

- **Ms. Ursula von der Leyen, President of the European Commission**
- **Ms. Kaja Kallas, High Representative for Foreign Affairs and Security Policy and Vice-President of the European Commission**
- **Mr. Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy**
- **Ms. Marta Kos, Commissioner for Enlargement**
- **Mr. Maroš Šefčovič, Commissioner for Trade and Economic Security**

Belgrade, March 31st, 2025

Your Excellencies,

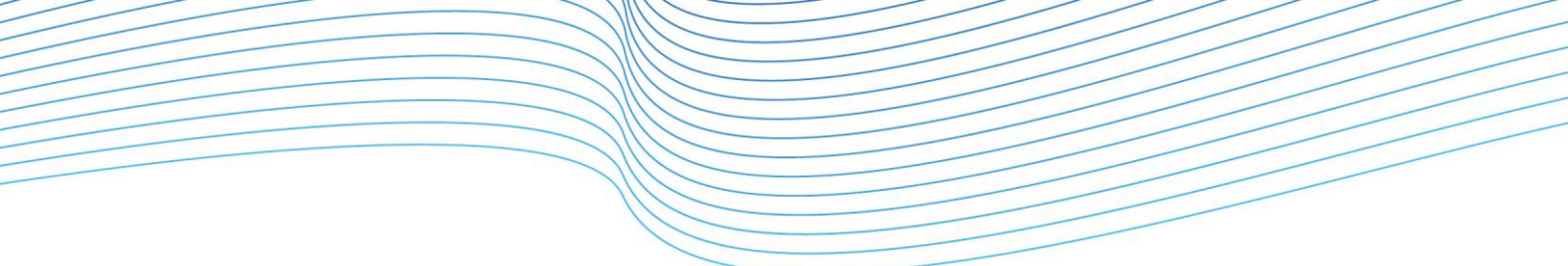
We address you as a coalition of civil society organizations strongly committed to Serbia's European future, **to express our deep concern about the potential consequences of including the Jadar project on the list of strategic projects of the European Union under the Critical Raw Materials Act (CRMA).**

As you are aware, Serbian citizens' trust in the European Union has been seriously eroded for quite some time. **Recent public opinion research has, for the first time, shown that the number of citizens opposing EU membership now exceeds those in favor.** This decline in trust is primarily the responsibility of Serbia's dominant political actors, who frequently portray the European Union as merely one of several pillars of Serbia's foreign policy. Given the immense public distrust surrounding the preparation process of the Jadar project, its designation as a project of strategic importance to the European Union, especially in the current geopolitical climate and during Serbia's institutional and societal crisis, **would further undermine citizens' confidence in the benefits of European integration. Additionally, the long-term geopolitical orientation of Serbia could be affected, potentially jeopardizing the political stability of the Western Balkans.**

Currently, over 60% of Serbian citizens oppose the implementation of the Jadar project, which plans to use technology that has never been deployed anywhere in the world. **This opposition primarily reflects a deep mistrust in Serbian institutions and their ability to impartially assess the public interest in such a complex project, as well as to enforce environmental and other regulatory standards should the project proceed.** The opposition has been expressed through mass protests across the country in both 2021 and 2024, with demands centered on the project's potential impact on the environment and local communities. **The Serbian government responded to these protests at the end of 2021 by revoking the legal basis for the project's implementation. However, this decision was later overturned by new rulings from the Constitutional Court and the government in 2024, further eroding public trust in institutions and democratic processes.**

In an attempt to initiate institutional dialogue on this matter, a Citizens' Initiative with a total of 38,000 signatures was submitted to the Serbian Parliament in May 2022. However, the initiative disappeared from the legal process, and judicial authorities have yet to act on criminal complaints filed in response.

Concerns over transparency and public participation in decision-making processes are further exacerbated by the inadequate responses from Rio Tinto, which has operated in



Serbia for nearly two decades. The local community was not adequately informed about earlier phases of research or the project's potential consequences. Furthermore, the documents forming the basis of the Draft Environmental Impact Assessment Study have yet to be made public, further fueling doubts about the objectivity and thoroughness of the decision-making process.

At the core of our concerns is the **growing gap between Serbia's legal commitments in the EU accession process and the reality faced by its citizens.** The lack of a clear, understandable response from EU institutions to such discrepancies further undermines the European Union's credibility. The ongoing wave of protests in Serbia, currently supported by two-thirds of the population, is driven not only by corruption but also by institutional failures to ensure safe infrastructure and transparent business practices in both the public and private sectors, aligned with the standards and practices of EU member states.

Under the current geopolitical conditions, EU enlargement policy, through various instruments, should provide a framework for clear strategic and security orientation for candidate countries. However, in this particularly complex moment for Serbia and the region, including the Jadar project on the CRMA list, would be perceived as endorsing a **transactional arrangement and supporting political actors who show little commitment to genuine progress in aligning Serbia with both fundamental EU principles, and its foreign and security policy.** Based on the reactions of various social actors, **we believe such a decision would provoke a new wave of protests or redirect existing demonstrations against the European Union, further diminishing support for Serbia's EU membership.**

The inclusion of any projects from Serbia on the EU's list of strategic projects, before the establishment of an unquestionable rule of law and alignment with fundamental EU principles and before demonstrating that ongoing projects comply with the highest European environmental protection standards, could be interpreted domestically and internationally as support for maintaining the status quo. **Prioritizing the strengthening of the rule of law in accession negotiations, on the other hand, would help restore citizens' trust in the European path as the only option that guarantees long-term stability and prosperity for Serbia and the region.**

Hoping that you will make a decision that will contribute to Serbia's democratization and European perspective in the long run, we extend our sincere regards.

Yours sincerely,

Program Council of the National Convention on European Union

National Convention on the EU is the largest organized EU supporter in Serbia. NCEU is a comprehensive platform of CSOs, strongly advocating for accession of Serbia to the EU. At the same time, we work on raising the awareness on the benefits of Serbia becoming a member state of the EU. This unique platform is closely monitoring the EU accession process and advocate for European values in Serbia since 2006.

NCEU gather more than 750 CSO's (NGO's, trade unions, representatives of the academia, the media, business associations etc.) with relevant experience in addressing issues from all the 35 negotiation chapters. So far, we established 29 working groups covering all the chapters, some of the working groups follow multiple chapters. Additionally, we recognized the need to follow cross-cutting issues steaming from the negotiation chapters which is why we established five multisectorial working groups.