

“Balkanka” Association, Sofia, Bulgaria

“Nature has all the time in the world, we do not”.

**NOTIFICATION
TO
THE IMPLEMENTATION COMMITTEE OF THE BERN CONVENTION CONCERNING
THE FIELD VISIT IN THE AREA OF BOSILEGRAD HELD ON 11.08.2026**



Representative for this notification:



dipl.eng. Dimitar Koumanov,
Member of the board

Sofia, Bulgaria
12.08.2026

Dear friends,

First and foremost, allow me to express our deepest appreciation and gratitude for the commitment of the Standing Committee of the Bern Convention in the case of the present and future mining activities in the Bosilegrad region in Serbia.

This letter is inspired by the discussion during the final meeting that followed the field visit in the end of the day, especially by what we and the local people have heard from the local authorities of the municipality - the mayor of Bosilegrad and others, from the representatives of the Serbian Ministry of Environment and from the management of the Karamanitsa mine.

To our view, the participants from the BERN Convention and we have heard too many lies from all of these Serbian officials, leaving us no chance to remain silent and to leave it at that without an answer. We believe that our answer and the information included here will help the Standing Committee take the right final decision on the Podvirovi and Popovitsa mines' case in the area of the Karamanitsa village in the end.

1. The most interesting statements of the Serbian representatives were as follows:

1.1. Statements from the mayor and the other municipality officials, as well as from the Serbian Ministry of Environment concerning water quality:

1.1.1. All the testing of samples in the area concerned conducted by Serbian licensed laboratories /paid by the investor - our note/, has always shown absolutely no pollutants in the surface waters at all. The pictures of the river we and the local people have shown at the meeting must have been taken from another river, rather than from the Karamanitsa River - the mayor said.

1.1.2. The News we shared concerning the present and future small hydropower plants to be developed in the entire area of the Bosilegrad municipality, namely that there will be more than 30 small HPPs that should be taken into consideration for their cumulative effects with any mining undertaking in any future EIA procedure, are not true.

1.2. Statement of the manager of the mine - Mr. Vukailovich- shared at Location point No1 of the field visit:

The heavy metal contents in the river sediments are exactly the same as they are in the soil of the surrounding area, therefore the chemical status of the river sediments is due to natural processes only, rather than to anything else. Acc. to Mr. Vukailovich this was proven by independent and licensed laboratory testing and study /paid by the investor - our note/.

1.3. Statement of a representative of the management of the mine:

During our visit in July 2022 when the team from the Bulgarian National Television was attacked, there was no official permit for a Bulgarian TV coverage issued by the official Serbian state authorities.

2. In the light of the above statements of the Serbian participants during the meeting, here are the facts we have always stumbled in each and every time during our previous monitoring visits in the area concerned. The TV reports displayed below are produced by the three nationwide broadcasted TV networks in Bulgaria, completely independent from one another. The reports are in Bulgarian, but the beautiful pictures and

the tables with the water sampling test results talk for themselves without any translation required:

By order of appearance:

2.1. NOVA TV coverage in 2019:

<https://www.youtube.com/watch?v=DS24JZlOs0o>

Please watch at 4:03 minute from the start - **Location No1** of the field visit on **11 August 2026** - you can tell that this is the exactly same location by the wooden bridge above the spot. See the blue - gray color of the water in the river.

3:03 minute from the start shows **Location No2** of the field visit on **11 August 2026**

1:03 minute from the start shows **Location No3** of the field visit on **11 August 2026**

Just watch the color of the water and keep believing the Serbs that that their "independent" testing is trustworthy...

And please note that the water samples taken from the river two kilometers downstream from the mine and tested in an independent Bulgarian licensed laboratory /not paid by the investor/ show **LEAD contents 46 times above the Environmental Quality Standard /EQS/.**

2.2. BTV Coverage in 2020

<https://www.youtube.com/watch?v=KkRbfbrrK-k>

Please watch:

At 2.49 minute from the start **Location No2** of the field visit on **11 August 2026**

11:20 minute from the start - the water samples taken from the river and tested in an independent Bulgarian licensed laboratory /not paid by the investor/ showing **LEAD 20 times above the EQS, Copper - 40 times above the EQS**

The expert from the laboratory commented that ***there is no way that such heavy metal contents can be due to natural reasons.*** /See section 1.2. above holding the comments of the manager of the mine on the "natural reasons" for the "natural" catastrophe/.

2.3. BNT coverage in 2022 - this is the famous case when we were attacked by the manager you have met yesterday and by the security of the mine:

<https://www.youtube.com/watch?v=IOoq2avG7bE>

This TV report shows exactly the same pictures as the previous reports but please pay special attention to **3:03 minute from the start when a special Report from the Mining and Geological University in Sofia is shown, stating the following statement we have translated for you:**

In Bulgarian:

"Факт е, че след устието на река Драговищица в река Струма се наблюдават от години концентрации на тежки метали. Водосборният басейн на река Драговищица е развит в по-голямата си част на територията на Република Сърбия. Босилеградския район се характеризира добив на оловно цинкови р, руди, ОТ КОИТО са наблюдаваните замърсявания!"

In English:

It is a fact that after the confluence of the Dragovishtitsa River into the Struma River, concentrations of heavy metals have been registered for years. The greatest part of the Dragovishtitsa River catchment area is located on the territory of the Republic of Serbia. The Bosilegrad region is characterized by the extraction of lead-zinc ores, TO WHICH the registered pollutants are due!

This is stated in an official report by the Mining and Geological University Sofia prepared for scientific purposes only, absolutely independent from anyone. Just like the report from the Belgrade University by the way...

3. About our statement that there will be more than 30 small Hydropower Plants planned or currently in operation in the Bosilegrad municipality area, which should be taken into consideration for their cumulative effects together with the effects from any future undertaking in the area concerned. The mayor and the representatives of the Serbian Ministry of environment didn't know about that and they were so surprised saying that we lie, remember?

Here is a link to the Bosilegrad municipality General Spatial Plan

<http://www.bosilegrad.org/sr/pdf/Prostorni%20plan%20Bosilegrada.pdf>

And here is what is written on Page 58 - According to the "Cadastre of Small Hydropower Plants", 22 potential locations have been identified - with an installed capacity of 8,675 kW, and according to additional analyses, there are indications for another 13 locations.

.....
End of quote

4. About the statement of a representative of the mine management that the Bulgarian National Television /BNT/ didn't have any official permit from the Serbian authorities to shoot any TV coverage on the spot.

We got in contact with the BNT producer - Mrs. Bogdana Lazarova - and she promised to send us a scanned copy of the permit, but pitifully she is on leave in Greece till the end of August. When she comes back we will share the document with you in due course.

CONCLUSION:

Anyone who watches the full beauty of the above TV reports and the additional information shared here by us can draw his own conclusions who to believe - us or the Serbian officials and the mining management.

Still, it is very important to say that should any official Serbian EIA Procedure go on any further in the future, the potential EIA Report will be prepared by the same "independent" experts and laboratories and will be approved by the same "independent" state authorities in Serbia.

Once the mining activities start, the impact on the environment will be monitored by the same crooks, with the same methods, and no one from Bulgaria will be allowed to pass through the border to check what's going on - just like yesterday - it took them two hours to wonder whether to allow us to get in Serbia, as you were warned in our previous communication on the potential existence of such a problem.

That is why we hope that the final Decision of the Standing Committee will be in favor of the people and the nature not only in Serbia, but in Bulgaria as well.

But hey, wait a minute! Did you notice that during the meeting everyone was talking about some kind of a tailings pond in the surroundings of **Location point No3** of the field visit? They were actually having in mind what you all have seen with your own eyes at that location, looking like this:



Now, you should know that this has Nothing to do with a normal tailings pond at all. It is stacked in the gully of the small stream, currently completely blocked by the huge pile of mining waste from the processed ores you all have seen yesterday. During the operation of the mine, all the fluid tailing is directly dumped into the bed of the stream, only to go further downstream without any treatment whatsoever as all the above TV reports have shown.

Normal tailings ponds collect only the fluid tailings to separate the toxic waste from the polluted water, and then the recycled water is reused in a closed cycle over and over again, to follow the ZERO WASTE principle!

In Serbia they have never heard about that principle, just like their Ministry of Environment has never heard of the cumulative effects that should be taken into consideration during the EIA procedures. Can you really believe that those guys, still living in the 19th Century, can change anything in their methods only to the satisfaction of their neighboring countries or of a signed by them Convention we have absolutely NO clue why they are accepted as a party to?

FINAL NOTE:

Here we have to underline how important the decision of the Standing Committee to the Bern Convention on the case actually is. The potential of this decision is to affect not only the species and the environment in Serbia, protected under the Convention, but also the wellbeing of the people in the neighboring municipalities, due to the risks for the drinking and irrigation water sources, for the air quality and so on.

We believe that any potential support on behalf of the Standing Committee, even if it is in the form of a well-intentioned recommendation for a proper EIA procedure to be carried out, will be used as an excuse by the Serbian party in their future contacts with the

affected party - Bulgaria and with the people living both in the Bosilegrad municipality in Serbia, and in the Kyustendil municipality in Bulgaria.

Therefore we hope that the Standing Committee will take into consideration all the risks and take the right decision, because once the groundwater drinking sources get polluted with heavy metals, there is Nothing to solve the Problem till the end of time.

Therefore, to our view a simple small mine is much easier to be refused authorization and the risks arising from such a decision, are much more acceptable, compared to the risk of a bilateral conflict between two neighboring countries, when the pollution of the drinking and the irrigation water sources becomes fact.

Unless the Standing Committee can take full responsibility for the quality of the Serbian EIA procedure, having in mind the statements of the Belgrade University and the Mining and Geological University in Sofia we have shared here, any potential recommendation for a Serbian EIA procedure with the quality from the 19th Century may compromise the very meaning of the Bern Convention itself.

We are also aware that under the circumstances it will not be an easy decision to be taken, crossing our fingers for the Standing Committee to do the right thing in the end.

Thank you all for your kind understanding and cooperation.

"Nature has all the time in the world, we do not".

Place, date and signature of representative:

Representative for this notification:



/dipl.eng. Dimitar Koumanov/
Member of the board

Sofia, Bulgaria
12.08.2026