during the forthcoming period.
Rationale for proposed activity (e.g. socio-economic, physical geographic basis)	<ul style="list-style-type: none"> The exploitation and treatment of polymetallic ore in Karamanica will improve the economic growth of the local community, The processing capacity for polymetallic ore is satisfactory regarding exploitation and its processing, The mine site is far from buildings where people reside permanently and densely populated zones, There are no protected natural and cultural resources within the boundaries of the exploitation field, There are no water supply facilities, sports fields, tourist locations or areas of public or other content nearby that could be endangered.
Additional information / comments	

(II) Information on the spatial and temporal boundaries of the proposed activity
(II) Informacije o prostornim i privremenim granicama predložene aktivnosti

<p>Location*</p>	<p>The project is planned for the south-east part of Serbia, within the area of Karamanica, municipality of Bosilegrad in the Pčinjski district. The site is approximately 39 km south-west of Bosilegrad, near the tripoint between Serbia, Bulgaria and Macedonia.</p>
<p>Description of the location (e.g. physical-geographic, socio-economic characteristics)</p>	<p>The site is in a rural area at altitudes exceeding 1000 m. According to the 2011 Census, there were 47 residents in Karamanica. Their main activities are agriculture and mining. The largest settlement in the vicinity is Bosilegrad, 39 km north-east of the site.</p>
<p>Rationale for location of proposed activity (e.g. socio-economic, physical-geographic basis)</p>	<ul style="list-style-type: none"> • The site of the "Podvirovi" and "Popovica" beds and the planned flotation plant is within the previously approved exploitation field, • The site is in accordance with the development documents of the local municipality (spatial plan of the municipality of Bosilegrad), • The reserves of polymetallic ore are satisfactory for exploitation, • The site is far from residential areas and densely populated zones, • There are no protected natural and cultural resources within the boundaries of the area, • There are no water supply facilities, sports fields, tourist locations or areas of public or other content nearby that could be endangered.
<p>Time frame for proposed activity (e.g. start and duration of the construction and operation)</p>	<p>The start of construction is expected in September 2021. The lifetime of exploitation is 13 years. The capacity and equipment of the flotation plant are based on the results of testing the pilot plant that was operational for the past three years.</p>
<p>Maps and other pictorial documents with the information on the proposed activity</p>	
<p>Additional information/comments</p>	

(iii) Information on the expected environmental impacts and proposed mitigation measures
(iii) Informacije o očekivanim uticajima na životnu sredinu i predložene mere ublažavanja

Scope of assessment (e.g. consideration of cumulative impacts, evaluation of alternatives, sustainable development issues, impact of peripheral activities, etc.)

- The scope of impact covers:
- Use of natural resources
- Impact on surface and ground water
- Impact on soil
- Impact on air quality
- Noise
- Waste generation in the processes of ore excavation, ore preparation, flotation processing and disposal of flotation tailings

The impact of mining activities on the geological structure may be summarised as follows:

- Loss of geological formations in the areas of intervention and associated geological formations;
- Activation and alteration of geochemical processes;
- Creation of new geological formations by mixing soil materials in various quantities and qualities, due to the ore excavation and disposal of mining waste in areas around the mine;
- Changes to the geomorphology of the entire mining area (topography - e.g. significant deformations of the terrain surface at the area of the "Popovica" bed, drainage and vegetation).

The potential negative impact on surface waters is related to the following:

- Release of untreated or insufficiently treated waste water originating from the drainage of exploitation sections of the pits.
- Contamination of precipitation by washing off polluting substances from auxiliary mining activities (e.g. workshops and potential spillage or leakage of fuels and lubricants);
- Contamination of soil and surface water by potentially sludgy waste water from the process of ore fragmentation (crushing and milling);
- Irregular operation or malfunctions on the biodisc for the treatment of sanitary-faecal waters;
- In case of accident: damage to pipeline systems, damage to the dam, or in the worst case the demolition of the dam of the flotation tailing pond may lead to the leakage of the tailings and a significant chemical accident (in this regard this impact may be considered transboundary in nature since the Karamanička River is a tributary to Golema River that flows into Dragovištica, crossing to the territory of Bulgaria at the settlement of Ribarci).

The following impact on soil is noted based on mining activities:

- Deterioration of the existing pedological layer structure, by mixing the pedological layer with the useless mineral raw materials and other unproductive materials, by disposal of mine tailings;
- Contamination of the upper layer, due to the settlement of dust and other substances from the air;
- Loss of arable top layer due to the construction of flotation plateau facilities, infrastructure such as roads, water channels, etc.

The overall air pollution is the consequence of the following:

- Air pollution through the exhaust fumes of pit freight vehicles;
- Air pollution through gaseous products after blasting;
- Air pollution through the exhaust fumes of working machinery;
- Air pollution with dust from the pit;
- Air pollution through the emission of gaseous pollutants and suspended particles from infrastructural facilities on the terrain surface.

Emissions from mobile equipment also contribute to the amount of dust emissions, while emissions are linked to internal combustion engines, the gases NO_x, CO, SO₂, VOCs. Based on intensity, pollutants such as exhaust fumes are among minor sources of pollution and are not registered as significant causes of environmental pollution. Dust emissions also occur due to wind-borne dust from the disposal site, from the roads for freight transport by truck, from open conveyor belts, during the disposal of tailings.

Studies performed in mines indicate dust may be a problem during dry periods. The amount of humidity in the ore affects the amount of dust emission. If humidity is high, dust emissions are negligible. Dust mainly causes issues for the mine staff.

Noise from mining activities will mainly affect staff at the work site, since noise levels exceed the limit value of 80 dB(A) prescribed for workplaces. Consequently, relevant measures need to be undertaken to ensure there is no unfavourable impact on the workers in the mine.

The contribution of mining activities to the existing traffic noise may be assessed as negligible. Therefore the impact of mining activities on traffic noise will not affect existing noise levels, either locally, or in the broader mine area.

<p>Expected environmental impacts of the proposed activity (e.g. types, locations, magnitudes)</p>	<p>During the works on the opening of the mine and the construction of the flotation plant there will be minor significant and short-term negative impacts on soil, water, air and noise. During operational activities, negative impacts on soil, water</p> <p>The impact on the population also brings positive effects. This project creates the opportunity for direct and indirect job creation, better roads and other infrastructure (electrical, water supply, internet access, etc.) On the other hand, there would be a local impact on water, air, soil and noise. In case of accident, cross-border impact on water is possible. The project will be in line with prescribed safety measures.</p>
<p>Inputs (e.g. raw material, power sources, etc.)</p>	<p>The project implementation involves the use of the following inputs: The total balance reserves (A + B + C₁) of ore are 3,156,848 t with Pb 2.98%, Zn 3.39% and Cu 0.31%</p> <p>During the exploitation lifetime of 13 years the processing balance is as follows:</p> <ul style="list-style-type: none"> - Input ore (dry): 3,027,285 t. - Cu concentrate (dry): 23,941 t with 21% Cu - Pb concentrate (dry): 98,255 t with 71% Pb - Zn concentrate (dry): 98,255 t with 71% Pb <p>The water balance is as follows:</p> <ul style="list-style-type: none"> - Water arriving with the tailings 808,393 m³/g - Precipitation (tailings pond contour) 76,848 m³/g - Evaporation loss 27,425 m³/g - Trapped with the tailings 72,492 m³/g - Mine water 50,458 m³/g - Water from the drainage process 76,650 m³/g - Return water 912,432 m³/g <p>The power supply with relevant voltage levels can be secured from the existing transformer substation near the mine, and connections to the nearby power lines. Alternatively, through the use of mobile aggregates for power production. The supply of pressurised air can be provided by using a compressor with the relevant capacity.</p> <p>The water supply for the future mine can be solved by potable water arriving by transport in its original packaging, or in special-purpose cisterns. Process water can be used from permanent waterways near the future mine (Popovički Stream, Golema River) combined with previously treated mine waters through pumping the same from the closed waterway system (mine - precipitators with water collectors - process water tank - mine).</p>
<p>Outputs (e.g. amounts and types of: emissions into atmosphere, discharges into the water system, solid waste)</p>	<p>Solid waste generated as construction residue:</p> <ul style="list-style-type: none"> • Excess earth from land works, • Concrete from building the concrete base, • Wooden boards from building the concrete base, • Pieces of the metal frame and other steel and metal parts - metal waste, • Plastic and other municipal waste created by workers hired for the construction, • Intermediate product to be temporarily deposited at a landfill with a maximum capacity of 24,000 m³. This intermediate product will be used in flotation processes in the future flotation plant. • Waste generated during the servicing and maintenance of equipment (metal and steel parts, plastic, cables, electric carts, used oils), • Paper jumbo-bags for packaging, • Used tires, • Municipal solid waste, etc.
<p>Transboundary impacts (e.g. types, locations, magnitudes)</p>	<p>There are no settlements near the border. There are no protected areas near the border. The Karamanička river passes through a tunnel in the flotation tailings pond zone, thus preventing this waterway from coming into contact with the contents of the tailings pond. The final recipient is the river Dragovistica, crossing the border with Bulgaria at the settlement of Ribarci. Transboundary impact is only possible in case of accident, related to damage, or in the worst case demolition of the flotation tailings pond dam. However, when considering this transboundary impact, one must take into consideration that the Bulgarian border is around 40 kilometres downstream from the site of the flotation tailings pond.</p>

Proposed mitigation measures (e.g. if known, mitigation measures to prevent, eliminate, minimize, compensate for environmental effects)	<p>Environmental protection measures are identified in the Request for determining the scope and content of the environmental impact assessment study of the subject matter project under chapter 7. The description of measures envisaged for the prevention, mitigation and elimination of all significant environmental impact, namely:</p> <ul style="list-style-type: none"> • Measures envisaged by Law and other regulations, norms and standards, and the deadlines for their implementation, • Measures envisaged by the technical documentation, • Measures during the opening of the mine, • Measures during the regular operation of the mine (measures for the protection of air, water, soil, measures for legal waste management, terrain stability and noise), • Measures for the protection of natural assets and immovable cultural assets, • Measures in case of accident, • Other protection measures, and • Environmental protection measures in case of a permanent cessation of operations. <p>The above measures will be elaborated in more detail and prescribed as mandatory environmental protection measures through the environmental impact assessment study of the subject matter project.</p>
Additional information/comments	
(iv) Name, address and telephone/fax numbers of proponent (developer);	
Name, address, telephone and fax numbers	Bosil-metal doo Georgi Dimitrova 74 Bosilegrad Telephone +381 64 64 50 794 Manager Miodrag Vukajlovic
(v) EIA documentation (e.g. EIA report or environmental impact statement (EIS)), if available.	
Is the EIA documentation (e.g. EIA report or EIS) included in the documentation?	No
If no/partial, description of additional documentation to be forwarded and (approximate) date(s) when documentation will be available	<p>The Request for determining the scope and content of the environmental impact assessment study was submitted to the Ministry of Environmental Protection on 14 July 2021.</p> <p>The request and Decision on the scope and content of the Environmental Impact Assessment Study will be available by 20 August 2021.</p>
Additional information/comments	
2. POINTS OF CONTACT FOR THE PARTY OF ORIGIN	
(i) Points of contact for the Party of origin	
The name, address and telephone/fax numbers of the authority responsible for coordinating activities relating to the EIA should be provided (see decision I/3) together with a name, address and telephone/fax numbers for further information	Ministarstvo zaštite životne sredine Omladinskih brigada 1 11070 Novi Beograd Tel.: +381 (0)11 31 31 356
(ii) Points of contact for the possible affected Party or Parties (iii) Tačke kontakta za moguće pogođene strane ili stranke	
The name, address, and telephone/fax numbers of the authority responsible for coordinating activities relating to the EIA should be provided (see decision I/3, appendix, for points of contact).	Ministry of Environment and Waters, Republic of Bulgaria 1000, Sofia, bul. M. Luiza '22 Republic of Bulgaria telephone: 02/940 60 00 Ministry of Environment and Physical Planning of Republic of North Macedonia, 18 Goce Delcev Blvd. Skopje, 1000

List of affected Parties to which notification is being sent	Ministry of Environment and Waters, Republic of Bulgaria 1000, Sofia, bul. M. Luiza '22 Republic of Bulgaria telephone: 02/940 60 00 Ministry of Environment and Physical Planning of Republic of North Macedonia, 18 Goce Delcev Blvd. Skopje, 1000 Republic of Macedonia
3. INFORMATION ON THE EIA PROCESS IN THE COUNTRY WHERE THE PROPOSED ACTIVITY IS LOCATED	
(i) Information on the EIA process that will be applied to the proposed activity	
Time schedule	The Request for determining the scope and content of the environmental impact assessment study was submitted to the Ministry of Environmental Protection on 13 July 2021. The phase of the environmental impact assessment procedure, ending with the adoption of the decision, i.e. the obtaining of the Decision on the scope and content of the Environmental Impact Assessment Study lasts at least (10+15+10+3) 38 days
Opportunities for the affected Party or Parties to be involved in the EIA process	Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991)
Opportunities for the affected Party or Parties to review and comment on the notification and the EIA documentation	The Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991) - The Republic of Serbia and the Republic of Macedonia have the right to respond to the notice within six weeks of reception.
Nature and timing of possible decision	The competent body shall notify the bodies, organisations and public concerned due to the submitted request to determine the scope and content of the Environmental Impact Assessment Study within ten days as of the date of receiving a complete request. The designer, authorities, organisations and the public may submit their opinion within fifteen days as of the date of reception of the notice as per the preceding paragraph. The competent body shall decide on the request taking into consideration the specifics of the project and location, as well as opinions of bodies, organisations and the public it concerns and submit the opinions of the affected parties under the ESPOO procedure
Process for approval of the proposed activity	An approval for the Environmental Impact Assessment Study, i.e. the Decision on the approval for the EIA is a condition for obtaining a "construction" permit, i.e. for obtaining a Decision on the execution of works based on the Main mining design for exploitation in line with the Law on Mining and Geological Explorations
Additional information/comments	
4. INFORMATION ON THE PUBLIC PARTICIPATION PROCESS IN THE COUNTRY OF ORIGIN	
Public participation procedures	The Request for determining the scope and content of the environmental impact assessment study will be published on the website of the Ministry of Environmental Protection of the Republic of Serbia. Within fifteen days the contents of the request will be on public review and available to the public, and all interested bodies, organisations and individuals may submit their comments and complaints on the request to the Ministry.
Expected start and duration of public consultation	The publication of the first phase of the request for determining the scope and content of the environmental impact assessment study is expected during July (by 23 July 2021). The public review will last for 15 days. The decision on the request, i.e. the Decision on the scope and content of the environmental impact assessment study shall be made within 10 days. The public shall be notified within 3 days as of the date of the adoption of the decision, and thereafter it comes into force as final.
Additional information/comments	
5. DEADLINE FOR RESPONSE	
Date	Six weeks upon obtaining the notice 01 September 2021