



REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

99-00-268 -22
26.06. 2025, Sofia

Subject: Notification pursuant to Article 10 of the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context for the project "Zonal Urban Development Plan" Wind Energy Park 48 (46) wind farms, transformer stations, electrical connection networks, construction and modernization of communication and access roads" settlement of Cherkesu, Constanta County."

DEAR MINISTER BUZOIANU,

In reference to the letter from the Minister of Environment and Water of the Republic of Bulgaria, ref. No. 99-00-268-16/09.06.2025, containing a response regarding the country's participation in the Strategic Environmental Assessment procedure in a transboundary context for the project "Zonal Urban Development Plan "Wind Energy Park 48 (46) wind farms, transformer stations, electrical connection networks, construction and modernization of communication and access roads," located in the town of Cherkesu, Constanta County," I hereby sendi you the comments and observations of the competent authorities of the Republic of Bulgaria on the project and express the following opinion:

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I. Comments and observations on the documentation submitted:

The graphic materials provided with the documentation are fragments of cartographic images on which the locations of the wind turbines and their respective areas of influence are schematically marked. In this regard, it should be noted that the wind farm facilities — the wind turbines and their accompanying technical infrastructure — must be located in such a way that their easement zones do not affect land properties in the territory of the Republic of Bulgaria and do not impose restrictions on their use.

II. Environmental components and factors:

Regarding the component „Water”:

The closest surface water bodies in Bulgaria, identified in the area of the zoning plan in the municipality of Cherkesu, are located south of the site boundary: BG1DJ900R1015 at a distance of about 1 km south of the site, BG2DO700L017 at a distance of about 34 km, BG2BS000C001 at a distance of about 36 km, southeast of the site boundary. The area is adjacent to two groundwater bodies (GGB) in Bulgaria (“Karst groundwater in Neogene – Sarmatian – Dobruja” with code BG1G000000N049, international code BG02/R02 and Karst groundwater in the Malm – Valangian Basin”, code BG1G0000J3K051, international code BG04/R04), which, in accordance with the River Basin Management Plan for the Danube Region 2022-2027, are in good chemical and quantitative status. The targets set for the two PWB by 2027 are “Preventing deterioration and maintaining good chemical and quantitative status.” The planned activities for the construction and operation of the wind farm in the territory of the settlement of Cherkez, Romania, will not have a significant negative impact on the status of surface or groundwater bodies in Bulgaria. The project does not envisage the abstraction of groundwater or surface water from the site area, so there will be no impact on the hydrology of the area, nor will other activities dependent on this resource be indirectly affected.

Regarding the component „Biodiversity”:

The report characterizes the territory that is expected to be affected by the implementation of the zoning plan—agricultural areas and areas with natural vegetation, pastures, meadows,

watercourses, and irrigation canals. The implementation of the plan may have a negative impact on biodiversity, both on potential (feeding/nesting/breeding) and natural habitats.

The report contains a realistic identification of the expected impacts on flora and fauna as a component of the environment, both during construction and during the operation of the power transmission network. The possible interactions with the flora and fauna inhabiting the area are described - the construction and operation of the wind farm pose a risk to some mammals identified in the implementation area, but also to the avifauna as a result of collisions with turbines and to chiroptera (bats) due to the phenomenon of barotrauma (sudden change in pressure within the range of the turbine blades).

The study in the report found that the identified impacts on some of the environmental components and factors are temporary and reversible, and that measures need to be implemented to ensure that the residual impact remains insignificant. These cover all identified forms of impact, and in order to validate the effectiveness of the avoidance and mitigation measures, a monitoring program has been proposed that includes provisions for both the construction and operational periods. The implementation of the monitoring programme is essential to ensure the proper application and functionality of the avoidance and mitigation measures.

Measures are generic and specific, targeting certain species and certain types of impact. In terms of minimising negative impacts on bats and birds, the measures relate to mandatory postponement of activities beyond the April-May period if nests are identified, signalling of turbines with flashing lights with long intervals between two consecutive lights, regular mowing of vegetation around the turbines to maintain low numbers of insect species that are a food source for both bats and birds, installation of an aerial detection lighting system (ADLS) on turbines T47, T46, T35, T36, T34 to reduce the risk of mortality of species sensitive to artificial lighting (birds and bats). The measure will be implemented from the first year of operation of the project, certain turbines will be required to limit wind speed to 6.5 m/s during the sensitive (migration) period (half an hour before sunset to sunrise) and bat protection systems that emit acoustic ultrasonic deterrent signals to remove bats from the rotor area, automatic power off/on system (e.g. DTBird, IdentiFlight, Robin Radar Max, STRIX BirdTrack), installation of a high-resolution camera system to capture video of birds on certain turbines (the camera system detects birds from a distance of up to 600 m and makes chase sounds and if the bird continues to approach the turbine, after 300 m the blades begin to slow to a speed of 3 rpm, which eliminates the risk of collision), installing day and night radar and video camera systems (on turbines T8, T18, T29, T32 and T37) that detect and prevent the risk of bats colliding with wind farm structures.

The Environmental Impact Assessment Report evaluates several alternatives, apart from the zero alternative, in terms of their impact on biodiversity. It proposes the implementation of a zonal urban park with 46 wind turbines with a total installed capacity of 303.6 MW.

The report examines the possible impacts of the implementation and operation of the wind turbines, as well as their decommissioning. It has been established that the wind farm will have an impact on the Bulgarian protected areas BG0000569 "Kardam" and BG0000570 "Izvor-Kraishte" for the protection of natural habitats and wild flora and fauna. The impact will affect the areas of both zones, within which direct and indirect impacts on their key elements—abiotic and biological factors—of vital importance to the subject of conservation may occur, such as impact on air quality caused by noise and vibrations, light pollution, increased concentration of pollutants in the soil/accidental pollution, physical and behavioural barriers for wild species, introduction/spread of invasive species, mortality of specimens (e.g., collision with wind turbines), which can cause habitat loss, changes in habitat conditions, habitat fragmentation, and a decline in the populations of protected species.

To assess the cumulative impact of the plan, including on Bulgarian protected areas, the presence of pressures and threats listed in the standard forms for the areas has been analyzed, as well as other projects that will be implemented or are in the process of implementation and that have the potential to affect habitats and species, depending on the scope of the impact.

*For BG0000569 "Kardam," a reasonable assumption has been made that there is no likelihood of direct loss of natural habitats or species habitats, nor of causing fragmentation or disruption of connectivity for species characteristic of this site, but some of them may be indirectly affected. During the construction period, there is a risk that the plan will disrupt the activity of wild animals and their populations due to reduced food resources, noise and vibrations or atmospheric emissions, and generate casualties, especially for *Spermophilus citellus*, *Mesocricetus newtoni*, *Mustela eversmanii*, *Vormela peregusna*.*

*For BG0000570 "Izvor – Kraishte," such impacts have been identified for the species *Spermophilus citellus*, *Mesocricetus newtoni*, *Mustela eversmanii*, *Vormela peregusna*, *Canis lupus* (only if presence is confirmed), and *Rhinolophus mehelyi*. Based on field studies and in-depth analyses of functional relationships between species and habitats (presented visually in graphs) for each of the protected areas, including the two Bulgarian ones, reasonable conclusions have been drawn about the absence of significant impacts on them, provided that the proposed measures to minimize the impact on specific species and their habitats are complied with for each of the project stages. The measures envisaged – general and specific – concern not only the subject of conservation in the Romanian protected areas, but also*



BG0000569 "Kardam" and BG0000570 "Izvor-Kraishte," where the impact on bats and terrestrial mammals will be reduced/eliminated.

The analysis of the impact of the project for the construction of 46 wind turbines in close proximity to the border with Bulgaria is objective, and the measures envisaged are sufficient to minimize/eliminate the negative impacts on biodiversity and, in particular, on the protected areas of the Natura 2000 network.

III. Regarding the impact of the plan on human and possible health risk from the implementation of the investment proposal:

Given the nature of the planned activities and the proximity of the project to the territory of the Republic of Bulgaria, and to populated areas within the country, it is necessary to assess the risks of implementing the plan on the environment and public health at the environmental assessment stage.

Please accept, Mr Minister, the assurances of my highest considerations and readiness for successful future cooperation.

Yours sincerely,

Manol Genov
Minister of Environment and Water