



МИНИСТЕРСТВО НА КУЛТУРАТА

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Ministry of Culture

BMM ref. No 0070 /03.11.2010

To: Mr. Adrian Gladstone,
Executive Director,
Balkan Mineral and Mining EAD,
2087 Chelopech village, Sofia District

CC: National Institute of Immovable Cultural Heritage,
16 Dondukov Blvd, Sofia

Krumovgrad Municipality
Zvanarka Mayor's Office
Ovchary Mayor's Office
Dazhdovnik Mayor's Office

With reference to your letter Ref. No 0067/20.07.2010

Re: Consultations on the Terms of Reference for the scope and content of the EIA for the Investment Project Proposal for Mining and Processing of Auriferous Ores from the Ada Tepe Prospect of the Khan Krum Gold Deposit, Krumovgrad Municipality.

DEAR MR. GLADSTONE,

The issue about conservation of immovable cultural heritage is discussed in Section 7.10. of the materials submitted in connection with the the ToR for the scope of the EIA for the the Investment Project Proposal for Mining and Processing of Auriferous Ores from the Ada Tepe Prospect of the Khan Krum Gold Deposit, Krumovgrad Municipality, Kardzhali District. Following a review of that Section and data on archaeological sites and valuable cultural heritage objects in place, I believe the ToR for the scope and content of the EIA needs a specific focus and elaboration on the following aspects:

1. Designated area status under the Cultural Heritage Act and regulated conservation status (boundaries and prescribed requirements). In that respect, this is to remind you that the National Institute of Immovable Cultural Heritage (NIICH) and the Ministry of Culture are currently implementing a procedure whose purpose is to clarify the cultural and scientific value and determine the regulated conservation status (borders and prescribed requirements) for protection of the area and the security/buffer area of the cultural heritage site, namely Gold Mine from the Late Bronze and Early Iron Age' located at Ada Tepe, in the village land of Ovchari village and Skalakov village, Krumovgrad Municipality. The Ministry of Culture will advise you in a timely manner about any administrative acts issued for that purpose.

Meanwhile, specific attention needs to be focused on the fact that pursuant to art. 146, par. 3 of the Cultural Heritage Act "any immovable and movable archaeological sites/objects shall have the status of cultural artifacts categorized as objects of national significance and national cultural heritage to the moment they are acknowledged as such under the provisions of this Act".

2. Description, characteristics and structure of the archaeological cultural heritage [site/object].

3. Measures planned in the proposed investment projects in terms of archaeological surveys, conservation and promotion campaigns or the immovable cultural heritage site and its security area, including:

- Archaeological surveys, stages and sub-sites, as well as procedures related to any approvals/acceptance of the archaeological survey results, assessment of cultural and scientific value and status of the finds, as well as conservation solutions pursuant to the Cultural Heritage Act;
- Conservation and restoration activities: designs preparation, coordination and approvals;
- Presentation/exhibition, both in situ and in museums: designs preparation, coordination and approvals;
- Scientific publications and promotion efforts for archaeological survey results.

4. Description, analysis and evaluation on any probability of potential significant impact on the tangible cultural heritage which may result from harmful emissions during the construction or operation stage.

4.1 .During the construction and operation stages of the open pit.

4.2 .During decommissioning, closure and rehabilitation of the open pit.

5. Summarized data of any potential impact at the construction and operation stages of the Investment Project on any components of the immovable archaeological finds according to the table below.

5.1. During the construction and operation stages of the open pit.

5.2. During decommissioning and rehabilitation of the open pit.

6. Comparison between the proposed options per breakdown of environmental components and factors: based on analysis and forecast of any potential impact following a fair review of all proposed solutions.

DEAR MR. GLADSTONE,

In connection with the upcoming coordination/sign off procedure, please be advised that the revised ToR for the scope of the EIA for the Investment Project Proposal for Mining and Processing of Auriferous Ores from the Ada Tepe Prospect of the Khan Krum Gold Deposit, Krumovgrad Municipality, Kardzhali District associated with the requirements set in this letter will be subject to a coordination review by the Ministry of Culture under the provisions of the Cultural Heritage Act.

Attachment:

*Table of summarized data on potential impact during construction and operation stages
of the proposed Investment Project
on the cultural heritage site.*

Deputy Minister

Prof. Chobanov

