

**REPUBLIC OF BULGARIA**  
**MINISTRY OF ENVIRONMENT AND WATER**

**OBOC-240 - 5**  
*20, August 2025, Sofia*

**Subject:** *Transboundary EIA procedure for the project "The development of the Arges and Dambovită rivers for navigation and other uses"*

**DEAR MINISTER BUZOIANU,**

*Hereby, we confirm the receipt of your letter Ref. No. DGEICPSC/28448/25.07.2025, providing information on the project "Development of the Argeş and Dâmboviţa rivers for navigation and other uses."*

*After reviewing the documentation and based on the opinions submitted, we hereby inform you as follows:*

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## ***I. General remarks:***

*By letter ref. No. VIII-5/940#1/05.08.2025 of the Executive Agency for the Study and Maintenance of the Danube River – Ruse (EASMDR) the following was stated:*

*1. The flow rate of the Arges River, which is a left tributary of the Danube River, is negligible compared to the ongoing water volumes of the Danube River. At average water levels, it is approximately 1.21%, i.e. it can change the water level of the Danube by 1-2 cm, which is within the permissible margin of error. The investment proposal is not expected to affect navigation safety from a hydrological point of view.*

*2. The investment proposal provides for excavation and dredging in the water area between the waiting areas on the right bank, the operational quay areas, and the waiting areas on the left bank. In the area of the Oltinitsa port, 650,000 m<sup>3</sup> of phased dredging works are planned.*

*In its opinion, the Executive Agency for the Study and Maintenance of the Danube River in Ruse, states that during the implementation of the IP requires coordination concerning the locations designated for the disposal of the dredged material.*

## ***II. Regarding the "water" component:***

*In section 4.1.2. "Quality of surface water bodies," it is stated that data from monitoring in 2013 and the First Management Plan were primarily used to assess the status of water bodies. Similarly, in section 4.1.5. "Quality of groundwater," data on the status of groundwater from 2013 was used.*

*It should be noted that by Decision No. 917/31.12.2024 of the Council of Ministers the River Basin Management Plan (RBMP) for the Danube River Basin Management District (DRBM) 2022-2027 has been adopted, and by Decision No. 941/28.12.2023 of the Council of Ministers the Flood Risk Management Plan (FRMP) for the DRB 2022-2027 and a national program for its implementation have been adopted, and it is necessary to conduct a coordination procedure with the Danube River Basin Directorate (DRBD), the competent authority under Article 155, paragraph 1, item 23 of the Water Act.*

*In point 4.1.5, the types of groundwater pollution referred to, which may have a significant impact on water quality, such as: non-compliant waste disposal sites, inappropriate manure storage systems, non-compliant fertilizer disposal sites, wastewater discharged without proper treatment, and other anthropogenic activities are strictly prohibited both in European*

legislation and in Bulgarian legislation, which transposes European directives in the field of water.

*In section 6.6.1.2.1.3. "Impact of bathymetric change":*

*"Depending on the design characteristics of the channels, anchorages, or mooring sites, changes in the hydrological characteristics of the water flow may occur. These characteristics should highlight high water flows, vortex movements, etc. Hydrological and hydraulic modelling studies can be used to find ways to avoid undesirable situations. These may range from dangerous vessel handling to the need for frequent dredging or disruption of fish resources. Depending on the characteristics of the water flow, unacceptable changes in qualitative characteristics may also occur."*

*The report does not clarify how possible changes in water flow characteristics would affect the profile of the Danube riverbed at the confluence with the Argeş River, the characteristics of this section in terms of navigation, and the potential impact leading to erosion of the Bulgarian bank.*

*In point 6.6.1.5 it is not clarified whether the planned project, which constitutes an exception under Article 4(7) of the Water Framework Directive (WFD), is included in the current Romanian RBMP as such an exception.*

*Point 6.6.4.2. states that fish migration (and other aquatic faunal classes) from the upper to the lower stream is not ensured, which represents a moderate to high negative impact which is difficult to assess precisely under the given conditions.*

*Other possible solutions need to be explored to ensure unimpeded fish migration in both directions – downstream and upstream.*

*In point 6.7, last sentence "In conclusion, as a result of the implementation of measures to prevent/reduce the impact in terms of water pollution, air pollution, and noise levels, any potential negative impact on Romanian territory will be completely eliminated and therefore **no negative transboundary impact will occur.**"*

***The assessment that the impact will be limited to Romanian territory is not justified. It is unclear how this conclusion was reached.***

*Point 7 states that "During the preparation of the impact assessment report for the project "Development of the Argeş and Dâmbovița rivers for navigation and other purposes," the following difficulties arose: first bullet point, last sentence: "All these details were missing at this stage and did not allow for the most accurate assessment of the level of pollutants that could be generated during the construction works;"*

*The declared lack of information, details, and insufficient level of technical information call into question the conclusions and impact assessments made.*

*At the end of the EIA report, the bibliographic reference is incomplete, listing sources without indicating the year/period to which they refer, e.g. statistical yearbooks – unknown for which year, FRMP – unknown for which period, and other bibliographic sources are outdated as of today. The assessment based on outdated/irrelevant documents and statistical data, as well as information relating to different periods in time, raises serious questions about the validity of the assessments and conclusions made.*

*With regard to similar to this project, Bulgarian legislation introduces specific requirements such as:*

- In flood plains and littoral lands appurtenant to water reservoirs, it shall be prohibited to: storage of pesticides, waste disposal and treatment; building of stock-breeding farms; construction of farm structures and residential buildings; washing and servicing of means of transport and equipment; planting of perennial crops with shallow root systems; the dumping of waste;*
- To protect against the harmful effects of water, the following are prohibited: disturbing the natural state of riverbeds, riverbanks, and coastal floodplains; reducing the conductivity of riverbeds, including by means of barrages and sills, without having the respective licence; using riverbeds as disposal sites for deposition of wastes, earth and rock mass; perform construction works upstream of river sectors confined to a closed conduit; storing or warehousing materials that would increase to a significant extent the destructive power of water in the case of flooding.*

*In this regard, during the construction, development, and operation of the waterway, compliance with the above provisions on Bulgarian territory must be ensured.*

*We draw your attention to the fact that, for the project submitted by you, opinions have been requested from the Ministry of Health and the Ministry of Regional Development and Public*

*Works of the Republic of Bulgaria. To date, no opinions from the aforementioned institutions have been received. Upon their submission, and in the event that remarks are made, they will be duly provided to you.*

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

*Yours sincerely,*

**Manol Genov**

**Minister of Environment and Water**

"За министър:

Заместник-министър

Заповед за замес

