



REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

No 99-00-517

09 October 2023, Sofia

Subject: *Remarks and comments on the project "Rehabilitation and modernization of port infrastructure in Bechet Port" with National Company "Danube River Ports Management" as Contracting Authority*

DEAR MINISTER FECHET,

With reference to the letter of the Minister of Environment and Waters of the Republic of Bulgaria No. 99-00-517/21.09.2023, containing the response for the participation of the country in the EIA procedure in transboundary context for the project "Rehabilitation and modernization of port infrastructure in Bechet port", in Romania, I hereby send the comments and observations of the public and the competent authorities of the Republic of Bulgaria on the project.

After reviewing the information provided and consulting with the competent authorities in our country on the project "Rehabilitation and Modernization of Port Infrastructure in the Port of Becket", the following recommendations and observations are received:

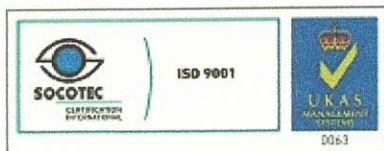
Given the location of the port, it is possible that in the event of an accident or mismanagement, transboundary waste contamination could occur, which in turn could lead to negative environmental impacts on the territory of the Republic of Bulgaria.

H. E. Mircea FECHET

Minister of Environment, Waters and Forests of Romania

12 Libertatii Blvd.,

Sector 5, Bucharest, Romania



Sofia 1000, 22 Maria-Luisa Blvd

Phone: +359 2 940 6194, Fax: +359 2 986 25 33





The notification states that dredging activities will be carried out in the area of the port of Becket, with the dredged sediment material being deposited in the bed of the Danube, outside the critical areas for navigation. According to the information provided by the Romanian side, the disposal areas will be specified with the Lower Danube River Authority – Galati. In this regard, it is necessary to assess the impact on the shipping lane and approaches to ports, ferries, etc., and forecast information is needed on the quantities of sediment that will be dredged and deposited back into the Danube bed. Information on the method of dredging and the technical parameters of the used equipment should be provided. There is a possibility of sediment transport and an increase in the siltation trend on the approach to the Oryahovo ferry complex.

In view of the fact that the distance from the construction zone to the Bulgarian coast is 500 m, in order to avoid negative impacts on the population of the Republic of Bulgaria living in the town of Oryahovo during construction activities related to the rehabilitation and reconstruction of the port of Becket, it is recommended to include the following preventive measures in the EIA report:

- When working in dry and windy weather, periodic water spraying of the work site in Beckett port should be carried out in order to prevent the spread of dust emissions in the direction of the town. The dust shall be prevented from entering the airspace.

- The construction activities are to be carried out only in a standard daily working mode in order to limit the noise exposure in the town Oryahovo during evening and night hours.

In the final administrative act (in the EIA decision), specific requirements should be laid down in order to ensure that, during implementation of the investment proposal, all necessary measures are taken to limit and minimize unorganized dust emissions into the ambient air from the construction and installation activities on the territory of the port, as well as to limit unorganized emissions during its subsequent operation.

Please accept, Honourable Minister, the assurance of my highest consideration and readiness for successful future cooperation.

Yours sincerely,

Julian Popov
Minister of Environment and Water