

# Submit your Request

The European Bank for Reconstruction and Development (EBRD)'s Independent Project Accountability Mechanism (IPAM) reviews **environmental, social or transparency** issues raised by individuals or organisations concerning Bank-financed projects which they believe to have caused, or likely cause, harm.

If your concern is related to:

- **Fraud, corruption or ethics**, please submit your complaint to the [Office of the Chief Compliance Officer](#) responsible for these issues, at [whistleblowing@ebrd.com](mailto:whistleblowing@ebrd.com).
- An EBRD **procurement process** that you participated in, please submit your complaint to the Procurement Policy and Advisory Department responsible for these issues at [ProcurementComplaint@ebrd.com](mailto:ProcurementComplaint@ebrd.com).

## Step 1: Required Information

This information is mandatory for IPAM to review and consider your request.

1. Who is submitting this Request? Please provide your name(s) or the name of your organisation.

The Informal group of citizens IGC (NGG) Trstionica and Boriva Nature Park, Kakanj Group representatives: [REDACTED]

2. IPAM is committed to protecting your identity, if you fear reprisals. Do you want your name(s) (or the name of your organisation) to be kept **confidential throughout this process**? Why do you require confidentiality?

Yes, protect our personal identities, but you may refer to the ICG Trstionica and Boriva Nature Park representing the civil movement of all citizens of the Municipality of Kakanj, as well as the wider community.

Because of our actions, we, as the representatives, have already received calls and messages to stop the actions of the group. Political and administrative authorities of

the Municipalities of Kakanj and Vareš, Zenica-Doboj Canton, Federation of Bosnia and Herzegovina and the Embassy of the United Kingdom of Great Britain in BiH, which prepared the documentation (although flawed and unlawful) for the stated project in Vareš through acts of corruption and in cooperation with the investor, Adriatic Metals, This “game” involves billions of euros, and it is exactly because of the amounts and corruption/criminal actions being carried out that we can reasonably suspect that our lives could be at risk. It is not that we are afraid to die for what we are doing, but we are afraid what could happen before we stop them!

**Note.** IPAM will share the concerns raised in your request with Bank staff and the Client, but your name and other details that would identify you will not be shared. \*

3. Do you fear you or other risk retaliation for sharing your concerns with IPAM ?  
Please provide details. (Let us know if this information should be treated confidentially.)

Yes. This is explained under point 3. The investor bribed the authorities, and the authorities accepted the bribe. This speaks enough about the investor/client. In Bosnia, we say: “He who lies steals, and he who steals, kills.”

We have already found out that Adriatic Metals are lying, providing false information in the official documentation on their web page, participating in corruption and inciting corruption, and it is perfectly realistic to expect they will continue doing this and execute us for standing in their way.

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4. Country

Bosnia and Herzegovina

5. Please provide your contact information

a. Telephone number

\_\_\_\_\_

b. Mobile number

\_\_\_\_\_

c. Email address

\_\_\_\_\_

d. Mailing address

\_\_\_\_\_

e. Fax number

\_\_\_\_\_

How can we best contact you?

Via e-mail.

6. Please name or describe the **EBRD Project(s)** that raises concerns. If you don't know the Project name, you can include details like the name of the company in charge of the Project, its location, or the activities it involves that are affecting you.

Adriatic Metals PLC's Vareš Project

7. What harm do you believe has been caused, or might be caused, by the Project? Please include details.

So far, the Project caused the following:

- Illegal cutting of the high forest planned to be protected under the Zenica-Doboj Canton Spatial Plan.
- Pollution of Vrući Potok drinkable water stream that surfaces, together with its tributaries, in Rupice, where detailed explorations and preparations for mining are being carried out at the moment.
- Consequently, the pollution of the Vrući Potok flow resulted in the disappearance of the river crab species that lived in Vrući Potok.

- As Vrući Potok is the tributary of the Trstionica River (drinkable water), Trstionica is polluted and all the life disappeared from it, including brook trout and other aquatic organisms.
- The forest road through the area of Mehorić-Vrući Potok-Rupice was widened without any permits, and this caused the devastation of nature and endangered animal habitats.
- Thousand tons of waste rock from the excavation site were transported in trucks and dumped at the banks of Vrući Potok, Trstionica and the Boriva River, which is also drinkable (along the Mehorić-Ponijeri road), and this permanently disrupted the river flows, and caused pollution and destruction of habitats.
- Trees and undergrowth previously growing on the banks of these rivers were cut.
- Excavators were used to illegally exploit gravel and stone from the Trstionica and Boriva riverbeds, and these were later grounded and processed in the illegally assembled concrete plant in Mehorić, on the bank of Trstionica. Those who gave the order and the excavator operator were not at all worried about the destruction of the water way or habitats of aquatic organisms and endangered species (river crab and brook trout).
- The stone along the road between Mehorić-the Trstionica primeval forest was illegally exploited.
- Heavy machines illegally entered the area of the primeval forest and stone and sand from Trstionica in the Trstionica primeval forest were illegally exploited.
- This resulted in landslides appearing at one of the entrances into the mine.
- The Mehorić plateau is completely devastated from the heavy machines and operation of the concrete plant; our actions resulted in the field inspection and the inspectors ordered for the concrete plant and the accompanying buildings to be removed, as well for the terrain to be restored. The terrain was not restored properly – the existing waste rock was only covered in humus and flattened.
- Constant noise, vibrations and drilling in the Rupice locality caused the endangerment of the wildlife habitat, and the wildlife escaped to look for a more peaceful place to live
- The Project continues to endanger the habitats of flora and fauna in this area, which is known for its biodiversity, presence of numerous vulnerable and endangered species and the untouched nature and abundant drinkable water ways.

In future, the Project will cause the following:

- Continuation and further devastation of the forest and primeval forest area, destruction of natural habitats, endangerment of flora and fauna.
- Occurrence of land slides all over the locality because of the merciless cutting of the forest.
- Destruction of underground drinkable water.

- Widening of the exploitation field in the area of Gornja Borovica-Donja Borovica-Semizova Ponikva will directly endanger, pollute and probably cause the disappearance of the following water flows:
  - The Bojića Potok stream, drinkable water, tributary of the Borovički Potok stream, Municipality of Vareš,
  - The Borovički Potok stream, drinkable water, tributary to the Bukovica River, Municipality of Vareš,
  - Bukovica, drinkable river ensuring water supply to 30 000 inhabitants of the Municipality of Kakanj,
  - The Rasadnički Potok stream, shallow water flowing from Gornja Borovica to Rasadnik, the Municipality of Kakanj,
  - At least four rivers, the water of which is drinkable, will be destroyed, polluted and completely obliterated,
  - All 30 000 of Kakanj inhabitants who use water from the Bukovica River will be left without water,
  - Ground pollution is inevitable,
  - Air pollution is inevitable in the entire 150 km wide area around the excavation site located on an elevation, at the altitude of over 1000 meters (NB; Kakanj 420 mNv, Sarajevo 530 m/Nv).

8a. Are you directly or personally affected by the Project?

Yes. We live in the vicinity of the area being devastated. The Project is taking the only untouched part of the Municipality from us, the only air spa, the only place we could escape to from the pollution caused by the industry in Kakanj, the only source of drinkable water, the only preserved piece of nature. We drink from Bukovica, our children learn to swim in Trstionica, and all our friends, families and fellow citizens are in the same situation.

8b. Are you submitting this Request as a Representative of a person or group affected by the Project?

Yes, we are [REDACTED] the representatives of the Informal Group of Citizens IGC Trstionica and Boriva Nature Park, gathering not only all our fellow citizens, but other nature lovers and responsible citizens of Bosnia and Herzegovina as well.

8c. Are you submitting this Request as an Organisation that is not directly or personally affected by the Project?

- No.

Please describe your efforts to engage with Project-affected people on the issues you are raising.

- We are trying to inform the public on the facts related to the Project, and we are doing this through our Facebook page [REDACTED]. We establish connections with our fellow citizens and we share and receive information sent by them.  
We engage with them in different activities, meetings, instructions to act, sending letters to inspections and alike.  
We advise each other on our further joint activities, we agree on the decisions and act as one.

What feedback did Project-affected people give you about the Project impacts?

- Photographs of the devastated areas, polluted water ways they used to drink, absence of aquatic animals, facts about the cut trees, photographs of cut forest, different documents that [REDACTED] could not get.  
Generally speaking, people are disappointed, afraid for their own future, their survival and their health. Our fellow citizens are afraid, they are in disbelief, and helpless, and already feeling very angry.

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What has prevented Project-affected people from submitting this Request?

- [REDACTED], people were afraid to talk about the problem because it implies criminal actions of taken by highly-positioned people in municipalities, councils, Cantonal Government, ministries and the Federation of BiH. Each information written by citizens in their comments is immediately deleted from the official web page of the Municipality of Kakanj. For months, the community could not even access the area and we had no information at all. We are organised now and people are freer to discuss the problem, despite the fact that the danger of retribution is still there.
- It was fear from retribution, lack of information and the feeling of being lonely in their problems that prevented people from reacting; people also did not know how to act.

9. Have you ever **contacted the EBRD** or the **EBRD Client** to try to raise and voice your concerns?

- The current contact between the members of the IGC is the only contact of this group with the EBRD, and this means our initial e-mail, online meeting and this official complaint.
- The client, Adriatic Metals PLC, contacted exclusively persons in power and concluded oral and written arrangements with those persons. They obtained clearly harmful and unlawful contracts and permits; they contacted the local Vareš community; they contacted only one man from the Kakanj local community, the president of the local community comprising three villages, and this man could not (with all due respect) understand the extent of the damages to be caused by this Project, and he could not in any way represent the interest of all citizens as he was neither authorised nor elected to do the same.
- They talked with the Mayor of the Municipality of Kakanj only after he got elected to the position, and he hid the Project from the public; his services did not react to our information on illegal works and devastation in accordance with their official duties; he covered for them and protected them even from Cantonal inspections until we initiated online spamming of the e-mail addresses of Municipal services and the Viber number of the Municipal inspection.
- During the public discussion [REDACTED] they admitted their mistake and told us they will make up for it, but this only resulted in a much worse situation. The representatives of the client/investor presented incredibly fake, false and illogical data on the “zero state of the area”, and this can be read in the attachment to this e-mail, in the document entitled Public Discussion (records) (NB: one of the stated nonsenses was related to the ph value of water in Vrući Potok, where the representatives of the investor stated that the ph value is 8.5, which is not true – we know that the value was always neutral and that the water was drinkable). [REDACTED]
- To make the situation worse, the client/investor treated the people who attended the discussion as if they were imbeciles until we told them that the attendees are highly educated in medicine, ecology, foreign languages, machine, mining, and geology and electric engineers with many years of experience, chemists, biologists, lawyers, and activists from Kakanj and different organisations all over Bosnia and Herzegovina.
- In addition, it is only if the project is stopped that further devastation of this highly sensitive area can be prevented.

Note. **IPAM is a ‘tool of last resort’** so, unless there is fear of retaliation, before submitting a Request to IPAM, you should first voice your concerns:

- with **EBRD staff** by sending your concerns to [csso@ebrd.com](mailto:csso@ebrd.com), or
- with the **EBRD Client** that is responsible for the Project.

Note: All supporting documentation must be sent via email to IPAM ([ipam@ebrd.com](mailto:ipam@ebrd.com)).

## Step 2: Additional Information if available:

10. What do you hope to achieve through the IPAM process?

It is our aim to stop the Project and thus this merciless devastation of nature, water, habitats, but also to protect our lives, health and survival in our homes. Whether we will achieve it in this or in another way is just the matter of time.

11. IPAM has two paths for reviewing your concerns.

**Path 1 – Problem Solving:** IPAM can act as a neutral third Party to help find mutually-satisfactory resolutions through flexible, consensus-based problem solving approaches.

**Path 2 – Compliance Review:** IPAM engages with Project-affected people, Bank staff, Clients and others to determine whether the Bank has met the provisions of its [Environmental and Social Policy](#) and/or [Access to Information Policy](#). The Compliance function only deals with compliance of the Bank, not that of the Client.

At this point, and subject to obtaining more information, what would be your preference?

- a) I am interested in the Problem Solving option.
- b) **I am interested in the Compliance Review option.**
- c) I am interested in both the Problem Solving and Compliance Review options.

12. Please list the Policy requirements you believe the EBRD has not met on this Project if you are familiar with the [Environmental and Social Policy](#) or [Access to Information Policy](#).

By investing in this project, the European Bank for Reconstruction and Development (EBRD) is investing in the project of devastation and regression. In international agreements, BiH committed to proclaim at least 17% of its territory protected by 2020. Currently, only 3% is protected. The area being devastated by this project is planned to be protected under projects on both cantonal and municipal level. We understand why the protection is not in place and why it is delayed by two years:



it is because of the corrupted authorities and presence of investors throughout Bosnia and Herzegovina who bribe their way into the realisation of such devastating projects, including this project of Adriatic Metals PLC.

13. Have you submitted any complaints to other organisations in relation to the concerns raised in your Request?

We have. These are municipal, cantonal and Federal inspections. We also plan to file criminal charges against responsible persons for a number of criminal offences.

14. Any other information you consider relevant:

The Mining-Geology Institute from Tuzla, who prepared the studies for the Adriatic Metals PLC is a private company in which people close to Adriatic Metals PLC own shares and who will write anything that the contracting party needs if they are willing to pay a price for the service. Therefore, the important permits for this project were issued on the basis of a study of one such company.

Professors [REDACTED] to whose opinion Adriatic Metals PLC refers as the opinion of independent experts are men on the Adriatic Metals PLC's payroll, and their services are paid by the company, therefore making it impossible for them to be independent experts.

We enclose to this document the study of the biodiversity of the area that we could get. The more comprehensive study was prepared by the Faculty of Natural Sciences and Mathematics in Sarajevo, and you can address them to obtain the study. Likewise, please stay in touch with us, as well, because we will soon be in position to obtain the study and send it to the e-mail address used to contact you.

Please send the completed form to IPAM along with supporting documents.  
(email: [ipam@ebrd.com](mailto:ipam@ebrd.com)).

Dear Sirs,

We are addressing you to report irregularities under your financial sponsorship of Adriatic Metals – Eastern Mining company.

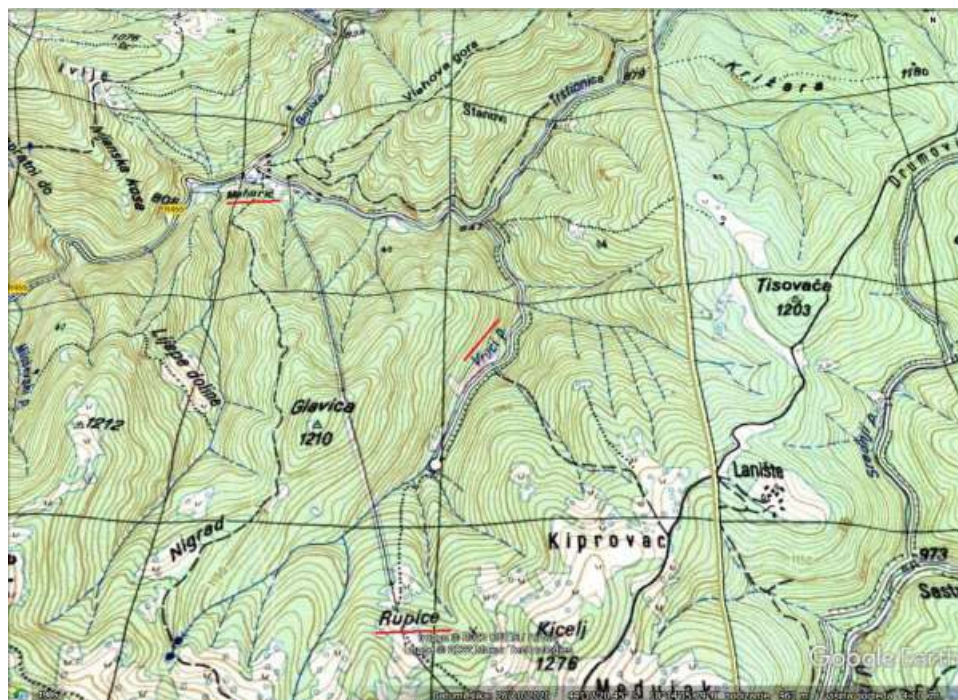


We are gathered around the project to protect the Mehorić Area, comprising primeval forest Trstionica, Vrući Potok (stream), and Trstionica and Boriva Rivers.

The issue we have is related to Eastern Mining d.o.o., Adriatic Metals' sister company, and in particular their project Rupice Mine in Vareš.



Rupice Mine, Vareš, is located where Vrući Potok surfaces.

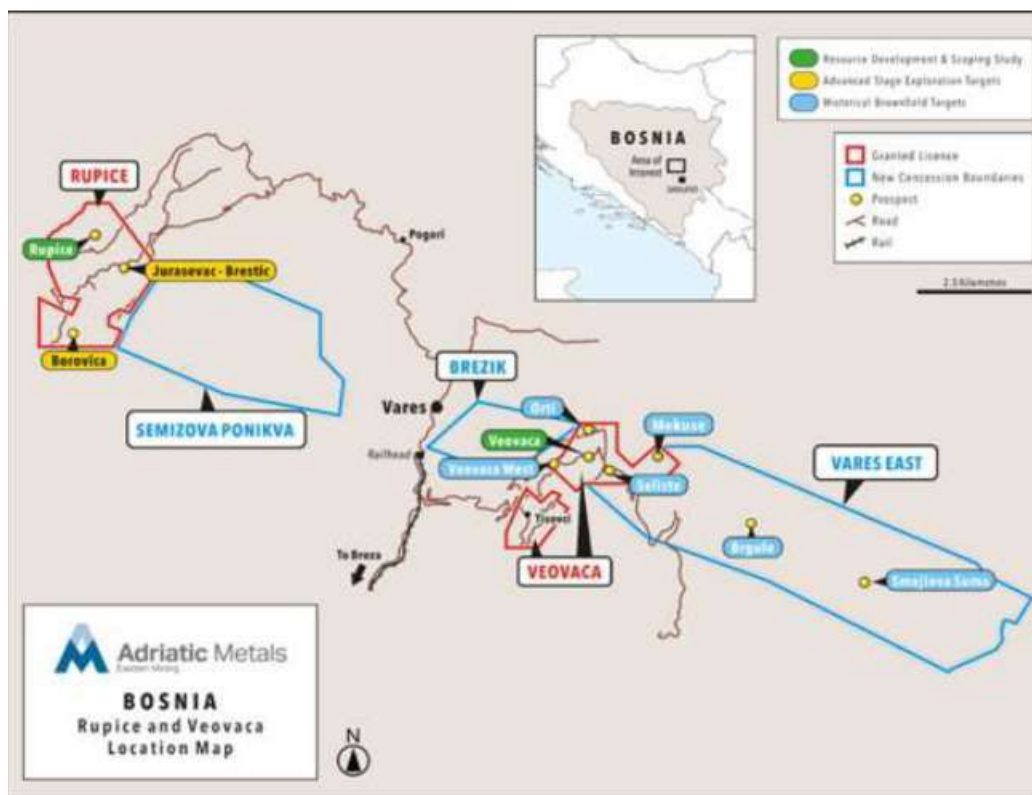


Vrući Potok used to be a crystal-clear stream with abundant drinking water and a rocky riverbed. It springs up from several smaller streams in Rupice, where Eastern Mining d.o.o. is currently carrying out works to open a zinc, lead and barite mine. These metals are not primary! Since Austro-Hungarian occupation of Bosnia and Herzegovina, it has been known that gold and silver may be found in Mehorić and Rupice. For citizens of Kakanj, the quantities of these ores are irrelevant, although this information concerns them most.

As shown on the map above, Rupice Mine is cut across by multiple waterways feeding Vrući Potok. These waterways will be permanently cut off, dried up and destroyed.

Therefore, Vrući Potok was clear, crystal-clear drinking water that is now polluted because of the preparatory works related to the mine.

The current works are being carried out at the altitude of 1000 m, and each incident may result in a far-reaching impact on the entire water network around the construction site. And this pollution is not only temporary!



In a meeting held with the representative of Eastern Mining d.o.o. [REDACTED], he informed us on the following activities in the mine:

- Vrući Potok is currently being put into pipes and the water is murky because of these works.
- The Eastern Mining project envisages for the drinking water from Vrući Potok to be used for the needs of the mine, hygienic needs of numerous workers, and for flushing the ore in a chemical procedure involving cyanide.
- After the use, the water is to be redirected to a collector and filtered to remove major waste, and then discharged back into Vrući Potok riverbed flowing toward the territory of Kakanj.

Therefore, the drinking water from Vrući Potok, flowing naturally in the territory of the Municipality of Kakanj is no longer drinkable, and the question is which poisons it contains. The document entitled *Water and Wastewater Management Plan* does not envisage for the wastewater to be discharged into Vrući Potok, but into the Mala Rijeka River.

*Activities*

1. The project water classes and their corresponding treatment demands should be governed to ensure the alignment with the project standards (for discharge and preservation of the good water quality and water environment status of the receiving waters).
2. The water treatment systems and acid drainage of the rocks (and potential inflow of mine water) demand detailed designing and commissioning.
3. The contractor will need temporary wastewater treatment systems in the electric energy plants in Rupice. Sufficient capacities will be engaged in Tisovci to wash and treat the existing sewerage network of the public utility company.
4. Monitoring: the quality of the water in the fish farm, drainage collectors of the Mala Rijeka River, Vrući Potok and Bukovice downstream from the reservoir for the fish farm will be monitored during the construction and the operational phase of the Rupice facility, of the treatment facility Vareš and the waste rock disposal sight will be monitored to ensure them against potential pollutants entering the drainage system, and treated properly before being discharged into the Mala Rijeka River.
5. The points of monitoring the surface waters established in the ESIA to be maintained during the construction and operational phases are identified below:

Table 5.2: Supervision of the surface waters during the construction and operational phases		
Basin	Monitoring points	Description
Treatment facility Vareš	PPV-4	Mala Rijeka, upstream from the treatment facility and the waste rock disposal site
	PPV-3	Mala Rijeka, downstream from the existing waste rock disposal site and the treatment facility
	PPV-10	Mala Rijeka, upstream from the new waste rock disposal site
	PPV-11	Mala Rijeka, downstream from the new waste rock disposal site
Rupice	PP-I	Borovica, downstream from the /illegible/ reservoir
	PP-II	Borovica, downstream from the Donja Borovica village
	PP-III	Borovica, upstream from the /illegible/ reservoir (eastern tributary)
	PP-IV	Borovica, upstream from the /illegible/ reservoir (western tributary)
	PP-V	Vrući Ppotok
	Vrući Potok spring	Public spring on the road
	Donja Borovica spring	Residential house

6. Monitoring should be carried out monthly during the construction works, and quarterly during the operational phase, including the results stated in the Annual Environment Monitoring Report. The monitoring parameters should include organic, inorganic, and microbial set with the currently determined physical-chemical parameters (the current list of parameters). Monitoring modifications should be overviewed as necessary, including the frequency and parameters. For example, if contamination indicators are noticed, the monitoring frequency should be increased, and additional parameters should be used to identify the source of the contamination and remove discrepancies.

Vrući Potok is Trstionica's tributary. In the studies concerning the biodiversity of Trstionica's upstream and Trstionica primeval forest, it is described as a "crystal clear river abundant in fish".

Trstionica surfaces in the nearby Trstionica primeval untouched natural forest envisaged to be put under the highest degree of protection. Unfortunately, because of corrupted Bosnian authorities, 30 plus acres of the primeval forest are not officially protected, although entering the area is forbidden because of the very protection plan.



Now, Trstionica is crystal-clear up to the location where Vrući Potok crosses it. The downstream is horribly polluted, dirty and not a suitable fish habitat. There is no more fish in the river, frogs have disappeared, water insects as well, and the river is devastated.



The place where Vrući Potok crosses Trstionica is only 1 km away from the entrance into the Trstionica primeval forest.

We used to drink from Trstionica. The water was drinkable until Eastern Mining d.o.o. came into the picture.

The Rupice Mine is only 300 m away from a natural and administrative border between the Municipalities of Vareš (which granted the concession in their territory) and Kakanj, citizens of which were never asked about their opinion. Likewise, local authorities of the Municipality of Kakanj were never consulted, but they also failed to react in an adequate manner, and therefore knowingly acted against the livelihoods and survival of the entire population.

As a polluted river, Trstionica meets the Boriva River, which is also crystal-clear and drinkable.

These two mountain rivers form Trstionica which flows through mountains and the forest, through settlements and the place from which Bosnian kings used to rule, through Obre – a neolithic site by the river, and crosses the Bosna River couple of kilometres downstream.

In the 2009-2029 Zenica-Doboj Canton Spatial Plan, it is foreseen for the area to be put under the highest degree of protection (as seen on page 103 of the stated document, shown below).

Municipalities	Protected natural heritage
Kakanj	<p>The protected forest-economic area (FEA) of Žuča – Ribnica (Directive 92/43/EEC-Annex I)-forest ecosystem within GJ Žuča-Ribnica belong to the collective ecosystem of interest for protection.</p> <p>Trstionica primeval forrest – having regard to the regulations in view of the Habitat Directive (Directive 92/43/EEC-Annex I) of this forest should be under the highest degree of protection under the IUCN category-special nature reserves, GJ Gornja Trstionica-Bukovica, GJ Tribija-Duboštica.</p> <p>Tajan natural monument – II protection zone (the Law on the Proclamation of a Natural Monument), 910.00 acres, Kakanj FEA.</p>
Zenica	<p>Protected tree: <i>Taxus baccata</i> L.</p> <p>Šahinovići hamlet, Pepelari village, Municipality of Zenica, state ownership (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 1195/55-dendrological rarity.</p>
Olovo	<p>Protected area: Čude canyon (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 1078/55). Characterised by a specific geomorphology and azonal stands of black pine tree. Protected tree: <i>Taxus baccata</i> L., located in Bukov Do village (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 1079/59). The tree is approximately 600 years old.</p>
Vareš	<p>Protected tree: <i>Tilia grandiflora</i> L. (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 08-433/1-59). The estimated age is 350 years.</p> <p>Protected tree: <i>Tilia grandiflora</i> L.</p> <p>This large linden tree is located on the cemetery in Očevlje, Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 08-432/1-59). The estimated age of the tree is 300 years.</p> <p>Protected peat area – on the Zvijezda Mountain in the vicinity of Vareš, the Municipality of Vareš, state ownership (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 08-429/1-59), 10 acres.</p> <p>Stavnja River spring – Municipality of Vareš, state ownership (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 08-275/1-58).</p> <p>Ponikva Cave – the Municipality of Vareš, state ownership (Decision of the Institute for the Protection of Cultural and Natural Sites of SR BiH 08-276/1-58).</p>

It is planned in the stated document for the area of Trstionica River and the primeval forest to be put under the highest degree protection because of the extraordinary biodiversity. The area of Gornja Trstionica and Bukovica is one of the very few preserved forest areas in the territory of the Municipality of Kakanj, covering the area of approximately 30 acres; in addition, the Municipality of Kakanj Tourism Development Master Plan states that “Trstionica is a crystal-clear river abundant in different fish species”. Under the Directive on Habitats, this type of forest should be protected at the highest level and treated as special reserve, and if protected, it should only be used for scientific and educational purposes (information from the Municipality of Kakanj).

*From the 2021-2027 Kakanj Municipality Development Strategy, adopted at the 18th session of the Kakanj Municipal Council held on 31 May 2022:*

*Strategic goal 3*

*3.3 \*To ensure a sustainable natural resources management system, to improve the quality of the environment\**

*3.3.1 To increase the surface of the protected area*

*The Municipality of Kakanj carried out the flora and vegetation endangerment assessment in their study entitled Valorisation of Natural Primeval Forest Area. The assessment of the endangerment of the vascular flora was carried out based on the criteria and methodology, and it resulted in a scientific basis implying that the proposal of the degree of protection of the stated area, with the aim of preserving the biological diversity, is of great significance for BiH and the region. Establishing a wider protected area of Trstionica basin will enable the protection of cultural-historical and natural heritage and preservation of culture and the eco-system. The development of touristic potential of this area would result in new jobs and active participation of the local community.*

*This method of protection would in time ensure self-sustainability of the area.*

**3.3.1 Increasing the surface of the protected area**

*The Municipality of Kakanj carried out the flora and vegetation endangerment assessment in their study entitled Valorisation of Natural Primeval Forest Area. The assessment of the endangerment of the vascular flora was carried out based on the criteria and methodology, whereby this resulted in a scientific basis implying that the degree of protection of the stated area, with the aim of preserving the biological diversity, is of great significance for BiH and the region. Establishing a wider protected area of Trstionica basin will enable the protection of cultural-historical and natural heritage and preservation of culture and the eco-system. The development of touristic potential of this area would result in new jobs and active participation of the local community.*

*This method of protection would in time ensure self-sustainability of the area.*

**[REDACTED]**: stated that he recognised that great efforts have been invested in the preparation of the document and congratulated everyone, but also noted that it is evident that the image created does not correspond to reality, and this characterises BiH politics in general. He pointed out that not enough attention is being paid to environmental protection, especially when it comes to the Trstionica River basin, where the establishment of a wider protected area of the Trstionica River basin and the possibility of cultural-historical and natural heritage are mentioned, as well as the development of tourism in the area. At the same time, works are being carried out upstream, and this clearly implies that Trstionica will not be the same in five years, i.e., as written in the Strategy, as they could clearly see when they recently visited the company carrying out the works in this area.

However, the works in the area continued, crushers and concrete plant are assembled, and Trstionica's riverbed and a part of the forest and green surfaces on the Mehorić picnic/rest area are completely devastated.





In fact, the almost illegal works caused the damage that can be evidenced as follows:

- Trstionica's riverbed (drinkable water) from Mehorić to the bridge across the mouth of Vrući Potok is buried in waste rock from the concessional Rupice Mine in Vareš, the bio-flora is completely devastated, and the previously jagged riverbed is narrowed down to a canal with a steep waste rock bank.





- In the same area, illegal quarrying works have been carried out on the rocks along the road (nota bene: the rocks did not pose any collapse risk, they stood there peacefully for decades).







- In the same area, trees and low vegetation were illegally cut, as well as bushes and other plants representing a food source for numerous wild animals, birds, and insects.
- At the location of the Rupice Mine in Vareš, the forest was illegally cut (an entire section, approximately 20 acres above the annual cutting plan); the roots were disposed of on the banks of Trstionica on top of the already piled-up waste rock.
- Vrući Potok (drinkable water!) was buried in waste rock in the same way, and narrowed down into a channel, thus causing enormous damage to the riverbed paved in smooth rock; Vrući Potok is constantly murky and muddy, and water animals that used to live there disappeared.







- The Mehorić location was a green meadow surrounded by the forest and vegetation, and beekeepers used to bring their bees to graze there during the summer. This location is currently overflowing with heavy machinery, trucks, rock breaking plants and concrete plants and various residential containers, and the ground is covered in concrete and permanently damaged.



- In the same location, Trstionica's riverbed is devastated in the roughest way, buried in waste rock, and piped to allow the crossing of heavy vehicles – the improvised bridge replaced the jagged riverbed that one could walk over and cross the river.
- Along the Mehorić – Ponijeri road, the Boriva River is also buried in waste rock, and on top of huge quantities of waste rock, construction material such as grids, aluminium profiles and alike were transported to the location as well.
- The heavy machinery also entered the area toward Trstionica's source – they excavated the gravel from the riverbed.

We have photographic evidence and video documentation for every statement in this letter.

The contractor of the above-mentioned devastating works carried out for the concessional Rupice Mine of Eastern Mining d.o.o., the concessioner, is Trgošped d.o.o. Kakanj.

#### Important notes:

1. In the devastated part, from Mehorić to the bridge (500 m) across the Vrući Potok mouth, Trstionica represents a natural and administrative border between the territory of Vareš and the territory of Kakanj (cadastre municipality Vukanovići). The devastation is happening in the territory of Kakanj! It is illegal, without any permits, and in the service of the concessional Rupice Mine in Vareš.

Bosnia and Herzegovina  
Federation of Bosnia and Herzegovina  
Zenica-Doboj Canton

/Coat of arms/

**MUNICIPALITY OF KAKANJ**  
*Mayor's Office*

Number: [REDACTED]  
Date: 7 June 2022



**SUBJECT:** Submission of information

Dear Sirs,

We hereby inform you that on 1 June 2022, the Municipality of Kakanj received your request to access information, requesting for information to be submitted on the works commenced at the location of Trstionica and Boriva Rivers, in view of whether the Investor requested the approval of the local self-government, whether a public discussion had been held, and in view of the opinion of the local population and Kakanj citizens on these activities – works in the stated localities, including a short explanation of the purpose of these works in that area, what type of investment this is, etc.

In fact, you stated in your request that the [REDACTED] received a series of letters and emergency appeals from citizens of Kakanj and surrounding settlements expressing their concerns about the devastation of the area rich in water and planned to be protected; in their appeals, the citizens are asking for an emergency stop to be put to the commenced works that have already caused devastation in the stated localities, because they suspect illegal works, works without permits and approvals of both local and cantonal inspection bodies.

Pursuant to Article 14, paragraph 1 of the Law on the Freedom to Access Information in the Federation of BiH (*Official Gazette of FBiH*, 32/01 and 48/11), the request was submitted to the competent municipal services (Economy, Urbanism and Environment Protection Service and to the Inspection Division) for their opinion, having in mind the fact that the requested information can be found in their records.

The information was submitted in the form of a letter, number 04/1-572/22 of 6 June 2022 and number 02/10-507/22 of 7 June 2022 and is enclosed to this letter.

**Enclosure:**

- Letter of the Economy, Urbanism and Environment Protection Service of the Municipality of Kakanj, number 04/1-572/22;
- Letter of the Inspection Division, number 02/10-507/22 of 7 June 2022.

**To be delivered to:**

1 x to [REDACTED]  
1 x to the Archives

/Stamp affixed/

Public Relations Officer

/Signature affixed/  
[REDACTED]



**Bosnia and Herzegovina**  
**Federation of Bosnia and Herzegovina**  
**Zenica-Doboj Canton**

*/Coat of arms/*

**MUNICIPALITY OF KAKANJ**  
*Department of Economy, Urban Land-Use*  
*Planning and Environment*

Number [REDACTED]  
Date: 6 June 2022

**Mayor's Office**

**SUBJECT:** Response to the request to access information

In view of the request to access information addressed by [REDACTED] of 31 May 2022, we hereby provide the information below:

- We had no requests to issue an urban permit for the works in the locality of Trstionica and Boriva Rivers or any requests to provide an opinion on the stated works, if any proceeding is ongoing before higher-instance courts (Canton or the Federation), and we have no knowledge of these particular works.

Sincerely yours,

*/Stamp affixed/* **ASSISTANT MUNICIPAL MAYOR**

*/Signature affixed/*  
[REDACTED]

**Bosnia and Herzegovina**  
**Federation of Bosnia and Herzegovina**  
**ZENICA-DOBOJ CANTON**  
**CANTONAL ADMINISTRATION FOR**  
**INSPECTION AFFAIRS**

/Coat of Arms/

Division for inspection in the areas of  
agriculture, water management, veterinary affairs, health, urbanism, and ecology  
**WATER INSPECTION**

Number: [REDACTED]  
Zenica, 17 June 2022

ZENICA-DOBOJ CANTON  
Cantonal Administration for Inspection Affairs  
Attn.: the Director

**SUBJECT: Submission of information on the actions taken**  
**REFERENCE: Request to access information of [REDACTED] of 1 June 2022**

In their letter captioned *The request to access information on construction works in the territory of the Municipality of Kakanj* of 1 June 2022 [REDACTED] requested the Division for inspection affairs in the areas of agriculture, water management, veterinary affairs, health, urbanism, and ecology of the Cantonal Administration for Inspection Affairs of Zenica-Doboj Canton to deliver information on their awareness on the commencement of works in the locality of Trstionica and Boriva Rivers in the territory of the Municipality of Kakanj.

In view of the stated request of [REDACTED], we hereby inform you that the Division of Inspection of the Municipality of Kakanj submitted to the Cantonal Administration for Inspection Affairs an anonymous e-mail report on excavation of material from the Boriva River in the Municipality of Kakanj, at the location in question called Mehorić, the Municipality of Kakanj, upon which the Cantonal Water Inspection carried out the inspection of the stated Mehorić location on 26 May 2022, and concluded that a mobile concrete plant owned by Trgošped d.o.o. Kakanj and accompanying facilities (mining plateau, containers, fraction boxes, canopies for the machinery, /illegible/, improvised /illegible/ and alike, and accompanying mechanisation, were installed at the location. Excavation of material at the stated location were not evidenced during the inspection.

The subject of the inspection did not provide water documents for the stated facilities and activities (mobile concrete plant for preparation of concrete and accompanying buildings) at the Mehorić location, the Municipality of Kakanj, and in accordance with their actual competence, the Cantonal Water Inspection took administrative and repressive measures to align the existing state with the provisions of the Law on Waters of Zenica-Doboj Canton (*Official Gazette of ZDC*, 17/07).

As the facility is a complex one and as the activities are to be subjected to inspection carried out by other inspection bodies, in accordance with the provisions of Article 65, paragraph (4) of the Law on Administrative Procedure (*Official Gazette of FBiH*, 2/98 and 48/99), the Cantonal Water Inspection duly informed in written the other inspection bodies of the Municipality of Kakanj and the water inspectorate of the Federal Administration for Inspection Affairs.

Sincerely yours,

/Stamp affixed/

/Signature/

[REDACTED]  
Cantonal Water Inspector

To be delivered to:

1. The Addressee
2. Archives

**SAVA RIVER WATERHSED AGENCY  
SARAJEVO**

Number: [REDACTED]  
Date: 23 June 2022

Pursuant to Article 14 of the Law on the Freedom to Access Information in the Federation of Bosnia and Herzegovina (*Official Gazette of FBiH*, 32/01), and acting upon the request of a non-government, non-profit, non-partisan organisation [REDACTED], the Sava River Watershed Agency hereby gave the following

**DECISION**

1. The [REDACTED] organisation is hereby **allowed** to access information on the works in the Municipality of Kakanj, on the commencement of works in the stated location, on the complaints of the local self-government or citizens on the devastation in that area, and on the request to issue a preliminary water permit or another document.
2. We respond as follows:
  - We are not familiar with the commencement of works at the stated location.
  - We have not received any complaints of the local self-government or citizens on the devastation in that area.
  - We have not received an official request to issue a preliminary water permit or another document.

**Note:**

In accordance with Article 5 of the Law on Waters of FBiH (*Official Gazette of FBiH*, 70/06), Trstionica and Boriva waterways in the territory of the Municipality of Kakanj are second-category waterways in terms of the importance for water management and fall under the scope of competence of the Ministry of Agriculture, Forestry and Water Management of Zenica-Doboј Canton.

3. This Decision shall enter into force on the day it was given.

/Stamp affixed/      DIRECTOR  
                                 /Signature/  
                                 [REDACTED], Bachelor of Engineering

To be delivered to:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- Archives

2. By burring the riverbed of Vrući Potok, which is an administrative border between the territory of Vareš and the territory of Kakanj, the stream is pushed into the territory of Kakanj – the wider Vareš territory.

3. Vrući Potok crosses and pollutes Trstionica; the dead weasel has been found (the first dead animal in fifty years, as far as we can remember) is the proof that the stated pollution is not naïve at all.





4. Trstionica meets Boriva, and they flow into the Bosna River.
5. On the way to the Bosna River, Trstionica and Boriva flow through Kraljeva Sutjeska which can be freely considered a national monument because of numerous important old buildings. In case of flooding – and this is not an abstract possibility because these are mountain rivers which always collect huge quantities of water from the mountains and rain fall – the waste rock bank will probably move and highly likely directly endanger the Kraljeva Sutjeska Franciscan Monastery (firstly built in the medieval Bosnian period, upgraded in the Ottoman period, and modernised in the Austro-Hungarian period) (dam, undermine, collapse), and endanger the one of the oldest mosques in Bosnia and Herzegovina, Sultan Fatih mosque in Kraljeva Sutjeska built in 1463. Flooding of the inhabited areas along the river, i.e., Kraljeva Sutjeska, Haljinići, Brežani, Obre, and Čatići is very likely.

At the time when the entire world is fighting global warming, we have acres of forest cut in the location of Rupice (we know that approximately 20 acres of large, healthy beech trees, and this can also be assessed from the roots disposed of along Trstionica).





At the time when the entire world is fighting to preserve every drop of water, Eastern Mining d.o.o. pollutes Vrući Potok – drinkable water, the Trstionica River – drinkable water, the Boriva River – drinkable water! These three are very powerful and wild mountain rivers that hold enough water even now, in times of extreme drought, but unfortunately, they are polluted now.

It is unacceptable for drinking water to be used so arrogantly in mines which will pollute the entire flow of a large stream and the entire flow of three rivers: Trstionica, Boriva and Bosna. Regardless of the planned collectors and filters, faecal water and water polluted with toxins will never be drinkable again.

This disaster does not affect people only! This is a disaster for numerous insects living in the area, birds, and wildlife (brown bear, wolf, deer, lynx, wild boar, and others), too.

The water pollution resulted in the disappearance of fish from Trstionica, and frogs and water insects disappeared as well.

The detonations constantly echoing through the mountain and ground vibrations from the heavy machinery and drilling bores caused the wildlife to disperse (it was common to see roe deer with their young drinking from the river, but the area is deserted now).

There are no snakes, either. We used to see vipers and adders, and even got bitten, but the snakes are gone, too.

There are no more newts.

We addressed different inspection authorities, and our activists' efforts, on-line protests in form of flooding the e-mail address of the inspection authority, and constant activities of informing the public resulted in the indolent authority being pressured into removing the illegal concrete plant. We are now focused on the rehabilitation of the devastated area along the Trstionica River and on bringing it to its previous state.

However, all our efforts are useless if Eastern Mining d.o.o. continues to devastate the area of Trstionica, Vrući Potok, Boriva and Rupice: if they continue to devastate the area and if they continue to pollute the water – and they will.

This wild nature area, envisaged to be protected, will be deprived of drinkable water, i.e., the water will poison everything in the area.

Employees of Eastern Mining told us privately that the goal is to find gold and silver, but we already know that the excavations in the Austro-Hungarian period were stopped because of the presence of mercury; even without mercury, it is enough for the water to be polluted with cyanide used to separate gold and silver ores; it is enough to know that faecal water will be filtered and discharged back into the drinkable water flow.

The wild nature will disappear, the drinkable water is already not drinkable anymore, but there is still enough time for everything to be put back into the previous state and for this catastrophic project to be stopped.

Eastern Mining d.o.o. was given the concession in the territory of Vareš, and all the existing permits are tied to Vareš. However, Vareš bears no damages from this project; on the contrary, all damages are caused in the territory of Kakanj, i.e., in the only remaining area of untouched nature in the entire Municipality



of Kakanj. We have nothing left! Mines and quarries already destroyed Zgošća and Ribnica Rivers, and now Eastern Mining d.o.o. is beginning to destroy the only river we have left, Trstionica.

We are trying to put a stop to this, and we will continue doing this, either peacefully or forcefully. We are currently trying to achieve something in a nice way, but if we fail, the only thing we will have left is to block the area and probably arouse civic revolt.

To make the things worse, we are afraid that the Rupice Mine will endanger the Bukovica River, as well, the source of which is on the other side of the hill where the mine is located.

The Bukovica River's source is far from the Rupice location. However, the Borovički Potok stream crosses Bukovica, and the source of its tributary, the Bojića Potok Stream, is very close to the Rupice location. We are afraid that this body of water could be endangered by the excavations, undermining and underground drilling, and Kakanj takes its drinkable water from the Bukovica River.



The hill where the Rupice Mine is located is a large mountain elevation with numerous small streams and their tributaries. It is an entire water network resembling capillary. The hill is also criss-crossed by underground waters which springing in the lower ground.

Every drilling, excavation, tunnelling, and undermining will most definitely cause immeasurable damage to these waterways, and even destroy them.

In addition to these problems concerning the water, survival of animals, destruction of the area rich in different species of rare flora and fauna caused by the very works, and the noise and devastation of the high forest, there is also the issue of the disposal of the waste rock from the mine. Since November 2021 to date (21 July 2022), all waste rock excavated in the Rupice location during the preparatory works for the mine, was disposed of directly into Vrući Potok, and into the riverbeds of Trstionica and Boriva Rivers.

The rivers became inaccessible because of the waste rock piles, the riverbed is narrowed into a canal, the water is polluted, the bank flora is destroyed, and to make things worse, the roots of the trees cut to make



room for the excavation works for the Eastern Mining d.o.o. mine were disposed of on top of these waste rock piles.

It is important to note that Vrući Potok, Trstionica and Boriva are water ways in the territory of Kakanj, while the concession was given by Vareš, for their territory.

Vrući Potok is also an administrative border between the two municipalities, just like Trstionica in one part, while the waste rock piling and illegal disposal under the mine-servicing works were carried out in the territory of Kakanj.

The Boriva River is entirely in the territory of Kakanj.

Therefore, the concession is given for the territory of Vareš, while the devastation is happening in the territory of Kakanj. The last untouched natural area in Kakanj is being destroyed.

We are looking for help. We cannot achieve much with these indolent authorities, and the Rupice project of Eastern Mining d.o.o. as the concessionaire directed all the destruction to Kakanj, in addition to everything being done outside the project scope and without official documents to be found on their web site. None of the water ways from the Rupice location flow to Vareš, and the water permit is related to Vareš.

The Rupice mine is endangering numerous water ways.

The concession for the mine should not have been issued at all, and the same is true for the operational permit and environmental permit because of the vicinity of water ways (the legal minimum is 1000 m of areal distance from the water ways).

When it comes to the concession itself, it had to be issued with the approval of all municipalities the territories of which could be endangered by the project (Amendments to the Law on Concessions, Article 1 as per Article 5), and this is not the case.

From October 2021 to 7 June 2022, the entire project was basically kept a secret despite all the questions we have asked:

- The Municipality of Kakanj regularly states in their releases that “they have no knowledge of the type of works being carried out”, and the councilmen of the Kakanj Municipal Council, eleven of them, visited Eastern Mining and the Rupice Mine on 15 May 2022 (Eastern Mining web site);
- The workers who illegally disposed of the waste rock into our rivers told citizens and hikers who wanted to know what they are doing, that they are building a road (although no road is planned, except the one used by the forest management service).

Vrući potok before:



Vrući potok after:



You can read more about our fight for the protection of our rivers and the Mehorić area on our Facebook page: [REDACTED].

Since you, the EBRD, are the main financier of this project of Eastern Mining d.o.o., we believe you are the most responsible party for the devastation. Without your funds, the devastation would not have been possible, i.e., it would not have been possible for the project carried out by the stated company to be implemented.

You approved the funds for the project, but you did not consult with the other side, in this case more than thirty thousand citizens of the Municipality of Kakanj, the majority of which live in the basin of the stated rivers and in the urban area and receive their drinking water from the Bukovica source.

Kakanj is an industrial municipality with a lot of problems caused by the air pollution devastating the ground, endangering people's health, and biodiversity. Because of the project you financed, the citizens of Kakanj will be experiencing problems with drinkable water as well.

The area we are trying to protect is **the only area in the Municipality of Kakanj** that is **left untouched**, but the works being carried out have already devastated the area to a large extent and threaten to destroy it completely.

**As the financier, the creditor of the stated project, we hold you responsible for the ecocide happening in the territory of the Municipality of Kakanj.**

Best regards,

IGC Trstionica and Boriva – Kakanj Nature Park