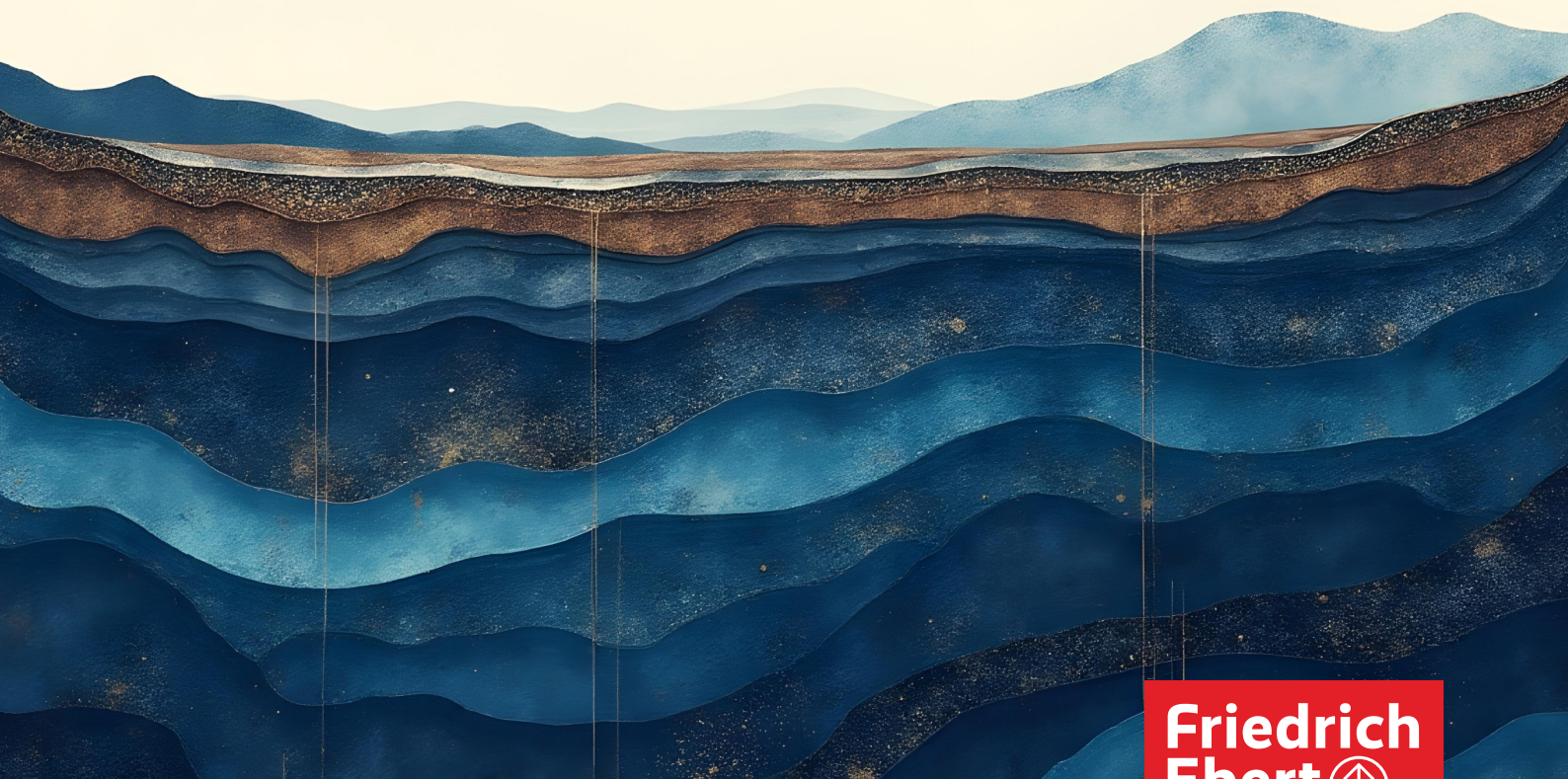


Majda Ibrakovic  
November 2025

# Critical Raw Materials: Dispatch from Bosnia and Herzegovina



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71000 Sarajevo  
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[info.soe@fes.de](mailto:info.soe@fes.de)

### **Publishing department**

Eastern Europe Department

### **Responsibility for content and editing**

Sarah Hees-Kalyani, Director, FES in Bosnia and Herzegovina  
Regional Coordinator, FES Dialogue Southeast Europe  
Selma Šehović, Program Manager, FES Dialogue Southeast Europe

### **Contact**

Sarah Hees-Kalyani Regional Coordinator

Selma Šehović Program Manager

### **Design/Layout**

Azra Kadić

### **Front page design**

Azra Kadić

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# Executive Summary

Bosnia and Herzegovina (BiH) stands at the intersection of the EU's green transition agenda and complex local realities. The EU's Critical Raw Materials Act (CRMA) and broader strategic interests have intensified foreign interest in BiH's mineral wealth—especially lithium, magnesium, nickel and cobalt—turning the country into a potential extraction hub for European industries.

## Current Landscape

Twelve critical raw material (CRM) projects are currently at various stages across BiH, led primarily by investors from the United Kingdom (UK), Canada, Australia, Germany, and Switzerland. Major sites include Vareš (silver, zinc, gold), Lopare (lithium, boron, magnesium), and Kupres (magnesium). Despite this activity, economic benefits for local communities remain minimal, with concession fees and local reinvestment disproportionately low compared to corporate profits. Transparency and accountability in concession granting are limited, and environmental and social costs are often ignored.

## Governance and Risks

BiH's mining governance is highly decentralized, split between the Federation of BiH, Republika Srpska, and cantonal authorities—leading to inconsistent standards, corruption risks, and weak enforcement of environmental and community rights safeguards. The absence of a unified state-level mining strategy further undermines oversight. Cases such as the Vareš silver project reveal patterns of preferential treatment for foreign companies and secrecy around contracts and environmental impact assessments.

## Environmental and Social Impacts

Mining in BiH poses acute threats to biodiversity, water resources, and local livelihoods. Exploration frequently targets ecologically sensitive or protected zones such as the Ozren and Majevisa mountains. Communities report pollution, deforestation, and exclusion from decision-making, leading to widespread distrust and resistance. Environmental incidents, like the water contamination near Olovo in 2024, underscore systemic gaps in monitoring and accountability. As a result, civic movements increasingly reject mining projects that prioritize foreign profit over local welfare.

## Geopolitical and EU Context

BiH's mineral potential is now a site of geopolitical competition between the EU, United States (US), Canada and Australia, actively enabled by domestic forces and elites. The EU's support for projects such as Serbia's Jadar mine, while promoting CRMA objectives, risks reinforcing perceptions of neo-extractivism and undermining public faith in EU values, while ignoring the authoritarian regime and the widespread opposition. Domestic leaders have sought to leverage mineral resources for political and economic gain, often non-transparently and without community consent. This dynamic threatens both environmental justice and regional stability.

## Key Recommendations

- **No new strategic mining projects** until rule of law, transparency, and environmental standards in BiH meet EU norms.
- **Ensure community participation and prior informed consent**, respecting Aarhus Convention principles.
- **Expand legally protected areas** to 30% of BiH's territory and enforce biodiversity safeguards.
- **Prioritize remediation** of legacy pollution and investments in recycling and secondary raw materials.
- **Support the reform of concession systems** to ensure fair distribution of resources and benefits.

# Introduction

The energy transition is reshaping southeast Europe, and Bosnia and Herzegovina (BiH) is no exception. By adopting the Sofia Declaration for the Green Agenda, BiH committed to decarbonization, including closure of its coal mines and coal-fired power plants by 2050. The EU's Critical Raw Materials Act<sup>1</sup> encourages Member States to enhance the extraction, processing, and recycling of CRMs. Yet BiH as an EU candidate country, with its current legislative framework, is not able to adequately control and sustainably manage its natural resources. This nurtures the argument that BiH is today more aligned with EU objectives than with the needs of its own population.

BiH has signalled modest readiness to engage with decarbonization according to the latest EU enlargement package; however, the process is complicated by persistent political conflicts, stalled EU integration, inefficiencies in addressing environmental, social, economic and political challenges, limited developmental vision, growing economic debt, and dependence on international aid and foreign investment.

Institutions focus heavily on creating a favourable climate for foreign investment and meeting EU expectations, often at the expense of protecting the country's natural resources and citizens' rights to a healthy environment and human dignity. BiH is often promoted as a country with significant mining potential and a longstanding industrial tradition by entity and canton level ministries, industry actors, foreign investment agencies and international finance institutions, even though it is still dealing with the repercussions of historic and ongoing mining. Various reports, presentations, workshops, strategic plans and other events have been held to promote the Western Balkans' mining potential.<sup>2</sup>

Currently, twelve CRM mining projects are at various stages of mineral exploration, planning, preparation, or operation in BiH. The concession fees defined by the relevant regulations<sup>3</sup> in the Republika Srpska and Federation of BiH (FBiH) entities,<sup>4</sup> including at the cantonal level for mining in FBiH, vary from 3 to 5%, providing very limited economic benefit to the affected local communities. The share of concession fees between the municipality, canton and entity level remain very low in comparison to corporate profits from mining.

The broader costs of mining, including social and environmental costs, infrastructure damage, population displacement, health impacts and long-term ecological harm, remain largely unaddressed in economic analyses and studies. Critical analyses of the long-term balance between benefits and harms of mining by the BiH academic and expert community are scarce. With only a few exceptions, academia in BiH has largely remained silent, or has supported the mining projects by participating in consultancy contracts for mining investors.

The CRMA designates strategic projects to increase EU capacity to extract, process and recycle strategic raw materials and diversify EU supplies from EU and non-EU countries.<sup>5</sup> For projects granted strategic status, approval procedures are to be fast-tracked, streamlining their application process and facilitating access to public or private financing. Strategic status is especially beneficial for mining companies struggling to secure capital or permits. Projects are still required to comply with EU law, including environmental, social, and procedural standards. To obtain strategic status, project promoters must submit an application to the European Commission demonstrating compliance with the criteria.<sup>6</sup>

<sup>1</sup> Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, [Fifth list 2023 of critical raw materials for the EU](#), European Commission, undated.

<sup>2</sup> See for example: University of Zagreb, Faculty of Mining, Geology and Petroleum Engineering et al., [Investment opportunities in raw materials in Bosnia and Herzegovina](#), Foreign Investment Promotion Agency, November 2020; Privredna komora Zeničko-dobojskog kantona, [Invest in ZDK](#), Privredna komora Zeničko-dobojskog kantona, 2020; Boban Jolović, [Exploring Bosnia and Herzegovina's approach to CRM development](#), Presentation at the 13th International Forum on Energy for Sustainable Development, 3 December 2024.

<sup>3</sup> Aleksandra Martinović, [Sistem koncesija u Bosni i Hercegovini – Pravni i institucionalni okvir](#), Transparency International Bosna i Hercegovina, 2024.

<sup>4</sup> Federation of Bosnia and Herzegovina, [Zakon o koncesijama](#), Službene novine Federacije BiH, broj 40/02 i 61/06.

<sup>5</sup> Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, [Strategic projects under the CRMA](#), European Commission, 2025.

<sup>6</sup> Diego Marin et al., [Understanding Strategic Projects Under the CRMA: A Guide to Rights and Processes](#), European Environmental Bureau, ClientEarth, December 2024.

As mentioned above, strategic projects can be developed in “third countries” (countries outside of the EU), including under the so-called Strategic Partnerships. Serbia’s Jadar project, led by Rio Tinto, has received significant backing from the EU and Germany through a Memorandum of Understanding (MoU) and a Strategic Partnership signed in July 2024.<sup>7</sup> Even though the nearby Lopare lithium project in BiH has not yet attracted the same level of international attention, the EU’s strategic interest in securing lithium supplies may influence BiH’s mining policies and politics. The political implications for BiH are multifaceted. The EU’s support of the Jadar project, including by declaring it as strategic,<sup>8</sup> is generating regional concerns about potential cumulative and cross-border environmental impacts, alongside growing local opposition and mass protests led by the students’ movement in Serbia amid systematic repression and shrinking civic space.

In this context, BiH is increasingly becoming a stage for global geopolitical competition over critical raw materials. While at this point not including any projects in BiH as strategic priorities, the EU CRMA has fuelled a so-called “mining renaissance” as it positions peripheral European countries as key sources of minerals essential for supply chains, energy transition, and industrial competitiveness. This report aims to map new critical mineral projects in BiH and examine the socio-ecological, economic, and (geo) political implications of the CRMA, particularly in relation to EU accession process and relevant policies.

<sup>7</sup> Directorate-General for Neighbourhood and Enlargement Negotiations, [EU and Serbia sign strategic partnership on sustainable raw materials, battery value chains and electric vehicles](#), *European Commission*, 19 July 2024.

<sup>8</sup> European Western Balkans, [European Commission approves controversial Serbian lithium project as strategic for the EU](#), *European Western Balkans*, 5 June 2024.

# Overview of CRM projects, stakeholders and actors in BiH

Ever since data on the mineral wealth of the former Yugoslavia became available to mining companies, most of the former republics have experienced a surge in mining interest. Geological assessments indicate that BiH is particularly rich in mineral resources. According to the EU-funded Mineral Register created as part of the RESEERVE project, BiH, along with Serbia, appears to offer the greatest potential for resource development in the region.<sup>9</sup> Some sources name BiH as a major bauxite producer with an annual production averaging one million tonnes.<sup>10</sup> A number of bauxite deposits exist in the country, including large deposits in operating mines. Lead, zinc and lead-zinc ores also occur as large and very large deposits, including greenfield<sup>11</sup> projects and mines under development. Precious and rare metals like silver, germanium, and gallium are contained in some lead-zinc ores, and a gold ore deposit is under development.<sup>12</sup> BiH has several registered CRM deposits, like bauxite and associated rare earth elements. Recovery of CRM rare earths from red mud is also seen as an ‘opportunity to be further examined’.<sup>13</sup>

According to the BiH Agency for Statistics,<sup>14</sup> the mining sector contributes 1.3% directly to the country’s gross value added (GVA) in 2024, but its impact on related industries and processing—especially base metals and energy—is far greater.<sup>15</sup>

By the time the EU was preparing the CRMA, governments in BiH were already conducting geological surveys and preparing new metal mines to supply resources critical to European supply chains. According to the EU-funded RESEERVE project database, the country hosts over 140 potential primary metal deposits and more than 270 secondary deposits—former mines and tailings facilities—reflecting its long-standing mining heritage.<sup>16</sup>

Modern investors and mining companies now use this historical narrative, often overlooking the substantial differences between past and present mining practices. While environmental standards today should be higher, so too is demand for ores and raw materials, which goes beyond the needs for a just and green transition or climate neutrality.<sup>17</sup> The key questions lie primarily in the socio-political dimensions and current imbalances in resource ownership, control, governance, extraction methods and intensity, profits and debts, and the ultimate use of resources—essentially, how mining benefits or harms society as a whole.

Out of the 34 metals identified on the EU’s CRM list,<sup>18</sup> around ten have been confirmed as deposits in BiH, including aluminium/bauxite, antimony, lithium, barite, copper, boron, magnesium, manganese, cobalt, and nickel. In addition, reserves of lead, zinc, precious metals—primarily gold and silver—and certain rare earth elements have been recorded, although publicly available data on the latter is limited.

Precious and rare earth metals often occur as secondary minerals that are not explicitly listed in exploration or mining permits. As a result, the public is not fully informed about the specific minerals being extracted or the destinations of processed materials. One illustrative case is the Rupice mine in the municipality of Vareš, owned by Canadian company DPM Metals (formerly UK-based Adriatic Metals). The mine’s original permits covered lead, zinc, and barite, but were later amended to include silver, gold, and copper. Following the start of operations, the mine has been marketed as the “Silver Operation,” reflecting the large volumes of silver extracted, which, given current market prices and in combination with other minerals, have generated significant revenue for the company.<sup>19,20</sup>

<sup>9</sup> Geološki zavod Slovenije et al., [West Balkan Mineral Register](#), RESEERVE project, undated.

<sup>10</sup> Centar za politike i upravljanje, [Kritični materijali u BiH: potencijali, prepreke i izazovi](#), Centar za politike i upravljanje, 2024, 14.

<sup>11</sup> PAS portable analytical solutions, [Greenfield Vs Brownfield Exploration](#), PAS, undated.

<sup>12</sup> Giannakopoulou et al., [Mineral Raw Materials’ Resource Efficiency in Selected ESEE Countries: Strengths and Challenges](#), *Materials Proceedings*, 5(1), 2021, 83.

<sup>13</sup> Ibid.

<sup>14</sup> Agency for Statistics of Bosnia and Herzegovina (BHAS), [Economic Statistics](#), BHAS, 29 July 2025.

<sup>15</sup> Centar za politike i upravljanje, [Kritični materijali u BiH: potencijali, prepreke i izazovi](#), Centar za politike i upravljanje, 2024.

<sup>16</sup> Geološki zavod Slovenije et al., [West Balkan Mineral Register](#), RESEERVE project, undated.

<sup>17</sup> Cleodie Rickard, [A mineral mining boom is not ‘critical’ for the green transition](#), *Climate Home News*, 11 August 2025.

<sup>18</sup> Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, [Critical raw materials](#), *European Commission*, undated.

<sup>19</sup> Harun Dinarević, [Prva godina zlatne drhtavice: Koliko i čega je do sada iskopano u Varešu?](#) *Naratorium*, 2 December 2024.

<sup>20</sup> Dejan Rakita, [Rudnik u Varešu: Od El Dorada do malverzacija i zagađenja prirode \(I dio\)](#), *Gerila.info*, 4 June 2024; [Rudnik u Varešu: Od El Dorada do malverzacija i zagađenja prirode \(II dio\)](#), *Gerila.info*, 5 June 2024.

Table 1: CRM projects in Bosnia and Herzegovina

Investor/country	Project name	Type of minerals/mining	Location*	Status
<b>Exploration phase (geological surveys)</b>				
SNK Metali d.o.o. Bijeljina Lykos Metals Limited (Australia)	Sinjakovo	Lead, zinc, copper, barite, and related metals	Jezero, Šipovo, and Mrkonjić Grad - RS	Halted – local resistance
Braha resources d.o.o. Bijeljina Lykos Metals Limited (Australia)	Čajniče	Copper, lead, zinc, lithium	Čajniče - RS	Unknown
Medeni brijeg d.o.o. Bijeljina Lykos Metals Limited (Australia)	Sočkovac	Nickel, copper, cobalt, zinc, lead, silver, gold	Petrovo <sup>21</sup> (Doboj - RS)	Halted – local resistance
Seven Plus d.o.o. Sarajevo	Duboštica-Tribija	Chromium	Duboštica (Vareš-FBIH)	Preparatory works
“BBM” d.o.o. for construction, mining, internal, and external trade, Sarajevo	Bakovići	Silver and gold	Bakovići (Fojnica - FBIH)	Halted – local resistance
Rudnik antimona d.o.o Kreševo	Čemernica	Antimone	Čemernica (Fojnica - FBIH)	Preparatory works
Leviathan Gold Ltd (Canada)	Foča project	Silver, lead, barite, zinc	Foča - RS	Exploration
Terra Balcanica (Canada)	Viogor-Zanik	Copper, zinc, barite, gold, silver, antimone	Brezani (Srebrenica - RS)	Exploration
<b>Planning phase (completed exploration)</b>				
Arcore Ltd (Switzerland)	Lopare project	Lithium, Boron, Magnesium	Labucka (Lopare - RS)	Request for exploitation submitted in February 2025
MFE Magnesium For Europe GmbH (Germany)	MFE Kupres project	Magnesium	Kupres - FBIH	EIA procedure active
<b>Operational phase (ore exploitation)</b>				
Adriatic Metals Plc (UK) DPM (Canada) – September 2025	Rupice/Veovača – Vareš silver project	Silver, zinc, lead, barite, copper, gold (underground)	Vareš - FBIH	Operating since 2024
Geomet - Mineco Limited (UK)		Lead**	Olovo - FBIH	Temporarily closed in 2024 <sup>22</sup>
<b>Bauxite mines in BiH (7 active – 6 local mining companies and investors and 1 international)</b>				

\* BiH entities: Federation of BiH – FBIH, Republika Srpska – RS.

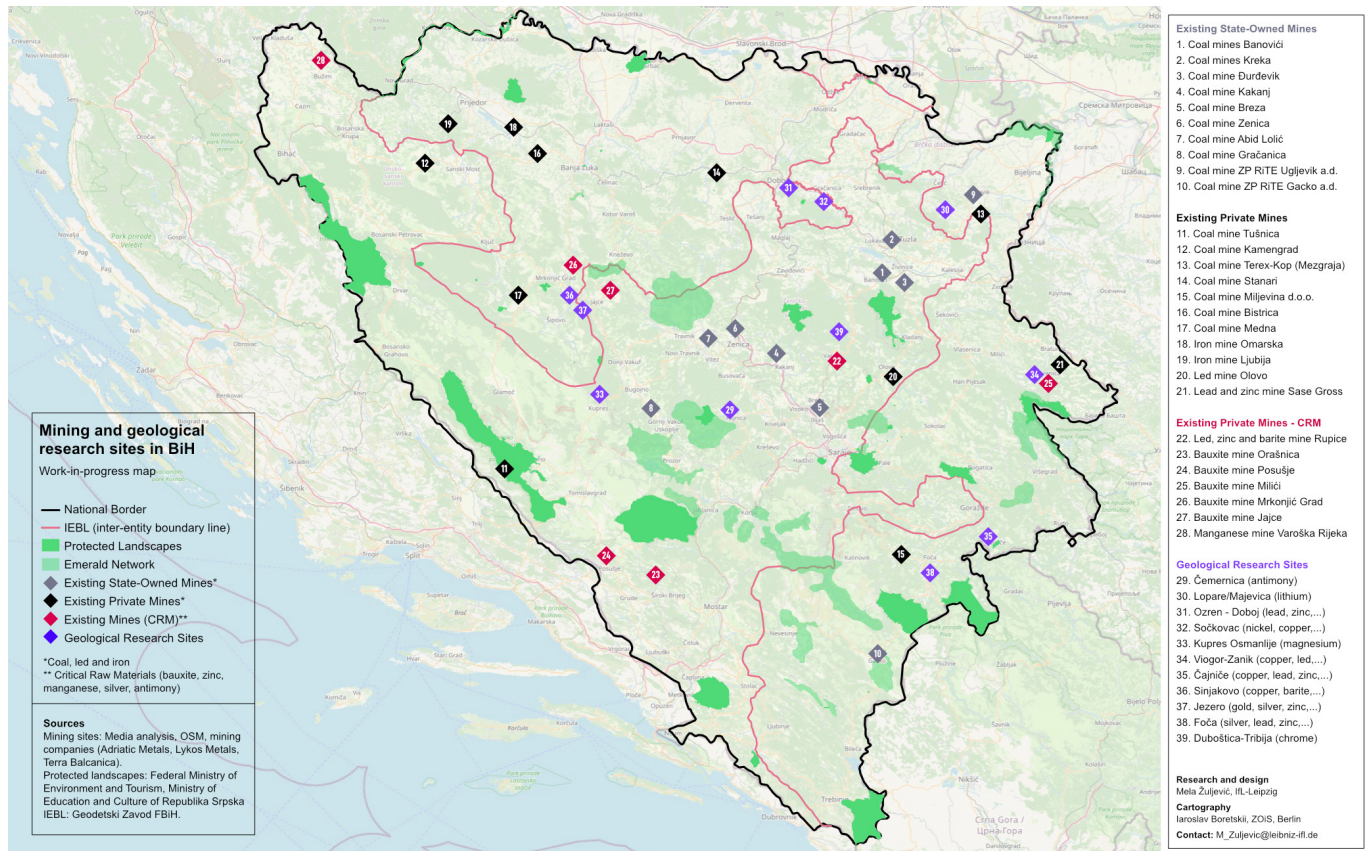
\*\* Lead is not a CRM, but the Geomet case in Olovo is listed in this table because of its impact and relevance

<sup>21</sup> For more details and concession grants in the Republika Srpska entity, see the official register: [Ministarstvo energetike i rudarstva, Katastar odobrenih istražnih prostora i odobrenih eksploatacionih polja](#), undated.

<sup>22</sup> Radio Olovo, [Šta je Olovu rudnik olova?](#) Radio Olovo, 9 October 2024.

As of Autumn 2025, preliminary geological surveys for lithium and related critical minerals are currently underway in Čajniče, Jezero, and Šipovo, with additional exploration

proposed in the municipalities of Ugljevik, Bijeljina, Zvornik, and Brčko.



Out of 53 bauxite deposits in Bosnia and Herzegovina, seven are active and eighteen are considered potential. Their operations face significant issues, including bankruptcy and intermittent activity, labour exploitation (e.g. Srebrenica),<sup>23</sup> and legal or environmental violations (e.g. Mrkonjić Grad operating without an environmental permit).<sup>24</sup> A deposit of antimony, beryllium, and rare earth elements has been identified in the Novo Goražde area. Among twelve smaller manganese deposits, only one manganese mine in Bužim was operational until it went bankrupt.

Small-scale mining projects in BiH usually go bankrupt because of low productivity and modernisation, volatile market prices, high production costs, workforce issues,

dubious privatisation processes and various social and environmental issues, including local resistance and mobilization. The Miljevica deposit is an operating site with more than 30,000 tonnes of annual capacity and currently the only operating magnesite deposit in BiH.<sup>25</sup>

The draft Spatial Plan of Tuzla Canton<sup>26</sup> (2025–2045), proposed in May 2025,<sup>27</sup> introduces provisions for exploring and potentially exploiting lithium, boron, and magnesium in Srebrenik and Čelić, while continuing nickel and cobalt exploration in Živinice and Lukavac. This marks a shift, as local authorities who previously opposed lithium and strategic mineral mining in the Majeвица region now appear more open to such projects.<sup>28</sup>

23 Faktor.ba, [Katastrofa u Rudniku boksita Srebrenica: Radnici u martu ove godine dobili plaću za maj prošle, šta kaže direktor](#), Faktor.ba, 11 December 2024.

24 Goran Katić, [Kopali boksit bez ekološke dozvole u jednom od najljepših sela BiH](#), Radio Slobodna Evropa, 27 February 2024.

25 University of Zagreb, Faculty of Mining, Geology and Petroleum Engineering et al., [Investment opportunities in raw materials in Bosnia and Herzegovina](#), Foreign Investment Promotion Agency, November 2020.

26 Ministarstvo prostornog uređenja i zaštite okolice Tuzlanskog kantona, [Prostorni plan za područje Tuzlanskog kantona za period 2025-2045. - nacrt](#), Ministarstvo prostornog uređenja i zaštite okolice, April 2025.

27 Ministarstvo prostornog uređenja i zaštite okolice Tuzlanskog kantona, [Nacrt Prostornog plana za područje Tuzlanskog kantona 2025-2045](#), 2 June 2025.

28 Gerila.info, [Zaokret prema rudarenju: Tuzlanski kanton otvara vrata eksploataciji litijuma i metala?](#) Gerila.info, 3 June 2025.

# Under the surface: how (CRM) corporate mining operates in BiH

The corporate mining business in BiH generally follows similar patterns seen elsewhere. Typically, a domestic junior company—or a subsidiary of a Western firm—initiates operations by developing a local presence and building connections with local politicians, institutions, consultants, and intermediaries. Their task is to map community attitudes, public opinion, relevant policies, regulatory gaps, and potential allies or opponents. Once this groundwork is laid, the company proceeds to seek exploration rights and concessions, securing permits and drafting contracts—frequently without informing or gaining input from local communities or even relevant authorities.

If exploration confirms commercially viable reserves—sometimes on the basis of incomplete or outdated geological data—the process shifts into what could be described as a “gold rush” narrative.<sup>29</sup> Announcements of major deposits of gold or other precious metals are used to build public enthusiasm, economic prosperity, win social license, and pave the way for further development.

Most foreign companies operating in BiH have entered under such circumstances: amid weak governance, limited oversight, and expectations of economic opportunity. Local stakeholders often support these projects in the hope of new business prospects, while communities may back them in the expectation of improved living standards.

<sup>29</sup> See for example: Forbes BiH, [BiH na pragu velikog rudarskog otkrića: Terra Balcanica širi zlatnu mineralizaciju u Brezanima i pokreće novu fazu bušenja](#), *Forbes BiH*, 19 August 2025.

# Which companies and investors are involved? Who are they partnering with?

Several foreign companies are actively engaged in the exploration of critical and strategic raw materials in BiH. The Australian firm **Lykos Metals** is investigating deposits of lead, zinc, copper, barite, and related metals in Jezero, Šipovo, and Mrkonjić Grad, as well as copper, lead, zinc, and lithium in Čajniče, and nickel, copper, cobalt, zinc, lead, silver, and gold in Petrovo. The Canadian company **EMX Royalty** is conducting preliminary geological surveys across the country. **Seven Plus d.o.o. Sarajevo** (BiH) is exploring chromium in Vareš, while **Terra Balcanica** (Canada) is targeting lead, zinc, and barite in the Foča region. **BBM d.o.o. Sarajevo (BiH)** sought to explore silver and gold in Fojnica, though the project was suspended following local community opposition in 2017.<sup>30</sup>

**Arcore Ltd** (Switzerland) completed lithium exploration in Lopare in 2023, confirming reserves of lithium, boron and magnesium. The geological exploration was done without the knowledge of the local population, who found out about the plans through the media only after the results were announced. The same happened in 2025, when the company applied for a concession for exploitation – the local authorities were again informed of this through the media. Soon the residents and surrounding municipalities started organizing themselves in resistance through numerous gatherings, protests, petitions and other actions to protect the Majeвица mountain.<sup>31,32</sup>

Additional preliminary surveys based on lithium exploration by different companies are under way in Čajniče, Jezero, Šipovo, Bijeljina, Zvornik, and Brčko, identifying around 20 potential deposits.

In September 2010, **Geomet Sase** Srebrenica was registered and granted a concession to explore the metallic mineral cerussite at the Očekalj and Prgoševo sites in the municipality of Olovo. Since 2014, the company has

operated under the name Geomet Olovo and began developing a cerussite mine—the oxide form of lead ore—funded by and operated on behalf of the UK-based Minenco Group.<sup>33</sup> According to the company, the mined ore was exported to China. Mining activities were halted in the end of 2024, due to environmental harm, local resistance and regulatory issues.<sup>34</sup> It is still not clear whether the closure is permanent, however the environmental incidents and institutional reactions could lead to further shutdowns or suspension of mining operations.

**Adriatic Metals BH** Vareš began operations in 2013, then known as Eastern Mining. The company acquired concession rights from MM Project in Kreševo for the exploration and extraction of barite, zinc, and lead across roughly 282 hectares in the municipality of Vareš.<sup>35</sup> The company was owned by UK-based Adriatic Metals PLC, with shares held by major international investment funds, including T. Rowe Price, Vanguard, J.P. Morgan, and BlackRock.<sup>36</sup> In June 2025, the Vareš mine was sold to Canada's **Dundee Precious Metals (DPM)** for USD 1.3 billion.<sup>37</sup>

As several of these companies are publicly traded, further transfers of ownership of mines and projects to new investors and larger senior companies remain likely.

Some of the recent publicly announced partnerships include **Swiss-German cooperation via the Arcore - Rock Tech Lithium partnership** contract<sup>38</sup> for battery production in Germany. A lithium converter project in Germany by Rock Tech (“the Guben Converter”) was recognized as a strategic project under the EU CRMA in March 2025.<sup>39</sup> The company announced it would use lithium from the Lopare mine to produce batteries and supply the German Mercedes-Benz group.<sup>40</sup>

30 Radio Sarajevo, [Projekt vrijedan 26 miliona KM: Građani obustavili istraživanje zlata u Fojnici](#), *Radio Sarajevo*, 3 July 2017.

31 Igor Todorović, [Activists in northeastern BiH to obstruct Majeвица lithium mining project](#), *Balkan Green Energy News*, 9 April 2025.

32 Igor Spaić, [Le Monde diplomatique otkriva: Litijum iz BiH strateški interes EU, kakva je uloga Schmidta?](#) *N1*, 11 May 2024.

33 Samir Lemeš, [Ekološke posljedice stranih ulaganja u BiH – Analiza i preporuke](#), *Balkan Investigative Reporting Network, Detektor*, 2024.

34 Melisa Teletović, [‘Zemljotres ili otpad’ iz rudnika olova krivi za zagađenje rijeke u srednjoj Bosni](#), *Radio Slobodna Evropa*, 30 May 2024.

35 Samir Lemeš, [Ekološke posljedice stranih ulaganja u BiH – Analiza i preporuke](#), *Balkan Investigative Reporting Network, Detektor*, 2024.

36 Market Screener, [Adriatic Metals](#), *Market Screener*, 2025.

37 Dejan Rakita, [Kako je Nikšićeva besperspektivna “šikara”, rudnik u Varešu, postala zlatna koka od dvije milijarde maraka](#), *Gerila.info*, 19 June 2025.

38 Dejan Rakita, Dodik, Lopare, litijum: Da li je na pomolu treći i završni čin?, *Gerila.info*, 22 February 2025.

39 RockTech, [Rock Tech awarded Strategic Project status by European Commission](#), *RockTech*, 26 March 2025.

40 Mining SEE, [Lithium from Lopare to be supplied to “Mercedes”](#), *Mining SEE*, 14 June 2024.

Ore concentrates from Vareš are also used across Europe. First they are transported to an export harbour in Croatia. Then, they are shipped towards European metal smelters in Germany, Scandinavia and elsewhere. Adriatic Metals

reported secured offtake agreements for 82% of Vareš' production for the first two years with Trafigura, Glencore, Boliden and Transamine.<sup>41</sup>

## Policies and politics related to CRMs in BiH

BiH's mining sector operates within a highly decentralized governance system, split between FBiH, Republika Srpska, and the Brčko District. Oversight is primarily at the entity level, with each maintaining agencies responsible for mining management, policy, and environmental protection.

In Republika Srpska, mining is regulated by the Law on Mining and the Law on the Geological Institute. In the Federation, key legislation includes the Law on Geological Surveys and the Law on Mining, but cantonal laws add complexity, often lacking harmonization with federal-level rules. The Federal Ministry of Energy, Mining, and Industry shares authority with cantonal ministries, dividing oversight by resource type: metallic minerals fall under federal control, while cantons manage non-metallic resources. Similar governance, legislation and decision-making applies to environmental, economic and social regulations.

This multi-layered system complicates permits and approvals, requiring federal, cantonal, and municipal permissions, while concession agreements are issued at the cantonal level. The fragmented structure increases risks of inconsistent standards, favouritism, and corruption, undermining transparency and accountability in mineral resource management.

The Vareš silver project, formerly owned by Adriatic Metals, is an example of such manoeuvres in the issuance and amendment of concessions and of overall non-transparency.

In 2013, the Zenica-Doboj Canton granted the company a large concession for exploration and exploitation of ores around Vareš for lead, zinc and barite. The fee charged to the firm was reportedly "six times cheaper than domestic companies" would have paid, thus arguably disadvantaging the public budget. Because the concession fee was very low and the conditions of the contract favourable to the company, the canton was deprived of nearly five million marks.<sup>42</sup> Additionally, the concession contract with its six amendments became publicly available only this year (twelve years later), after a legal and court proceeding led by a local civil society organisation.<sup>43</sup>

BiH lacks a state-level mining strategy, and the mining legislation in both entities is outdated. The official raw materials list is neither up to date nor aligned with the EU acquis. Due to the country's complex governance structure, there is no state-level spatial plan; only Republika Srpska has an adopted entity-level plan, while the Federation of BiH has yet to approve its entity-wide spatial plan. Within the Federation, each of the ten cantons maintains its own regulations and plans, further complicating coordination and oversight of mining activities. Inspections are often not followed up, with personnel insufficiently trained and companies not held accountable with adequate penalties for environmental breaches.

<sup>41</sup> Cecilia Jamasmie, Adriatic Metals gears up for Bosnia-Herzegovina mine opening, [Mining.com](#), 23 May 2023.

<sup>42</sup> Ibro Čavčić, The Zenica Government Treat For The World's Ore Traders, *Center for Investigative Reporting*, 12 July 2023.

<sup>43</sup> Abraš Media, [Ugovor o koncesiji za rudnik Adriatic Metalsa uskoro javan!](#) *Abraš Media*, 22 February 2025.

# Environmental and socio-economic aspects

Mining in BiH poses significant environmental risks due to weak regulatory oversight, legacy pollution from historic mines, and operations in water-rich or ecologically sensitive areas. Many projects occur near rivers, aquifers, forests, and protected zones, threatening water quality, biodiversity, and local ecosystems. Combined with limited civic space and community engagement, as well as a focus on short-term economic gains over environmental safeguards, these factors make mining a major source of ecological concern in the country.

It is both indicative and concerning that exploratory work for mineral extraction is taking place in areas designated for protection, including the Ozren and Majevisa mountains, the Trstionica virgin forest, and the Pliva, Sana and Krivaja river basins.

Another critical issue relates to unresolved or disputed property and legal rights during geological exploration. The dispute over state property in the Adriatic Metals Vareš project centers on the use of publicly owned forest land that the FBiH government temporarily allowed for mining infrastructure. In July 2024, the Constitutional Court of Bosnia and Herzegovina annulled that decision, ruling that converting state-owned forest land for private use constitutes unlawful disposal of state property, which only state-level institutions have the authority to approve.

The issue drew international attention when High Representative Christian Schmidt publicly criticized the Court's decision, warning that such interpretations could deter investment and harm economic development.<sup>44</sup> His remarks sparked backlash from civil society groups, who accused him of siding with corporate interests and undermining the rule of law. The case highlights deep institutional fragmentation and the ongoing tension between promoting foreign investment and safeguarding constitutional control over BiH's state assets.

Moreover, these regions are groundwater-rich, serving as key sources for water supply, drinking water, and irrigation. Due to past experiences and current governance, as well as a lack of legal enforcement and any environmental safeguards, local communities perceive these activities very negatively, expressing significant skepticism regarding both the intentions of the companies involved and the government's approach to raw mineral exploitation.<sup>45</sup>

The green transition must not create "sacrifice zones" in marginalized regions of BiH. With only 4% of the country's territory under protection, vulnerable ecosystems and communities face intensified pressures from geological surveys and mining, while economic benefits to the communities remain limited, with rising profits for multinational corporations and development happening elsewhere.<sup>46</sup>

The first company to establish itself in the new wave of mining activity, UK-based Mineco, was temporarily shut down in 2024 following a series of environmental incidents, including heavy metal contamination of the Bioštica and Krivaja river valley, caused by wastewater discharge – up to 200 times higher than the maximum allowed limit. The company has firmly denied that its facility was responsible for the environmental incident. According to its owner Geomet, the company has always been committed to upholding the highest international standards, with a strong emphasis on environmental protection and improving the lives of Olovo's residents. However, the Geomet argues that persistent obstruction by certain individuals has prevented them from operating and contributing to the local community, leaving them reluctantly forced to suspend their activities.<sup>47</sup>

<sup>44</sup> Darko Kurić, [BiH: civic mobilisation against mineral exploration](#), *Osservatorio balcani e caucaso transeuropa*, 22 January 2024.

<sup>45</sup> Majda Ibraković et al., [The Raw Materials Situation in Neighboring European Countries: Bosnia and Herzegovina, Serbia, Georgia, Armenia](#), *Heinrich Boell Stiftung*, July 2024.

<sup>46</sup> Jelena Kalinić, [Paradoksi zelene tranzicije na primjeru rudarenja u Bosni i Hercegovini](#), in Anes Podić (Ed.), *Rudarenje u BiH: opasnosti po okoliš i ljude*, *Eko akcija*, 2024.

<sup>47</sup> Ekapija, [Ekološki potresi u rudniku Olovo - Višemilionskoj britanskoj investiciji prijete gašenje](#), *Ekapija*, 24 October 2024.

This example illustrates a lack of accountability for the damage inflicted upon the local area, despite evidence presented by the competent authorities – the municipality of Olovo and the Public Attorney’s Office. At the same time, the company portrays itself as seeking to assist the community through the provision of jobs and similar benefits, which is obstructed by “certain local actors” who are to blame for the closure.<sup>48</sup>

Another British company, Adriatic Metals, received extensive concessions from the Zenica-Doboj Canton, including reduced fees, expanded mining areas, and amendments to spatial plans and land conversion favouring construction over forests, while extending rights to multiple minerals—effectively granting unrestricted access to all resources in the area.<sup>49</sup> Environmental safeguards have been weakly enforced: the public consultations for the mine’s environmental impact assessment excluded affected communities in the neighbouring municipality of Kakanj, and Federal government decisions have cleared the way for forest land conversion without proper oversight. In October 2023, 3,000 square metres of forest were felled “by mistake,” threatening the nearby Trstionica virgin forest.<sup>50</sup> Activists have lodged complaints with the Bern Convention Secretariat and the EBRD’s Independent Project Accountability Mechanism, highlighting the ongoing socio-environmental risks.<sup>51</sup>

BiH’s vulnerability to climate disasters is amplified by corruption, legal violations, and intensive extractivism. The October 2024 flash floods in Donja Jablanica, worsened by illegal deforestation and a quarry, killed 19 people—yet a year later, no one has been held accountable for the loss of human lives and material damage.<sup>52</sup> Similar risks loom around mining areas, tailings, and landslides in towns like Donji Kakanj, Ugljevik, and Sanski Most, where communities remain exposed to ongoing environmental hazards.

The following statements illustrate the concerns of local residents, environmentalists and activists:

*“We are most concerned about water pollution. Like all of Bosnia, the Majeвица region is very rich in natural water and drinking water sources. We also know that on the other side of the mountain, the Serbian side, another lithium mine is planned, and the investor wants to use sulphuric acid there. We fear that this could happen here too, that is why we are worried about our water. We know from past experience that such pollution can exterminate the ecosystem from a river for tens of kilometres.”*

*(Interview with Vladimir Topić from the Center for Environment in Banja Luka).<sup>53</sup>*

*“The investor promised to resolve this issue soon, and we trusted them and waited. Two years have passed since that promise, so we requested the environmental permit from the ministry to determine why these practices were happening and whether they were allowed. In the end, it turned out the company did not have an environmental permit at all,”*

*(Interview with Boro Marić from the Greenways Association in Pecka, noting how bauxite dust spread from the mine and mud was carried onto the local road by trucks).<sup>54</sup>*

48 Klix.ba, [Nakon stava Pravobranilaštva Olovo, iz Geometa kazali da je iznesen “niz neistina”](#), Klix.ba, 16 October 2024.

49 Constitutional Court of Bosnia and Herzegovina, [Odluka o privremenoj mjeri](#), Constitutional Court, 30 May 2024.

50 Eko BiH network, [Takozvano zeleno rudarstvo – impakti na životnu sredinu i zajednice u Bosni i Hercegovini i Srbiji](#), Eko BiH, 24 November 2023.

51 Samir Lemeš, [Ekološke posljedice stranih ulaganja u BiH – Analiza i preporuke](#), Balkan Investigative Reporting Network, Detektor, 2024.

52 Marija Augustinović, Ermin Zatega, [Iako vlasti negiraju, kamenolom u Jablanici imao odobrenja](#), Radio Slobodna Evropa, 4 November 2024.

53 Gerila.info, [Rudarenje mineralnih sirovina: Potencijal ili opasnost za životnu sredinu?](#) Gerila.info, 21 October 2024.

54 Goran Katić, [Kopali boksit bez ekološke dozvole u jednom od najljepših sela BiH](#), Radio Slobodna Evropa, 27 February 2024.

*“Bosnia and Herzegovina has already contributed to [the EU’s] sustainable development through brain drain—the most skilled segment of the population emigrates to developed countries—and it is unfair to further burden the country by converting valuable forest and agricultural land into mines. Of particular concern is the issue of remediation, or the lack of guarantees to restore land after mining operations conclude. There is no mechanism to compel investors to return degraded land to a usable state once extraction has ended.”*

*(Interview with professor Samir Lemeš from Eko forum Zenica at a meeting with EU consultants for CRM).*

At a public assembly held in September 2025 in Breza, a small mining town in central Bosnia, workers, miners, residents, land defenders and many other groups from BiH and the region, jointly expressed their opposition to the ongoing unjust transition. They stated that all further transformations must be based on the principles of social and energy justice and energy sovereignty, people’s needs and the preservation of nature, and not on the accumulation of profit by private actors and centers of power, or growth of war machinery and destructive technologies. In particular they emphasised the need for communities to regain control over the management of common goods in the interest of all and asserted the right of communities to say no to projects that would harm them.<sup>55</sup>

The exploitation of natural resources in BiH frequently encounters strong public resistance.<sup>56</sup> In response, the entity authorities in Republika Srpska have amended the legislation on geological exploration in ways that strip local communities of their right to decide on mining projects within their territories, shifting decision-making power to the entity level.<sup>57</sup> This effectively removes residents from processes that directly affect their livelihoods, while enabling authorities to allocate mineral resources to investors without local consent. Based on previous concession agreements, it is likely that the entity governments will seek to accelerate such decisions under the promise of economic benefits and new jobs.

Analysts and experts claim that in practice, however, control over mineral resources would largely be transferred to foreign companies, leaving BiH with concession fees that are significantly smaller than the profits reaped by investors.<sup>58</sup> The case of Vareš highlights the stark imbalance in benefits from mining, as the royalties paid to local and state authorities remain negligible—just BAM 568,444 (around USD 312,815), or **less than one percent of total sales of USD 27 million**. This amount covers only half of the extracted resources, with production expected to increase eightfold in 2025. The disparity raises serious questions about equity, resource sovereignty, and the effectiveness of current concession frameworks.<sup>59</sup>

<sup>55</sup> Conclusions from ZBOR (plenary assembly) for miners, land and water, Breza, 12 to 14 September 2025, in Bob Myers, [Bosnia: Unite for mineworkers, for land and for water. No to unjust transition](#), *People and Nature*, 25 September 2025.

<sup>56</sup> Balkan Green Energy News, [Locals defy lithium mining plans on Mount Majevica](#), *Balkan Green Energy News*, 13 March 2025.

<sup>57</sup> Ljupko Mišeljić, [Majda Ibraković: Izmjene Zakona o geološkim istraživanjima su interes privatnih rudarskih kompanija](#), *Tačno.net*, 31 January 2024.

<sup>58</sup> Vladimir Spasić, [Osam lokalnih samouprava u BiH protiv rudnika litijuma na Majevici](#), *Balkan Green Energy News*, 17 September 2024.

<sup>59</sup> Adriatic Metals, [Annual Report for the year ended 31 December 2021](#), *Listcorp*, 30 March 2022.

# New emerging conflicts in BiH, again?

New mining projects in BiH are often planned along the entity line, primarily in depopulated areas that hold significant natural and historical value. These include the Ozren Mountains (nickel and cobalt exploration), Majevisa Mountains (lithium), the Trstionica virgin forest (near Rupice mine), the Krivaja River (threatened by lead and potential chromium mining), the Pliva River (affected by planned mines in Jezero), and the Konjuh mountain (potential copper site). Such plans create a direct socio-ecological conflict between resource extraction and the potential protection of these areas for nature conservation purposes.

Some of these areas were heavily impacted by war, and others have been cleared of landmines, such as the Ozren and Majevisa<sup>60</sup> mountains, or returnees have resettled (like in the village of Duboštica near Vareš). Today, these communities are predominantly elderly, yet they now face the risk of another round of marginalization, dispossession, and socio-environmental degradation due to the proposed mining projects.

The “Mine Free Majevisa” initiative, jointly implemented by Norwegian People’s Aid and BiH Mine Action Center (NPA BiH and BHMAC), has removed explosive ordnance from 26 square kilometres of land containing an estimated 6,000 landmines, returning safe land to communities and enabling them to build a safer and more sustainable future.<sup>61</sup> But the residents of villages on the Majevisa mountains<sup>62</sup> are now rightly questioning whether their land was cleared of mines – including with German support – not for their safety, but to pave the way for German companies to benefit from exploitation of lithium for the automotive industry.

Many of the proposed mining projects target greenfield and populated sites – areas with no history of mining.<sup>63</sup> Most local communities in these regions oppose mining and prefer to see their lands designated as protected areas, supporting agriculture, sustainable farming, tourism, and other economic activities that are more compatible with long-term social and environmental well-being.<sup>64</sup>

<sup>60</sup> Bosnia and Herzegovina Mine Action Center (BHMAC), [Opština Ugljevik oslobođena od mina](#), BHMAC, 13 August 2024.

<sup>61</sup> Selma Antić, [Ambassador of Germany to Bosnia and Herzegovina paid a visit to the NPA land release task in Sapna](#), Norwegian People’s Aid, 20 October 2023.

<sup>62</sup> Tuzlanski.ba, [Majevisa bez mina do 2024. godine](#), Tuzlanski.ba, 20 October 2023.

<sup>63</sup> Balkan Green Energy News, [Locals defy lithium mining plans on mount Majevisa](#), Balkan Green Energy News, 13 March 2025.

<sup>64</sup> For more introspective insights on the resistance to mining in BiH, see: Peter Lippman, [Grassroots Resistance to Environmental Destruction in Bosnia-Herzegovina. Part IV: Majevisa](#), LeftEast, 7 June 2025.

# Geopolitical aspects: the global and EU relevance of CRMs in BiH

*“We have high hopes on enlargement towards the Western Balkans... and its raw material potential”*

*(DG GROW, April 2024)<sup>65</sup>*

As an EU candidate country, BiH is directly impacted by EU rules on critical raw materials. It was granted EU candidate status in 2024, and while negotiations are poised to begin, no chapters have been opened yet, pending the fulfillment of the required reforms. The EU has emphasized the importance of BiH adopting reforms, particularly in areas such as the rule of law, anti-corruption measures, and electoral processes before formal negotiations can begin. As such, by positioning BiH as a key potential supplier of critical materials, the CRMA, as well as the current Growth Plan for the Western Balkans, pressures the country to align its policies with EU strategic interests to develop so-called *sustainable raw materials value chains*,<sup>66</sup> prioritising them over local development priorities or environmental protection.

The CRMA creates a situation where BiH is expected to deliver minerals for European supply chains while simultaneously having to build the legal, regulatory, and environmental frameworks to do so responsibly, putting the country under multi-dimensional political, economic, and social pressure, supposedly to further the enlargement goal.

Additionally, the memorandum signed between the EU and Serbia in July 2024, launching a Strategic Partnership on sustainable raw materials, battery value chains and electric vehicles, has created more (geo)political tension, following the mass resistance movement and anti-lithium protests in Serbia, that are generally supported by citizens, civil initiatives and movements in the region and beyond.<sup>67</sup> The EU's support for the Jadar lithium project risks undermining its own credibility, as it appears to prioritize

its own strategic economic interests over human rights, democracy, environmental protection, community rights and transparent governance. This approach may fuel public mistrust in the EU's commitment to democratic values and sustainability, driving eurosceptic sentiment in the region.

Following this, the former president of Republika Srpska Milorad Dodik, who was recently stripped from this function by the BiH Constitutional Court after almost three decades of power,<sup>68</sup> seized the opportunity to advance his interests, publicly offering BiH's natural resources to foreign investors in early 2025. Dodik announced that Republika Srpska was ready to explore partnerships in strategic minerals with Hungary, the United States, Serbia, Russia, the EU, and China. His references to U.S. negotiations suggest an attempt to get sanctions lifted and curry favour with the Trump administration.<sup>69</sup> Yet Hungary may play an even more pivotal role: RS has long nurtured close ties with Budapest, which has protected Dodik from broader EU sanctions, and reports emerged last year of potential Hungarian involvement in mining projects, including the lithium site on Majevisa.<sup>70</sup> Details of the collaboration and future concession rights remain unclear, highlighting the complex interplay of regional politics, foreign investment, and resource control.<sup>71</sup>

At a meeting held in July 2025 in the US Congress, the Minister of Foreign Relations in BiH, Elmedin Konaković, noted that BiH's mineral sector is highly attractive and is drawing significant interest, but it is essential to make clear that the entities cannot engage in negotiations independently.

*“It is very important to send the message that the entities cannot negotiate with just anyone. We have expressed our willingness to lead the process of discussions with American partners on joint cooperation in exploring potential mineral reserves, including lithium and some others. Of course, full consideration would be given to protecting the human environment and ensuring that these processes do not*

<sup>65</sup> Chamber Investment Forum Western Balkans 6 (WB6 CIF), [Online Workshop: Critical Raw Materials potential in the Western Balkans Region](#), WB6 CIF, 26 April 2024.

<sup>66</sup> European Commission, [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. New growth plan for the Western Balkans](#), European Commission, 8 November 2023.

<sup>67</sup> Eko BiH network, [Podrška ekološkom pokretu u Srbiji u borbi protiv otvaranja rudnika litijuma i bora u dolini Jadra](#), Eko BiH, 5 August 2024.

<sup>68</sup> Dragan Maksimović, [Republika Srpska: Milorad Dodik steps aside](#), DW, 30 September 2025.

<sup>69</sup> N1, [Dodik says BiH's RS entity is prepared to explore strategic minerals partnership with Hungary and the U.S.](#), N1, 21 May 2025.

<sup>70</sup> Zsuzsa Bodnár, Orsolya Fülöp, [Orbán and Dodik to deal with lithium mine, residents would face eviction and deforestation](#), Atlatzso, 20 May 2025, updated 4 June 2025.

<sup>71</sup> Government of Hungary, [Külföldről konstruált jogi boszorkányüldözés zajlik Milorad Dodik ellen](#), Government of Hungary, 3 March 2025.

*disrupt anything crucial to public health. I would like to note that we will propose to the Council of Ministers that such a document be sent quickly and urgently for further procedure, and that, in cooperation with the entity authorities, we manage this process as it should be—within Bosnia and Herzegovina’s systemic competencies and, of course, in partnership with the United States,” he stated.*<sup>72</sup>

It is evident that the race for BiH’s mineral resources represents both a geopolitical struggle and a domestic contest, with local politicians competing to make the most attractive offer under pressure from global powers. At the same time, affected communities and civil society are increasingly mobilizing in response, organizing protests, legal actions, petitions, community initiatives, public campaigns, and other forms of advocacy.<sup>73</sup>

Among the concerns raised by experts and seen by citizens is how mining projects could shape the course of EU enlargement and (de-)democratization in the region. A substantial share of citizens across the Western Balkans, particularly in Serbia and the Republika Srpska entity in BiH, no longer believe in their countries’ EU membership in the foreseeable future. Critics argue that the EU’s new quest for critical raw materials in the Western Balkans and interest-oriented partnerships forged with national governments and authorities in the region could further compromise and ultimately damage the region’s value- and norm-based EU integration, while at the same time eroding the democratic structures needed for truly comprehensive security in the region.<sup>74</sup>

<sup>72</sup> [Euronews.ba, Konaković: Sa američkim partnerima o Južnoj interkonekciji i istraživanju minerala u BiH](#), *Euronews*, 17 July 2025.

<sup>73</sup> See Peter Lippman’s series of articles on [Grassroots Resistance to Environmental Destruction in Bosnia-Herzegovina](#), *LeftEast*, June 2025.

<sup>74</sup> Friedrich Ebert Stiftung, [Youth studies 2024-2025](#), Friedrich Ebert Stiftung, 2024; and Regional Cooperation Council (RCC), [Balkan Barometer 2024](#), RCC, 2024. For further context, see Valery Perry, [A Modern Rush for ‘Green Deal’ Minerals Challenges Troubled Governance in the Western Balkans](#), *Just Security*, 2024.

# How to achieve honest and meaningful cooperation between the EU and communities in BiH?

The EU must uphold its core values—democracy, rule of law, human rights, environmental protection—and prioritize the rights and wellbeing of local communities. This includes respecting their right to say no,<sup>75</sup> ensuring meaningful participation under international standards such as the Aarhus Convention, international law principles and human rights, community consent, and supporting sustainable local economic activities like agriculture and food production. While these principles are also reflected in the EU CRMA, it is doubtful EU actors will be able to enforce them on the ground, given their limited role and oversight of the individual projects.

Ignoring community voices risks social tension, resistance, euroscepticism, and a loss of EU credibility **for failing to uphold its own proclaimed values**. Pinning the responsibility on the host country authorities is insufficient in the current political context of BiH. Several EU regional initiatives have already revealed a lack of understanding of local political economy, the risks of strengthening oligarchies, and the consequences of disregarding democratic principles. Some of them include the lack of transparency in processes related to the Green Agenda for the Western Balkans and its action plan and the EU's Environmental Forum.

For cooperation to be honest and meaningful, the EU must actively and independently engage with communities, enforce democratic safeguards, and ensure that development benefits those most affected. As one Member of the European Parliament clearly stated: “Striking deals with autocrats simply to secure access to raw materials should never be the EU's strategy.”<sup>76</sup>

**Apart from environmental and social concerns, the sensitivity of historical, cultural, socio-political and demographic aspects must be carefully considered. BiH has already endured the devastation of war with its detrimental effects on the environment and population, and former minefields and war-affected zones must not be converted into extractive frontiers and sacrifice zones again through mining conflicts.**

## Key Considerations, context and risks:

1. Historical context and emerging conflicts – e.g., cleared minefields potentially being repurposed for mineral mining.
2. Vulnerability of local communities and their sensitivity to new socio-environmental conflicts.
3. Biodiversity priorities – protecting territory rather than causing destruction.
4. Weak regulatory frameworks that can destabilize investments.
5. Issues with spatial planning and unclear state property/ownership rights.
6. Lack of adequate inspections, enforcement mechanisms, effective, proportionate and dissuasive penalties as well as mining/environmental standards.

<sup>75</sup> Kamilya Tyulebayeva et al., [The right to say no – a legal toolbox for communities affected by mining in the EU](#), European Environmental Bureau, February 2023.

<sup>76</sup> BarBalkans, The shadow of lithium looms over Bosnia, *BarBalkans*, 22 March 2025.

# Recommendations for meaningful cooperation between the EU and local communities

## EU officials and political actors should:

1. Support the rule of law and strengthen direct democratic processes, by not promoting or considering new (strategic) mining projects in BiH (until the rule of law and EU standards to human rights and environmental protection are generally applied);
2. Include and respond to feedback from civil society and local community representatives in the decision making on CRM strategic projects and partnerships;
3. Listen to and respect civil society and community positions, including the right to prior and informed consent or the right to reject mining projects;
4. Prioritize the implementation of conventions such as the Aarhus and the Bern conventions for environmental justice and protection, including the most recent International Union for Conservation of Nature (IUCN) call to governments on safeguarding biodiversity and human rights in energy transition mineral governance;<sup>77</sup>
5. Insist on BiH enhancing biodiversity protection by expanding protected areas to the EU standard of 30% by 2030, as committed under the Kunming-Montreal Protocol;
6. Address depollution and reducing environmental impacts of mining by enforcing and supporting publicly and/or financially the remediation of existing mines landfills and tailings facilities;
7. Prioritize investments in the reduction of mineral use and the promotion of secondary raw materials and recycling solutions over new (greenfield) extractive operations.

The EU must not support CRM investors who falsely advertise the country as if it is no different than doing mining in other countries such as Australia or Ireland. This repeats the EU's previous mistakes, such as promoting privatization in the region. At most CRM promotional events, including those organised by the European Commission there seems to be no understanding about the political economy in the region, or of the risks of further strengthening kleptocracy and oligarchy, or wilful blindness is exhibited in the interest of profit for EU businesses.<sup>78</sup>

Finally, if BiH emerges as a nearby source of critical raw materials, the EU must also recognize that any disputes or conflicts over these resources could pose direct security risks at its doorstep, and it is likely to be met by severe local unrest, further destabilizing the region.

<sup>77</sup> IUCN, [Motion 104. Safeguarding biodiversity and human rights in energy transition mineral governance](#), IUCN World Conservation Congress, 2025.

<sup>78</sup> Western Balkans Info Hub, [Key Points of the Online Workshop on Critical Raw Materials Potential in the Western Balkans Region](#), Western Balkans Info Hub, 14 May 2024.

### **About the author:**

Majda Ibrakovic is a geographer, environmentalist and organiser from Zenica, Bosnia and Herzegovina. She has been actively involved in environmental civil society for the past decade. Majda critically engages with the discourses around green transition and (green) growth. She organises and supports local communities and grassroots movements in their struggles for socio-ecological justice, with a particular focus on the extractive and energy industries. She holds a Master's degree in Degrowth: Ecology, Economics and Policy master's programme at the Universitat Autònoma de Barcelona.

## Critical Raw Materials: Dispatch from Bosnia and Herzegovina

Bosnia and Herzegovina is emerging as a potential hotspot in Europe's race for critical raw materials. The country's weak institutions, political volatility, and fragile post-war landscape raise urgent red flags. As the EU accelerates its CRM agenda, BiH risks becoming a peripheral extraction zone where environmental safeguards, community participation, and democratic standards are sacrificed for speed.

This analysis maps the surge of projects across BiH and exposes the gaps: limited oversight, unclear property rights, low concession fees, shrinking civic space, and mounting local resistance. Without meaningful engagement with communities and civil society, the EU's CRM ambition could fuel instability, deepen distrust, and undermine its own credibility in a candidate country.

The EU must uphold its core values: rule of law, human rights, biodiversity protection, and avoid treating the Western Balkans as a risk-free extension of its supply chain. Strategic partnerships cannot bypass democratic safeguards or ignore post-war sensitivities.

A responsible approach requires transparency, community consent, strengthened environmental governance, and prioritising circular solutions over new extraction. Europe's green transition must not create new sacrifice zones on its doorstep.

Further information on this topic can be found here:

➔ [fes.de](https://fes.de)