

REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

99-00-268-46 - 32
23 March 2026, Sofia

Subject: *An Environmental Impact Assessment Report, submitted in accordance with Article 4 of the Convention on Environmental Impact Assessment in a Transboundary Context for the investment proposal (IP) "Construction and operation of a wind farm consisting of 48 (46) wind turbines with an approximate capacity of 316.8 MW (303.6 MW), substations, electricity transmission networks, construction and modernization of communication and access roads, Cherkez Municipality, Constanta County."*

DEAR MINISTER BUZOIANU,

I hereby acknowledge receipt of your letter Reg. No. DGEICPSC/124815/11.02.2026., which provides information on the investment proposal (IP) "Construction and operation of a wind farm consisting of 48 (46) wind turbines with an approximate capacity of 316.8 MW (303.6 MW), substations, electrical interconnection networks, construction and modernization of communication and access roads, Cherkez Municipality, Constanta County."

After reviewing the documentation and based on the submitted comments, I hereby inform you of the following:

H. E. DIANA BUZOIANU
Minister of Environment, Waters and Forests of Romania
12 Libertatii Blvd.,
Sector 5, Bucharest, Romania



Sofia 1000, 22 Maria-Luisa Blvd



Phone: +359 2 940 6194, Fax: +359 2 986 25 33

In addition to the Environmental Impact Report, the following documents have been submitted: Assessment of Intermittent Shading, Detailed Layout Plan of the Wind Farm, and Topographic Surveys.

The Assessment of Intermittent Shading states the following:

“Intermittent shading refers to the flicker effect caused when the rotating blades of wind turbines periodically cast shadows through confined openings, such as windows of nearby homes. The assessment was performed using the internationally recognized WindPro modeling software, which simulates a worst-case scenario in accordance with IFC standards and local guidelines. This includes assumptions such as continuous sunshine, no barriers or cloud cover, and continuous turbine operation.

The objective of this study is to assess the potential impact of intermittent shading along the route crossing Romania and Bulgaria, and on sensitive receptors near the national border, ensuring compliance with both national and cross-border environmental regulations.

As a result, the authors of the Assessment draw the following conclusion: “The results confirm that none of the modeled receptors—neither the road crossing Romania and Bulgaria nor the receptors near the border—exceeded the IFC thresholds of 30 hours per year or 30 minutes per day, which is in line with international standards.”

Given the wind farm’s location in close proximity to the border with the Republic of Bulgaria, to the south, and in view of the potential cross-border impact of the planned energy park on the nearest sites located within the territory of the Republic of Bulgaria (specifically, this applies to generator T3, located 1.56 km from the village of Yovkovo, as well as to generator T47, located 2.1 km from the village of Kraishte), we hereby inform you that the competent authorities in the Republic of Bulgaria have provided comments and observations on the EIA Report for the relevant investment proposal, which are to be included as mandatory requirements in the final act issued by the Romanian authorities, namely:

1. “Wind Energy Park: 48 (46) wind turbines, transformer stations, electrical transmission networks, construction and modernization of communication and access roads,” to be implemented in compliance with all measures provided for in the submitted

Environmental Impact Report, for the prevention, reduction, and elimination of harmful impacts on the environment, living conditions, and public health resulting from the project's implementation;

2. The paint used on the wind turbines (tower and rotor) shall be of the "light - absorbing" type to prevent the creation of conditions for light reflection;

3. Following the implementation of the investment proposal, monitoring of noise levels, non-ionizing radiation, and light effects at the boundary with the affected Bulgarian settlements shall be provided. The results of the monitoring should be provided to the competent Bulgarian authorities.

Please accept, Honourable Minister, the assurance of my highest consideration and readiness for successful future cooperation

Yours sincerely,

Julian Popov
Minister of Environment and Water