



MINISTRY OF AGRICULTURE AND FOOD

EXECUTIVE FOREST AGENCY

REGIONAL FORESTRY DIRECTORATE OF TOWN RUSE

Town Ruse, 7 Skobelev Blvd., PC 443; telephone exchange 082 / 821 706, fax: 082 / 821 708, e-mail: ruruse@nug.bg

Outgoing No: ГФ – 88 / 19. 05. 2014

**TO: MR. ALEXANDER CHAKMAKOV
EXECUTIVE DIRECTOR OF
“GRAVEL AND SAND PITS BULGARIA” EAD
BULGARIA, 1528 SOFIA,
at 6, PORUCHIK NEDELCHO BONCHEV STREET**

REGARDING: Notification about investment proposal for “Sand and Gravel Excavation from Alluvium Deposits in the Bed of River Danube, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo village, Municipality Slivo pole, Ruse Region”.

DEAR MR. CHAKMAKOV,

At the Regional Forestry Directorate of town Ruse with reg. index 940 / 23. 04. 2014 a Notification was entered by “GRAVEL AND SAND PITS BULGARIA” EAD about investment proposal of the company for “Sand and Gravel Excavation from Alluvium Deposits in the Bed of River Danube, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo village, Municipality Slivo pole, Ruse Region” for which Terms of Reference and content about Environment Impact Assessment Report is envisaged to be elaborated.

From the submitted Notification and its Annexes it is seen that with the realization of the investment proposal (IP) an extraction section is affected, which is part of the river bed of water body – river Danube, public state property, in section Mishka (from km 462.0 to km 459.4) in the area of Babovo village, Municipality Slivo pole, Ruse Region, to the north and north-west of Mishka island (Big Mishka-1 and Small Mishka – 2) and to the south of Small Mishka island (Mishka – 3).

The right of use - Excavation of alluvium deposits is done pursuant to the Water Act, and it is envisaged that the IP shall not affect lands and soils beyond the water body. Besides for extraction of aggregate – sand and gravel, extraction of alluvial deposits is done periodically also from the critical sections, with the purpose of maintenance of the navigational conditions in the Lower Danube. In the Notification it is stated that the aggregate extraction activities are coordinated and shall be controlled by the Executive Agency for Exploration and Maintenance of River Danube.

The transportation of the excavated sand and gravel – from Mishka section to own pier / industrial site of the company shall be carried out along river Danube. It is indicated in the Notification that the pier site is located in land property with identification 63427.8.1076 from quarter 1 under the Plan of town Ruse, Eastern Industrial Zone of town Ruse and is a licensed and effective port for processing of general and bulky materials.

To the Notification under review Decision No 3 - IIP/2014 on assessment of the necessity for execution of environment impact assessment is attached of the **Minister of Environment and Water (for brevity Decision of MOEW) on assessment of the necessity for execution of environment impact assessment. In the Decision it is indicated that the extraction section Mishka falls within the boundaries of two protected zones, pursuant to the Biodiversity Act (BA):** in protected zone **BG0000377 Kalimok-Brashlen**, identified for conservation of natural habitats and wild flora and fauna and protected zone **BG0002030 Complex Kalimok**, identified for protection of wild birds. It is specified that Section „Mishka" does not fall within the borders of protected areas, pursuant to the Protected Territories Act, but is in close proximity to the protected locality **Kalimok-Brashlen**.

It is also indicated in the Decision of MOEW that in reference to In connection with Article 12, paragraph 1 and paragraph 2 of the *PE Ordinance*, the realization of the investment proposal is admissible versus the regimes, determined with the orders, declaring as a protected zone BG 0000377 Kalimok – Brashlen and **BG0002030 Complex Kalimok – only within the boundaries of certain extraction section**, with the coordinates of the points, indicated in the attached scheme of the section with actual extraction and in the Decision of MOEW - whereby **island formations along the river Danube are not affected**.

According to the provisions of Article 31, paragraph 1 of the Biodiversity Act and Article 2, paragraph 1, of the *Ordinance for PE*, the investment proposal is liable to assessment for its compatibility with the subject and the purposes of protection of the above described protected zones, which is likely to have significant negative impact on natural habitats and habitats of species, subject to protection in these zones.

Mr. Chakmakov,

Having reviewed the presented Notification and its Annexes, including Decision No 3 - IIP/2014 of 06. 03. 2014 of the Minister of Environment and Water, we present to you information of the forest territories on Mishka island (Big Mishka-1 and Small Mishka – 2) and to the south of Small Mishka island (Mishka – 3).

The forest territories on Mishka island and Small Mishka fall within the region of activity of the Northern Central State Enterprise DP – Gabrovo town, Territorial Subdivision State Hunting Enterprise (TS SHE) Danube – town Ruse. The same are structured as

department 229, sub-divisions: “a”, “b”, “c”, “d”, “e”, “f”, “g”, “h”, “I”, “j”, k”, “l”, “m”, “n”, “o”, “p”, “r”, “1”, according to the forestry map and the Forestry Plan of 2012 of TS SHE Danube. Part of the sub-divisions “e”, “f”, “g”, “h”, “I”, “j”, k”, “l”, “m”, are forest cultures, planted with natural origin, mostly of white ivy and singularly field elm, black and white poplar – branches I – 214 and I-37/61, field ash, field elm, black and white poplar ; sub-division m is arranged as a felling area, and sub-division l is arranged as weir.

The areas of Mishka island and Small Mishka are forest territories – public state property, within the boundaries of protected locality Kalimok – Brashlen , declared with Order No RD – 451 / 04. 07. 2001 of the Minister of Environment and Water (SG, issue 68 / 2001).

Recommendations for “mitigation of impact on animal species, inhabiting the island” can be made after assessment of the rate of impact on the protected zones, carried out by experts, in compliance with the requirements of Article 31, paragraph 20 of the Biological Diversity Act and Article 9, paragraph 1 of the Ordinance on environment, with competence in the following fields: phytocenology, hydrobiology and ornithology, according to the aforesaid Decision of MOEW.

Attachments:

1. Copy of Observation with outgoing No 420 / 16. 05. 2014 of TS SHE Danube – town Ruse
2. Extract from the Forestry Map (from map of the sheets and from map sheet No 42), pre-division sheet for division 229 and taxation descriptions of sub-divisions 229 “a”, “b”, “c”, “d”, “e”, “f”, “g”, “h”, “I”, “j”, k”, “l”, “m”, “n”, “o”, “p”, according to Forestry Plan of TS SHE Danube – town Ruse – certified copies.

Respectfully,

/Signature unreadable/

Eng. Sevdalina Dimitrova
Director of RFD

ROUND STAMP: REGIONAL FORESTRY DIRECTORATE

TS STATE HUNTING ENTERPRISE DANUBE

Ruse, 19 Mariya Luiza street, Telephone: 820 217, fax: 820 223

Rectangular stamp:

*REGIONAL FORESTRY DIRECTORATE:
7000 RUSE, 7 SKOBELEV STREET
REGISTRATION INDEX AND DATE: 1089 / 16. 05. 2014
OUTGOING No: 420 / 16. 05. 2014*

To: The Regional Forestry Directorate

Further to your ГФ – 78 / 08. 05. 2014.

In connection with investment proposal for extraction of sand and gravel from alluvial deposits from the bed of river Danube, Mishka section, State Hunting Enterprise Danube expresses the following Observation:

Mishka island is a state forest territory – division 229 of FSP of the State Hunting Enterprise Danube.

The island is a part of the protected locality Kalimok – Brashlen and its territory is occupied mostly of local wood species like white ivy and black poplar.

State Hunting Enterprise Danube is not a competent body regarding the impact assessment, which the realization of the investment intention would have on the environment.

Because activities, directly on the territory of island Mishka are not envisaged, we consider that the wood vegetation will not be subjected to significant harmful impact.

However, State Hunting Enterprise Danube is not in a position to make in-depth analysis of the impact which the presence of sand and gravel extraction machinery would have on the ecosystems and the biological species, like release of harmful emissions, noise pollution, river bottom relief change, disturbance of the tranquillity of the animal species, inhabiting the region and etc.

The institution, competent to answer to the raised issues is MOEW, the represented by RIEW, town Ruse.

Attachments:

1. Excerpt from the forestry map of Mishka island.
2. Pre-division sheet and taxation characteristics of the sub-divisions on the territory of Mishka island – 17 pcs.

Director:

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Eng. J. Sariliev