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# **IN THE MIRE:**

## **Risks to Banks and Investors from Rio Tinto's planned Jadar Mine Project in Serbia**

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**Finance risk briefing**

**April 2023**

# Executive Summary

In January 2022, Rio Tinto's plans for a lithium mine, processing plant, and tailings landfill in the Jadar Valley in Serbia were annulled by the Serbian government following unprecedented public pressure. Over half a million Serbian and European citizens have signed petitions<sup>1</sup> calling for the cancellation of the project and protests over many months drew tens of thousands of people.<sup>2</sup> Aleksander Vucic was re-elected President in April 2022 on the promise that the Jadar Project had been cancelled.<sup>3</sup> At its 2022 AGM, Rio Tinto declared its intent to overturn this decision.<sup>4</sup> The company has undertaken project-related activity including land purchases after January 2022.<sup>5</sup> Together with Vucic's post-election statements that the cancellation was a mistake, this activity suggests that it was merely a political ploy. This will only strengthen the opposition to the project as well as the possibility of social unrest. This further raises the project's risk profile for Rio Tinto.

The Serbian government has not correctly applied the EIA Directive to the Jadar Project despite the EU confirming applicability to a project in a formal candidate state for EU membership.<sup>6</sup> The published EIA scope report<sup>7</sup> excludes the processing plant and tailings landfill meaning the cumulative impacts of the entire project have not been considered by the government.

Rio Tinto has consistently underestimated local and national opposition to the Jadar Project despite huge public protests. Continuing opposition from hundreds of property owners who refuse to sell their land threatens to significantly delay the start of the development even if the Serbian government reverses its decision. While Rio Tinto claims never to threaten expropriation, company pamphlets circulated among landowners explicitly describe it as the ultimate outcome.<sup>8</sup> Such a strategy is high-risk in a country with recent experience of war and ongoing political upheaval where property is considered a source of private stability.

Members of the Serbian Academy of Sciences have warned of the potential implications for Serbia's largest source of drinking water.<sup>9</sup> A study from the University of Belgrade Faculty of Biology commissioned by Rio Tinto warned that the mine should be abandoned to protect biodiversity. The proposed mine is situated in an area of exceptional archaeological importance representing a test of Rio Tinto's post Juukan Gorge pledge to make protecting cultural heritage an issue "felt in the hearts and minds" of its employees.<sup>10</sup>

Rio Tinto's plans remain a flash-point for protest, controversy, and legal challenges and present significant environmental and social risks. Investors and financiers should urge Rio Tinto to formally abandon the project and respect the Serbian government's decision to annul the company's plans. If Rio Tinto intends to proceed, financial institutions should insist that the company first fully addresses the human rights, social & political, and environmental risks arising.

This briefing outlines the risks facing Rio Tinto from its plans to proceed with the proposed Jadar Project. We suggest questions investors should ask the company to understand if it has adequately assessed such risks.

## Major Risks for Rio Tinto from the Jadar Project:

- **Inadequate impact assessment released by the Serbian government and Rio Tinto and the incompatibility of the approval process with EU law.**
- **Risks to Rio Tinto's ability to develop the Jadar Project because of significant opposition from landowners and the general public and inadequate stakeholder involvement.**
- **Risk to Rio Tinto's social licence because of perceived political 'gamesmanship' around the cancellation of the Jadar Project and because of danger to areas of historical and cultural significance.**
- **Negative environmental impacts including on water supplies and biodiversity loss.**

# Introduction

Rio Tinto wants to develop a lithium and borate mine in the Jadar Valley in Serbia. The proposed development includes an underground mine with associated infrastructure and equipment, including electric haul trucks, as well as a chemical processing plant to produce the lithium carbonate (collectively referred to in this briefing as the Jadar Project). Although formally cancelled by the Serbian government in January 2022 ahead of a general election and in response to protests that drew thousands of people<sup>11</sup> Rio Tinto has expressed its intention to press ahead with the mine “now that elections are out of the way”.<sup>12</sup> It remains to be seen whether the decision to revoke Rio Tinto’s licences will be permanent, or prove to have been a political ploy.

There are serious concerns about the proposed Jadar Project’s impact on local communities, water supplies, archaeological & cultural sites, and biodiversity as well as criticisms of a lack of transparency, inadequate impact assessments leading to irregularities in the approval process, and the implementation of the cancellation decision.

Rio Tinto operates in the shadow of the civil war that followed protests against its operations in Bougainville Papua New Guinea<sup>13</sup> and more recently its deliberate 2020 decision to destroy a site of community, national and international significance at Juukan Gorge in Western Australia. That decision led to potentially irreparable damage to the company’s reputation. It also exposed Rio Tinto’s inadequacies in governance and internal communication processes; and in understanding of and respect for the communities in which the company operates, and of the importance and underpinnings of its social licence.<sup>14</sup> Like the Dakota Access Pipeline controversy, the Juukan Gorge scandal also demonstrated that national or state laws are often insufficient to avert unacceptable consequences.

In this context, shareholders and financiers should be concerned about and scrutinise Rio Tinto’s plans for the Jadar Project. This project remains a flash-point for protest, legal challenges, and controversy.

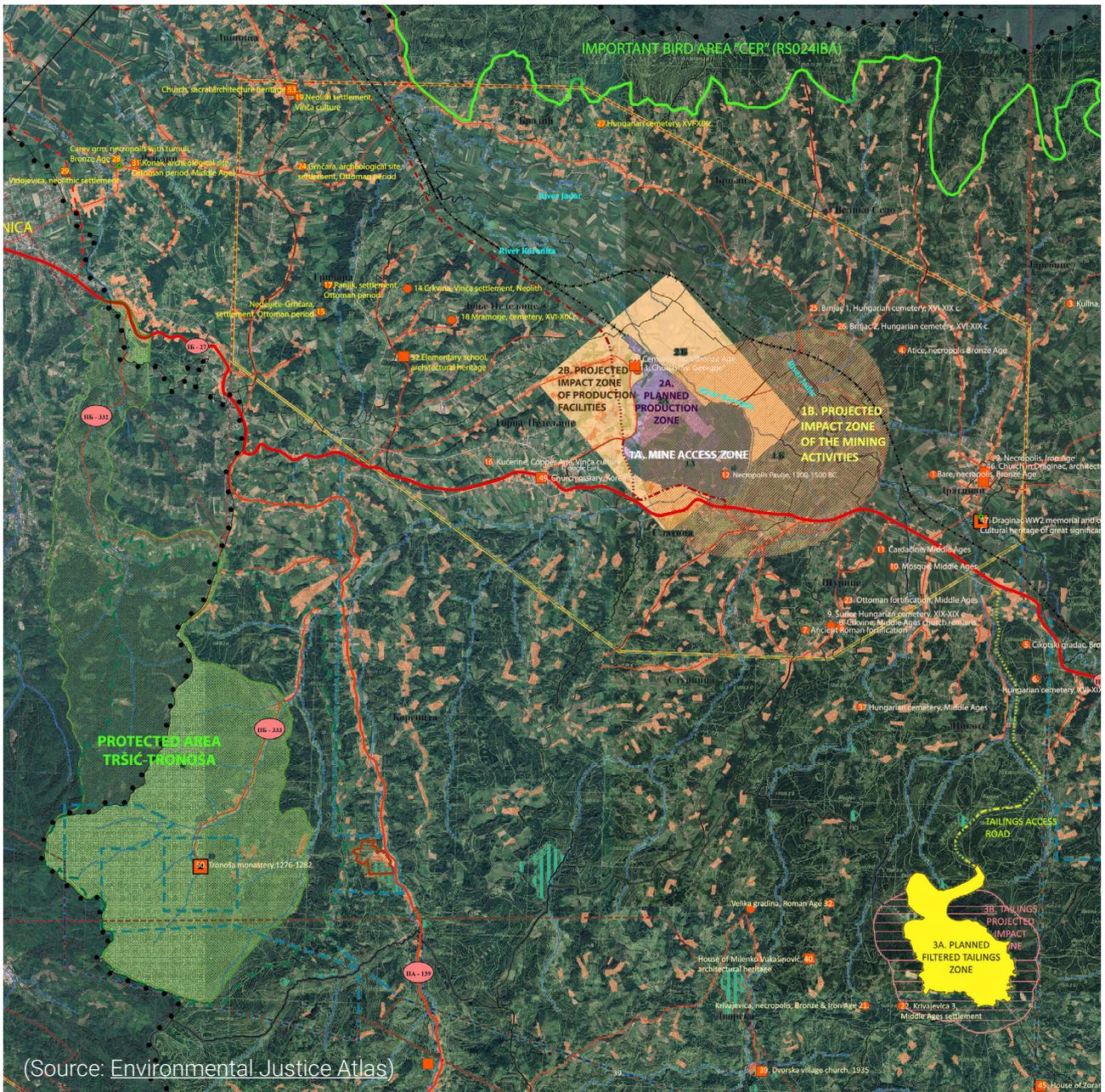
# The Jadar Project

The proposed Jadar Project is situated in Western Serbia, in very close proximity to the border with Bosnia & Herzegovina. The area is home to Serbia’s most fertile land and is a rich agricultural area consisting of farming, bee-keeping, and tourism. Agricultural yields alone are estimated at over €70 million per year.<sup>15</sup> About 20,000 citizens in this region actively rely on agriculture.<sup>16</sup> This is under threat from the building of the mine, the associated displacement of people and destruction of productive agricultural land.

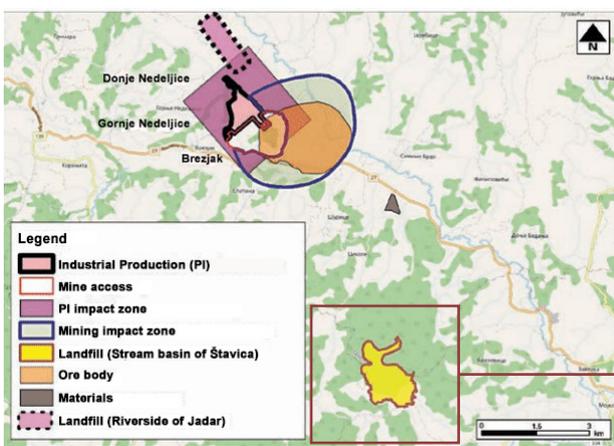
The spatial plan for the Jadar Project covers 22 villages and 2,030 hectares of land for a special purpose complex, accompanying corridors and traffic infrastructure systems.<sup>17</sup> It would be situated on the bank of the Korenita river, a tributary to the Jadar river, with underground mining to be performed underneath both riverbeds. Tailings are to be located a few hundred metres from the mine, close to the rivers and would amount to 1.3 million tons per year (90 million tons over the life of the mine). This landfill occupies an area of 19.5 ha, with floors 10 metres high, from elevation 137 to elevation 197, with a total height of 60 metres.<sup>18</sup> Another proposed area for tailings is near villages Stavica and Krupanj.<sup>19</sup> However, due to numerous requests for changes in location conditions<sup>20</sup> with unclear conclusions, it is believed that both locations are to be used. The Jadar river and the Korenita river are prone to flooding every year, with the most recent large floods being in 2020.<sup>21</sup> The Jadar Project is designed to operate 24/7 over a mine life of 60 years.

The proposed Jadar Project is situated in an area of exceptional archaeological importance. The spatial plan misclassified several extremely important archeological and cultural sites. One example is the Bronze Age archaeological site of Paulje, roughly 3500 years old, which in the spatial plan is listed as outside the Jadar Project mining area<sup>22</sup> when it is in fact situated in the middle of the mine access zone. (See Map 1 on page 4)

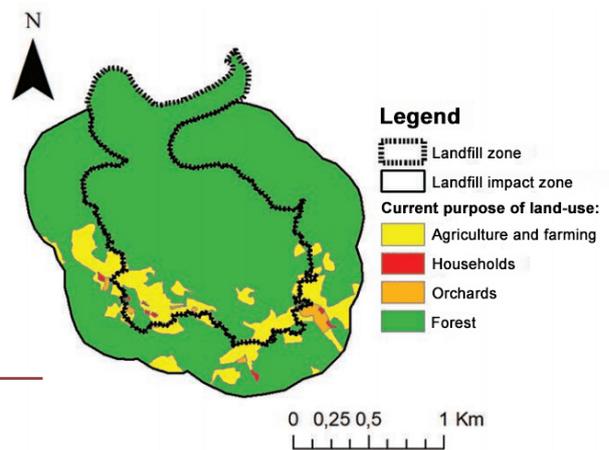
The Jadar Project is owned by Rio Sava Exploration which is 70% owned by Rio Tinto Minerals Development Limited and 30% by Rio Tinto Nominees Limited. Rio Tinto originally intended to start construction in 2022 and operate by 2026. In July 2021, Rio Tinto stated that it “committed USD\$2.4bn” to the Jadar Project.<sup>23</sup> It is expected to finance the project from its own capital. It is worth noting that there has never been a lithium mine, processing facility or tailings landfill in such a densely populated area, and more importantly never in a fertile valley.



Map 1. Spatial Plan for the Jadar Project with protected areas and places of interest



Map 2. Planned facilities and influence zone



Map 3. Surface structure of the Štavnica stream basin

(Source: Serbian Academy of Sciences and Arts, Project Jadar: What is known)

# Risks for Rio Tinto

## Inadequate impact assessment and lack of compliance with EU law

Serbia is an official EU candidate and with a mine life of 60 years, the Jadar Project would operate during Serbia's EU membership. It is important therefore that all permitting related to the proposal as well as its possible cumulative phases are in accordance with European standards and legislation including the Water Framework Directive, the Mining Waste Directive and associated conditions such as insurance including proper risk and accident assessment. This would likely impact the mine's plan, timeline, permitting and increase costs. There are already concerns that the Serbian government is supporting the Jadar Project in ways that represent a breach of EU public procurement rules and standards.<sup>24</sup>

In May 2021 the European Commission confirmed that the Environmental Impact Assessment (EIA) directive and Strategic Environmental Assessment (SEA) directive would be applicable for assessing the environmental impact of the Jadar proposal and that the EIA must cover the entire proposal so as to assess its cumulative impact.<sup>25</sup> Provisions of the EIA

on at the site very difficult.<sup>28</sup> Unlike the mining and initial concentration phase, which uses virtually no chemicals, the final processing stage could yield contaminants that might affect water quality. There is also no description of the significance and quality of natural resources or on protected natural areas. For example, there is no mention of the Cer Valley classified land (discussed in detail below).

There is a lack of capacity in Serbia to properly monitor and enforce environmental protections and meet the EIA and SEA provisions. For example there are only 6 water inspectors<sup>29</sup> and even less mining inspectors.<sup>30</sup> A 2020 World Bank review on Serbia's mining sector stated: "[...] Several government agencies appear to have capacity constraints in terms of staffing and budget. Government should ensure that all relevant agencies (GIS, Mining cadaster, unit monitoring licences and unit monitoring environmental/social impacts) are adequately staffed and have sufficient budget to fulfil their mandate."<sup>31</sup>

In a face-to-face meeting with the prime minister, members of local landowners' association Ne Damo Jadar were told that "the Jadar Project is unquestionable." Asked about environmental protection laws, the prime minister simply stated that Serbia is "not the UN."<sup>32</sup> This puts into question the government's preparedness to act according to EU directive, and this despite the EU Commission's statement quoted above



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### EIA Scoping Report

Directive cannot be ignored by splitting a project into smaller projects to avoid assessing the cumulative environmental impact.

In early July 2021, Serbia's ministry for the environment released Rio Tinto's project presentation and EIA Scoping Report (the EIA Scoping Report).<sup>26</sup> It was incomplete and covered only the mine complex without the processing plant and tailings landfill. For example, there is no description of the technology to be used for the processing of lithium ore, how the mining waste would be treated, its composition, or the location of the landfill. This splitting of key parts of the project is in breach of the EIA Directive. An independent expert reviewer<sup>27</sup> concludes that the separation of these related processes, especially for waste management and disposal, makes understanding what would go

and their statement that they "would be supportive of any project only if it came with a positive environmental impact assessment and met the highest environmental standards."<sup>33</sup> It is unclear what legal standards Rio Tinto would comply with should the cancellation of the Jadar Project be revoked.

In addition to not following the correct EIA procedure, there are concerns that there have been other legal irregularities from the outset including about the reclassification of agricultural land as construction land even before permits had been issued<sup>34</sup> and the impact on archaeological sites not yet fully explored and the CER Valley protected area.

## **If the project is revived, it is likely that legal challenges will be filed against Rio Tinto and the Serbian government.**

### **Questions for Rio Tinto:**

- **What is Rio Tinto's own risk and long-term cost assessment of Serbia not applying EU directives and standards at the outset given its intention to accede to the EU?**
- **Will Rio Tinto commit to meeting EU standards and laws on the Jadar Project?**

### **Opposition from landowners and the general public**

Rio Tinto has suggested that they were surprised by the cancellation as they had not received significant comments on their impact assessment.<sup>35</sup> However comments were submitted by 20 groups including national NGOs with large membership; local groups spanning collectives of landowners, journalists, and activists; individual members of the Serbian Academy of Sciences; and numerous individuals, professors, locals and even citizens living abroad.<sup>36</sup> More groups chose not to offer detailed comments on an incomplete assessment to avoid lending it legitimacy. Furthermore, given the very significant public opposition to the Jadar Project, the company's apparent failure to understand the level of public anger raises questions about its risk assessment.

Rio Tinto needs 600 hectares of land to continue development. "Ne damo Jadar" consists of around 335 property owners refusing to sell their land to the company. Their opposition threatens to significantly delay the start of the development if the Serbian Government overturns its decision to cancel the project. The company claims to have purchased between 40% and 80% of the land needed to commence mine construction. Sources differ on this however leading to a concern that the figures are being manipulated. For example, the Guardian reported the company has bought "80% of the land and property" it needs,<sup>37</sup> while the company stated to the Centre for Investigative Journalism in Serbia that it owns 40% of the required land area.<sup>38</sup> However analysis of records shows that,

although the company has purchased 50% of the land parcels needed by number, these account for only 130 hectares of the 600 hectares required, or 21% of what is needed for the first phase of development.

Rio Tinto incentivised the demolition of the homes they have purchased, leaving the remaining residents with rows of roofless and windowless properties surrounding their still-functioning farms.<sup>39</sup> Armed security patrolled the area throughout 2021 and until the project's annulment. The psychological impact of this should not be underestimated in a country that is already suffering collective trauma from recent wars.

Serbia's 2015 mining law ranks boron and lithium of strategic importance and therefore allows for expropriation. While Rio Tinto claims never to threaten expropriation, company pamphlets circulated among landowners explicitly suggest that if owners do not

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sell the land at the offered price, they will eventually be expropriated.<sup>40</sup> A strategy predicated on expropriation is high-risk given the cultural importance of private property ownership in Serbia where ongoing political upheaval means that property is considered a source of private stability.

There is a growing national movement against the Jadar Project. Over Twenty organisations<sup>41</sup> as well as several independent experts are members of the Marša Drine! campaign initiative against the project, and in support of the local opposition. Wider public opinion is also against the mine. Rio Tinto expressed concern in a meeting with the EU about a possible national referendum on the project acknowledging that it “could produce a more complicated dynamic.”<sup>42</sup> Opposition will likely only get stronger should the company return.

A national citizens’ initiative launched in March 2022 calling for a national ban on lithium and borate extraction gathered over 38,000<sup>43</sup> notarized signatures which were submitted to parliament for deliberation after the summer break. It has still not been put before the relevant committee despite rules that it should do so within 30 days, raising further concerns about the political governance around this project.<sup>44</sup> Green-Left coalition “Ne Davimo Beograd” has filed criminal charges against the Members of Parliament allegedly responsible for the disappearance of the initiative.<sup>45</sup> Over half a million Serbian and European citizens have signed petitions calling for the cancellation of the Jadar Project.<sup>46</sup> Numerous local protests have taken place against the project and Serbia’s diaspora is mobilising in the USA, UK and Australia.

The Cer mountain, part of the Jadar valley, was the first line of defence in World War One against Austria-Hungary and Germany, and a major line of defence in World War Two. The people of the Jadar valley know, through family history and aural tradition, what it means to fight to defend their land. This historical and cultural backdrop should not be ignored by Rio Tinto or the Serbian government. One of the leaders of Ne Damo Jadar has said “[...] *Our land, our roots, our home, our heritage are not for sale, nor are our souls. We inherited everything we have, and it is our obligation to pass it on to our grandchildren. You do not have our permission to build a mine in the Jadar Valley! We will defend this country at the cost of our lives.*”<sup>47</sup> Activists have warned of the risks of protests descending into violence and ultimately “civil war” in a meeting with the European Commission.<sup>48</sup>

The disastrous conclusion to Rio Tinto’s operation at Bougainville in Papua New Guinea highlights the dangers of companies underestimating opposition to their activities and failing to understand the cultural and political context of countries and communities in which they operate. The military suppression of protests against environmental damage and the company’s

hirings and labour practices that eventually turned violent led to a decade-long civil war, accusations against Rio Tinto of complicity in war crimes<sup>49</sup> and the filing of a human rights complaint under the OECD Guidelines in Australia.<sup>50</sup>

## **A strategy predicated on expropriation is high-risk given the cultural importance of private property ownership in Serbia.**

### **Political risk**

Aleksander Vucic was re-elected as Serbia’s President in April 2022 based on the promise that the Jadar Project had been cancelled. The strength of the demonstrations against the project forced him into his first U-turn since coming to power. Announcing the annulment of Rio Tinto’s Special Purpose Spatial Plan-Jadar (the legal basis for the project) Prime Minister Ana Brnabic said “As far as project Jadar is concerned, this is an end.” [...] Rio Tinto gave insufficient information both to the local community and the government [about the impact of the project].<sup>51</sup> However, almost immediately after the election, Vucic stated that the cancellation had been a mistake.<sup>52</sup> He has also, during

## **This political gamesmanship will only strengthen the opposition to the project as well as the possibility of social unrest. This will further raise the risks for Rio Tinto.**

unprompted outbursts in parliament, made groundless allegations of ‘foreign interference’ against community groups and Serbian environmental NGOs who oppose

the project.<sup>53</sup> Together with irregularities following the cancellation, and reports of continued on the ground activity by Rio Tinto, this has led people to worry the cancellation was only an election ploy.

Following the project's cancellation all relevant authorities should have repealed without delay all individual acts they adopted with connection to this proposal. That did not happen. For example, the Ministry for Mining has confirmed that the permitting process for the surface area (exploitation field) of the mine (Field 3) is still in process.<sup>54</sup> Members of Marš sa Drine have filed administrative complaints which are still in process.<sup>55</sup> Rio Tinto has continued to undertake project-related activity even after the formal cancellation.

Rio Tinto trespassed on local activists' land after the cancellation decision.<sup>56</sup> There is also confusion about the company's response to allegations of continuing to secure properties since January 2022.<sup>57</sup> The company's own statements to the EU Commission<sup>58</sup> contradict land purchase public records.<sup>59</sup> Rio Tinto claimed that purchases since January 2022 were merely the formal completion of previously contracted sales and that "three such decisions are still to be implemented."<sup>60</sup> However, analysis of relevant records suggest that seven such purchases have since been completed.<sup>61</sup> A January 2022 confidentiality agreement between

Rio Tinto and Thyssen was amended in March 2022 (two months after the cancellation of the project) to include the Faculty of Technology in Bor. In April 2022, a whistleblower shared evidence confirming that Rio Tinto was currently working with Thyssen Schachtbau on delivering a VSM boring machine to the Jadar Valley that month.<sup>62</sup> Bechtel, the contractor on the project, advertised in 2023 "for long term career professionals, with an initial assignment supporting the Jadar Project."<sup>63</sup>

The cancellation of the mine secured Vucic's re-election. If the government reneges on that decision he is unlikely to be elected again. If Rio Tinto chooses to press ahead with a project involving expropriation of private property in the face of national and local opposition on the back of a Vucic decision, the company risks social unrest and another costly political u-turn.

## Questions for Rio Tinto:

- How did Rio Tinto underestimate the level of opposition to the Jadar Project given the large public demonstrations?
- Would Rio Tinto agree that some of its actions since January 2022 fueled public anger about perceived political gamesmanship in defiance of the will of Serbian citizens?
- How confident is Rio Tinto that it can acquire the necessary land without resorting to expropriation?
- Given that communications issued by Rio Tinto or their representatives referred to expropriation, what prompted this high risk approach?
- If land is acquired via expropriation, how does Rio Tinto intend to maintain a social licence to operate the Jadar Project ?
- Given that there is evidence company representatives have entered private property since the project was cancelled, what steps has Rio Tinto taken to ensure no employees or contractors enter onto private property without consent?

# Negative Environmental Impacts

## Risk of Water contamination

According to the spatial plan, the tailings are to be located a few hundred metres from the mine; very near to the Jadar and Korenita rivers, with another suggested site further away near Stavica and Krupanj.<sup>64</sup> Tailings would amount to 1.5 million tons per year, which during a 60 year mine life would amount to 90 million tons of tailings. As the Jadar and the Korenita rivers are prone to flooding<sup>65</sup> there exists a high risk that tailings would end up in these two rivers, and then escape into the Drina,<sup>66</sup> the Sava, and the Danube rivers. The Drina borders Bosnia & Herzegovina and the Danube flows into Romania.

The operation of the flotation facility would require over 1000 tons of concentrated sulfuric acid per day<sup>67</sup> and large amounts of water which Rio Tinto would pump from an alluvium of the Drina river and release back into the Jadar River (a tributary of the Drina) after processing by reverse osmosis, which in the case of concentrated sulfuric acid is not entirely effective.<sup>68</sup> There is a potentially high risk of devastating effects on aquatic species, land, air and people.

An expert reviewer<sup>69</sup> of the water section of Rio Tinto's EIA Scoping Report notes that "A thorough discussion of the water treatment scheme is required, including the water treatment systems that will be used, the costs for operating these treatment systems, and the backup procedures that will be undertaken if the treatment process does not work as designed. In addition, there needs to be a description of the wastes generated during water treatment, and the plans for disposal of this waste."<sup>70</sup> This 'splitting' of the chemical processing plant from the mine in the EIA Scoping Report also means the SEVESO Directive<sup>71</sup> has not been applied, and this despite the fact that Rio Sava director Vesna Prodanovic makes reference to it in her contribution to the Serbian Academy of Sciences publication "Project Jadar: What is Known."<sup>72</sup>

In an open letter to the Serbian Prime Minister, members of the Serbian Academy of Sciences (the Academy) pointed out "major irregularities, illogic narrative, flabbiness and neglect during the development of the "Project Jadar", which may result in erroneous and dangerous management of water resources, mining waste and biodiversity, with likely long-lasting and detrimental consequences on human health in

Radjevina and its surroundings." They warned that in their opinion, "it is highly unlikely that [Rio Tinto] will prevent the release of toxic and dangerous compounds into the Macva's underground water horizon, which is estimated to be the largest drinking water-supply source in whole of Serbia [sic]."<sup>73</sup> In March 2022 the Academy released a publication "Project Jadar: What is known." This book is a collection of thesis, reports, essays and findings about the Jadar project, further cementing scientific argument against it.<sup>74</sup>

## It is highly unlikely that [Rio Tinto] will prevent the release of toxic and dangerous compounds into the largest drinking water-supply source

Evidence from the Institute of Public Health in Sabac commissioned by Rio Tinto showed significant amounts of silicone, arsenic, and lithium in holes drilled during exploration.<sup>75</sup> Some of Rio Tinto's over 500 drilling holes<sup>76</sup> are already leaking, and the polluted water is escaping onto agricultural and grazing lands.<sup>77</sup> Rio Tinto has reportedly already had to pay compensation to five landowners.<sup>78</sup> An independent study shows that boron, arsenic and lithium from exploratory wells has contaminated the Jadar river. "It was found that concentrations of boron were 17 times higher, arsenic nine times higher and lithium three times higher downstream of the test drill zone, when compared to 2km upstream. Those three elements represent the fingerprint of the exploratory zone, the body of the ore in Jadar."<sup>79</sup>

## Biodiversity loss

A University of Belgrade Faculty of Forestry paper states that the Jadar Project "will irreversibly change and degrade the existing landscape and endanger biodiversity". Nearly 200 hectares of forests would need to be cut: 80 hectares for roads/ railways and 164 hectares for 35% of projected tailings.<sup>80</sup> The Jadar Project would impact two category I landscapes of outstanding features as defined by Serbian law<sup>81</sup> The Cer Valley classified land (area of 19,000 hectares), part of the Internationally Important Bird Area program and verified with BirdLife International is located in the northern part of the area in which the Jadar Project will be located.<sup>82</sup> The "Cultural Landscape Tršić-Tronoša"

is also situated within the spatial plan.

A study by the University of Belgrade Faculty of Biology commissioned by Rio Tinto found “a high degree of total biodiversity” within the relevant area and concluded that the “optimal and basic measure to protect biodiversity” was to abandon the Jadar Project.

deforestation, bioaccumulation of heavy metals, and leaching within rivers and streams, amongst others.<sup>88</sup>

While the cancellation decision in January 2022 ‘stopped’ this complaint, the Bureau to the Standing Committee of the Bern Convention issued a decision in April 2021<sup>89</sup> and “expressed its concern on the



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“Project Jadar; What is known.” Serbian Academy of Sciences and Arts

The authors warned that “[...] the implementation of the planned activities, especially the disposal of industrial waste, will significantly impair biodiversity in the entire area of the planned works. In certain primary zones of the influence, there will be complete and direct destruction of habitats with the disappearance of all organisms that inhabit them.” It also warns that the Jadar Project “can affect the overall ecosystem diversity of all aquatic and terrestrial habitats outside the area of the mining complex”. Rio Tinto has not published the full report. A summary is included in a book published by the Academy.<sup>83</sup>

A study published by Acta Scientifica Balcanica, 2022, revealed that concentrations of boron and lithium in a stream water of the River Jadar would pose a great risk to aquatic ecosystems in any lapse in proper processing of wastewater at either average, low, medium, or high water levels, causing toxic, genotoxic and other pathological effects on aquatic organisms.<sup>84</sup>

In September 2021, NGO Earth Thrive filed a complaint that Serbia has violated the Bern Convention on the Conservation of European Wildlife and Natural Habitats by failing to take appropriate and necessary measures to protect wild flora and fauna species from the Jadar Project.<sup>85</sup> According to Earth Thrive, a total of 807 habitats would be impacted - several with EUNIS codes<sup>86</sup> - as well as over 68 species in the Bern Convention and other species protected under other international conventions including the Bonn Convention, and the EU Conservation of Natural Habitats and of Wild Fauna and Flora, and others.<sup>87</sup>

Earth Thrive also point to the 2021 EIA scoping document from Serbia’s Ministry of Environmental Protection which finds 15 negative impacts from the mine, including the loss of plant and animal species, reduced habitat connectivity, pollution (air, soil, water),

considerable negative effects on the species and habitats that the construction of a lithium mine would have.” According to Earth Thrive the Bureau has put the Complaint on ‘stand-by’ ready to be opened should the project resurrect at a future point.

## Cultural Impacts

The Jadar Project represents a test of Rio Tinto’s post Juukan Gorge pledge to making protecting cultural heritage an issue “felt in the hearts and minds” of its employees,<sup>90</sup> as the project would directly impact and possibly even destroy areas of great historical and cultural significance.

Within the Spatial Plan’s project footprint are cultural monuments with status of protected immovable cultural property.<sup>91</sup> Those include the Tronoša Monastery from 1317, and the Monument and memorial to executed victims from 1941 in Dragina, which includes marked tombs of the victims. Within the project footprint is also the Church of St George and its adjacent graveyard. (See Map 1 on page 4) The Institute for the Protection of Cultural Monuments of Valjevo has also listed 50 objects of architectural and archaeological heritage and importance within the spatial planning area that are just outside the zones of mining activities and landfills.<sup>92</sup> There is concern that the Jadar project usurps potential of a planned “Podrinjsko-Jadar” tourist destination, due to the overwhelming amount of historical, cultural and spiritual sites of significance that stand to be affected.<sup>93</sup>

A prehistoric necropolis in Paulje is situated in the village of Brezjak, 12 km to the southeast of Loznica and in the direct way of the proposed Jadar Project,

located within the production zone. It contains artefacts and necropoles (mounds) from the Bronze age and Iron age Roman period. It consists of 50 barrows arranged in smaller groups consisting of 3 to 5 tumuli.

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Their sizes vary between 10 to 20 metres in diameter and 1 to 3 m in height. Serbian archaeologists call it "one of the most important Bronze age sites not just in Serbia, but in central Balkans."<sup>94</sup> It was identified in 2017 by academics as having "potential for future archaeological research."<sup>95</sup>

A number of the sites that need to be excavated for preservation are on private land. Such excavations would have to take place before the Jadar Project could proceed. Refusals by landowners to permit such activity or sell the relevant land will cause significant delays - as well any permitted excavation. At least one landowner on whose land there are 5 necropoles has refused to sell.<sup>96</sup> Similarly any attempt to remove other cultural artefacts to appropriate institutions rather than protect them in-situ will be threatened by landowners refusing permission for such activity on their land. There are also concerns about potential conflicts of interest arising from Rio Sava's funding of excavation work by the Museum of Jadar at the Paulje Necropolis.<sup>97</sup>

## Questions for Rio Tinto:

- Given that academics have warned that there will be "complete and direct destruction of habitats," from this project how does Rio Tinto believe this project is acceptable given that threat to biodiversity?
- Will Rio Tinto publish the complete University of Belgrade Faculty of Biology study on biodiversity impacts?
- Did Rio Tinto make sure that the Serbian government conducted the necessary regulatory inventory on archeological sites before commencing with project plans?
- How does Rio Tinto plan to address the prehistoric archeological sites on private land situated within the project footprint and to which owners refuse to give access?
- Why does Rio Tinto's EIA Scoping Report only deal with the mine and not the processing plant and tailings landfill? Why does it not include an assessment of impacts on the CER Valley classified land?
- Will Rio Tinto provide the specific information on water treatment suggested by Dr. David Chambers?

# Lack of Transparency

The Australian parliamentary committee inquiry into Juukan Gorge criticised Rio Tinto's "self-interested reliance on outdated laws and unfair agreements containing gag clauses." There is disquiet (on the grounds of public interest and conflicts of interest) at the extent to which Rio Tinto has entered into confidential memoranda of understanding with the Serbian government and Serbian public academic institutions. In 2017 the Serbian government and Rio Tinto signed a memorandum of understanding which was withheld from the public for many years and has finally been made public.<sup>98</sup> Likewise there are concerns - including among academics - about an agreement between the company and the Faculty of Mining and Geology at the University of Belgrade pursuant to which Rio Tinto has paid up to €1.5 million to the faculty for unspecified and unpublished 'consultations' and the lack of transparency about this deal.<sup>99</sup> There is also a confidentiality agreement in place with the Faculty of Technology in Bor Serbia signed by the Faculty in March 2022 - after the cancellation.<sup>100</sup>

Despite requests the Serbian government and Rio Tinto have not published English language versions of key documents such as the Feasibility Study and the EIA Scoping Report significantly increasing the cost of review for civil society by independent experts who do not speak Serbian. According to Dr. David Chambers the company has not published any of the 20 environmental assessments that have been conducted which are relevant to many of the issues that are not addressed in its Feasibility Study and the EIA Scoping Report.<sup>101</sup> All of these environmental assessment reports should be made available.

**Despite requests the Serbian government and Rio Tinto have not published English language versions of key documents such as the Feasibility Study and the EIA Scoping Report.**

BankWatch in its 2020 report on the project claimed that impacted residents were not properly informed by either the government or Rio Tinto about the project or the consultation process. While community and civil society groups and representatives have been invited to online information webinars and to ad hoc private meetings with Rio Tinto, it is alleged that no such representatives have been invited to participate in a formal and detailed feasibility and impact assessment and approval process as required by law.<sup>102</sup> This is an inadequate approach by Rio Tinto to stakeholder engagement on a controversial project with such potential negative impacts on communities.

## Questions for Rio Tinto:

- **What failings has Rio Tinto identified in its stakeholder outreach and consultation process on the Jadar Project and what specific plans does it have to address the owners who refuse to sell land?**
- **In the interests of building stakeholder trust will Rio Tinto publish English language versions of all environmental assessments and technical reports it has produced or commissioned (including from academic institutions) in relation to the Jadar Project and of the Feasibility Study and EIA Scoping Report, as well as all future reports?**

# Conclusion

The Jadar valley is a fertile river valley rich with biodiversity which would be threatened by pollution from the Jadar Project. Hundreds of farmers are at risk of eviction and around 19,000 people living in the valley would be left in danger of toxified water, air and soil. Understandably the project faces considerable local and national opposition - which has already forced the Serbian government to cancel Rio Tinto's licences. This opposition combined with the risks to water, biodiversity, and historical sites also provide an opportunity to assess whether Rio Tinto has fully grappled with the internal deficiencies highlighted by the company's actions at Juukan Gorge. Shareholders and other financial stakeholders should urge Rio Tinto to abandon the project. If Rio Tinto intends to proceed with this project, financial institutions should insist that the company fully address all of the social, political, human rights, and environmental issues arising.

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*This briefing is published by volunteers of "Marš sa Drine!" in cooperation with BankTrack.*



**BANKTRACK**

Marš sa Drine is a network of independent experts, activists & NGOs throughout Serbia and its diaspora opposed to Rio Tinto's Jadar project and the mining of lithium in Serbia based on social, environmental, economic and heritage grounds. Marš sa Drine supports local landowners association Ne damo Jadar, based in the Jadar Valley in Western Serbia which consists of 335 property owners opposed to Rio Tinto's jadarite mine proposal.

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# Endnotes

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To Zorana Mihajlovic, Minister of Mining and Energy.

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[68] David M. Chambers PhD in email correspondence with Mars Sa Drine "The description of the water treatment process now available indicates that a "staged" Reverse Osmosis (RO – i.e. filtration) process will be used. It is not clear what constituents will require the "staged" processing in order to meet water quality discharge standards, what water quality standards will be applied to the mine discharge, or whether a mixing zone in the river will be required/allowed. Water can be treated to any desired level of cleanliness. The primarily [sic] limitation is the cost of that treatment. Regulatory agency permit requirements drive what type of water treatment is required, and how much that water treatment will cost. Typically a regulatory agency will not impose limits that are costly to the discharger, because that might make the operation unprofitable, and governments want the tax revenue and jobs the discharger provides. In addition to determining what discharge limits will be required by a permit, another thing to look for in a permit requirement is whether a discharger is granted a mixing zone. A mixing zone – an area of a water body where water quality standard exceedances are allowed – is used to dilute contaminants in order to meet water quality standards, and is an economic concession to a discharger. Reverse osmosis would probably not be used to remove sulfuric acid. Sulfuric acid is H<sub>2</sub>SO<sub>4</sub> – two hydrogen ions and one sulfate ion. In water, the two hydrogen ions and the sulfate ion are dissolved, so you have an H<sup>+</sup>, another H<sup>+</sup>, and a SO<sub>4</sub><sup>=in</sup> solution. It is unlikely that reverse osmosis, which is basically a filter, would be successful at capturing the hydrogen ions, since they are very small. Reverse osmosis is not known for being very effective at filtering sulfate ions either. To remove sulfuric acid, the typical treatment is to first add a neutralizing agent like lime to complex/remove the hydrogen ions (i.e. by raising the pH). Removing sulfate ions is more difficult, and the process used to do this depends on how low the level of sulfate in the final discharge needs to be. It all depends on the limit for sulfate in the discharge permit. It is possible that the proposed "staged" reverse osmosis process is intended to remove sulfate to the limit required, but it is not possible to say more given the limited information available on the water treatment process, and the lack of discharge permit requirements." 8 March 2023

[69] David M. Chambers PhD has 45+ years of experience in mineral exploration and development – 15 years of technical and management experience in the mineral exploration industry, and for the past 30+ years he has served as an advisor on the environmental effects of mining projects both nationally and internationally. He has Professional Engineering Degree in physics from the Colorado School of Mines, a Master of Science Degree in geophysics from the University of California at Berkeley, and is a registered professional geophysicist in California (# GP 972). Dr. Chambers received his Ph.D. in environmental planning from Berkeley. His recent research focuses on tailings dam failures, and the intersection of science and technology with public policy and natural resource management.

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