



# Environmental Information and Training Center

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**EITC Ref. No**

**29/07.06.2010**

**To:**

Balkan Mineral and Mining EAD  
26 Bacho Kiro St., floor 3; Sofia 1000

**CC:**

Ministry of Environment and Water  
22 Maria Luisa Blvd.; Sofia 1000

Dear Sirs,

This is to declare that the undersigned organizations and associations **are interested in participating in the consultation process** provisioned in Chapter Three of the Regulation on the Terms and Conditions for Environmental Impact Assessment for the Investment Project of Balkan Mineral and Mining EAD for Mining and Processing of Gold Ore from Ada Tepe Prospect, Khan Krum Deposit, Krumovgrad Municipality.

For contacts: [dpopov@bankwatch.org](mailto:dpopov@bankwatch.org); mobile: 0886 818 794

Sincerely:

Daniel Popov  
Member of the Managing Board of the **EITC**

**Suggestions** for the scope of work and content of the EIA Statement of the Investment Project and the Compatibility Assessment against the Subject Matter and the Purpose of Protected Areas.

1. The implementation of such a large-scale investment project will have a substantial impact on Krumovgrad Municipality which currently does not have industrial polluters in place and has a highly developed farming business. The Project will change both the local employment structure and the business in the minesite area, and it is likely to have a negative impact on the sustainable development potential based on organic farming and tourism.

Having those arguments in mind, we believe it is imperative to have a detailed review of:

- the “zero” alternative;
- economic and social limitations the Investment Project is going to impose; and
- the territorial coverage of those limitations.

The EIA Statement needs to review the consistency and inconsistency against the strategic documents in place, namely the Krumovgrad Municipal Development Plan (2009-2013) and the District Development Plan (2005-2015).

2. The current Investment Project is related to the Ada Tepe prospect only, although other prospects of the Khan Krum Deposit will be potentially developed as well. It is mentioned that they will be subject to separate EIA statements and compatibility assessments. In our opinion, that approach involves a risk of evaluating the impact in an uncoordinated manner, and therefore we insist that at this early stage yet, the EIA includes a theoretical assessment of the **cumulative impact** of the deposit development as a whole. Details are required on the other prospects as well – distance from populated and protected areas.
3. The EIA Statement needs to include an attached Transportation/Haulage Plan of the route and volumes of concentrate to be hauled.
4. We suggest that the Statement reviewed in detail any water-related issues:
  - Impact of the planned borehole on the aquifer of the abstraction (the river) and respectively the impact of the borehole flow rate on the other adjacent boreholes;
  - Impact on Kessibirska River at the SW side of Ada Tepe.
5. We very much hope that this Investment Project will not apply the bad practice of incompliance with the hygiene protection distances to populated areas as required under Regulation 7 of the MoH.
6. One of the key issues in the Project implementation seems to be the noise emissions. We suggest if possible, blasting tests to be carried out within different conditions and the obtained data to be included in the Statement, as well as the anticipated daytime and nighttime levels of noise to be generated by the open pit operation.

7. Information needs to be in place about international experience in the area of mining waste storage. Risks and advantages need to be identified for the proposed “newly designed Integrated Mine Waste Facility”. Argumentation of the planned “...dewatering of flotation tailings prior to disposal at the waste facility. Dewatering of tailings will allow for co-disposal together with the waste rock.”.
8. We suggest the EIA Statement to include detailed information about the archaeological sites within and adjacent to the deposit area.

Regarding the **economic aspects** of the Investment Project, we suggest:

9. Rationale of the annual mining throughput and respective lifetime of the operation at the prospect and eventually, other prospects at the deposit area.
10. Argumentation of the approaches applied in the “thorough geological and economic evaluation of the mineral resources and reserves which will be feasible to mine with an open-pit method”.
11. Comparison of different options at different volumes of “gold and silver reserves and resources in the Ada Tepe prospect and respectively with various gold cutoff grades”, including forecast of gold price changes.

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