

OVOS-68-17 / 18.11.2024

TO
Mr. Daniel Marinov TINTYAVA
EXPLORATION AD
6570 IVAYLOVGRAD, 6 SEPTEMBER STREET
6 SEPTEMBER STREET NO. 1

IVAYLOVGRAD MUNICIPALITY

ROSINO
MUNICIPALITY
IVAYLOVGRAD
MUNICIPALITY

MAYOR'S OFFICE OF THE VILLAGE OF
GUGUTKA MUNICIPALITY OF
IVAYLOVGRAD

Mr. Vasil Ouzounov Director of
"EASTERN BLACK SEA REGION" PLOVNIV 35
35 YANKO SAKAZOV STREET

Ms. Mariana Valcheva
DIRECTOR OF RIEW-HASKOVO
CITY OF HASKOVO
14 DOBRUJA AVENUE

Subject: Notification of investment proposal (IP) "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Haskovo, Haskovo region"

Subject: Notification of investment proposal (IP) "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region"

DEAR MR. MARINOV,

With regard to your notification concerning IP "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava region" with reference number 8/14.2.2023, in accordance with Article 5, paragraph 1 of

the decree on the conditions and procedure for conducting environmental impact assessments (EIA decree, published in the Government Gazette, No. 25 of March 18, 2003, as amended and supplemented by the Government Gazette, No. 12 of February 12, 2016), we hereby inform you of the following:

I. With regard to the requirements of Chapter Six of the Environmental Protection Act (EPA):

1. The investment proposal provides for the extraction and processing of polymetallic (gold-silver) minerals from the Rosino deposit in the Tintyava area, with the future concession area covering 3,044.7 hectares, of which 1,308.5 hectares will be disturbed.

The main activities included in the investment 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.
- gradual restoration of the affected areas.

The infrastructure in the Tintyava area is as follows: open-pit mine, enrichment plant, waste rock disposal area, soil disposal areas, tailings pond, contact water pond, non-contact water pond, mine roads.

The deposit will be developed using open pit mining methods involving drilling and blasting. Once the ore reserves have been exposed and prepared for extraction, they will be separated from the rock mass using millisecond-duration NONEL blasting. The open pit mine (covering an area of 299.1 hectares) will be divided into two mining areas for timely, phased restoration. The mined ore mass will be loaded and transported to the crushing plant.

The ore processing technology includes the following processes: Crushing, sorting, and transport. Storage of crushed ore (covered storage). Grinding (ball mill). Flotation. Thickening of flotation tailings. Thickening of concentrate and filtration. Disposal of flotation tailings.

The flotation plant will be designed to process up to 1.75 million tons of ore per year throughout the concession period or until the deposit is finally exhausted, depending on the mining regime during the years. The nominal capacity of the flotation plant is 217 tons (dry material) per hour.

The main enrichment process for separating gold and silver from the ore will be carried out by flotation. It will be implemented in flotation machines, where the separation of the useful component from the rock mass is carried out based on the different surface properties of the minerals and the rock mass. The useful component, in this case the gold-silver concentrate, in the form of foam, flows over the edges of the flotation cell and enters the next stage of operation.

The waste from the flotation enrichment of the ore (mining waste), which is discharged from the bottom of the cell, will be stored in a waste storage facility.

The flotation scheme is a typical collective flotation, which includes primary and controlled flotation and two cleaning flotations to obtain a processed gold-silver concentrate.

The flotation waste disposal technology will be based on the "Downstream" method - construction of a sand prism from the flotation waste. This method has been selected as the most suitable for the seismicity of the area and environmentally friendly, as it is a semi-dry disposal technology. After separation in the enrichment process, the waste is thickened in a thickener (settling tank), after which it is transported by slurry pumps to the mining waste facility - the waste storage facility. This disposal method ensures a higher water recycling rate, high stability of the flotation waste (less drainage water), as well as maximum use of the designated space, with a reduced area compared to the conventional fully wet method.

It is planned to store 8,575 million tons (6,125 million m³) of mining waste over a period of 6 years. After the sixth year, the waste, which has been classified as non-hazardous, will be used to backfill Section 2 of the mine. After this period, the waste pond will no longer be used and will be reclaimed.

A drainage system is planned to be constructed beneath the waste storage facility to collect filtered water, including rainwater.

The extraction of polymetallic ores from the Rosino deposit has an expected operating period of 9 years, with:

- average annual production from the open pit mine of 3,310,546 tons or 1,362,365 m3 for a period of 8 years.
- average annual ore production of 1,750,000 tons or 720,165 m3 for a period of 6.5 years.

The approved 9-year operating period includes 2 years of mine construction, 6.5 years of main mining and processing, and 0.5^1 year of phasing out, during which only low-quality raw materials will be processed.

Operation is planned to be in two shifts, eight hours a day, seven days a week, 351 working days a year.

The operation of the mining and processing complex will require the construction of accompanying infrastructure, such as roads, power and water supply lines, buildings, and facilities.

The implementation of the investment proposal requires the construction of internal roads and access roads to the facilities. The road connection to the Rozino mine will be provided by the existing road through the village of Konnitsa to the village of Rozino, which is connected to the asphalt road II 59 linking the towns of Ivaylovgrad and Krumovgrad.

In order to supply electricity to the engines, equipment, and facilities of the enrichment plant and open pit mine, it is necessary to construct a power transmission line - branches from existing power supplies.

There are no plans to construct a natural gas pipeline.

The Rosino deposit, in the Tintyava area, is located 1.2 km south of the village of Rosino, Ivaylovgrad municipality, Haskovo region. The land areas of the settlements that will be affected by the perimeter of the future concession area are: the villages of Rozino and Gugutka, Ivaylovgrad municipality, Haskovo region.

Register of coordinates of the boundary points of the concession area for the investment project (BGS 2005 system)

Rozino deposit		
No	East	North (m)
1	408795	4589229
2	409239	4589184
3	409510	4588798
4	409894	4588109
5	410156	4588107
6	410316	4587852
7	410175	4587565
8	409332	4587580
9	40891-3	4587690
10	407982	4587362
11	407609	4587916
12	407997	4588738

Thus, the declared IP falls within the scope of Annex No. 1 of the Environmental Protection Act

environmental protection - point 19. "Open-cast mining in quarries and raw material mines - covering an area of more than 25 hectares, or peat extraction" - covering an area of more than 150 hectares from Annex No. 1 of the Environmental Protection Act and pursuant to Article 92, points 1 and 2 of the Environmental Protection Act, is subject to a mandatory environmental impact assessment (EIA).

By letter No. EPE-68/23.10.2024 from the Ministry of Environment and Water, published on the website of the Ministry of Environment and Water, the Greek government informed the Republic of Bulgaria that it intends to participate in the environmental impact assessment procedure for the investment project "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region.

In accordance with Article 94(1)(4) of the Environmental Protection Act, the competent authority for taking a decision on the EIA is the Minister of Environment and Water.

2. In relation to the notification submitted, we would like to point out that, in accordance with the provisions of Article 82(3) of the Environmental Protection Act, when the implementation of the investment project requires the development of other activities related to the main subject of the assessment, auxiliary or supporting activities, these are also included in the required assessment.

3. It should also be noted that in order for your obligations under Article 95(1) of the Environmental Protection Act to be considered fully fulfilled, you must publish your proposal on your website, if you have one, and through the media or other appropriate means. In this regard, you must provide evidence of notification.

4. In accordance with the requirements of Article 4a of the EIA Regulation, an opinion is required from the Eastern Aegean Basin Directorate (EABD) on the admissibility of the investment proposal in relation to the regimes set out in the current river basin management plans and flood risk management plans. According to the opinion of the EEA No. PU-10-182/16/26.09.2024 (a copy of which is attached for reference), the investment proposal is acceptable from the point of view of the RBMP and FRMP of the EEA (2016-2021), the Water Act and secondary legislation, subject to the conditions set out in the letter.

5. The customer has provided information on the hazardous substances listed in Annex 3 to the Environmental Protection Act, which it intends to have on site at the mining facility. Attached to the notification is a report on the classification carried out in accordance with Article 103 of the Environmental Protection Act, according to which the company is not classified as a low- or high-risk company. In Table 10 of the report, the client explained that, at this stage, it is not possible to describe the technological installations in which the dangerous substances will be present, as there are no working drawings dimensioning the specific installations and pipelines in a way that would allow the quantities to be calculated. This exemption is permitted under the provisions of Article 4(5) of the EIA Regulation. In such a case, the notification pursuant to Article 103(2) or (5) of the Environmental Protection Act shall be submitted together with the EIA assignment pursuant to Article 10(3) for an investment proposal falling within the scope of Annex No. 1 of the Environmental Protection Act.

II. With regard to the requirements of Article 31 of the Biodiversity Act (BDA):

The investment proposal does not fall within the boundaries of protected areas within the meaning of the Protected Areas Act. The Rosino deposit falls within the boundaries of protected areas (Natura 2000 sites) within the meaning of the Biodiversity Act (BA):

- in the protected area BG0001032 'Rodopi-East', designated in accordance with Article 6(1)(1) and (2) of the BDA for the protection of natural habitats and wild flora and fauna, as announced by Decision No RD-267/31.03.2021 of the Ministry of Environment and Water (published in the State Gazette No. 43/2021)

- and in the protected area BG0002019 'Bjala Reka' for the protection of wild birds, designated by Decision No RD-575/08.09.2008 of the Ministry of Environment and Water (published in the State Gazette No 85/2008).

The eligibility check carried out in accordance with Article 12(1) and (2) of the Decree on the conditions and procedure for assessing the compatibility of plans, programs,

works and investment proposals with the subject and objectives of the protection of protected areas (Decree on the Environment, State Gazette No. 73/2007, as amended and supplemented), it was found that the implementation of the investment proposal is acceptable in accordance with the regimes established by the decisions declaring the protected area BG0001032

"Rodotsy-East" and protected area BG0002019 "Byala Reka".

The investment proposal is subject to a compatibility assessment in accordance with the provisions of Article

2, paragraph 1, point 1 of the decree on the conditions and procedure for assessing the compatibility of plans, programs, projects, and investment proposals with the purpose and objectives of protecting protected areas (Decree on Compatibility, Government Gazette No. 73/2007, as amended and supplemented) and must be assessed for its compatibility with the purpose and objectives of the protection of protected areas. The compatibility assessment procedure is carried out through the EIA procedure, in accordance with Article 31(4), in conjunction with paragraph 1 of the ZBR.

After examining the documentation submitted in the notification in accordance with Article 39(3) in conjunction with Article 39(5) of the EIA Directive, the assessment of the likely significant negative effects is that the investment proposal is likely to have significant negative effects on the natural habitats, populations, and habitats of species subject to protection in sites 33 BG0001032 'Rodopi-East' and 33 BG0002019 'Biala Reka' for the following reasons:

1. When the investment proposal is implemented in accordance with its location and the declared parameters of its elements, there is an objective possibility of significant negative impact in terms of:

- damage and fragmentation of 6 types of natural habitats subject to protection in the protected area BG0001032 "Eastern Rhodopes," including those that are a priority for protection, namely: habitats 6210 'Semi-natural dry grasslands and scrubland communities on calcareous substrates (*Festuco Brometalia*) (*important orchid sites)', 91M0 "Balkan-Pannonian oak-chestnut forests", *91AA "Eastern European oak forests", *6220

"Pseudo-steppes with cereals and annual plants of the Thero-Brachypodietea order", 5210 "Shrubs with *Juniperus* spp" and habitat 5130 "*Juniperus communis* communities on calcareous soils".

- Damage and fragmentation of habitats of species subject to conservation in protected area BG0001032 "Rhodopes-East": Lesser mouse-eared bat (*Myotis blythii*), Mediterranean bat (*Rhinolophus blasii*), Greater mouse-eared bat (*Myotis myotis*), Long-fingered bat (*Myotis capaccinii*), Geoffroy's bat (*Myotis emarginatus*), Long-winged bat (*Miniopterus schreibersii*), Mediterranean bat (*Rhinolophus euryale*), Mehely's bat (*Rhinolophus mehelyi*), lesser horseshoe bat (*Rhinolophus hipposideros*), greater horseshoe bat (*Rhinolophus ferrumequinum*), Bechstein's bat (*Myotis bechsteinii*), Barbastella barbastellus, Wolf (*Canis lupus*), Bear (*Ursus arctos*), Paracaloptenus caloptenoides, Eriogaster catax, *Lycaena dispar*, *Euplagia quadripunctaria*, hermit beetle (*Osmoderma eremita*), longhorn beetle (*Morimus fonereus*), great capricorn beetle (*Cerambyx cerdo*), stag beetle (*Lucanus cervus*), Elaphe sauromates, *Testudo graeca*, and *Testudo hermanni*.

- permanent and irreversible deterioration of the quality of the breeding, feeding, refuge, and/or migration habitats of the above species, as well as of the bird species protected in the protected area BG0002019 "Biala Reka"

- fragmentation or disturbance of the integrity of the protected areas affected

- the occurrence of a barrier effect, permanent disturbance of species and disturbance of the species composition of protected areas

- change in the degree of conservation of species habitats

2. There is a possibility of cumulative effects from the implementation of the investment proposal due to the existence of multiple areas designated for exploration and/or research and concessions for the extraction of underground resources within the boundaries of protected area BG0001032 'Rhodopes-East' and protected area BG0002019 'Biala Reka', and in particular on the territory of the municipality of Ivaylovgrad.

The compatibility assessment report should be structured in accordance with the requirements of Article 23(2) of the Environmental Impact Assessment Directive, in accordance with the criteria set out in Article 22 thereof, using quantitative estimates of the expected losses or

degradation of habitats and species habitats (per area) and species (per size and population density) subject to conservation in the protected area, taking into account the representativeness of habitats and/or species in the area and in the network as a whole, including a detailed analysis and assessment of possible cumulative effects, including possible alternatives, the existence of the circumstances referred to in Article 33 of the Biodiversity Act, proposals for mitigation/compensatory measures, etc.

The assessment must be carried out by a team of experts who meet the requirements of Article 9(1) of the Environmental Impact Assessment Directive, including a phytocenologist or botanist, zoologist, and ornithologist.

In accordance with Article 39(6)(4) of the EIA Directive, we inform you that information on the subject and objectives of the protection of the protected areas affected is available in the information system for protected areas of the Natura 2000 network.

III. The next steps you need to take to carry out the EIA procedure are:

1. Commission a study on the scope and content of the EIA for the entire investment proposal and all facilities and/or activities related to its construction and operation, taking into account the cumulative effects of its implementation and considering alternatives for the implementation of the investment proposal, which should be in accordance with the requirements of Article 10(3) of the EIA Decree and the information obtained during the consultations in accordance with Article 9 of the same decree.

2. You should consult with the Ministry of Environment and Water regarding the assignment, and we recommend that you also consult with the Eastern Aegean Basin Directorate, the Regional Inspectorate of Environment and Water in Haskovo, other specialized bodies, and the interested public. In relation to Article 10(7) of the EIA Regulation, you should also consult the Ministry of Health on the content and scope of the assessment of environmental health and hygiene aspects and the risk to human health.

3. You must commission the preparation of the EIA report to a team of experts, headed by a person who holds a master's degree and meets the requirements of Article 83 of the Environmental Protection Act. The EIA report must be prepared in accordance with the terms of reference, which reflect the information from all consultations held and the requirements of Article 96(1) of the Environmental Protection Act. •

4. When preparing the EIA report, the contracting authority shall take into account the provisions of Article 104 of the Environmental Protection Act and indicate whether there are any establishments/facilities classified as low and/or high risk in accordance with Chapter 7, Section I of the Environmental Protection Act and are located in the area of the properties that are the subject of the concession. Up-to-date information on the companies is available in the register provided for in Article 111(1)(6) of the Environmental Protection Act, which is published on the website of the Ministry of Environment and Water at: <https://www.moew.government.bg/bg/prevantivna-dejnost/himichni-vestestva/sevezo/registur/>.

5. Given that mining waste disposal facilities, including waste or sludge ponds, fall within the scope of Chapter 7, Section 1, of the Environmental Protection Act, the contracting authority shall provide appropriate documentation demonstrating the classification, origin, type, and composition of the technological waste that will be produced during the flotation process.

6. The notification in accordance with Article 103(2) or (5) of the Environmental Protection Act shall be submitted together with the EIA assignment.

7. Submit the completed EIA report and its annexes for quality assessment to the Ministry of Environment and Water, in accordance with the provision of Article 13(1) of the EIA Regulation. In this context, it is necessary to submit an application for the issuance of an EIA decision using the template in Annex 8 to the EIA Regulation.

8. Taking into account the letter from the Greek government, No. EIA-68/23.10.2024, a copy of the EIA report in Greek must be submitted to the Ministry of Environment and Water in printed and electronic form.

When submitting the documents, a fee of BGN 1,200 shall be paid in accordance with Article 1(5)(2)(a) of the schedule of fees collected by the Ministry of Environment and Water. The fee shall be paid by bank transfer to the following account:

IBAN BG35 BNBG 9661 3000 1387 01

BIC BNBGBGSD

Please note that, in accordance with Article 2a, paragraph 5, point 1 of the EIA Regulation, the EIA procedure, including the EIA for the above-mentioned investment proposal, will be terminated if the client fails to comply with the instructions given to him in accordance with Article 5, paragraph 1 of the same Regulation for more than 12 months.

Annex: in accordance with the text

REPUBLIC OF BULGARIA
*** MINISTRY OF THE ENVIRONMENT AND WATER**
BASIN DIRECTORATE "EASTERN BLACK SEA REGION"
SEA"

Reference No. PU-10-182 (16)
Plovdiv DH. 26.09.2024.

Classification level: 0 (TLP-WHITE)

TO
MS MARIA GOULAMOVA
DIRECTOR OF THE EO, EIA AND PZ MOSV
DEPARTMENT
BUL. "KN. MARIA LUIZA" ZH2
1000, SOFIA

Subject: *Opinion pursuant to Article 155, paragraph 1, item 23 of the Investment Proposals Act (1Sh) "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region, with client: Tintyava Exploration AD.*

DEAR MR KALUGEROV,

In response to your letter No. M EIA-68-9'04.09.2024, requesting an opinion in accordance with Article 4a, paragraph 1, of the EIA Regulation, and having examined the attached notification and the additional information received, the Eastern Aegean Sea Basin Directorate (EASBD) expresses the following opinion:

E Assessment of the admissibility of the investment proposal in relation to the objectives and environmental protection measures set out in the River Basin Management Plan for the Eastern Black Sea Region (RBM Plan for the EBR) and the Flood Risk Management Plan for the Eastern Black Sea Region (FRMP Plan for the EBR).

1.1. Characteristics and purpose of the investment proposal: The client's investment proposal provides for the extraction and processing of polymetallic (gold-silver) ores from the "Rozino" deposit in the Tintyava area, with a future concession area of 3044.7 hectares, of which the disturbed area will be 1308.5 hectares.

Coordinates of the boundary points of the project concession perimeter for

No.	East	North
1	408795	4589229
2	409239	4589184
3	409510	4588798
4	409894	4588109
5	410156	4588107
6	410316	4587852
7	410175	4587565
8	409332	4587580
9	408913	4587690

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10	407982	4587362
11	407609	4587916
12	407997	4588738

The main activities included in the proposal are:

- open-pit mining of polymetallic ore
- 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.
- gradual restoration of the affected areas.

The investment proposal is new and is not related to the expansion or modification of existing activity.

The first two years are planned to be devoted to the construction of the mine, and by the end of the second year, sufficient exposed and ready-to-mine reserves will be secured. The ore processing plant will be constructed: the retaining wall of the waste reservoir will be completed up to 360 m, as well as the adjacent infrastructure. The retaining wall and adjacent infrastructure for the contact water reservoir will be constructed, with a retaining wall height of 311 m.

m. The retaining wall and adjacent infrastructure for the (clean) water contact tank will be constructed, with a height of 305 m. Approximately 90% of the soil and humus masses from the project areas will be collected and stored selectively. These will be stored selectively in two separate sanitary landfills for soil and humus masses (soil material).

The overburden (mining waste) at the Rosino deposit is compact rock that does not contain any ice, but covers rock that contains or is mixed with minerals, which requires its selective removal. For this purpose, drilling and blasting (DBO) with a delay of milliseconds will be carried out in order to separate the barren part from the rock mass, load it with an excavator onto dump trucks, and transport it to a barren rock landfill.

The deposit will be developed using the open pit method, with BEW execution. Once the ore reserves have been exposed and prepared for extraction, they will be separated from the rock mass using the NONEL blasting method with a delay of milliseconds. The open pit will be divided into two mining areas to ensure timely, gradual restoration. The mined ore will be loaded and transported to the crushing plant.

For the conditions of the "Rozino" deposit, separate disposal is provided for:

- Topsoil and humus
- Barren rock.

The ore processing technology includes the following sequential processes:

- Crushing, sorting, and transportation
- Storage of crushed ore (covered storage)
- Grinding (ball mill)
- Floating
- Thickening of flotation tailings
- Concentrate density
- Disposal of flotation tailings.

The ore crushing system comprises three crushing stages: primary jaw crusher, followed by secondary and tertiary cone crushers. The crushed ore will be stored in a covered storage facility with a capacity of 15,000 tons. The crushed ore will be fed into the grinding area. The grinding process will consist of a ball mill operating in a closed circuit with a set of cyclonic separators. The ball mill discharges into a bucket, which

feeds the cyclone group via a cyclone feed pump in operation/standby mode. The cyclone group consists of 14 cyclones, 12 of which operate continuously and two are on standby. The overflow from the cyclones passes to the flotation area and the pulp returns to the ball mill.

The flow diagram of the flotation process will consist of two tanks with agitators for pulp preparation, four cells for primary flotation, two cells for cleaning, and two cells for final flotation. The flotation unit will be designed to process up to 1.75 million tons of ore per year. The nominal capacity of the flotation unit is 217 tons (dry material) per hour. The main enrichment process for separating gold and silver from the ore will be carried out by flotation. It will be implemented in flotation machines, where the separation of the useful component from the rock mass is carried out based on the different surface properties of the minerals and the rock mass. The useful component, in this case the gold-silver concentrate, in the form of foam, flows over the edges of the flotation cell and enters the next stage of operation. The waste from the flotation enrichment of the ore (mining waste) is removed from the bottom of the cell and deposited in a waste tank. The flotation scheme is a typical collective flotation involving primary and controlled flotation and two cleaning flotations to obtain a processed gold-silver concentrate. The flotation line is fed with pulp from the hydrocyclones in the grinding section by gravity. To proceed with the flotation process, it is necessary to add reagents such as frother (methyl isobutyl carbinol - MIBC), collector (potassium amyl xanthate - PAX), etc.

- The concentrate thickening and filtration circuit will consist of a 16 m diameter concentrate thickener, a vertical plate filter, and a pressure drainage filter. The overflow water from the thickener (drainage) will be recycled back to the process water tank and reused in the grinding and flotation cycle.

The most economical solution is to deposit the thickened (semi-dry) flotation tailings. The deposition technology will be based on the Downstream method - construction of a sand prism from flotation tailings. After separation in the enrichment process, the waste is compressed in a thickener (settling tank) and then transported by slurry pumps to the mining waste facility - the tailings storage facility. It is planned to store 8,575 million tons (6,125 million m³) of mining waste over a period of 6 years. After the sixth year, the waste, which is classified as non-hazardous because laboratory tests and analyses show that it does not contain hazardous and priority hazardous substances, will be used to backfill the Section 2 mine pit. After this period, the waste pond will no longer be used and will be remediated. A drainage system is planned to be constructed beneath the waste pond to collect filtered water, including rainwater.

• The extraction of polymetallic ore from the Rosino deposit has an expected operating period of 9 years with:

- * average annual production from the open pit mine of 3,310,546 tons or 1,362,365 m³ over a period of 8 years

- average annual ore production of 1,750,000 tons or 720,165 m³ for a period of 6.5 years.

The approved 9-year operating period includes 2 years of mine construction, 6.5 years of main mining and processing, and 0.5+1 years of phasing out, during which only low-quality raw materials will be processed.

The implementation of the investment project will require water for production needs at the enrichment plant, for irrigation during dust suppression, and for the drinking and domestic needs of the staff.

According to the information contained in the notification, a hydrological study was carried out to determine the availability of water resources from surface water systems and it was found 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 pumping station (PS) "Rozino" at a flow rate that provides a minimum water quantity of 50 l/s (expected total volume 648,000 m³), equal to 10% of the average annual water quantity, while ensuring the ecological minimum in the river. During this period, an open tank for non-contact water will be filled through continuous pumping of water.

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

Rainwater will accumulate within the Rosino mine drainage basin, depending on the exposure of the mine over the years. This water will be drained into an open contact water tank and used in the technological process.

A hydrogeological study conducted in the deposit area has found that groundwater has an insignificant flow rate and its yield is extremely insufficient for technological needs.

For optimal water consumption, part of the water will be reused, for which an open contact water tank will be constructed.

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

The activity does not involve the emission of priority or hazardous substances that come into contact with water. All facilities where chemicals are used will be closed and isolated from the ground surface.

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

The implementation of the investment proposal does not provide for the discharge of production wastewater into water bodies or the sewage system of residential areas.

Two options are being considered for the treatment of domestic wastewater:

- to construct watertight underground septic tanks, which will be maintained by a company that has the relevant rights in accordance with the legislation in force, or
- to construct a local treatment plant that will operate with active microbiological sludge, with the treated water being discharged into the contact tank.

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

In preparing its opinion on admissibility No. PU-01-183(5)/26.05.2023, BD IBR formally requested information on the location of all water pumping facilities for drinking and domestic use, for which BD IBR has no information and which are located on the territories of settlements in the Rozino deposit area, in the Tintyava area, respectively from the Municipality of Ivaylovgrad, the Municipality of Krumovgrad and V and K EOOD, Haskovo.

The following letters were submitted:

- Letter from the Municipality of Ivaylovgrad, No. PU-01-183(3)/10.05.2023, according to which the Rosino deposit area, Tintyava region, also includes the following facilities:
 - Rosino pressure tank, located on a plot of land with identification number 62935..177 - municipal public property:
 - The "Rozino" pumping station, located on plot no. 59197.45.59 - state private property.

- Main water pressure pipe connecting the Rosino pressure tank and the pumping station

Rosino

The above facilities are used to supply drinking and domestic water to the population of the village of Rozino

- Letter from the Municipality of Krumovgrad, No. PU-01-183(4)/U12.05.2023, informing that there are no local water sources in the village of Tintyava, Municipality of Krumovgrad, Kardzhali Region.

- Letter from ..V and K EOOD, Haskovo, No. PU-01-183(2)/03.05.2023, stating that in the area of the Rosino deposit, in the Tintyava region, apart from the aforementioned Rosino PS catchment basin and the Gugutka PS well, there are no other water pumping facilities for the supply of drinking and domestic water.

Northeast of the perimeter of the IP "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area," there is a pressurized water pipeline made of fi-89 steel pipes, which leads to a pressurized tank with a capacity of 100 m³ that supplies Rozno, located on plot 62935.23.177, village of Rozino, Pasishte, area 11,388 m².

By letter No. 99-00-587/01.03.2024, (incoming No. PU-10-182(7)01.03.2024 E) in relation to the determination of the transboundary impacts of the SD for the "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the territory of the municipality of Ivaylovgrad, Haskovo region", the following were presented:

- Report on the hydrogeological conditions in the IP area for the Rozino deposit, Jess E EOOD, 2023.

- Hydrological assessment of the discharge into the Biala River and its tributary Arpa Dere near the village of Gugutka, Ivaylovgrad municipality, Haskovo region. Design and Analysis Ltd., 2019.

Opinion of Jess E Ltd. prepared on the basis of available public information on water, detailed geological, hydrogeological, and seismic studies conducted in the Tintyava area and the Rozino deposit, as well as a report on the project "Study of transboundary aquifers between Bulgaria and Greece BG-GRG WB."

The "Report on the hydrogeological conditions in the area of the investment proposal for the Rozino deposit" summarises the results of the hydrogeological studies carried out in the Rozino deposit area.

The groundwater in the area studied for the investment proposal for the Rozino deposit is connected to the groundwater system (GWB) BG3G000PtPg049 - Fractured waters - Eastern Rhodope complex.

The general direction of groundwater drainage is south-southeast. The following hydrogeological conditions are present:

- The filtration parameters of the lithological varieties (Paleogene sedimentary complex and metamorphic basement) that form the hydrological system (GWB) BG3G000PtPg049 – Water faults Eastern Rhodope complex, the groundwater levels flowing in them and their chemical composition, as characterized in accordance with Annex 1 of Directive No. 1 of 10.10.2007. The structure, hydrogeological conditions at the top of the aquifer, and filtration properties of the groundwater body within the boundaries of the study area have been determined.

- The filtration parameters of the alluvial sediments (sludge, gravel, and mixed-grain sand, including lenses and intermediate sand-clay layers) formed in the plain of the Byala River and its tributary Arpa Dere have been determined. The dependence of groundwater levels flowing in the alluvial soil on river water levels has been determined. The chemical composition of groundwater has been studied in accordance with Annex 1 to Directive No. 1 of 10.10.2007.

- The filtration parameters of its decompacted soils (sandy clays with angular rock inclusions of various sizes) that form the PVT cover

BG3G000PtPg049 - Fractured waters - Eastern Rhodope complex. It was found that no groundwater flows through it.

Based on the data presented and analyzed, a description of the natural hydrogeological conditions in the Rosino deposit area was made.

In an expert report by Jess B“EOD, the following hydrogeological conditions in the IP area were examined:

- Groundwater in Paleogene rocks and in the metamorphic basement. The geological formations are represented by a metamorphic basement - consisting of a variety of migmatites, serpentinites, amphibolites, marbles, gneisses, and granites, and a Paleogene sedimentary complex - comprising breccias and conglomerates, coarse to silty sandstones, marls, and schistose shales.

Groundwater is classified as fracture-fed. The recharge of groundwater accumulated in the Paleogene sediments in the study area occurs mainly through fractures in tectonic faults from neighboring horizons and metamorphic rocks. The highly dissected relief, combined with the very low filtration characteristics of the rocks, is a prerequisite for very low recharge from filtration.

Groundwater levels are determined at a depth of 31.33 m to 4.82 m below the surface, generally following the ground line. The general direction of groundwater drainage is south-southeast towards the Byala River plain. The filtration parameters of the aquifers are very low.

The results of chemical analyses (eight samples tested in 2019 and one sample tested in 2022) show lower concentrations of the parameters tested compared to the quality standard according to Directive No. 1 of 10.10.2007.

The "Report on the hydrogeological conditions in the Roziyo deposit area" states that there are several exceptions to the overall picture in terms of the content of the indicators studied, which are explained in the report. In most samples, manganese is present in concentrations higher than the quality standard, while in one of the samples, iron is also present in higher concentrations. Both elements are petrogenic and are often transported into groundwater when rocks undergo weathering. It should be noted that in fissure waters, such an increase also occurs when both elements are deposited in rock fissures in the form of hydroxides. In one sample, arsenic is present in increased concentrations (34 ug/l). Arsenic, selenium, and antimony usually show increased content together with heavy metals in rocks with hydrothermal mineralization. This is observed both in the Sredna Gora ore zone and in the mineralization of ores in the Rhodopes. In this case, selenium and antimony do not show increased content, only arsenic. Only in one sample is nickel slightly increased. It is concluded that, as these are isolated results of increase, no clear trends can be drawn from them. This may become possible when a groundwater monitoring network for the Rosino deposit is established and results are collected regularly over time.

According to the report, the main conclusion from examining the data on the chemical composition of groundwater in Paleogene sediments and metamorphic bedrock is that the values of indicators studied in individual boreholes are very close and reflect a relatively stable chemical composition of groundwater, which has not been altered by human activity. What is important in this case is that these results can be used as a basis for determining the basic characteristics of the chemical composition of groundwater in the area during future development of the deposit.

- Groundwater in alluvial deposits in the Biala River plain. Alluvial deposits are represented by boulders, mixed-grain gravel, and sand in various proportions, including lenses and intermediate layers of sand-clay. In some areas, their thickness exceeds 5-6 m.

Water levels in the observed excavations in the study area vary in depth from 0.04 to 4.24 m from the surface. Groundwater is in direct hydraulic connection with the waters of the Byala and Arpa Dere rivers.

The results of chemical analyses (two samples) show low content of the indicators studied in comparison with the quality standard according to Directive No. 1 of 10.10.2007. The "Report on the hydrogeological conditions in the IP area for the Rozino deposit" states that for two *of the factors (aluminum and iron)* there is a slight increase in the content in one of the samples and in the quality standard. According to the authors of the report, the increase is minimal and most likely corresponds to natural variations for the two indicators (which are also key elements in rock formation).

According to the report, the values of the indicators studied at the sampling sites are very close and reflect a relatively stable chemical composition of the groundwater in the alluvial sediments. The data show that these groundwater resources are in good condition and their quality has not been affected by human activity (agricultural or geological exploration). It should be added that these results can be used as a characteristic background for the chemical composition of alluvial groundwater in the area.

The actual data presented above show that the groundwater in the IP study area for the Rozino deposit has the characteristics of GWB BG3G000PtPg049

- Fractured waters - Eastern Rhodope Complex. They are fractured and flow through impermeable rocks through their fractures. This determines the low flow characteristics of the groundwater. These waters are mainly connected to the upper (more eroded and fractured) part of the geological formations and follow the relief, draining towards the local erosion base

- in this case, towards the plain of the Biala River and its tributaries. The opinion includes a graph of water levels in relation to ground elevation in the IP study area based on data from monitoring wells. The indicated trend describes the direction of groundwater flow towards the erosion base of the Biala River.

The opinion concludes that:

There is no data on the basis of which the risk of transboundary pollution of surface and groundwater can be determined.

No impact on surface water is expected, either in terms of quality or quantity. The planned construction of hydraulic structures for water management (drainage channels, wells) during the implementation of the investment proposal will minimize and limit the impact on water quality. The investment proposal provides for the construction of two consecutive tanks (the second of which is intended for non-contact water, i.e. under certain conditions clean), which will eliminate even the slightest possibility of water separated by the investment proposal entering water systems.

There are no plans to discharge wastewater into water systems or the sewage system of residential areas. All collected water will be used in technological cycles.

In order to supply water to the area for technological needs, a hydrological study has been carried out to determine the availability of water resources from surface water systems. The possibility of using this water has been established without causing a reduction in water quantities or disruption to the natural flow of water. The use of water will only be possible after obtaining a permit in accordance with the Water Act.

No impact on groundwater is expected, either in terms of quality or quantity.

A hydrogeological study carried out in the deposit area concluded that groundwater has an insignificant flow rate. Given the planned depth of the mine, there is no reason to believe that there could be a direct impact on groundwater or drinking water sources, with corresponding health protection zones and permitted exploitation in accordance with the Water Act.

To determine the explosive seismic effects during the implementation of the investment project, experimental blasting was carried out on site. Based on the results obtained from measurements with specialized equipment, a report was prepared on the assessment of the side effects of technological explosive works on the environment and the management of these effects within the permissible safe levels for the Rosino deposit in the municipality of Ivaylovgrad. Haskovo region. Haskovo region, which is referred to as provided during the EIA process.

According to the opinion, the analysis of the results obtained gives reason to conclude that, provided that the recommended maximum mass of explosive material in a delay interval is complied with, the vibration velocity at depth is not expected to be exceeded, which would have seismic effects on groundwater and water sources, and the implementation of the IP will not have negative effects on surface and groundwater.

The purpose of the technical-hydrological study "Hydrological assessment of the discharge in the Biala River and its tributary and in the Arpa Dere River near the village of Gugutka, Ivaylovgrad municipality, Haskovo region", prepared by ... Design and Analysis Ltd EOOD, 2019, is to determine the hydrological and runoff characteristics of the Biala River and its tributary, the Arpa Dere River, at six points (cross-sections). The conclusion of the study defines the hydrographic characteristics of the catchment area, the average annual runoff, expressed by the runoff coefficient, the runoff rate, the annual runoff, the minimum water quantities expressed by an ecological minimum of 10% of the runoff rate and 90% reliability of the minimum quantity, and the maximum water quantities with 0.1% and 5% reliability, 1% and 5% respectively.

The general section of the study presented contains findings on the presence and absence of constructed dams (flow regulation facilities) and the absence of water pumping in the catchment areas at present, but there is no analysis or conclusion regarding the specific amount of water pumping envisaged in the SD and the impact this will have on runoff.

1.2. Location: According to the information provided (register of coordinates of the Rozno deposit boundaries, Tintyava area), the IP is located within the scope of the BG3G000PtPg049 groundwater body - Fractured waters - Eastern Rhodope complex. The groundwater systems of section III of the IBR's SDG have been designated as groundwater systems suitable for human consumption within the meaning of Article 119(1)(1) in conjunction with Article 119(4)(1) of the Water Act. There are designated water protection zones in the groundwater systems in accordance with Article 119a(1)(Za) of the Water Act (WA). The deposit is not located in a vulnerable water protection zone included in Section 3, point 3.3.1 of the RBMP of the IBR. The IP is not located within the boundaries of an established health protection zone around groundwater sources.

The nearest sources of drinking and domestic water from groundwater in the Rosino deposit area are:

- Approximately 2000 m south of point 7, which outlines the future concession area, is the TC of PS "Gugutka" for the supply of drinking and domestic water to the villages of Gugutka and Byal Gradets, Ivaylovgrad municipality, Haskovo region. There is no SHP built around the water pumping facility in accordance with Directive No. Z/10.10.2000. There is no sanitary protection zone around the water pumping facility in accordance with Directive No. Z/10.10.2000.

- Approximately 500 m east of point 6, which marks the boundary of the future concession area, lies the Rozino catchment basin, located on the territory of the village of Pastrok, municipality of Ivaylovgrad, for the supply of drinking and domestic water, and belongs to the State Forestry Service. There is no sanitary protection zone around the water pumping facility in accordance with Directive No. 3/10.10.2000. There is no sanitary protection zone around the water pumping facility in accordance with Directive No. 3/10.10.2000.

The Rosino deposit is located within the boundaries of the surface water system (WB) 'Biala River and its tributaries' with code BG3MA100R270. There are designated water protection zones (33) in the water system in accordance with Article 119a(1)(5) of the Water Act (WA). The IP is located within a sensitive area.

in accordance with Article 119a(1)(3)(b) of the WA. described in Rule 3 of the IBR's RBMP. The IP does not fall within the water protection zones established in accordance with Article 119a, points 1, 2, and 4 of the WA.

The PP is located within the boundaries of water protection zone 33 "Rhodopes - East" with code BG0001032, which has been established in accordance with Article 119a, paragraph 1, point 5 of the Water Act and is included in section 3, point 3.5.1 of the IBR's SDMP. The IP is located within the boundaries of water protection zone 33 "Byala, Reda" with code BG0002019, established in accordance with Article 119a, paragraph 1, point 5 of the Water Act, which is included in section 3, point 3.5. 2. of the RBMP of the IBR (only point 12 describing the boundaries of the concession area is outside the zone).

The Rosino deposit is located outside the areas designated as areas at significant risk of flooding in the IBR and does not fall within areas that may be flooded according to the maps of areas at risk of flooding in accordance with the scenarios set out in Article 146e of the Water Act.

1.3. Status of water systems AND environmental protection OBJECTIVES:

13.1. Status according to the IBR RBMP: According to section 4, points 4.2.2 and 4.2.3 of the IBR RBMP, the groundwater body BG3G000PtPg049 is in good chemical status and good quantitative status. The environmental protection objective for the groundwater body BG3G000PtPg049 is to maintain good chemical status and prevent deterioration.

The surface water system with code BG3MA100R270 is defined as a water system in good ecological status and good chemical status. The environmental protection objective for this water system (in accordance with the provisions of Chapter X, Section III of the Water Act) is to protect its good ecological status and prevent its deterioration, to protect its good chemical status and prevent its deterioration, and to achieve the objectives for water protection zones.

1.3.2. Status according to the latest annual assessment: For 2023, the water system with code BG3MA100R270 has been determined to be in good ecological status and good chemical status according to the "water" table.

1.3.3. Conclusion on the availability of data on the deterioration or improvement of the status of the water body compared to that assessed in the WFD. For the water system with code BG3MA100R270, the ecological and chemical status has been maintained in accordance with point 1.3. 1.

1.4. Measures provided for in the SDG and the IBR SDG:

1.4.1. Measures in the IBR WMP. The measures to achieve the objectives for the protection of groundwater and surface water bodies and water protected areas are described in the annexes to section 7 of the IBR WMP. The following measures may be applied to this IP:

- Measure: Prevention of deterioration of water status from projects and activities at the investment proposal stage, code RM_9. Actions to implement the measure - Prevention of the implementation of investment proposals that lead to negative changes in the status of water bodies, code RM_9_2.

- Measure: Restoration and protection of river banks and riverbeds from erosion, code HY_1_1 Action for the implementation of the measure: 8. Prohibition of cutting natural coastal vegetation, code HY_1_1

- Measure: "Improvement of the hydromorphological status of rivers," measure code HY_7 Action for the implementation of the measure: Prevention of new negative changes in the hydromorphological regime (caused by hydroelectric power stations, removal of sediments from reservoirs, new water abstractions, etc.) in water systems that have been designated or fall within water protection areas, with code HY_7_1.

For PWT BG3G000PtPg049 - Rift waters - Eastern Rhodope complex, the following measure applies:

Study to determine surface and groundwater pollution, with measure code OS_3 and measure implementation action - 3. Conducting exploratory monitoring to determine the sources of pressure in cases of identified deterioration of the water system and unidentified sources of this pressure, with action code OS_3_3 and action specification - Conducting monitoring to identify sources of pressure in cases of identified

deterioration in the status of the water system and an unidentified source of this pressure. The measure applies to the entire groundwater system.

- Annex 4, Section 7 of the SDG for the IBP provides for one measure: I. General measures: 1. The planning and implementation of all activities under the SDG should not conflict with the regimes of protected areas established by the orders for their declaration and management plans, as well as with the regimes of protected areas established by the law on protected areas, the orders for their declaration, and the management plans. The measure has code I_1.

1.4.1.1. Specific requirements and measures in the RBMP concerning water protection areas. The entire concession area falls within the scope of a protected area. The entire concession area falls within the scope of protected area 33 "Rhodopes - East" with code BG0001032 and 33 "Biala Reka" with code BG0002019 (only point 12 describing the boundaries of the concession area is outside the zone), which were declared by Decisions No. RD-267 of March 31, 2021, and RD-575/08.09.2008, introducing a series of prohibitions and restrictions.

The IBR RBMP (2016-2021) provides for a measure with code HY_1_1. 8. The prohibition on cutting natural coastal vegetation, with action code HY_1_1, applies to the part of water bodies falling within water protection zones in accordance with Article 119a(1)(5) of the Water Act.

The concession area covers a large part of the catchment area of the Yuren Dere River, a right tributary of the Arpa Dere River, and it is likely that there is natural riparian vegetation to which the prohibition on cutting applies. No measures have been submitted concerning water protection zones.

1.4.2. Measures in the IBR PUD: The measures in the IBR PUD programme of measures are described in the annexes to section 5 of the IBR PUD. The IBR PUD does not provide for measures for the area of the specific IP.

1.4.2.1. Assessment of the potential increase in flood risk during the implementation of the IP. We believe that the implementation of the IP will not lead to a significant increase in flood risk.

2. Prohibitions and restrictions provided for in the Water Act in relation to this type of investment intention.

According to Article 116, paragraph 1, point 4 of the Water Law, all waters and water systems must be protected from depletion, pollution, and deterioration in order to maintain the necessary quantity and quality of water and a healthy environment, to safeguard ecosystems, preserve the landscape, and prevent economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems.

The prohibitions in Article 118a(1)(1.2), ZI 4 of the Water Act for the protection of groundwater from pollution must be observed.

In accordance with the provisions of Article 156a(1)(1), 2, 3, and 4 of the Water Act, it is necessary at all stages of the planning and design, construction, and maintenance of the planned facilities to take measures to protect water bodies from pollution.

The abstraction of water from surface or groundwater is subject to a permit regime in accordance with Article 44(1) of the Water Act.

The construction of new installations in a water system is subject to a permit regime in accordance with Article 46(1)(1) of the Water Act.

2.2. Prohibitions, restrictions, and requirements included in secondary legislation under the Water Act: For water abstraction facilities that do not have a defined sanitary protection zone in accordance with Directive No. 3/16.10.2000 on the conditions and procedure for the study, design, approval, and operation of sanitary-nutritional zones around water sources and drinking and domestic water supply facilities and around mineral water sources used for therapeutic, prophylactic, drinking and hygiene purposes (published in the Government Gazette No. 88 of 27.10.2000)

It is necessary to take into account the measures in Annex 1 of the national list of measures for the RBMP, in the list of activities, prohibitions, or restrictions in drinking water protection zones in the section on groundwater, in the additional prohibited activities, 2. in a safety zone within a radius of 1000 m from the water pumping facility, where no protection zone has been established.

For groundwater systems or parts thereof located in the first horizon (which is exposed at the surface), the following prohibitions apply:

- Extraction: of underground resources, including aggregates and construction materials, below the water level.

- Activities leading to the indirect discharge of harmful substances into the water body from the earth's surface or between the earth's surface and the water table.

Activities that are not prohibited but may be permitted if specific studies (EIA procedure) demonstrate that they will not affect the status of the waters in the protection zone and/or that, as a result of these activities, no additional treatment will be required to ensure the necessary quality of drinking water for the same use, for groundwater systems or parts thereof located in the first horizon (which is exposed to the surface) include:

- Extraction of underground resources, including aggregates and construction materials between the earth's surface and the water table.

- Extraction of underground resources in the area of water abstraction for drinking and domestic water supply to the population, without specific studies and investigations proving that the extraction activity does not reduce the groundwater level and there is no risk of deterioration of its quality.

- Construction of geological, hydrogeological, and geotechnical research facilities, including groundwater pumping facilities in the underground water system (aquifer).

- Activities leading to the indirect discharge of harmful substances from the earth's surface into the water system.

Conclusion: The investment proposal is acceptable from the point of view of the SDG and the IBR SDG (2016-2021), the Water Act and secondary legislation, subject to the following conditions:

- Pollution of surface and groundwater bodies from activities related to the operation of the investment proposal is not permitted.

- Activities that could lead to a negative change in the status of the BG3MA100R270 water system are not permitted.

- The direct or indirect discharge of harmful substances into groundwater during the implementation of the investment proposal is not permitted.

- Cutting of natural coastal vegetation is not permitted.

- Water abstraction from surface or groundwater shall be carried out after obtaining a permit in accordance with Article 44(1) of the Water Act.

- The construction of new facilities in a water system shall be carried out after obtaining a permit in accordance with Article 46(1)(1) of the Water Act.

- Protection of drinking water sources in the investment project area in terms of quantity and quality.

- The construction of drainage channels in the vicinity of the mine and open pit must be provided for in order to collect rainwater and snowmelt from higher elevations and prevent surface water from flowing into the mine.

- Given the client's intention to fill the dam to avoid contact with the water of the Arpa Dere River in the area of (PS) "Rozino," the company must implement appropriate and feasible measures for the reuse of rainwater and drainage water, which should be integrated into a closed cycle, in order to reduce the planned water abstraction and ensure the efficient use of water.

- An assessment of the existence of negative changes in the hydromorphological status of the Arpa Dere River resulting from the implementation of the IP and related to the planned water abstraction for filling the non-contact reservoir must be carried out and presented, which shall be prepared by experts in the relevant field.

- The construction and operation of the waste reservoir must comply with the requirements of the Spatial Development Act (SDA), the Underground Resources Act (URA), the Mining Waste Management Directive, the standards for the design of concrete and reinforced concrete structures for hydraulic works, the standards for the design of retaining walls, and the standards for the design of hydraulic works. Necessary conditions for ensuring

short-term and long-term safe disposal of waste.

- No mining activities will be carried out within a radius of 1000 m from water pumping facilities around which no health protection zone has been established.

Drilling and blasting operations will be used to exploit the Rosino deposit. In this context, an assessment of the impact of drilling and blasting operations on groundwater in the investment project area and, in particular, on drinking water and domestic water sources. A report on the impact of drilling and blasting operations on groundwater in the Rosino deposit area must be submitted to the BDIBR.

- The next step will be to determine the planned mining depth.

- The potential impact of the investment proposal on surface water must be examined in terms of compliance with the provisions of Article 116(1)(4) of the Water Act and the measures set out in the RBMP (2016-2021) of the IBR related to the current IP.

- With regard to the plan to use flotation waste after the sixth year for backfilling the Section 2 mine, a characterization of the mining waste should be carried out in the next stage of the process in order to determine its properties and behavior.

- A watertight shaft must be constructed in accordance with technical and health requirements. The waste water produced must be cleaned periodically and transported to a controlled area by persons who have the relevant documents in accordance with the legislation in force. It should be noted that, in accordance with Article 46(4)(2) of the Water Act, in conjunction with Article 87(1) of the Spatial Development Act, it is not permitted to discharge water other than domestic sewage into the watertight pit.

- Pollution of the extraction site with fuel and lubricants from technical equipment and other pollutants is not permitted.

- The prohibitions laid down in the orders of the Minister of Environment and Water for the declaration of areas 33 "Rodopes-East" with code BG0001032 and 33 "Biala Reka" with code BG0002019.

3. Information on the existing and permitted impacts of the IP on nature. For water body code BG3MA100R270, the BD IBR has no information on valid water abstraction permits issued.

4. Information on the available water resources in the part of the groundwater system where water abstraction is planned. This IP is not related to water abstraction from a groundwater system.

5. **Justified assessment of significant effects on waters AND aquatic ecosystems.** Given the lack of the following data: description of mining waste to determine its properties and behavior, assessment of the impact of drilling and blasting operations on groundwater in the area of the investment proposal, in particular on drinking water sources and domestic water supply, and analysis of the potential impacts of the investment proposal on surface waters in terms of compliance with the provisions of Article 116. paragraph 1, point 4 of the Water Act and the measures set out in the IBR's RBMP (2016-2021) concerning this IP, the IBR DB considers that the operation of the IP may have significant negative effects on waters and aquatic ecosystems in the area of the "Rosino" deposit.

6. Conclusion on the applicability of Article 93(9)(3) of the Environmental Protection Act. We consider that Article 93(9)(3) of the Environmental Protection Act does not apply to the investment proposal, as the investment proposal does not fall within the scope of Article 156e(3)(2) and (3) of the Water Act.

Yours sincerely

VASIL OUZOUNOF

Director of the Basin Directorate