

Positions, recommendations and notes on documents related to Draft Terms of Reference for EIA, provided by:

Fire Safety and Rescue Center with the Kardzhali District Police Department;

Haskovo Regional Technical Inspection;

Kardzhaly District Civil Protection Department; Kardzhaly Regional Inspection on Public Health Protection and Control (RIPHPC)

Water Supply and Sewage EOOD - Kardzhaly;

Kardzhaly District Governor;

on the Investment Project "Mining and processing of gold ore from the Ada Tepe prospect in the Khan Krum Deposit."

Positions, recommendations and notes:

1. **Positions and recommendations - Kardzhaly District:**

1.1 On the Mine Waste Management Plan and the ToR for the Draft EIA Statement:

- "They are drafted in compliance with the Environmental Protection Act (art. 95, par. 2), the Underground Resources Act (art. 22d, par. 3) and the Regulation on the Terms and Conditions for EIA Preparation". ([Position of the Kardzhaly Civil Protection Department](#))

1.2 On the ToR for the EIA Statement:

- The ToR for the scope and content of the EIA is thorough and formulated in a competent manner. Risk factors are properly defined (harmful physical factors - noise, dust etc.) as part of the future implementation of the Investment Project and the operation at the deposit. All aspects of mining and processing are reviewed, including proposed approaches, technologies and methods, together with the possible alternatives. It is properly noted that the key flaw of the open-pit method is the impact on the landscape and topography, the formation of a pit and a stockpile. It is recommended that Option 1 be accepted and approved. ([Position of the Kardzhaly Civil Protection Department](#))

1.3 Regarding the favorable social consequences:

Direct and Indirect Benefits for the region and the country will include:

- Employment (approx. 300 jobs to be created for more than 8 - 9 years, as at least 75% of the workforce will come from the Krumovgrad region. Also, indirect jobs to be created (service providers) in a region with a high unemployment rate, within a period of economic crisis when alternative employment is sought to replace tobacco growing.

Decrease of job-related migration of workforce within Bulgaria or abroad;

- Revenues for Krumovgrad municipality [generated] by property tax payment in connection with the Project infrastructure to be developed and by sales of municipal property;
- Higher market demand and supply within the region and boosted creation of extra jobs, and conditions for improved standard of living of the local population;
- Increase of direct foreign investments (in times of economic crisis at that) ([Position of the Kardzhaly Civil Protection Department](#));

- Implementation of new and modern business practices, improvements to the business climate in the region, which could potentially attract other investors to the local economy; (Position of the Kardzhaly Civil Protection Department)
- Extra investments which will contribute to the development of the social infrastructure - education, healthcare, communications and roads; (Position of the Kardzhaly Civil Protection Department)
- Increased national revenues from taxes, royalties and customs duties. (Position of the Kardzhaly Civil Protection Department)

1.4 Recommendations from the Kardzhaly District [Administration] and other local institutions:

- critical points **to discuss and clarify, with particular attention on them** in the actual EIA Statement.
1. Perform studies and provide findings on the impact on water **volumes** to be used (surface or ground water) for production purposes and as tap/drinking water at the site based on the existing water sources in the Krumovitsa watershed, those located down the Krumovitsa River to the point where it flows into Arda River, past the location of the [future] site.
To date, the operational water sources include those catchments which support the Guliika group of villages, Krumovgrad, the Ovchari group, the Gorna Kula-Zvezdel group, and the Potochnitsa - Moryantsi group. (Recommended by the Kardzhaly Water and Sewage company)
 2. Evaluate the site impact on the surface water **quality** during the operation period and after closure and rehabilitation. (Recommended by the Kardzhaly Water and Sewage company)
 3. By factoring in the impact of the Investment Project under the above items 1 and 2, assess whether the respective restrictions or bans have been imposed. (Recommended by the Kardzhaly Water and Sewage company)
 4. Assess whether resources for constant monitoring have been provided , in order to monitor the surface water quality (Krumovitsa River) by indicators which could change when reagents are handled and stored, i.e. warehouse impact of reagents and chemical substances as part of the gold mining process. (Recommended by the Kardzhaly Water and Sewage company)
 5. Assess whether emergency alarm systems have been provided for cases of accidental spills of hazardous or toxic emissions in order to prevent [contaminated] water supply to the reticulation from the Krumovitsa water catchment which could have dangerous levels of hazardous substances and hurt human health and lives. (Recommended by the Kardzhaly Water and Sewage company)
 6. The Investor needs to obtain a water use permit under the provisions of the Waters Act .
 7. The **dust** levels in the air layer closest to the ground (as a result of blasting, haulage, shipping, handling load transfer and disposal) within the local populated areas, provided that dust filter bags and sprinkle-based dust suppression systems are used.

8. The **noise** levels in the populated areas (with a designated priority according to size of permanent population) and measures to achieve levels within the regulated limits, but as the indicator should be mining and haulage equipment (396 trips per day including 50t trucks, 120t hydraulic excavator, and a jaw crusher).

It is especially important to assess the need to implement measures to limit the noise propagation towards adjacent populated areas. It is specified that, the Project is planned to use new and modern equipment compliant with the EU and global standards.

9. Blasting operations impact on the buildings in the region (distances, impact, stability etc.).

10. The overhead crane specified in the documents must comply with the Regulation on Safe Operation and Technical Inspection of Lifting Equipment. [\(Recommended by the Haskovo Regional Technical Inspection\)](#)

11. Any other equipment must comply with the Regulation on the Substantial Requirements and Compliance Assessment of Machines. [\(Recommended by the Haskovo Regional Technical Inspection\)](#)

12. Develop handling procedures for reagents **and** explosives as required under art. 7 of the Act on Technical Requirements to Products. [\(Recommended by the Haskovo Regional Technical Inspection\)](#)

13. At the current stage, the Report structure, particularly the section which reviews the health and hygiene aspects should additionally include coordination/sign off letters by the Ministry of Health, regarding the defined hygiene protection distances to the following sites:

- Open pit;
- Process Plant;
- Process Plant;
- Mining waste facility. [\(Recommended by the Kardzhaly Water and Sewage company\)](#)

14. The so proposed Investment Project could be implemented following preparation of the required project/design documents, which should be compliant with the fire safety rules and norms in Bulgaria and coordinated/signed off as provisioned in the Zoning Act. [\(recommended by Fire Safety and Rescue Center with the Kardzhali District Police Department\)](#)