



# KRUMOVGRAD MUNICIPALITY

6900 Krumovgrad, 5 Bulgaria Square, Telephone Exchange: +359 3641/71-23, 75-53,  
73-80; Fax: 70-24; E-mail: [minkrum@abv.bg](mailto:minkrum@abv.bg)



To: **Balkan Mineral and Mining EAD**  
**1000 Sofia, 26 Bacho Kiro Street, 3<sup>rd</sup> floor**

BMM in-0050/02.9.2010

## **OPINION**

### **BY BOTH THE MAYOR OF KRUMOVGRAD MUNICIPALITY AND CHAIRMAN OF THE KRUMOVGRAD MUNICIPAL COUNCIL**

**Subject:** Terms of Reference for the scope and content of the EIA Statement for the Investment Project titled 'Extraction and Processing of Auriferous Ore from the Ada Tepe Prospect, Khan Krum Deposit'.

**DEAR SIR/ MADAM,**

The Terms of Reference for the scope and content of the EIA Statement for the Investment Project titled 'Extraction and Processing of Auriferous Ore from the Ada Tepe Prospect, Khan Krum Deposit' has been filed with the Krumovgrad Municipal Administration. The documents were reviewed by a panel of administration officials, and following a resolution taken by the Krumovgrad Municipal Council – reviewed by the Standing Committee on Zoning, Public Works and Environment.

Our common opinion is that the EIA scope should be extended and the Assessment be sufficiently comprehensive because of the following factors:

1. The EIA Statement should ensure the implementation of **Alternative Option 1** for ore processing (*presented on page 24 of the Terms of Reference*) in implementing the Investment Project, thus avoiding the use of cyanides. The joint motion for a resolution on a general ban on the use of cyanide mining technologies in the European Union (B7 0238/2010) prompts to withhold support for any mining projects that involve direct or indirect use of cyanide technologies until a total ban is passed by the end of 2011.

2. Take into account the **cumulative effects** that would arise from combining the impact of the Investment Project and impact of mining the other planned prospects (as stated in the Mineral Concession Application for mining of auriferous ore from the Khan Krum deposit). Reporting on overall impact will be based on the contour line enclosed to the Concession Application for the Khan Krum deposit filed with the Ministry of Economy, Energy and Tourism.

3. Recognize the impact of **blasting operations**, blast shockwaves, noise and dust on the buildings, earth layers and water flow rate.

- Define more precisely the envisaged blast power of the blasting operations mentioned on page 5 of the Terms of Reference.

4. Analyse to the detail the **dust emissions** in the ground air layer (caused by the blasting operations, haulage and transfer of ore), using a dust collection and suppression system.

5. Establish a **transport infrastructure** - haulage route, concentrate tonnage transported, number of trips per day or month, type of motor vehicles; assess the impact on the local population and environment, and take actions to prevent any accidents.

6. The EIA Statement should focus on the analysis of noise emissions caused by mining and haulage plant and affecting the local communities, inclusive of the anticipated noise emissions during the day and night period caused by the normal operation of the open pit. Actions aimed at limiting the noise should cover all communities located close to the site.

7. The EIA Statement should give detailed and clear information on the **river water** of Krumovitsa River:

- Impact of the envisaged fresh water borehole on the water flow rates in the other boreholes drilled for drinking water supply to the local communities.
- Amount of water required upon commissioning the pit.
- Draw up a water balance, taking into account the precipitation, evaporation, water catchment areas, topography, etc, to be confirmed by the Basin Directorate for Water Management – East Aegean Region – based in Plovdiv.
- Avoid the Investment Project Site to fall within the sanitary protection zones - Belt I, Belt II or Belt III.
- Actions envisaged to prevent any pollution to the Krumovitsa River by the return water tank or Integrated Mining Waste Facility (IMWF). A risk assessment of a possible tank overflow.
- Reagents concentration in the waste and reagents long-term behavior in the IMWF; detailed assessment of the biological and physical characteristics of the reagents, toxicity, environmental behavior (dissolution, mobilization, accumulation in food chains).

8. Provide information on the **health protection** of the following communities: Soika, Chobanka 1, Chobanka 2, Kupel, and Pobeda, which will fall within the sanitary

protection zones despite the statutory distances set out in Regulation № 7 on the hygiene requirements for health protection of urban environment.

9. Make a detailed analysis of jobs to be opened up and indicate the **employment percentage** for the local people that will be involved in the implementation of the Investment Project.

10. Envisage actions in case of any **accident** during the construction and operation of the open pit that may affect the public health or environment.

11. Would a gold price drop below the desired rate of return result to less environmental protection or abandonment of the pit?

12. A joint Bulgarian-German research project has resulted in registering an archaeological site titled 'Gold Mine Dating Back From the Late Bronze and Early Iron Age', Ada Tepe area, village land of both Ovchari village and Skalak village. The archaeological site has the status of an immovable cultural heritage of national significance category within the meaning of art. 146, par. 3 of the Cultural Heritage Act (CHA). The EIA Statement should provide guarantees for the preservation of any **archaeological sites** within the Khan Krum concession area applied for.

13. We insist on the careful consideration of the **zero option** because the implementation of the Investment Project will have a negative impact on the Krumovgrad Municipality which has so far not been affected by anthropogenic modification and is free of any industrial polluters.

- The EIA Statement should take into account that the Project will be on a possible collision course with the Municipal Development Plan of Krumovgrad Municipality, Regional Economic Development Strategy (2007-2015), and traditional occupations.
- The EIA Statement should specify the risk affecting the ability of Krumovgrad Municipality to develop environmental and alternative agriculture and tourism posed by the implementation of the Investment Project.

**DEAR SIR/ MADAM,**

The Krumovgrad Municipality has, at the proposal of the Standing Committee on Zoning, Public Works and Environment, turned to EIA experts registered with the Ministry of Environment and Water. We therefore reserve the right to file an opinion on the Mining Waste Management Plan by the end of September, 2010, as well as to amend this Opinion.

**Sebihan Mehmed**  
**Mayor of Krumovgrad Municipality**

**Metin Bairamali**  
**Chairman of the Krumovgrad Municipal Council**