

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

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20.10.2025

**X EIA-68-65/20.10.2025**

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**TO**

**MR. DANIEL MARINOV**

**EXECUTIVE DIRECTOR OF TINTYAVA EXPLORATION AD**

Ivaylovgrad 6570, Municipality of Ivaylovgrad, Haskovo Region

Re: Your ref. no. 35/08.08.2025, ref. no. 35/2/26.08.2025, and ref. no. 35-01/07.10.2025

**COPY:**

**MINISTRY OF HEALTH**

**MINISTRY OF ENERGY**

**RIOSV-HASKOVO**

**BASIN DIRECTORATE "EASTERN BLACK SEA REGION"**

**MUNICIPALITY OF IVAYLOVGRAD**

**MAYOR'S OFFICE OF ROZINO**

**MAYOR'S OFFICE OF GUGUTKA**

**MAYOR'S OFFICE OF BYALGRADETS**

**Re:** *Assessment of the quality of the environmental impact assessment report, including the report assessing the degree of impact of the investment proposal (IP) "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, Ivaylovgrad municipality"*

**DEAR MR. MARINOV,**

After reviewing the above-mentioned environmental impact assessment (EIA) report, including the attached impact assessment report (IAR) submitted to the Ministry of Environment and Water (MEW) with ref. No. EIA-

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Sofia, 1000, 22 Knyaginya Maria Luiza Blvd.

Tel: +359(2) 940 6194, Fax: +359(2) 986 25 33 68-30/08.08.2025 for quality assessment, significant omissions and inconsistencies have been identified, which do not allow a decision to be made.

***I. Regarding the EIA report:***

Pursuant to Article 14(4) of the Ordinance on the Conditions and Procedure for Performing Environmental Impact Assessments (the EIA Ordinance), the quality assessment of the EIA report is **negative**. The following ambiguities and omissions have been identified:

1. Under the component "Water":

1.1. According to the "Report on the consultations held and the manner of reflecting the opinions received" submitted with the EIA report, it was found that some of the conditions and comments set out in the opinion of the Ministry of Environment and Water on the scope and content of the EIA have been accepted and reflected in the report. A "Report on integrated and sustainable water management," a "Hydrological assessment of the outflow in the Biala River and its tributary Arpa Dere," and a " "Report on the assessment

of the side effects of the explosion on the environment" have also been prepared and submitted.

In the EIA report, Table No. XI-1. *"Information on the consultations held and the manner of reflecting the opinions received with regard to the "Water" component"*, for items 2.6.1. -2.6.5., it is stated that *the "Hydrological assessment of the outflow in the Biala River and its tributary Arpa Dere", "Report on integrated and sustainable water management" and "Report on the assessment of the side effects of the explosion on the environment,"* but after reviewing them, it was found that they lacked the required:

- results from determining the hydrogeological parameters of the aquifers, as well as determining the filtration coefficient of the rock types in the area of the "Rozino" deposit, "Tintyava" area;
- determination of the potential risk of water seepage from the tailings pond into the groundwater in the area;
- determination of the potential risk of water seepage from the backfilling of the pit with waste rock;
- assessment of the impact of blasting on the mechanical properties of water-bearing rocks.

Possibility of additional cracks appearing;

- analysis and assessment of the impact of blasting operations, analysis and assessment of the impact of ore extraction and material removal from the mine pit, as well as analysis and assessment of the impact of deposited material (in the tailings pond and during backfilling) on the water intake facilities intended for drinking and domestic water supply to the population, located in the area of the "Rozino" deposit, "Tintyava" area. This includes water intake facilities used by the water supply and sewerage company and the municipality of Ivaylovgrad, with and without established sanitary protection zones.

1.2. Water balance modeling shows that approximately 300 000 m<sup>3</sup> of active volume will be required for the fresh water reservoir, and to achieve this, the reservoir has been designed with a total allowable volume of 365 000 m<sup>3</sup>. Modeling shows that a water import of 50 l/s for 5 months per year is sufficient to supply the project based on this water volume. According to the preliminary design, to compensate for the expected annual water deficit of approximately 125,000 to 300,000 m<sup>3</sup> in the plant's water supply, water will be supplied from a pumping station on the Arpa River, located approximately 1.7 km east of the site. It is planned to pump water directly from the Arpa Dere River during the wet months of the year (from January to May inclusive). The water intake from the Arpa Dere River will be close to the confluence with the Yuren Dere River and adjacent to the existing pumping station in the village of Rozino. This pumping station is designed to pump water from a spring that flows into the whirlpool. The flow rate of this spring varies between 6 and 11 l/s throughout the year, depending on the season. It has been calculated that the flow rate required to supply the village of Rozino is approximately 0.34 l/s. The excess water from the spring, after the relevant justification, could be used for the industrial needs of the site throughout the year. It is planned that the water intake will be carried out from a naturally formed pool without the need to build a dam or other construction works blocking the river.

Bottled water will be supplied for drinking purposes, and industrial water will be used for domestic purposes.

There are no plans to build a central sewerage system due to the lack of a treatment plant near the site.

A "zero discharge" approach has been adopted, and there are no plans to discharge wastewater into surface water bodies.

From the above, it is clear that the planned water intake from the Arpa Dere River will be maintained and there are no plans to reduce the quantities, nor has the possibility of reducing them been considered.

1.3. Information from the River Basin Management Plan (RBMP) for the Eastern Black Sea Region has been presented in tabular form on the connection between terrestrial ecosystems and groundwater body BG3G000PtPg049. There is no analysis of compliance with the provisions of Article 116(1)(4) of the Water Act - all waters and water bodies shall be protected from depletion, pollution, and damage in order to maintain the necessary quantity and quality of water and a healthy environment, preserving ecosystems, conserving the landscape, and preventing economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems, and the measures set out in the 2022-2027 RBMP relevant to the present IP.

1.4. The EIA report provides information on the planned water abstraction and the possible impact on the surface water body. To fill the open reservoir for non-contact water, it is planned to use water from the Arpa Dere River during the period January-May, when there is sufficient flow in the river, in the area of the Rozino pumping station (PS) "Rozino" at a flow rate that will provide a water quantity of 50 l/s (expected total volume of 648,000 m<sup>3</sup>). This flow, equal to about 10% of the average multi-year water quantity,

guarantees the ecological minimum in the river. Hydrological data for the Arpa Dere River are presented in tabular form. The Arpa Dere River is a left tributary in the middle course of the Byala River. Water abstraction of a total of approximately 648'000 m<sup>3</sup> for the months from January to May (inclusive) represents approximately 0.54% of the average water quantities for the Byala River during this period, according to data from HMS 62800, Byala River, Dolno Lukovo village (according to the table provided).

In connection with the above, the EIA report states that the planned water abstraction from the Arpa Dere River to fill the open reservoir for non-contact water during the operation of the Rozino deposit, with a total volume of 648,000 m<sup>3</sup> and limited to the months from January to May (practically outside the active irrigation season), is not expected to have a negative transboundary impact on the quantitative status of surface waters. The annexes to the EIA report present a hydrological assessment of the outflow in the Biala River and its tributary Arpa Dere near the village of Gugutka, Ivaylovgrad municipality, Haskovo region. The presented study is unsigned. The attached hydrological assessment lacks an analysis and conclusion regarding the specific amount of water abstraction envisaged in the IP and the impact it will have on the outflow.

1.5. The EIA report states that the IP does not affect drinking water supply facilities and sanitary protection zones for these facilities. Within the territorial scope of the future concession area "Rozino" there is only a dry well (R-19) near the village of Rozino on the road to the village of Gugutka (not in use) and the "Anas" fountain (G-1) near the village of Gugutka (not in use). In the wider area around the IP site, other water sources have been identified that are used for watering and irrigation, as well as those that are not used or have dried up. 800 m east and 1800 m south of the boundaries of the future concession area "Rozino" are located facilities of VIK - Haskovo PS Rozino (on the terrace of the Arta Dere, PWT BG3G000PtPg049) and PS Gugutka (on the terrace of the Byala Reka River, VT BG3MA100R270), permits under the Water Act and without established sanitary protection zones.

No assessment has been made as to whether individual sections of the IP fall within future sanitary protection zones in connection with the presence of water intake facilities for drinking and domestic water supply less than 1000 m from the boundaries of the future concession area, for which no SPZ has been established.

1.6. The EIA report does not include information on the characteristics of the hydrogeological conditions and factors (based on hydrogeological studies and a hydrogeological report submitted to the East Black Sea Region Database) affecting the quantity and quality of groundwater in the area in order to clarify the impact of • the operation of the Rozino deposit on groundwater, specifically on the water sources for drinking and domestic water supply to the settlements in the area.

The appendices to the report do not include a hydrogeological report, and the team of experts who prepared the report does not include a geologist-hydrogeologist.

1.7. The report presents information on drilling and blasting operations. A report on the assessment of the side effects of the explosion on the environment is attached, but it is not signed and no document certifying the necessary classification of the author has been presented. The Study assumes that, given that the relief where the deposit is located is a hill, the radius of the protected zone is not less than R=450 m. The following conclusions can be drawn from the assessment of the impact of blasting operations on people and the environment, part of which is that: The PVR technology envisaged for the development of the "Rozino" deposit is in accordance with the standards for safe impact on people and buildings outside the danger zone when applying drill-and-blast mining of the rock mass and for all three diameters of the blast holes (76, 89, and 102 mm) provided for in the conceptual design when detonating each drill charge with a separate (independent) delay interval, with the maximum mass of the drill charge not exceeding 30 kg, according to the forecast calculations based on the experimentally established dependencies of the static impact of the explosion on the distance and mass of the charge. In conclusion, there is no conclusion specifically addressing surface and groundwater in the area, given that a drinking water supply catchment is located approximately 620 m east of the site.

1.8. The following measures are provided for in the IBR's 2022-2027 RBMP:

- Annex 7.2.1 to Section 7 of the IBR RBMP provides for a measure entitled: Prohibitions and restrictions on activities in drinking water protection areas and in designated sanitary protection zones and buffer zones around water intake facilities/systems, action to implement the measure: DW135 Prohibition on the extraction of underground resources, including inert materials, in a buffer zone with a radius of 1000 m from facilities for the abstraction of groundwater for drinking and domestic water supply. The measure has code DW1;

- Annex 7.2.1. to Section 7 of the IBR's RBMP provides for a measure entitled: Prohibitions and restrictions on activities in drinking water protection zones and in designated SPZs and buffer zones around water abstraction facilities/systems, action to implement the measure: DW\_1\_4 Compliance with prohibitions and restrictions in the SHP in accordance with the order defining the zone and the list in Annex 1 to the National Catalogue of Measures (RBMP). The measure has code DW1;

- Annex No. 7.2.1. to Section 7 of the RBMP of the IBR provides for a measure entitled: Prohibition on the extraction of inert materials less than 50 m from river banks, action for implementation of the measure: HY31 Prohibition on the extraction of inert materials less than 50 m from river banks. The measure has code HY\_3;

- Annex 7.2.1. to Section 7 of the IBR's RBMP provides for a measure entitled: Prevention of the discharge of priority substances into groundwater, action to implement the measure: GD12 Prohibition or restriction of activities that increase the risk of direct or indirect discharge of priority and hazardous substances or other pollutants into groundwater, including the exposure of groundwater to the surface by removing sediments and soils covering the water body. The measure has code GD I.

In connection with the above, the EIA report should be supplemented as follows:

- All developments and annexes to the EIA report should be signed and accompanied by documents certifying the necessary qualifications of the report's author.

- A description should be made of the hydrogeological conditions and factors (based on hydrogeological studies and the hydrogeological report submitted to the East Aegean Sea Region Database) affecting the quantity and quality of groundwater in the area in order to clarify the impact of the exploitation of the "Rozino" on groundwater, specifically on the water sources for drinking and domestic water supply to the settlements in the area. Information on the existence of water intake facilities presented by the Municipality of Ivaylovgrad with ref. No. PU-01-183(3)/ 10.05.2023, the Municipality of Krumovgrad with ref. No. PU-01-183(4)/12.05.2023, and "V and K" EOOD, Haskovo, with ref. No. PU-01-183(2)/03.05.2023. The information must be prepared by a qualified person (geologist-hydrogeologist) and the hydrogeological report must be attached to the EIA report.

- The possible impact of the IP on surface waters should be considered in terms of compliance with the provisions of Article 146, paragraph 1, item 4 of the Water Act - all waters and water bodies shall be protected from depletion, pollution, and damage in order to maintain the necessary quantity and quality of water and a healthy environment, preserving ecosystems, conserving the landscape, and preventing economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems, and the measures set out in the 2022-2027 RBMP relevant to this IP.

- An assessment should be made as to whether individual sections of the IP fall within future P-ri or Sh-ti zones of the SAZ of nearby water sources for drinking and domestic water supply to the population. If they do, it should be borne in mind that there are certain prohibitions, restrictions, and limitations in cases of proven necessity in accordance with Ordinance No. 3/16.1.2000 on the conditions and procedure for the study, design, approval, and operation of sanitary protection zones around water sources and facilities for drinking water supply and around mineral water sources used for therapeutic, prophylactic, drinking, and hygiene needs.

- The conclusions made in the Report on the assessment of the side effects of the explosion on the environment should be supplemented by including conclusions specifically related to surface and groundwater, given that a drinking water supply catchment is located about 620 m east of the area. The drinking water supply source should be included in the list of protected sites in the report ( ).

- The report should also consider the above measures relevant to the IP.

2. *With regard to 'Atmospheric air and climate'.*

2.1. Greenhouse gas emissions:

The EIA report states that *"the implementation of the IP will not contribute to climate change, i.e. no greenhouse gas emissions will be generated."* This statement contradicts the report's own findings, which note that emissions from diesel engines in construction and transport equipment will be generated during construction and operation. The text also describes standard measures to limit greenhouse gas emissions (maintenance of equipment, prevention of idling, application of European standards), but there is no quantitative assessment.

Other sources of greenhouse gas emissions are not considered, such as blasting, ore processing (energy-intensive processes), concentrate transport, and tailings pond operation and reclamation. Therefore,

the information on greenhouse gases is insufficient. A quantitative calculation of emissions in tCO<sub>2</sub>/year for all stages and costing based on reference indicators should be provided.

## 2.2. Adaptation to climate change:

The report includes a paragraph describing the *"primary and secondary health effects"* of climate change - heat and cold waves, vector-borne diseases, contaminated food and water, and mental disorders. This information is accurate and useful, but it is presented in a general, reference plan and is not linked to the specific investment proposal.

In conclusion, the authors state that "no significant negative impacts related to the investment proposal have been identified, and therefore no adaptation measures are required." This conclusion is not sufficiently substantiated. There is no analysis of the impact of climate risks characteristic of the region, such as:

- extreme precipitation and torrential rains - a risk to the mine, tailings storage facility, and dumps;
- droughts and heat waves - water shortages for flotation, health risks for workers;
- forest fires – a real threat in the Eastern Rhodopes;
- landslides and erosion – possible intensification due to changing rainfall patterns.

These risks have not been assessed, nor have specific adaptation measures been proposed (e.g., engineering solutions for drainage, backup water sources, fire prevention measures, emergency plans).

2.3. The EIA report does not refer to key documents that set the framework for integrating climate aspects:

- National Strategy for Adaptation to Climate Change and Action Plan;
- Long-term Strategy for Climate Change Mitigation until 2050;
- European Strategy for Adaptation to Climate Change (2021).

In view of the above, with regard to climate change, the information in the report should be supplemented with:

- A quantitative assessment of greenhouse gas emissions from all stages and facilities, including costing;
- An analysis of the project's vulnerability to climate risks and extreme events;
- Specific engineering and organizational adaptation measures.

2.4. Air monitoring is not comprehensive enough—there is no comprehensive program for long-term monitoring. The link with certain climate factors, such as temperature inversions, etc., has not been taken into account. The analysis is limited to technical parameters and does not consider cumulative effects with other sources of pollution. The link with health risks to the population is not covered in sufficient detail.

The EIA report does not consider the interactions between climate, air, and water within a single logical framework.

## 3. With regard to biodiversity.

In the EIA report, in section IX "Description of the measures envisaged to avoid, prevent, reduce and, where possible, eliminate the significant adverse effects on the environment and human health" on page 250, we propose additions in connection with the objective described in the report, *"The implementation of the measures should lead to the maximum preservation of the populations of plant and animal species found on or in the immediate vicinity of IP<sup>1</sup>"*, we propose:

3.1. on page 256, measure 41, the words "only autochthonous" should be replaced with "local plant species suitable for the region." It is not possible to find a sufficient number of seedlings, cuttings, or seeds of autochthonous species. The material for recultivation comes from the available numbers and species in existing nurseries, and it is important that they are not foreign but local species that will benefit the environment.

3.2. On page 256, add a new measure 42 for the design and construction phases, with the result of implementation being preserved biodiversity, with the following text "Activities for the preparation of the project site shall commence outside the nesting and rearing period from March 15 to June 30." This is a compensatory measure for the text described on page 167 *"When activities begin during the nesting season, if there is a nest within or near the IP, there is a risk that it will be destroyed or abandoned, resulting in the loss of eggs and/or young. If this happens, the impact on the population of the species in the area could be significant."*

3.3. Add a new measure 43 for the design and construction phases, with the result of implementation being protected biodiversity, with the following text: "Vehicles and machinery shall not leave the existing/designated roads when carrying out the relevant activities described in the IP."

3.4. Add a measure for the safety of electricity poles, related to the text on page 165: *"Bird mortality can also be observed from power lines. When using poles with an inappropriate design, this may be caused by electric shock in the case of 20 kV power lines. In the case of higher voltage power lines, there is no risk of electric shock, but there is a possibility of birds colliding with the lightning protection cable."*

3.5. For the five protected species described on page 167, the yellow-bellied snake (*Ophisaurus apodus*), the northern goshawk (*Accipiter gentilis*), the red-breasted flycatcher (*Ficedula parva*) and the wildcat (*Felis silvestris*), feasible, measurable, and controllable measures should be listed in the table, indicating who is responsible for their implementation and setting a condition for scientific consultation and monitoring during their implementation.

4. *With regard to "Soils" and "Subsoil and mineral diversity".*

4.1. The EIA report lacks a detailed analysis of mineral diversity beyond gold-bearing ores. The risk of geochemical processes (drainage, mobilization of heavy metals, etc.) has not been examined in depth.

4.2. The cumulative impacts are assessed in an overly simplistic manner.

4.3. The description of the ores—the main object of the investment proposal—is inconsistent and does not provide a realistic picture of their mineral and chemical composition. Gold is listed as the only element to be mined and extracted, and it is unclear whether the ores are to be used in a complex manner. There is also a lack of information about silver and other valuable metals. In this regard:

4.3.1. How many types (or grades) of ore have been identified in the Rosino deposit, Tintyava area, and what are they? The term "ore" is an economic concept and differs significantly from other similar terms, such as mineralization and mineralization. Therefore, the types of ore to be mined in the deposit must be justified in advance depending on the natural characteristics, the technology of extraction, and the enrichment of useful components. But if there is only one type of ore for which reserves have been calculated, then this must be clearly stated throughout the report.

4.3.2. It is unclear why the ore from the deposit is first defined as polymetallic (in the title of the EIA report), then as polymetallic (gold-silver) on page 11, and finally as polymetallic gold-silver (again on page 11).

It is unclear what other metals are known, assessed, and potentially extractable from the ore in the deposit in order for it to be classified as polymetallic. The report does not provide such data, and there is no basis for calling the ore from the deposit polymetallic.

4.3.3. In the EIA report, the Rosino deposit in the Tintyava area is repeatedly referred to as gold-silver. Reserves of 11.3 million tons of ore with a gold content of 1.33 g/t are indicated. However, there is no mention of calculated reserves or resources of silver, nor of its presence in the ore at all. The expected end product from the implementation of the investment project is also only gold-bearing concentrate.

The flotation process for ore enrichment is described in detail, with the target gold concentration in the final concentrate being between 22 and 30 g/t, depending on its content in the source ore. There is no description of how this process will be controlled and how the gold content will be determined. It is unclear what the loss of gold, silver, and other useful components that will go into the flotation waste will be. The presence of pyrite in the waste could create serious environmental problems in the area.

4.3.4. It is unclear what form the gold takes in the ore from the deposit. The answer to this question directly concerns the ore enrichment technology. The EIA report mentions once that "no native gold has been found in the ore" (p. 39), while elsewhere it describes gold found only in isolated samples (p. 85). It is highly likely that most of the gold in the deposit is present as an impurity in other minerals. Given the unclear form of gold presence in the ore, what exactly will be the starting natural product (mineral or group of minerals) that will be subjected to enrichment by flotation in order to obtain the expected end product - gold-bearing concentrate with a content of Au g/t?

4.3.5. Regarding the impact on soils:

When assessing soil contamination, only the soils within the project area are taken into account. There is no information on the soils in the nearby villages and agricultural lands that are threatened by unorganized dust emissions as a result of drilling and blasting activities, crushing, transportation of crushed ore, grinding, and as a result of the deposition of fine dust flotation waste. In this regard, monitoring activities should be planned at selected sites for environmental control in the area before and after the start of exploitation of the deposit.

4.3.6. On page 80 of the EIA report, the text: *"The results of the analyses show compliance with the maximum permissible concentrations according to Ordinance No. 3/2008 on the standards for permissible*

*content of harmful substances in soils and those specified in Annex 2 to Article 4 - Standards for protective concentrations, MPCs, and intervention concentrations for persistent organic pollutants and petroleum products in soils for all indicators.*" should be corrected. The results of the analyses should focus on *the content of harmful substances in soils* within the maximum permissible concentrations according to Ordinance No. 3/2008 on the standards for permissible content of harmful substances in soils and those specified in Annex 2 to Article 4 - Standards for precautionary concentrations, MPCs, and intervention concentrations for persistent organic pollutants and petroleum products in soils for all indicators.

4.3.7. On page 153 of the report, after the text: "The humus layer and soil cover will be separated and temporarily deposited. The deposited soil materials will be used for the recultivation of the areas disturbed by the activity," the following text should be added regarding how the removal, storage, and utilization of the topsoil layer will be carried out and whether it will be done in accordance with the provisions of Section II of Ordinance No. 26 of October 2, 1996, on the recultivation of disturbed areas, improvement of low-yielding land, removal and utilization of topsoil.

4.3.8. On page 254 of the report:

- Measure 27, in the sentence: "The locations for temporary storage of topsoil within the boundaries of the designated site shall be determined *and marked*."

- the words "and marked" should be deleted

- After the quoted sentence, the following should be added: "When the topsoil cannot be utilized immediately after its removal, it shall be stored in topsoil depots in accordance with Article 10, paragraph 1 of Ordinance 26/02.12.1996.

- Measure 28, in the sentence: "Developing a plan and monitoring the soil in accordance with Article 29, paragraph 1, item 2 of the Soil Act," the word "own" should be added before "*monitoring*."

5. *With regard to hazardous chemicals and the risk of accidents:*

The text on page 122 under item 11.2 Risk factors related to the population and human health "Hazardous chemicals - No activities involving the storage and use of hazardous chemicals are carried out on the concession area or in its vicinity. The nearest enterprise with a risk potential for a major accident involving hazardous substances is 45 km away" is inaccurate and we suggest that it be clarified. The information contradicts the inventory list of hazardous substances (which will be used and stored) presented in Table V.9.I. . Classification of hazardous substances in accordance with the requirements of Regulation (EC) No. 1272/2008 on the classification, labeling, and packaging of substances and mixtures, on page 186.

6. Upon review of the documentation from the Ministry of Health, the following shortcomings were identified from a health perspective:

6.1. The EIA report does not take into account all the recommendations of the Ministry of Health set out in letter ref. No. 26-00-2518/27.12.2024.

6.2. After the analyses of the expected impacts on environmental factors, the following were not done:

- characterization of the individual risk factors in terms of their impact on human health and their comparison with the applicable hygiene standards and requirements, both for the working environment and for the affected residential areas. Identification of the most significant risk factors for the affected population and workers at the site.

- Assessment of the possibilities for combined, complex, cumulative, and remote impact of risk factors, both for workers and for the population exposed to adverse effects, taking into account the production activities of other manufacturing enterprises in the area and the road sections of the municipal and national road infrastructure.

- Forecast assessment of the impact after implementation of the IP. Review and assessment of the health status of the potentially affected population with analysis and interpretation of demographic indicators and morbidity indicators for the areas (based on data for the last available 3-5 year period) where the population may be exposed to the impact of the construction and operation of the IP.

- a comprehensive risk assessment, in a separate section, based on all analyses and assessments carried out in the report, for damage to human health, with a reasoned argument to prove that people living in populated areas will not be exposed to health risks in terms of environmental pollution, as well as to propose health protection and risk management measures.

6.3. The documents do not discuss radiation protection measures related to the requirements of the Ordinance on Radiation Protection in Activities with Materials with Increased Content of Natural

Radionuclides (Adopted by Council of Ministers Decree No. 229 of 25.09.2012, published in State Gazette No. 76 of 5.10.2012, amended and supplemented in No. 110 of 29.12.2020). According to Annex No. 1 to Article 1, paragraph 1 of the Ordinance, the extraction and processing of polymetallic ores from the deposit covered by this IP fall within the scope of the Ordinance.

6.4. The EIA report does not address the factor of ionising radiation, as the health risk has not been assessed. No results for the content of radionuclides in the rock mass and in the waste (mining and flotation) have been provided, either in the main documents or in the text of Annex No. 9. With regard to ionising radiation, it is only stated that the natural radiation background for the population is not expected to be exceeded, which is extremely insufficient from a risk assessment point of view.

6.5. The EIA report does not provide for monitoring of radiological indicators of environmental and living environment factors, as well as mining and flotation waste.

We would like to point out that the former uranium mining site "Planinec" is located in the territory of the village of Planinec, 5 km away from the village of Rozino, Ivaylovgrad municipality. The existence of such a site suggests a possible increased content of natural radionuclides in the territory of the investment proposal. As already noted, no data from analyses of radionuclide content in the ore from the deposit has been presented.

Based on the above in points 4-6, the EIA report should be supplemented with information on the ionising radiation factor, including the provision of analysis reports determining the content of radionuclides in the rock mass of the site, samples taken at different depths, as well as in the flotation waste.

6.6. With regard to atmospheric air, as evident from the report, the main pollutants will be PM10 and PM2.5 dust fractions. The methodology used allows for the calculation of maximum single and average annual concentrations emitted from area and linear sources, but there is a significant weakness in that the software product used is not applicable for calculating average daily concentrations. With a total of 88 blasts per year, the risk of exceeding the average daily concentrations of PM10 during these days is significant. In this regard, evidence must be provided that the maximum permissible concentration (MPC) for average daily concentrations of PM10 will not be exceeded more than 35 times in a calendar year (Ordinance No. 12 of July 15, 2010, on standards for sulfur dioxide, nitrogen dioxide, fine particulate matter, lead, benzene, carbon monoxide, and ozone in ambient air).

The report does not provide information on the expected number of motor vehicles (MVs), transport schemes, and linear models for external transport flows serving the site and for transporting the flotation concentrate to its final destination, calculating their contribution to unorganized dust and gas emissions in the populated areas through which the vehicles will pass. In this regard, the EIA report should be supplemented with the necessary information.

6.7. With regard to surface and groundwater, the EIA report takes into account only some of the recommendations in the Terms of Reference for the scope and content of the EIA, reflected in letter ref. No. 26-00-2518/27.12.2024 of the Ministry of Health. The operation of the facility will require significant amounts of water, and the EIA report does not sufficiently clarify the public health implications for the quantity and quality of water for domestic and drinking water supply in the area from the planned intensive water abstraction, e.g. from the water source "Fresh water with a flow rate of 50 l/s from the Arpa Dere River at the Rozino pumping station for the months of January to May (i.e. 5 months of the year)". On page 149, it is noted that an approximate annual water deficit of 125,000 to 310,000 m<sup>3</sup> is expected in the supply to the installation. In these circumstances, we believe that the planned water intake from the Arpa Dere River in the vicinity of the existing pumping station in the village of is likely to create a shortage of water for drinking and domestic use, and the absence of such a risk has not been proven in the EIA report and the expert reports attached to it. This concerns the adequacy of the water supply both to the village of Rozino and to the settlements along the valley of the Biala River, a tributary of which is the Arpa Dere River. There is no substantiated comment on the extent to which the data used for the analysis for the period 1961-1998 in "Table No. V.12-2 Average data on water quantities at two points on the Biala River" are currently relevant. There is no substantiated hydrogeological expertise on the following questions: Is there a risk of affecting the drinking water supply of the settlements in the area? Will the IP reduce the flow rate of the water sources for drinking water supply?

The reference on page 268, column 3 of Table No. XI-1. "Report on the assessment of the side effects of the explosion on the environment" is inappropriate, as this document does not contain any text relating to the question raised in the Terms of Reference, how the use of drilling and blasting activities will affect the quantity and quality of water from drinking water sources, surface water, and groundwater. The text of the



actual EIA report also lacks an expert answer to this question.

The EIA report does not provide a definitive answer as to whether the IP will worsen the chemical condition and change the active reaction of surface and groundwater in the area.

Given the priority importance of protecting the purity of water resources, especially groundwater, whose quality is difficult to restore once polluted, it is necessary to categorically guarantee that the purity of surface and groundwater will be preserved.

Last but not least, it is stated that industrial water will be used for domestic purposes (cleaning of sanitary facilities, etc.), but no mention is made of what water will be used for hygiene purposes (washing hands, bathing, etc.), given that it must meet the requirements of Regulation No. 9 on the quality of water intended for drinking and domestic purposes.

6.8. As a result of ore mining activities, certain potentially hazardous wastes will be generated that could pose a risk to human health. However, this risk is not sufficiently addressed and assessed in the report. In this regard, the EIA report should be supplemented.

It should be noted that the enrichment waste designated in the EIA report with the non-hazardous waste code "01 03 06 - enrichment residues other than those mentioned in 01 03 04\* and 01 03 05\*", is a mirror code for hazardous waste with codes 01 03 04\* and 01 03 05\*, according to Ordinance No. 2 on the classification of waste. This means that the classification of enrichment waste under code 01 03 06 should be established by conducting tests in accordance with the Ordinance to prove its non-hazardous properties after its formation. Otherwise, the waste should be classified under code 01 03 04\* or 01 03 05\*. In this regard, the EIA report should include a measure requiring a procedure for the classification of enrichment waste from due to the existence of mirror codes.

6.9. With regard to the physical factors of noise and vibration:

As mentioned above by the Ministry of Health, the report lacks forecasts for the expected number of heavy goods vehicles and transport schemes for external flows for the removal of flotation concentrate. There is also no assessment of the likely impact of the associated noise and vibrations on populated areas.

When assessing the potentially affected population and areas in terms of the impact of individual risk factors on human health and comparing them with the applicable hygiene standards, the authors of the report considered that excessive noise and vibration levels are not expected either in the pre-operational stage or during the operation of the facility. With regard to the intermittent noise generated during blasting operations, a test explosion was carried out and a report was submitted assessing the indirect impact of the explosion on the environment for the site: Rosino deposit (attached to the EIA report). The results and forecasts present the impact of the explosion on the environment, based on measurements taken with specialized equipment during experimental blasting operations carried out within the project perimeter of the Rozino mine. However, no comprehensive assessment of the living environment in the nearest populated areas has been made.

As mining operations progress in depth, working conditions and environmental impact change. Therefore, we believe that, regardless of initial forecasts, the EIA report should include a measure requiring periodic control measurements, updating of mathematical models with specific data on the deposit determining the levels of impact, and, if necessary, adjustment of the parameters of blasting activities.

6.10. Last but not least, we would like to point out that the activities are planned to be carried out in an open manner, which in itself is a prerequisite for possible pollution of environmental factors (acoustic comfort, atmospheric air, including in closed rooms, vibrations, ionising radiation). In this regard, the EIA report should be supplemented with a more detailed assessment of the health risk to the environment and a number of measures should be proposed to prevent and reduce this impact.

6.11. Working environment:

Air pollution (p. 208 of the EIA report) in the working environment, the inhalable and respirable (PM<sub>4</sub>) fractions of dust and respirable free crystalline silica are of hygienic significance, rather than PM<sub>10</sub> and PM<sub>2.5</sub>. According to Bulgarian legislation (Ordinance No. 13 of December 30, 2003, on the protection of workers from risks related to exposure to chemical agents at work), it is necessary to provide for periodic monitoring of the inhalable fraction (mg/m<sup>3</sup>), respirable fraction (mg/m<sup>3</sup>) and free crystalline silica (mass %), as well as exhaust gases from diesel machinery, transport and service equipment (CO<sub>x</sub>, NO<sub>x</sub>, SO<sub>x</sub>, incompletely combusted hydrocarbons, soot, various types of oils, as well as the reagents used in the enrichment process, in mg/m<sup>3</sup>), in compliance with the requirements of BDS EN 689:2018+A1:2019.

It is necessary to include and describe in detail the engineering and technical measures that will be taken to reduce the levels of dust and chemical agents in the air of the working environment in order to reduce

occupational exposure to the lowest possible levels, bearing in mind that PPE for respiratory protection is not a means of permanent protection for workers.

6.12. The regulatory documents described in the section "Health and hygiene aspects" (on page 248 of the report) show that the health risk assessment does not take into account the applicable regulatory documents related to health requirements when assessing the health risk from the implementation of the IP.

In conclusion, the Ministry of Health considers that the EIA report should be revised and supplemented in accordance with the above and taking into account the recommendations in letter ref. No. 26-00-2518/27.12.2024 of the Ministry of Health.

7. The requirements of Article 12(1)(4) of the EIA Ordinance, according to which the EIA report should also include a list of the experts and the team leader who prepared the EIA report, with each of them signing the sections of the report they have developed, have not been fully met. The attached list of experts and the team leader does not contain any signatures.

7.1. The declarations required under Article 12, paragraph 1, item 5 of the EIA Ordinance should be submitted on paper with all validity requirements, including a wet signature, and the content of the electronic version should be identical to the content of the paper version. Accepting documents with only scanned or electronic signatures would not meet the requirements of the EIA Ordinance. Acceptance of documents with only scanned or electronic signatures would not meet the requirements of the EIA Ordinance.

8. An up-to-date opinion from the East Aegean Sea Basin Directorate is required, given that Decision No. 920/31.12.2024 of the Council of Ministers adopted the River Basin Management Plan for the East Aegean Sea Basin 2022-2027. The East Aegean Sea Basin Directorate expressed its opinion in a letter ref. No. EIA-68-61/26.09.2025 to the Ministry of Environment and Water (a copy is attached for reference), according to which part of the project concession area subject to the IP falls within the scope of the measure with code DW1, code for implementation of the measure: DW\_1\_35 in the RBMP for the Eastern Black Sea Region 2022-2027 and must be excluded from the concession area of the "Rozino" the buffer zone within a radius of 1000 m from facilities for the abstraction of groundwater for drinking and domestic water supply (the "Rozino" catchment, located in the territory of the village of Pastrok, Ivaylovgrad municipality).

## ***II. Regarding the Mine Waste Management Plan:***

Consultations were held with the Ministry of Energy on the submitted Mine Waste Management Plan (MWMP) attached to the EIA report on the investment proposal for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, Ivaylovgrad municipality". In this regard, an opinion was received, ref. No. EIA-68-62/06.10.2025, from the Ministry of Environment and Water, according to which, at this stage, the information on the management of mining waste has not been duly presented in the Mining Waste Management Plan.

The prepared MWMP does not reflect the client's intention for the management of mining waste in connection with the management of waste from the processing of raw materials at the enrichment plant. The information is presented as an intention, but does not reflect the capacity of the mining waste facility (MWF) - which is a tailings storage facility. Essentially, the facilities to be built to ensure the stability of the tailings storage facility are not specified, and there is no information on the overall physical stability of the MWF; only the area is specified without providing additional information. We would like to draw your attention to the fact that one of the conditions for categorizing the SMO, including the tailings storage facility, is to ensure the physical stability of the constructed facility, which is missing from the plan.

The Mine Waste Management Plan must include conditions and measures, including programs to prevent harmful effects on the environment, in accordance with the requirements of Article 22g, paragraph 5 of the Underground Resources Act (URA). According to the requirements included in the content of the Ordinance on Mining Waste Management (OMWM) in Annex No. 1, operators are required to submit such programs.

In conclusion, we would like to draw your attention to the fact that when classifying mining waste, it is necessary to take into account the levels of cyanide concentrations specified in Article 22g, paragraph 6 of the ZPB, if they are used in the enrichment process.

## ***III Regarding the attached impact assessment report (IAR):***

After reviewing the information presented in the report, in accordance with the criteria for assessing its quality set out in Article 24(3) of the Ordinance on the conditions and procedure for assessing the compatibility of plans, programs, projects, and investment proposals, the subject and objectives of the

protection of protected areas (the Ordinance on Environmental Protection), the following was established:

The impact assessment report is structured in accordance with the requirements of Article 23, paragraph 2 of the Ordinance on the EC, but the information presented in it is incomplete and insufficient for making a reasoned decision, for the following reasons:

1. The proposed version of the EIA lacks the detailed analysis and assessment of the cumulative impacts resulting from the multiple activities, as requested by letter ref. No. EIA-68-17/<sup>4</sup> 18.11.2024 from the Minister of Environment and Water, a detailed analysis and assessment of the cumulative impacts resulting from the multiple areas provided for exploration and/or research and concessions for the extraction of underground resources within the boundaries of protected area BG0001032 "Rhodopes-East," and in particular in the territory of the municipality of Ivaylovgrad. The report should contain a detailed analysis of the potential impacts and cumulative effects of the granted and active permits for exploration and/or prospecting and concessions for extraction in protected area **BG0001032 "Rhodopes-East"** and in protected area **BG0002019 "Biala Reka"**. It is necessary to supplement point II of the EIA with the following analysis:

- Analysis of the potential impacts that may lead to cumulative effects as a result of the currently valid permits for exploration and/or prospecting within the boundaries of protected area **BG0001032 "Rhodopes-East"** for the protection of natural habitats and wild flora and fauna and protected area **BG0002019 "Biala Reka"** for the protection of wild birds;

- Analysis of the potential impacts that may lead to cumulative impacts as a result of the currently valid concessions for the extraction of underground resources (approved investment intentions for the extraction of underground resources) within the boundaries of protected area **BG0001032 "Rhodopes-East"** for the protection of natural habitats and wild flora and fauna and protected area **BG0002019 "Byala Reka"** for the protection of wild birds;

- Comprehensive analysis of potential cumulative impacts in relation to approved PPPs and IPs of a different nature within the boundaries of protected area **BG0001032 "Rhodopes-East"** for the conservation of natural habitats and wild flora and fauna and protected area **BG0002019 "Biala Reka"** for the protection of wild birds.

In the analysis, the individual impacts that would arise as a result of the cumulative effect should be described and assessed by type and degree in relation to the species and natural habitats subject to protection in the protected areas, in accordance with Article 24, paragraph 3, item 4 of the Ordinance on Environmental Impact Assessment:

- Description (characteristics, number) of other PPAs/IPs taken into account (in the same land area, municipality, protected area, not only of the same nature and regardless of who implemented them), in interaction with which the assessed project may have a significant negative impact on the protected area;
- The cumulative effect analysis must determine: 1) the geographical boundaries within which the cumulative effect is to be studied, bearing in mind that these may vary for different types of impact (e.g., effects on water resources, noise, vibrations, atmospheric air, etc.) and may extend over different distances; 2) all possible sources of impacts arising from the project under consideration, together with other sources in the environment and other impacts that may arise from other proposed PPPs/IPs, the timing and phases of the PPPs/IPs; 3) the types of impacts (e.g., noise, reduction of water resources, chemical emissions, etc.) that may affect the structure and functions of the protected area that are vulnerable to change; 3) the mechanism by which the potential cumulative effect occurs (e.g., via water, air, accumulation of impacts over time or space). When a habitat or species in the area already has an unfavorable conservation status, or when the critical impact thresholds for specific habitat or species elements are exceeded (or when the area is subject to a cumulative effect that will lead to one of these conditions), any additional PPP/IP that, alone or in combination with others, adds additional impacts to these levels. The conclusions of the analysis should clearly indicate which elements of the project, in conjunction with which PPP/IP, were taken into account in the decision-making process in relation to the effects of the combination. Simply stating that "there will be no cumulative impacts" is insufficient.
- The EIA report does not include the information described in section II - Appendix P-1.
- The list of PPPs/IPs submitted with the EIA report in "Text Annex 14 Table cumulative effect Rosino" is incomplete in terms of approved IPs of a similar nature within the boundaries of 33 BG0001032 "Rhodopes-East", in particular in the territory of the municipality

of Ivaylovgrad. It should be supplemented by referring to the public register with data on current or completed EIA procedures, which is available on the website of the Ministry of Environment and Water in the section Preventive Action/EIA/Public registers on

EIA:

<https://www.moew.government.bg/bg/prevantivna-deinost/ovos/publiczni-registri-po-ovos/>. All approved PPPs/IPs should be taken into account in the cumulative effect analysis.

- For example, in the presented analysis for assessing the cumulative impact in combination with other PPPs/IPs within the boundaries of 33 BG0001032 "Rhodopes-East" does not take into account the IP for "Extraction and processing of gold-bearing ores from the "Ada Tepe" section of the "Khan Krum" deposit, municipality of Krumovgrad, approved by EIA Decision No. 18-8, 11/2011 of the Minister of Environment and Water, in the analysis and determination of potential cumulative effects. 11/2011 of the Minister of Environment and Water, in the analysis and determination of potential cumulative impacts. In this regard, the analysis in section II of the EIA should be supplemented by taking into account the parameters, characteristics, and affected habitats and species as a result of the implementation of the IP "Extraction and processing of gold-bearing ores from the Ada Tepe section of the Khan Krum deposit, municipality of Krumovgrad, approved by EIA Decision No. 18-8, 11/2011 of the Minister of Environment and Water.

2. In section V.I.I. of the EIA for protected area BG0001032 "Rhodopes-East" For the protection of natural habitats and wild flora and fauna, **a direct impact of 17.3182 ha** (0.122% of the habitat area in the protected area) of **priority natural habitat 91AA\* "Eastern forests of downy oak"**. The conclusion on the degree of impact at the same point is assessed as "insignificant". However, the EIA does not include reasons and lacks expert analysis of how the direct loss of natural habitat areas will affect its conservation status (CS) in the protected area and at the biogeographical level, in accordance with Article 22 of the Ordinance on EIA. The assessment should be carried out in relation to all parameters of the PS, including taking into account the analysis of the cumulative effect. Alternatives to the IP should be considered and assessed in relation to the impact on the priority natural habitat. Adequate mitigation measures should be proposed to reduce or eliminate the impacts on the natural habitat. As a result of the analysis, the presence or absence of the hypothesis of Article 33 of the Biological Diversity Act (BDA) should be justified.

3. There is uncertainty regarding the information presented in the EIA on pages 39-42 concerning the expected direct or indirect impact on natural habitat **6210 "Semi-natural dry grasslands and scrubland communities on calcareous substrates (Festuco-Brometalia)"** (\*important orchid habitats). The EIA should specify whether the priority form of the natural habitat (\*important orchid habitats) is subject to protection in the areas affected by the IP. To this end, in order to establish whether the affected areas of habitat **6210** have the characteristics of the priority form, in accordance with the "Guidelines for the identification of habitats of European importance in Bulgaria," an on-site inspection should be carried out during a suitable vegetation period for orchid species. Depending on the results of the inspection, the conclusions in the EIA should be reviewed and revised with regard to the expected degree of impact on natural habitats, and an analysis should be presented of how the direct loss of natural habitat areas will affect its conservation status in the protected area and at the biogeographical level, in accordance with Article 22 of the Ordinance on Environmental Impact Assessment. The assessment should be carried out with regard to all parameters of the conservation status, including taking into account the analysis of the cumulative effect. Alternatives to the investment proposal should be considered and assessed in case of impact on the priority form of the habitat. Adequate mitigation measures should be proposed to reduce or eliminate the impacts on the natural habitat. The analysis should justify the presence or absence of the hypothesis under Article 33 of the Biodiversity Act.

4. The conclusions in Part V.2. of the EIA describe the species and habitats for which a negative impact is expected - 4 types of natural habitats are affected, habitats of 30 species subject to protection in 33 BG0001032 "Rhodopes-Eastern", fragmentation of habitats, as well as the habitats of 25 species, barrier effect for 12 species, mortality of individuals of 23 species. However, the analysis and conclusions in the EIA report lack an assessment of how these impacts will affect the conservation status of these species in terms of all conservation status parameters, including taking into account the analysis of the cumulative effect. The assessment should be carried out in relation to all conservation status parameters. Adequate mitigation measures should be proposed to reduce or eliminate the impacts.

5. Similarly, with regard to the conclusions presented in Part V.2. of the EIA report concerning the 23 directly affected bird species subject to protection in 33 BG0002019 "Biala Reka". However, the analysis

and conclusions in the EIA report lack an assessment of how these impacts will affect the PS of these species in terms of all PS parameters, including taking into account the analysis of the cumulative effect. The assessment should be carried out in relation to all PS parameters. Adequate mitigation measures should be proposed to reduce or eliminate the impacts.

6. Part VI. Proposals for mitigation measures need to be revised in light of the results of the impact analysis in Part V, as the version presented in the EIA is incomplete and inconsistent with the conclusions of the impact analysis. For example, the analysis contains mitigation measures for some bird species (e.g., the short-toed eagle, etc.), but these are not included in the measures in Part VI. Proposals for mitigation measures. This part should list all mitigation measures for all species and natural habitats for which they are proposed.

7. The alternatives proposed and described in the EIA are not consistent with the results and conclusions regarding the expected impacts on species and natural habitats and do not address the reduction of these impacts. Adequate alternatives that take into account the identified impacts should be proposed, considered, and evaluated.

8. The appendices to the EIA in Part XIII. Appendices, described on the electronic medium, are not attached to the submitted version of the EIA on the electronic medium.

In connection with the above, pursuant to Article 24, paragraph 4 of the Ordinance on EIA, **the assessment of the quality of the submitted impact assessment report is negative**, given that the information provided is incomplete and insufficient for making a reasoned decision.

Pursuant to Article 24(6) of the Ordinance on Environmental Impact Assessment, the environmental impact assessment report shall be returned **for completion and revision in accordance with the above comments**.

#### ***IV. With regard to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991):***

By letter ref. No. EIA-68-28/14.02.2025 from the Ministry of Environment and Water to Tintyava Exploration AD, in point 9 *"With regard to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991),"* **information was provided that the Greek government wishes to participate and has declared its participation in letter ref. No. OBOC-68/23.10.2024 to the Ministry of Environment and Water, in the environmental impact assessment procedure concerning the project under consideration.**

In this regard, a letter was sent with ref. No. EIA-68-40/19.08.2025 from the Ministry of Environment and Water to the company "Tintyava Exploration" AD, informing it that, in accordance with the principles of international cooperation in environmental impact assessment, particularly in a cross-border context, it is necessary to provide in Greek a copy of the EIA report with all annexes (including the impact assessment report - IAR) in paper and electronic form for assessing the quality of the report, the non-technical summary and the final version of the EIA terms of reference, comments are reflected and the results of the consultations with all affected municipalities and interested departments are provided as soon as possible.

**To date, the Ministry of Environment and Water has not received a letter with an attached copy in Greek of the EIA report with all annexes from the company Tintyava Exploration AD**, which, according to Article 4 of *the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991)*, should be provided by the country of origin to the affected country. The Ministry of Environment and Water, as the competent authority, shall take all necessary and effective measures to prevent, reduce, and control significant adverse transboundary impacts resulting from the proposed activities, in compliance with *the Convention on Environmental Impact Assessment in a Transboundary Context* and Article 7 of *Directive 2011/92/EU* of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.

In implementing the procedure under Articles 3, 4, and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context, no opportunity for participation has been provided to the affected country, the Republic of Greece. The right that the Espoo Convention and Directive 2011/92 grant to the public concerned in the affected countries is the right to actively and effectively participate in decision-making procedures. The same right is granted to the Bulgarian public concerned by national law. There is a constituted state in the consultation procedure on the report on the IP "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, Ivaylovgrad municipality". The failure to submit the necessary documentation for this consultation prevents its lawful conduct by the competent environmental authority, the Ministry of Environment and Water. The opinions expressed during the consultations in the Republic of

Bulgaria and the Republic of Greece should be taken into account when preparing the environmental impact assessment report for the investment proposal of Tintyava Exploration AD, in its capacity as the contracting authority.

In view of the above, after the necessary revision and supplementation of the investment proposal (IP) for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region, in accordance with the above comments regarding the EIA and SEA reports, and in view of the lawful conduct of the transboundary procedure, the contracting authority for the investment proposal is obliged to ensure that the content of the documentation is identical in both Bulgarian and Greek.

***V. Regarding the actions to be taken by the contracting authority to continue the EIA procedure, including the SEA procedure:***

The supplemented EIA report and its annexes, including the supplemented and revised EIA, reflecting all the above-mentioned omissions, incompleteness, and weaknesses, shall be submitted to the Ministry of Environment and Water **by November 2, 2026**.

We remind you that, pursuant to Article 13(2) of the EIA Ordinance, you are required to ensure that the content of the documentation on paper and electronic media is identical—the EIA report and all its annexes.

Pursuant to Article 25(5) of the EIA Ordinance, you are required to provide the above-mentioned reports in Greek, namely: an additional copy of the EIA report and its annexes, the supplemented and revised EIA, as well as a translation of the non-technical summary.

**Annex:** as per the text.

October 20, 2025

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MANOL GENOV  
Minister of Environment and Water

# REPUBLIC OF BULGARIA

## MINISTRY OF THE ENVIRONMENT AND WATER

### BASIN DIRECTORATE "EASTERN BLACK SEA REGION"

Ref. No. PU-01-808 C<sup>0</sup> ^)  
Plovdiv, 2025

Classification level: I(TLP-GREEN)

TO

MS MARIA GULABOVA

DIRECTOR OF

DIRECTORATE "ECOLOGICAL ASSESSMENT,

ENVIRONMENTAL IMPACT ASSESSMENT

ON THE ENVIRONMENT AND

POLLUTION PREVENTION"

MINISTRY OF

ENVIRONMENT AND WATER

22 KN. MARIA LUIZA BLVD.

1000, SOFIA RE: Opinion pursuant to Art. 155, para. 1, item 23 of the Water Act for the investment proposal "Extraction and processing of polymetallic ores from the deposit in the village of

*Re: Opinion pursuant to Article 155(1)(23) of the Water Act on the investment proposal "Extraction and processing of polymetallic ores from the Rosino deposit, area "Tintyava", located in the municipality of Ivaylovgrad", commissioned by: "Tintyava Exploration" AD.*

DEAR MS. GULABOVA,

In response to your letter ref. No. EIA-68-51/03.09.2025, requesting an updated opinion on the admissibility of the investment project in relation to the regimes set out in the River Basin Management Plan (RBMP) and the Flood Risk Management Plan (FRMP) in the Eastern Black Sea Region 2022-2027, we would like to inform you that additional information is required.

The client's investment proposal provides for the extraction and processing of polymetallic (gold-silver) ores from the "Rosino" deposit, Tintyava area, with the future concession area amounting to 2,753 decares, of which 1,179 decares will be disturbed terrain. At the time of preparation of the EIA, no concession agreement for the deposit has been concluded.

The main activities included in the proposal are:

- open-pit mining of polymetallic ores;
- processing of the ore by flotation to obtain concentrate;
- construction and operation of the necessary accompanying infrastructure - roads, water supply, electricity supply, material storage facilities, mining waste facilities, etc.;
- phased recultivation of the affected areas.

The concession term is set at 35 years.

The purpose of the investment project is the open-pit mining and processing of polymetallic gold-silver ore from the Rosino deposit, Tintyava area. The technological process of open-pit mining includes exposing the natural resources, performing drilling and blasting works (DBW) and crushing the ore. The ore will be processed by flotation to obtain a concentrate, which will be the final product for the installation. No block metal is expected to be obtained. The generated mining waste will be deposited in mining waste facilities.

of them at a depth of less than 120 meters and about 1% below 140 meters. The maximum depth of the mine pit is planned to be about 140 m from the surface. The bottom of the mine is expected to reach an elevation of 435 m.

Blasting will be carried out by an external contractor who will deliver the necessary explosives immediately before blasting, so there is no likelihood of explosives being present on site. The specified charge weight is mandatory when preparing the Blasting Project and Passport for each individual blasting operation.

With regard to the embankment works, a selective embankment formation technology using a bulldozer and motor vehicles is envisaged.

Selective/separate disposal of:

- Soil-humus mass;
- Sterile rock mass (overburden);
- Flotation waste.

According to preliminary studies, the technological sequence for processing the mined ore includes the following main and ancillary activities:

- crushing and transportation;
- storage of crushed ore in a covered buffer warehouse, which is a covered reinforced concrete platform with a scraper underneath;
- grinding (ball mill);
- flotation;
- thickening of flotation waste and disposal of SMO;
- concentrate thickening and filtration;
- accompanying activities - technological provision of: water, air, and reagents.

The implementation of the investment project will require quantities of water for production needs (in the enrichment plant, for irrigation in case of dusting and for drinking and domestic needs of the personnel).

It is indicated that a hydrological survey, defined in a hydrogeological report, for the availability of water resources or surface water bodies, has established that during the period January-May, when there is sufficient flow in the river, it is possible to use water from Arpa Dere, in the area of the (PS) "Rozino" at a flow rate that will provide a minimum water quantity of 50 l/s (expected total volume of 648,000 t<sup>3</sup>), equal to 10% of the average annual water quantity, as well as guarantee the ecological minimum in the river. During this period, an open reservoir for non-contact water will be filled through continuous water pumping.

A possible option for water pumping is the construction of a pumping station in the area of the existing PS "Rozno", which is used for the supply of drinking water to the village of Rozino. Due to the higher flow rate in February, March, and April, a higher flow rate of about 100 l/s can be used during these months to fill the non-contact water reservoir on days with higher rainfall.

Rainwater will accumulate within the catchment area in the Rosino mine pit, depending on the exposure of the mine over the years. This water will be drained into an open reservoir for contact water and will be used in the technological process.

A hydrogeological study conducted in the area of the deposit has established that the underground waters have an insignificant flow rate and their yield is extremely insufficient for technological needs.

For optimal water consumption, part of the water will be recycled where possible, for which an open contact water reservoir will be built.



Bottled water will be provided for drinking purposes. Water from the clean water tank will be used for domestic purposes (for sanitary facilities).

No wastewater will be generated during the construction works. Chemical toilets and mobile sinks are provided for the workers.

The following wastewater is expected to be generated at the site: production wastewater from the flotation and dewatering of the concentrate, and domestic and fecal wastewater from the workers at the mining site. All this water will be recycled, with the open reservoir for contact water serving as a buffer volume.

There are no plans to discharge production wastewater into water bodies or into the sewage system of populated areas.

A local treatment facility (operating with active microbiological sludge) will be built to treat domestic sewage, and the treated water will be discharged into the contact tank.

There are no plans to discharge domestic sewage into water bodies or into the sewage system of populated areas.

Surface water, rainwater, and water from mine drainage will be collected and discharged into the contact water tank.

The wastewater described above will be generated throughout the entire life cycle of the mining facility.

The closest water sources for drinking and domestic water supply from groundwater in the Rosino deposit area are:

- About 1630 m south of point 7 describing the contour of the future concession area is the TK of PS "Gugutka" for drinking and domestic water supply to the villages of Gugutka and Byal Gradets, municipality of Ivaylovgrad, Haskovo region. There is no sanitary protection zone (SPZ) built around the water intake facility in accordance with Ordinance No. 3/10.10.2000. There is no sanitary protection zone around the water intake facility in accordance with Ordinance No. 3/10.10.2000.

- Approximately 620 m east of point 6 describing the contour of the future concession area is the "Rozino" water intake facility, located in the territory of the village of Pastrok, municipality of Ivaylovgrad, for drinking and domestic water supply, owned by the State Forestry. There is no sanitary protection zone around the water intake facility in accordance with Ordinance No. 3/10.10.2000. There is no sanitary protection zone around the water intake facility in accordance with Ordinance No. 3 of 10.10.2000.

Annex 7.2.1. to Section 7 of the updated RBMP of the IBR, adopted by Decision No. 920/31.12.2024 of the Council of Ministers, provides for a measure with code DWJ and title: Prohibitions and restrictions on activities in drinking water protection areas and in designated sanitary protection zones (SPZ) and buffer zones around water intake facilities/systems. Action to implement the measure: DW\_J\_35 Prohibition on the extraction of underground resources, including inert and construction materials, in a buffer zone with a radius of 1000 m from facilities for the abstraction of groundwater for drinking and domestic water supply.

In view of the above circumstances, part of the project concession area subject to the IP falls within the scope of the mark set in the RBMP for 2022-2027 and needs to be excluded from the concession area of the Rosino deposit the buffer zone within a radius of 1000 m from facilities for the abstraction of groundwater for drinking and domestic water supply (the "Rozino" catchment, located in the territory of the village of Pastrok, municipality of Ivaylovgrad).

Yours sincerely,

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**VASIL UZUNOV**

*Director and Basin Directorate J East*