



REPUBLIC

BULGARIA

MINISTRY OF THE ENVIRONMENT AND WATER

12.2.2026

DOVOS-68-91/12.02.2026 Ref

REG. N°

Signed by VIOLETA

VANILEVA-MARTINOVA

TO
MR. DANIEL MARINOV EXECUTIVE
DIRECTOR OF
TPTPYAVA EXPLORATION AD
city. Ivaylovgrad 6570,
Ivaylovgrad Municipality, Haskovo Region

Ref. No. 01/05.01.2026 and No. 06/16.01.2026

COPY:

RIOSV — XACEOBO

BASIN DIRECTORATE

"PZTOCHPOBELOMORSEP DISTRICT"

MUNICIPALITY OF IVAYLOVGRAD

KMETCTBO VILLAGE OF ROZINO

EMETCTBO VILLAGE OF GUGUTKA

KMETCTBO VILLAGE OF

BYALGRADETS **EMETCTBO**

VILLAGE OF KONNITSI

Re: Assessment of the quality of the supplemented environmental impact assessment report, including the supplemented and revised report assessing the degree of impact of the 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. MAPHOV,

With regard to the above-mentioned supplemented environmental impact assessment report (EIA), including the revised and supplemented impact assessment report attached thereto, submitted to the Ministry of Environment and Water

Sofia, 1000, 22 Knyaginya Maria Luiza Blvd.



(MOCB) ref. No. OBOC-68-69/ 05.01.2026 and additional documents ref. N• OBOC-68-71/ 16.01.2026, we hereby inform you of the following:

I. Regarding the OBOC report.

Upon review of the submitted documentation, it was established that the content of the OBOC report complies with the requirements of Article 96, paragraph 1 of the Environmental Protection Act (EPA). Pursuant to Article 14, paragraph 3, item 2 of the Ordinance on the Conditions and Procedure for Performing Environmental Impact Assessments (the OBOC Ordinance), the assessment of the quality of the OBOC report is **positive**, with omissions that are not material to the OBOC decision. The quality of the documentation has been assessed in accordance with the criteria set out in Article 14, paragraphs 1 and 2 of the EIA Ordinance, and the following inaccuracies have been identified in the assessment of the supplementary EIA report, which should be corrected:

1. From the Ministry of Health:

1.1. It is justified that, according to data from the East Aegean Basin Directorate, 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 located TK of PC for drinking and domestic water supply to the villages of Gugugka and Byalgradets, municipality of Ivaylovgrad, Haskovo region. There are no sanitary protection zones (CO3) around the water intake facility, in accordance with Ordinance No. 3 of 2000.

- About 620 m east of point 6 describing the contour of the future concession area is the Rozino catchment, located in the territory of the village of Pastrook, municipality of Ivaylovgrad, for drinking and domestic water supply, owned by the State Forestry. There is no CO3 built around the water intake facility, in accordance with Ordinance No. 3 of 2000. There is no CO3 built around the water intake facility, in accordance with Regulation No. 3 of 2000.

The Ministry of Health notes that neither in the opinion of the BD "Eastern Black Sea Region", the OBOC report does not specify the exact distance of the PC "Rozino" and its water intake facilities, which are managed by VIK Haskovo and serve for drinking and domestic water supply to the village of Rozino. On this issue, the OBOC report states that "800 m east and 1800 m south of the boundaries of the future "Rosino concession area" there are facilities of VIK - Haskovo PC Rozino (on the terrace of the Appa Dere) and PC Gugutka (on the terrace of the Byala Reka River) facilities, with no CO3 established.

Approximately 620 m east of the area, there is a catchment for drinking and domestic water supply, which, as is clear from the above, is owned by the State Forestry and is different from the Rozyno PC.

On pages 174, 261, and 398 of the OBOC report, it is noted that a technological option is envisaged for limited water abstraction from the terrace of the Appa Dere River through the construction of a pumping station in the area of the existing PC "Rozino", which is used for the supply of drinking water to the village of Rozino, which is unacceptable from a health point of view. The Ministry of Health notes that this envisaged option is only marked as a possibility, but has not been analysed in the OBOC report and its annexes from a technological, hydrological, and health and environmental perspectives, including with regard to the possibility that its implementation could affect the amount of water used for drinking and domestic water supply in the surrounding settlements, which we consider to be an omission, and such an expert analysis should be provided.

The Ministry of Health considers that no assessment has been made as to whether individual sections of the IP fall within future sanitary protection zones in connection with the existence of water intake facilities for drinking and domestic water supply for which no CO3 has been established.

In the OBOC report, with regard to the same reservoir (referred to in places in the text as a "dam" or "facility"), the terms "non-contact," "clean," "conditionally clean," "fresh," and "freshwater" are used as synonyms in different contexts; this should be corrected by using only one term, e.g., "clean water reservoir," and clearly

specifying all sources of water collection and abstraction from which water will flow into it.

The same should be corrected and systematized for the contact water reservoir, which, for example, on page 21 is referred to as a "mixed water reservoir." Separately, on page 163 of the OBOC report, the terms "contact and non-contact groundwater" are introduced, which essentially contradicts other texts on the absence of contact and impact on groundwater during the implementation of the IP.

The Ministry of Health points out that the planned system for capturing possible breaches of the contact water reservoir, including a drainage curtain and an injection barrier, cannot guarantee 100% absence of water seepage from this reservoir towards the clean water reservoir. Such contact water entering the clean water tank is also provided for by means of overflows to the clean water facilities, dimensioned for a maximum theoretical rainfall event.

The Ministry of Health has concluded that the revised and supplemented OBOC report still does not provide a definitive answer to the question: Will the IP reduce the flow rate of the water sources used for drinking and domestic water supply in the area and will it create a shortage of water for drinking and domestic needs in the village of Rozino and the settlements along the Biala River valley?

In addition, it should be noted that, in connection with the above, the report and its annexes again do not contain any substantiated comments on the extent to which the data used for the period 1961-1998 in

"Table No. V.12-2 Average data on water quantities at two points on the Biala River" is currently up to date. This is old data from a period 65-28 years ago, and given climate change, it is very likely that the current water quantities in the Biala River are lower.

The OBOC report recommends that, in the case of blasting operations at a distance of less than 300 m from a populated area, protective blankets should be used as a precautionary measure to prevent rock fragments from flying and posing a risk to the population and the environment. The Ministry of Health considers this recommendation to be good, as it follows that the IP's activity will not actually be 1,200 meters from the nearest site subject to health protection, but will be closer to 300 meters, which is unacceptable from a health point of view.

2. With regard to "Soils" and "Subsoil and mineral diversity":

After reviewing the documents received and Table N° XI-1. Reference to the consultations held on the scope of OBOC and the manner of reflecting the opinions received, we found that the comments and proposals referred to in points 4.3.6., points 4.3.7 and 4.3.8 on page 8 of letter ref. OBOC-68-65/20.10.2025 from the MOCB have not been accepted by the "authors of the EIA" with comments in the column "Reasons for acceptance/rejection". In this regard, we maintain our comments, which are essentially terminological and based solely on existing and applicable legislation, as follows:

2.1. On page 80 of the OBOC REPORT, the text:

*"The results of the analyses show **compliance** with the maximum permissible concentrations according to Regulation N° 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, MPC and intervention concentrations for persistent organic pollutants and petroleum products in soils for all indicators."*

4 The following text should be clarified and correctly reflected: The results of the analyses show *that the content of harmful substances in the soil is* within the maximum permissible concentrations according to Regulation No. 3/2008 on the standards for permissible content of harmful substances in soil 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 soil for all indicators.

The proposal is justified by: The provision of Article 1 of Regulation No. 3/2008 on the standards for permissible content of harmful substances in soils refers to the determination of concentrations for permissible content of harmful substances in soils. In this sense

harmful substances in soil do not "**comply**" with these standards, but may exceed or be below these concentrations. This is not a matter of correcting data, as the authors of the EIA understood and stated in their comments on the Table.

2.2. On page 153 of the OBOC report, after the text: *"The humus layer and soil cover will be separated and temporarily deposited. The deposited soil material will be used for the recultivation of the areas disturbed by the activity."*

The following should be added: The removal, storage, and utilization of topsoil shall be carried out in accordance with the provisions of Section II of Regulation N• 26 of 2.10.1996 on the recultivation of disturbed land, the improvement of low-yield land, and the removal and utilization of topsoil.

The proposal is based on: Regulation No. 26 of October 2, 1996, on the recultivation of disturbed land, improvement of low-yielding land, removal and utilization of topsoil, which refers to various aspects of soil protection, in which the removal, storage, and utilization of topsoil is regulated solely by the provisions of Section II of the Ordinance.

The aforementioned Regulation K• 26 is mentioned only twice in the supplementary report on OBOC — once on page 178, where the text refers to the recultivation of disturbed land, and a second time on page 293 in Section VIII. Description of the forecasting methods or data used to determine and prepare the assessment of significant environmental effects, including details of the difficulties (e.g., technical shortcomings or lack of know-how) encountered by the developer of the investment proposal in gathering the necessary information, and the main elements of uncertainty. Laws, regulations, methodologies, methodological guidelines, instructions, orders, decrees, rules, strategies, plans, programs, and literature used in the preparation of the EIA.

This contradicts the statement by the authors of the OBOC report that, in rejecting our proposed addition: "In order to avoid overburdening the report, repetitions of *things* already written are avoided."

2.3. On page 254 of the report, in measure 27, in the sentence: "The locations for temporary storage of topsoil within the boundaries of the designated site should be identified and marked," the words "and marked" should be deleted.

The proposal is justified by: According to the provisions of Article 26 of the Regulations for the Implementation of the Agricultural Land Protection Act, it is specified that the explanatory note to the detailed development plan (PYP) for the site (route) of a given facility, it is specified what part of the site (route) will be stripped of topsoil and to what depth. When the topsoil cannot be utilized immediately after its removal, the plan shall specify the location, boundaries, and area of the site for the topsoil deposit. The cited normative act does not require "marking," which should be omitted.

2.4. On page 254, in measure 28, in the sentence: *"Developing a plan and monitoring soils in accordance with Article 29, paragraph 1, item 2 of the Soil Act,"* the word "own" should be added before "monitoring."

The proposal is justified by: The word "**own monitoring**" is a term from the Soil Act and, as noted, is in accordance with the provisions of Article 29, paragraph 1, item 2 of the Soil Act.

3. We hereby inform you that an up-to-date opinion has been requested from the Basin Directorate.

"Eastern Black Sea Region" for the eligibility of the IP under the regimes set out in the current River Basin Management Plan (RBMP) and Flood Risk Management Plan (FRMP) for the Eastern Black Sea Region 2022-2027. From the Basin Directorate

"Eastern Black Sea Region", in a letter ref. N OBOC-68-88/30.01.2026 to the MOCB, which we provide for your consideration, an opinion is expressed that the investment proposal is admissible from the point of view of the RBMP and FRMP for the Eastern Black Sea Region 2022-2027, the Water Act and its subordinate legislation, subject to the conditions specified in the opinion.

N. Regarding the intention to manage municipal waste•

Following consultations with the Ministry of Energy on the submitted intention for mining waste management, an opinion was expressed under ref. No. OBOC-68-78/19.01.2026, confirmed by an opinion under ref. No. OBOC-68-83/27.01.2026. According to this, on the basis of Article 82, in connection with the application of Article 22g of the Underground Resources Act and the Ordinance on the Management of Mining Waste, the Ministry of Energy, Directorate "Natural Resources, Concessions and Control" at this stage, accepts the prepared Mine Waste Management Plan only as a measure for mine waste management. The submitted "Mining Waste Management Plan" has been prepared in terms of structure and content in accordance with the provisions of Article 22a, paragraph 1, and Article 22c, paragraph 1, of the Underground Resources Act. riches and meets the requirements of the Ordinance on the Management of Mining Waste.

III. TO OfffffoIMR!* * *p * Assessment of the degree of impact:**

After reviewing the information presented in the revised and supplemented report for **assessing the degree of impact** (EIA), in accordance with the criteria for assessing its quality set out in Article 24, paragraph 3 of the Ordinance on the conditions and procedure for assessing the compatibility of plans, programs, projects, and investment proposals with the subject and objectives of the protection of protected areas (the Ordinance on the Environment) and those requested by letter ref. No. OBOC-68-65/20.10.2025 of the MOCB, and on the basis of Article 39, paragraph 8, in conjunction with Article 24, paragraph 5, item 2 of the Ordinance on the Environment, the MOCB **gives a positive assessment of the quality** of the additions and revisions (DOSV) for the IP "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region", in view of the following:

1. The impact assessment report (IAR) is structured in accordance with the requirements of Article 23, paragraph 2 of the Ordinance on EIA, and the information presented therein is current as of the date of preparation of the report.

2. The EIA report contains a summary of the investment proposal, with a detailed and quantitative description of the elements and technical parameters that may have a significant impact on the subject and objectives of the protection of protected areas during the exploitation of the Rosino deposit. Information is also provided on the stages of implementation of the investment proposal, distributed over the term of the concession, as well as information and a description of the extraction technology.

3. The EIA report presents information on other plans, programmes, projects and investment proposals that are coexisting and/or in the process of development and approval, as well as an analysis and conclusions on the degree of cumulative effect on the subject and objectives of conservation in the protected areas affected by the investment proposal.

4. A description is made of the types of natural habitats, populations, and habitats of plant and animal species subject to conservation in the protected areas affected by the implementation of the IP.

5. The nature and extent of the expected impact of the implementation of the IP on the natural habitats, habitats, and populations of the species subject to protection in protected areas BG0001032 "Rhodopes-Eastern" and BG0002019 "Biala Reka" has been determined.

6. The EIA report provides for adequate mitigation measures to reduce the impact during the implementation of the IP, targeting all stages of the IP. Alternative solutions for the implementation of the IP have also been considered and evaluated.

7. The necessary graphic materials—sketches, maps, etc.—have been added to the report as appendices.

8. The experts who prepared the report have attached the necessary documents and declarations certifying compliance with the requirements of Article 9(1) of the Ordinance on Environmental Impact Assessment.

IV. With regard to the actions to be taken to continue the EIA procedure, including the compatibility assessment procedure:

Based on the above, you need to take the following actions:

1. In compliance with the requirements of Article 25(1) of the OBOC Regulation, you must submit to the MOCB the OBOC report with all its annexes, with the inaccuracies reflected, on paper and electronic media with a translation into Greek, for the purpose **of consulting with the competent authority of the affected country**.

We will notify you in a timely manner of the outcome of the consultation with Greece, including the need to hold a public consultation in the territory of the affected country or its participation in the upcoming public consultation in the territory of the Republic of Bulgaria.

2. Pursuant to Article 16, paragraph 1 of the OBOC Regulation, MOCB **designates** the municipality of Ivaylovgrad, the mayor's office of the village of Rozino, the mayor's office of the village of Gugutka, the mayor's office of the village of Byalgradets, and the mayor's office of the village of Konnitsa **as affected parties, with which you shall jointly organize a public discussion** of the OBOC report together with all its annexes, including the EIA. To this end, you should:

2.1. Submit the OBOC report with all its annexes, including the inaccuracies, to the MOCB in paper and electronic form no later than 30 calendar days before the public discussion meetings under Article 17 of the OBOC Regulation.

2.2. Before organizing the public discussion, submit to the Regional Inspectorate for Environment and Water (RIEW) — Haskovo a copy of the OBOC report together with all its annexes, in paper and electronic form.

2.3. Ensure public access to the OBOC documentation for at least 30 calendar days prior to the start of the public consultation and a place for submitting written opinions.

2.4. To organize a public discussion, you should submit a written request to **the relevant municipality and mayor's offices, proposing a place, date, and time for the public discussion meeting(s), as well as public access to the documentation and the submission of opinions**, with the date of the meeting being up to 60 days from the date of submission of the request. The meeting is within 60 days of the date of submission of the request. The written request must be accompanied by a copy of the OBOC report with all its annexes, including the EIA, to the municipality of Ivaylovgrad, the mayor's office of the village of Rozino, the mayor's office of the village of Gugutka, the mayor's office of the village of Byalgradets, and the mayor's office of the village of Konnitsa, which must confirm the proposal in writing within 7 days of the submission of the request or make another proposal. If no decision is made within the 7-day period, the contracting authority's proposal shall be deemed accepted.

2.5. The place, date, and time of the meeting(s) shall be announced by the contracting authority through the media or by other appropriate means at least 30 days before the scheduled date(s), with a standard announcement in accordance with Annex No. 3 of the OBOC Regulation.

We draw particular attention to the fact that, pursuant to Article 17(1)(3) of the OBOC Regulation, **the affected municipalities/mayors' offices with** which the contracting authority is obliged to organize the public discussion, must ensure that the affected population is notified in an appropriate manner of the upcoming public discussion, **including by posting a notice in a publicly accessible place in** the building of the municipality/mayor's office, for which **a protocol is drawn up, a copy of which must be provided** to MOCB.

3. Notify the MOCB in writing and provide evidence of compliance with points 2.3, 2.4, and 2.5 at **least 30** days before the public consultation meeting(s).

Please note that, pursuant to Article 17(1)(5) of the OBOC Regulation, the contracting authority may, at its discretion, notify other specialized persons, bodies, and organizations in writing of the public consultation meeting(s).

We would like to inform you that the MOCB will provide access to the documentation as follows:

- the OBOC report (once it has been submitted to the MOCB) via the website www.moew.government.bg/ключова_тема_Preventivna at address: at www.moew.government.bg/ключова_тема_Preventivna

public notice/OBOC for a period of 30 days prior to the public consultation meeting(s), in accordance with the provisions of Article 15, paragraph 1 of the OBOC Regulation;

- on the EIA website at: www.moew.government.be/ключова topic Харџа 2000, in accordance with the provisions of Article 16, paragraph 2 of the OBOC Regulation and in accordance with Article 25, paragraph 1 of the OS Regulation.

Appendix: as per the text.

12.2.2026



MANOL GENOV
Minister of Environment and Water Signed
by: MANOL GENOV

VYA PHO WITH EL EKTPOH NO
NODMISANYAORIGIN

ДОНЕТЕ лепнине 12.02.2026



REPUBLICA BULGARIA
MINISTRY OF THE ENVIRONMENT AND WATER
BASIN DIRECTORATE "EAST BLACK SEA REGION"

Classification level: 0 (TLP-WHITE)

30.1.2026

.X, PU-01-808-6/30.01.2026

Per.Nº

Signed by: BD - IBR

TO
MS MARIA GULABOVA
DIRECTOR OF DPREECNYA "EOOVOSPZ"
MHPCTERPCTBO OF THE ENVIRONMENT AND WATER
RESOURCES BUL. "PRINCESS MARIA LUIZA" N• 22
1000, GR. COFIMI

Re: *Assessment of the quality of the draft environmental impact assessment report (OBOC) for the investment proposal (IP) "Extraction and processing of polymetallic ores from the "Rozino" deposit, Tintyava area, located in the municipality of Ivaylovgrad, Laskovo region.*

DEAR MS. GULABOVA,

In response to Bame letter with outgoing number OBOC-68-73/16.01.2026r. requesting an opinion on the quality of the supplementary report for OBOC, as well as a ruling on the admissibility of the IP in relation to the regimes set out in the current River Basin Management Plan and Flood Risk Management Plan for the Eastern Black Sea Region 2022-2027, after reviewing the attached materials, the East Aegean Region Basin Directorate in Plovdiv expresses the following opinion:

I. Regarding the supplemented Environmental Impact Assessment Report (EIA) for the investment proposal (IP) "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the territory of the municipality of Ivaylovgrad, Haskovo region

1. The EIA Report states on page 72 that "Up-to-date information on the status of the groundwater body is presented on the basis of the Annual Bulletin on the Status of Surface and Groundwater Bodies in the Western Black Sea Basin Management Area for 2022 (published on 12.05.2023)".

Also on page 72, it is stated that "The assessment of the chemical status of groundwater bodies in the Western Black Sea River Basin Management District is based on the measured values of pollutant concentrations and pollution indicators at monitoring points, the determination and comparison of the corresponding 5 annual average values with the relevant quality standards in Annex No. 1 to

Regulation No. 1 of 10.10.2007 on the study, use, and protection of groundwater, as well as a comparison of the average annual values of the relevant pollutants/pollution indicators with the relevant permissible values for each of the groundwater bodies included in the RBMP of the ZBR (2016-2021).

It should be noted that with regard to the chemical status of groundwater bodies in Izochnoefirimo sk a o for basin management:

- An overall assessment of the chemical status of groundwater bodies in the RBMP (2022-2027) is published on the website of the East Aegean Sea Basin Directorate in Plovdiv - https://earbd.bg/indexdetails.php?menu_id=966, Annexes to Section 4 (Monitoring and assessment of the status of surface waters, groundwater, and water protection zones) - Annex 4.2.2.2.1. Obshta ochenka_him_status GW.

- According to the annual reports on the status of waters for the period from 2011 to 2024 inclusive in the territory of RIEW-Haskovo, an overall assessment of the chemical status for PBT is provided.

- Reports on the status of water bodies in the Eastern Black Sea Region are published annually on the website of the Eastern Black Sea Region Basin Directorate - https://earbd.bg/DOKLADI_ZA_SYSTOYaNieto_Na_Vodnite_Tela_Na_Teritoriyata_Na_IIR-c762.

2. Maps are presented at an appropriate scale indicating the exact location of the IP. It is specified that the bottom of the mine is expected to reach an elevation of 435 m.

3. The EIA report characterises the ecological status of surface and groundwater bodies within the boundaries of the IP.

4. Information is provided on water protection zones in accordance with Article 119a of the Water Act, sanitary protection zones (CO3), and water sources for drinking and domestic water supply.

5. The report presents information on surface and groundwater. An integrated approach to water quality management within the production site has been developed. It is noted that the integrated approach adopts the principles of minimizing wastewater quantities, for which purpose a strategy has been developed for the minimal use of fresh water and its maximum reuse within the production site.

6. The EIA report analyses compliance with the provisions of Article 116(1)(4) of the Water Act and the measures set out in the IBR's RBMP (2016-2021) relevant to this NP.

7. The OBOC report presents information on the planned water abstraction and its potential impact on the surface water body.

8. The EIA report characterizes the hydrogeological conditions and factors. The annexes present a hydrogeological assessment and opinions from the relevant competent persons.

9. The EIA report provides information on the drilling and blasting works. An assessment report on the side effects of the explosion on the environment is attached, subject:

"Rozino Deposit, Kardzhali Municipality." The EIA contains a forecast and assessment of the expected impact on surface and groundwater and provides for measures to prevent, reduce, or mitigate this impact.

10. The EIA report provides a forecast and assessment of the expected impact on surface and groundwater and sets out measures to prevent, reduce or, where possible, eliminate harmful effects on the environment.

The supplemented EIA for the investment project "Extraction and processing of polymetallic ores from the "Tintyava" area, located in the municipality of Ivaylovgrad, Haskovo region, will contain the necessary information regarding the water component,



necessary to make a competent decision on the degree of impact, with a technical error noted in point 1 of this opinion.

II. Regarding the admissibility of the PIR in relation to the regimes set out in the current River Basin Management Plans (RBMP) 2022-2027 and the Flood Risk Management Plan (FRMP) for the Eastern Black Sea Region 2022-2027

1. Assessment of the admissibility of the IIP in relation to environmental protection objectives; measures set out in the River Basin Management Plan for the Eastern Black Sea Region (RBMP for the EBR) and in the Flood Risk Management Plan for the Eastern Black Sea Region (FRMP for the EBR).

1.1. Characteristics and purpose of the EIA: The IP is related to the assessment of the quality of the supplemented environmental impact assessment report (EIA) for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region.

The client plans to extract and process 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. 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, and

др.;

- Gradual recultivation of the affected land. 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 the exposure of natural resources, drilling and blasting (D&B) and crushing of the ore. The ore will be processed by flotation to obtain a concentrate, which will be the final product for the plant. No block metal is expected to be obtained. The generated mining waste will be deposited in mining waste facilities.

In connection with a letter from the Minister of Environment and Water ref. No. 99-00-587/27.05.2024, pursuant to Article 98(1) of the Environmental Protection Act, a notification has been prepared and sent to inform the potentially affected party, the Republic of Greece, in connection with the OBOC procedure and in accordance with the requirements of the OBOC Convention in a transboundary context. The notification was prepared in accordance with Decision 1/4 of the First Meeting of the Parties to the Convention.

By letter ref. K• OBOC — 68/23.10.2024, the MOCB received an official response from Greece confirming its desire to participate in the OBOC procedure as an affected party. With this, the competent authority for conducting the OBOC procedure becomes the Minister of Environment and Water. The scope of the assessment examines in detail the transboundary aspects of the impact, with special attention paid to the "Water" component. The letters related to the transboundary procedure are presented in an appendix to the EIA.

In order to ensure the comprehensiveness of the analyses and assessment of the "groundwater" component, the Contracting Authority commissioned the preparation of a "Report on the hydrogeological conditions in the area of the investment proposal for the Rozino deposit". This report was prepared by persons with the relevant expertise and was submitted to the MOCB by letter from the Contracting Authority ref. No. 4-2/28.04.2024. There are two opinions on the report - one from the BD IBR ref. No. PU-10-182(8)/12.05.2024 and one from an expert hydrogeologist. All documents are presented in an appendix to the EIA.



The EIA was prepared on the basis of Article 96, paragraph 1 of the Environmental Protection Act, in accordance with consultations held with the affected parties and the public, additional studies conducted during the OBOC procedure, including letters from the MOCB ref. No. OBOC-68-17/18.11.2024 and ref.

No. OBOC-68-28/14.02.2025. It was submitted for quality assessment to the MOCB in August 2025. By letter ref. No. OBOC-68-65/20.10.2025 (Text Annex N• 7A), a first negative assessment of the quality of the OBOC and EIA report was given, pointing out certain omissions, and the report was returned for completion.

The current supplemented EIA reflects the comments made, with attention being paid to the response to the comment given in point 1.5 of the MOCB letter: "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 CO3 has been established."

A survey has been conducted of all water sources around the future concession area. Water supply and sewerage facilities are located 800 m east and 1800 m south of the IP boundaries - Haskovo PC Rozino (on the terrace of Appa Dere) and PC Gugutka (on the terrace of the Byala River). Information has been requested from the BD IBR under the Access to Public Information Act. In Decision No. ZDOI-01-9/31.01.2025 of the Director of the BDIBR on granting access to public information, it is stated that "At present, we have no information about the existence of future P-ri or III-ti CO3 belts in nearby water sources for drinking and domestic water supply," and in view of this, no such assessment has been made in the report.

With regard to the information provided in the letter from BD IBR Plovdiv ref. N PU-01-808(2)/26.09.2025, stating that "Approximately 620 m east of point 6 describing the contour of the future concession area is the "Rozino" water intake, located in the land of the village of Pastrok, municipality of Ivaylovgrad, for drinking and domestic water supply, owned by the State Forestry. There is no CO3 built around the water intake facility in accordance with Ordinance No. 3/10.10.2000. Annex No. 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 DW_1 and title: Prohibitions and restrictions on activities in groundwater protection areas and in designated sanitary protection zones (CO3) and buffer zones around water intake facilities/systems, action to implement the measure: DW_1_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 measure set out in the IBR 2022-2027 RBMP and needs to be excluded from the concession area of the "Rozino" the buffer zone within a radius of 1000 m from facilities for abstraction of groundwater for drinking and domestic water supply (the "Rozino", located in the territory of the village of Pastrok, municipality of Ivaylovgrad).", in the EIA

It should be noted that the Rosino catchment is located 2,300 meters from the mine contour where mining will take place and 1,300 meters from the boundary of the buffer zone with a radius of 1,000 meters from the water intake facility. The catchment is close to point 6 of the contour of the future concession area, which is below the clean water reservoir. The map material presented shows that no mining, and therefore no PBP, can be carried out in the 1000 m buffer zone (without a specified CO3), as there will be an artificial water intake facility there, necessary for the needs of the IP and representing a clean water reservoir. The EIA emphasizes that extraction will take place 1300 m from the buffer zone with a radius of 1000 m (without a defined CO3) and 2300 m from the catchment itself, therefore there is no reason to exclude the buffer zone around the Rosino catchment from the future concession area. The exclusion of this territory will make it impossible to build a reservoir for



clean water necessary for the implementation of the IP. In addition, the report notes that the IP's catchment areas during operation are clearly indicated, and it is clear that there is no mining activity in the buffer zone of the Rozino dam.

In the EIA, the expected impacts are assessed, and general and specific conclusions are formulated regarding the expected potential impacts, including their extent. Based on these conclusions, recommendations and measures are proposed to reduce the impacts, address potential future environmental problems, and ensure the safe operation of the facility, guaranteeing the protection of human health, the environment, and the sustainable development of the region.

The total concession area is 2,753 decares, of which 1,179 decares will be disturbed land. The buffer zone covers 1,574 decares. Part of the facilities will be developed in already worked/disturbed areas and no new land will be taken, with this "overlap" amounting to 261.9 decares.

In compliance with the requirements set out in letter ref. No. PU-02-231/1/18.12.2024 of the BD IBR, drainage ditches are to be constructed around the perimeter of the mine field and the open pit mine in order to collect rainwater and snowmelt from higher elevations and prevent surface water from entering the mine pit. With regard to their illustration on the site plan, it should be emphasized that they are marked hypothetically, taking into account the geodesy of the terrain at the moment. Their exact location will be determined after engineering calculations and the development of specific technical designs, with a view to their maximum efficiency in relation to the technical parameters of the overall future project. Therefore, in some places, the contour of the hypothetical ditches extends beyond the proposed concession area, which will be corrected at the technical design stage and will be adjusted to the concession area provided, as they will be constructed within this area.

The bottom of the mine is expected to reach an elevation of 435 m. According to the drilling work carried out, no underground water has been reached at this elevation and therefore no additional water inflow to the pit is expected other than that from rainfall and snowfall.

Water quantities that have entered the mine and depots as a result of rain and snowfall will be directed to the lowest parts of the respective facility. In the mine pit, a sump is planned to be formed at each working level to collect surface water, which will be used to irrigate the mine roads. If necessary, excess ore water will be pumped out and redirected to the contact water facility to replenish the circulating water. All dumps will be constructed and developed with slopes at each stage to ensure that surface water flows back to the outer edges by gravity. A system will be built to drain surface water, which will be directed to the ore processing plant or the contact water reservoir. The open contours of the pit's front horizons will facilitate the gravitational redirection of rainwater and its removal outside the pit perimeter, which would reduce the need for drainage during mine extraction.

Bottled water will be supplied for drinking purposes. For hygiene and domestic needs, a contract will be concluded with the water supply and sewerage company for the supply of water from a reservoir owned by the water supply and sewerage company, located 800 m from the domestic premises in the OF area. The existence of infrastructure with technical capability for connection to the future facility is indicated. The exact routes will be determined during the working design phase.

There are no plans to build a central sewerage system due to the lack of a treatment plant near the site. As an option, the possibility of using mobile sanitary facilities, which would be maintained by a specialized company, has been considered.



company that will periodically collect the generated water according to a schedule and transport it to a licensed treatment plant. An option for the design and construction of a mobile treatment plant tailored to the consumption of the facility has also been considered, which will be removed after the end of the facility's operation and its closure.

According to the preliminary design, to compensate for the expected annual water deficit of approximately 125,000 to 310,000 m³ in the supply to the installation, water will be supplied from a pumping station on the Apap Dere River located about 1.7 km east of the site.

It is planned to pump water directly from the Apa Dere River during the wet months of the year (from January to May inclusive). Water intake from the Apa 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 maintain the village of Rozino is in the order of 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 CMP activities blocking the river.

The surface runoff from the open pit mine will be used as the primary source of water for the production facility. This water is pumped from the sumps of the open pit mine to the OF reservoirs. The water stored in the tailings pond is the second source of water for the plant, with the fresh water reservoir being used as a source of supplementary water (third source) if the water from the open pit mine and the tailings pond is not sufficient or of the required quality to meet the factory's water needs.

During the operational phase, according to the EIA, no negative impact on surface waters is expected due to the absence of objective reasons for this.

With regard to water abstraction from the Apra Dere River, the report states the following:

The planned water abstraction for the project is seasonal, with a flow rate of up to 50 l/s and an operating period from January to May (5 months per year). Water abstraction is planned near an existing pumping station near the village of Rozino, where drinking and domestic water supply to the population takes priority over industrial water use. Water abstraction for the project will be carried out on the basis of a permit issued in accordance with the Water Act, which sets out specific conditions and requirements for water use, ensuring the provision of water for drinking and domestic needs of the population in the project area. The water deficit of 125,000-310,000 m³ indicated in the Report on Integrated and Sustainable Water Management (Text Annex Ko 11) represents a balance. This assessment of the needs of the production facility under different scenarios, rather than an unconditional planned water intake from the Appa Dere River. The main principle of the project is to minimize the use of fresh water and maximize the reuse of water in circulation.

The investment proposal for "Extraction and processing of polymetallic ores from the Rozino deposit, Tintyava area" is limited and only involves the use of groundwater when necessary. The hydrogeological study conducted so far in the area of the deposit has established that the groundwater has an insignificant flow rate for technological needs. Therefore, an additional study of the hydrogeological conditions and the potential of the PBT is planned.

It is planned that the inflow of groundwater collected in the sumps of the pit will be pumped to the installation as a priority in order to meet the requirements of the technological installation, and any excess water will be pumped to the tailings storage facility for temporary storage.



Groundwater from the open pit mine will be used as the primary water source for the production facility. This water is pumped from the sumps of the open pit mine to the OF reservoirs.

In order to reduce the amount of infiltrated contact water, a decision was made to line the bottom and walls of the contact water tank with an insulating screen. In principle, no filtration water should seep from the tank, except in the event of a membrane defect. Water from any breaches will join the flow of filtration water coming from the tailings storage facility. Contact filtration water that has passed through any breaches in the screen, as well as filtration water under the base of the facility, will enter the contact water reservoir either directly through the surface drainage or after being captured by the drainage curtain and pumped back into the contact water reservoir.

The filtered water passing through the curtain will be stopped by the injection barrier. The injection curtain acts as a barrier not only to the contact filtered water but also to the non-contact water, preventing the two flows from mixing. The report states that the non-contact filtration flows are limited to the contact water reservoir and are not expected to cause groundwater contamination.

With regard to drilling and excavation works (PBP1):

The EIA report indicates the impact on water from PBP, providing results from *test blasting*. It is emphasized that the Rosino water intake is located 2,300 meters from the contour of the mine where mining will take place and 1,300 meters from the buffer zone with a radius of 1,000 meters from the water intake facility. The figure clearly shows that the catchment is close (620 m) to point 6 of the contour of the future concession area, which is below the clean water reservoir. The map material shows that no extraction, respectively PBP, can be carried out in the 1000 m buffer zone, as there will be an artificial water intake facility necessary for the needs of the IP and representing a clean water reservoir. A report on a test explosion is presented in a text appendix. The main conclusions are as follows:

- The explosive seismic impact does not pose a risk to buildings, facilities, water bodies, or the population.
- With regard to the impact on groundwater, no vibration or dynamic parameters have been identified that exceed the natural seismicity of the area.

The conclusion is that the results obtained give reason to conclude that, subject to compliance with the recommended maximum mass of BB in a delay interval, no exceeding of the vibration velocity at depth is expected that would have a seismic impact on groundwater and water supply sources, and the implementation of the IP will not have a negative impact on drinking water sources that are not directly affected by the extraction works.

With regard to the hydrogeological conditions in the area:

A report on the hydrogeological conditions in the area of the investment proposal under assessment is attached to the EIA. The conclusions of this report are as follows:

Hydrogeological parameters and filtration coefficients

The hydrogeological studies and experimental filtration tests confirm that the aquifers in the area of the Rozino deposit, Tintyava area, have very low water conductivity and limited water abundance. The filtration coefficients determined for the Paleogene sediments and the metamorphic basement range from 2.11×10^{-7} to 2.13×10^{-9} m/s, which indicates a highly limited underground flow and a lack of potential for significant groundwater migration.

Potential risk of seepage from SMO



Based on the geological parameters, low natural water permeability, and planned waterproofing measures (HDPE geomembrane, drainage layers, infiltrate collector), it has been established that the potential for seepage from the SMO to groundwater is minimal. The rock masses act as a natural hydrogeological barrier, which, in combination with the engineering measures, eliminates the risk of impact on groundwater.

In addition, the results of the geochemical and ARD tests on the waste materials show no potential for acid drainage generation, which is a key prerequisite for limiting the risk of acidification and secondary mobilization of metals.

Potential seepage during backfilling of the pit

Backfilling will be carried out with non-aggressive, inert sterile rock mass with no potential for acid drainage. The low filtration capacity of the surrounding rocks and the absence of local aquifers ensure that no infiltration or contamination of groundwater is expected during backfilling.

Impact of blasting

Analysis of the structural-geological and hydrogeological conditions shows that the existing fracturing is poorly developed and inherited. Controlled application of blasting will not generate significant new water-conducting fractures and will not alter the mechanical or filtration properties of the water-bearing rocks.

Impact on drinking water sources

The development of the Rozino deposit does not and cannot affect drinking water sources in the area. This is evidenced by:

- the lack of a hydraulic connection between the IP zone and the water intake facilities;
- the different depth and nature of the aquifers;
- the absence of established groundwater in the mine area outside the limited local

The flow rate of the water sources will not be reduced by the activities of the IP, and no change in the groundwater regimes is expected.

The flow rate of water sources will not be reduced by the activities of the IP, and no change in groundwater regimes is expected.

Impact on the chemical status of water

Chemical analyses of groundwater and surface water (2019-2023) show stable parametric composition, with no traces of pollution or negative trends. The project has no potential to worsen the chemical status or pH of groundwater and surface water.

Summary conclusion from the Report on the hydrogeological conditions in the area of the assessed investment proposal:

Based on all studies, tests, and analyses conducted, it has been established that:

- The hydrogeological conditions are characterized by low water conductivity and limited underground drainage.
- No seepage or contamination from SMO or backfilling is expected.
- The blasting works will not have a negative impact on the fracturing and filtration properties.
- The IP does not affect the drinking water supply in the area and does not pose a risk to water intake facilities.
- The chemical status of groundwater and surface water will not be impaired.

It has been concluded that the development of the Rosino deposit does not pose a risk to groundwater, drinking water sources, or the quality and quantity of groundwater and surface water in the area.

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- Surface water. During all stages of implementation of the investment proposal for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area: the impact on surface waters is considered insignificant. The surface waters used from the Appa Dere River are in quantities of up to 10% of the average annual water



quantities and are not expected to have a negative impact (including transboundary), respectively, no discharge of waste water into surface water bodies is planned. The "zero discharge" approach has been adopted.

- Groundwater. Implementation of the investment proposal for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area is not expected to have a negative impact on groundwater and will not lead to a deterioration in the chemical and quantitative status of the affected groundwater body BG3G000PtPg049 Fissured waters - Eastern Rhodope complex.

As a technological option, a variant for water abstraction from the terrace of the Appa Dere River is envisaged through the construction of a pumping station in the area of the existing PS "Rozino".

It is planned that extraction will take place 1300 m from the boundary of the buffer zone of the "Rozino" catchment, with a radius of 1000 m and 2300 m from the catchment itself, therefore no negative impact on the drinking water protection zone is expected. A clean water reservoir will be built at the point of the concession area closest to the catchment.

Extraction works will be carried out in the infiltration zone without reaching the water level. The passive inflow of groundwater will be pumped to the installation as a priority in order to meet the technological requirements of the OF.

The impact on the chemical condition of groundwater will be neutralized by lining the bottom and walls of the contact water tank with an insulating screen and by constructing a system to capture any leaks, including a drainage curtain and an injection barrier.

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The EIA report states that the Ivaylovgrad area is adjacent to zone GR12 - the geographical region of Thrace. The OBOC report will use data from the Thrace River Basin Management Plan (GR12).

The Thrace Water Management Basin (GR12) is a transboundary basin management area. The western part of the basin borders the territory managed by the Bulgarian Basin Directorate for Water Management in the Western Black Sea Region, where the Nestos and Despatis rivers are transboundary. The central and eastern parts border the Bulgarian IBR BD, where the transboundary rivers are the Arda (Ardas) and Luda Reka (Erythropotamos). The Evros River basin is also transboundary, as it is partially located in the territory of the Bulgarian IBR BD RRB in the Eastern Aegean Sea (the rivers). The Maritsa (Evros) River forms the border between Bulgaria and Greece for 12 kilometers, as well as between Greece and Turkey, with the exception of a section upstream of Nova Vissa, where the river flows through Turkish territory. On Greek territory, the Byala River flows into the Luda River - Eritropotamos.

At all stages of construction, operation, and recultivation of the "Rozino" site, no transboundary impact is expected on the ecological and chemical status of surface waters, runoff, and water quantities entering the territory of the Republic of Greece from the catchment areas of the Luda and Byala rivers.

The planned water intake from the Appa 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 m³ is limited to the months from January to May (practically outside the active irrigation season) and is not expected to have a negative transboundary impact on the quantitative status of surface waters.

No impact on surface waters is expected, either in terms of quality or quantity. The IP provides for the construction of two consecutively located reservoirs (the second of which is for non-contact water, i.e. conditionally clean), which will eliminate and



the smallest possibility of water separated from the IP entering water bodies. There are no plans to discharge industrial and domestic sewage into surface water bodies or into the sewerage network of populated areas. All collected water will be reused in the technological cycles.

For the water supply of the site for technological needs, a hydrological survey has been carried out to determine the availability of water resources from surface water bodies. The possibility of such water use has been established without causing a decrease in water quantities and disruption of the natural water flow. Water use will only be possible after obtaining a permit in accordance with the Water Act.

The report states that no impact on the chemical and quantitative status of groundwater bodies is expected. A hydrogeological study was also conducted in the area of the deposit, which found that the 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 bodies or drinking water sources, with corresponding sanitary protection zones and permits for exploitation in accordance with the Water Act. In view of this, the report states that no impacts can be assumed that would negatively affect the quantity and quality of water in Greece.

1.2. Location: The site of the NP implementation falls within the boundaries of the surface water body (BT) "Biala River and its tributaries" with code BG3MAI00R270.

The NP falls within the boundaries of water protection zone 33 "Rhodopes - Eastern" with code BG0001032, designated in accordance with Article 119a, paragraph 1, item 5 of the Water Act, included in Section 3, point 3.5.1 of the RBMP of the IBR. The IP falls within the boundaries of water protection zone 33 "Biala Reka" with code BG0002019, designated in accordance with Article 119a, paragraph 1, item 5 of the Water Act, included in Section 3, point 3.5.2 of the RBMP of the IBR (as a very small part of the concession area is located outside the zone).

The IP does not fall within the water protection areas under Article 119a, paragraph 1, item 1 (for surface waters), item 2, item 4, described in Section 3 of the RBMP of the IBR. The Rosino deposit, Tintyava area, does not fall within the boundaries of an established CO3 around a water source from a surface water body.

The IP "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region" falls within the boundaries of the underground water body **BG3G000PtPg049 - "Puknatinit waters - Eastern Rhodope complex"**.

The groundwater bodies are designated as water protection areas pursuant to Article 119a, paragraph 1, item 1 of the Water Act. Within the groundwater bodies, there are designated water protection areas pursuant to Article 119a, paragraph 1, item 1 of the Water Act. Parts of the northern and eastern parts of the Rosino deposit, Tintyava area, fall within a vulnerable water protection zone included in Section 3, item 3.3.1 of the RBMP of the IBR. The Rosino deposit, Tintyava area, does not fall within the boundaries of established CO3 around groundwater or mineral water sources.

The established groundwater sources for drinking and domestic water supply in the IP area are as follows:

- Approximately 1630 m south of point 7 describing the contour of the future concession area is located TK of PC "Gugutka" for drinking and domestic water supply to the villages of Gugutka and Byal Gradets, municipality of Ivaylovgrad, region of Haskovo. There is no CO3 built around the water intake facility in accordance with Ordinance N•.3/10.10.2000r. There is no CO3 built around the water intake facility in accordance with Regulation N•.3/10.10.2000r.

- There is no CO3 built around the water intake facility in accordance with Regulation N•.3/10.10.2000r. About 620 m east of point 6 describing the contour of the future concession area is the "Rozino" catchment, 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 CO3 built around the water intake facility in accordance with Regulation N•.3/10.10.2000r.



The Rosino deposit, area "Tintyava," is located outside the areas identified as having a significant potential risk of flooding in the NBR.

1.3. Status of water bodies and environmental protection objectives:

1.3.1. Status according to the IBR's IIURB: Surface water body with code BG3MA100R270 is defined as being in good ecological status and good chemical status. The environmental protection objective for this specific water body (in accordance with the provisions of Chapter X, Section III of the Water Act) is to maintain good ecological status and prevent its deterioration, to maintain good chemical status and prevent its deterioration, and to achieve the objectives for water protection areas.

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

1.3.2. Status according to the latest annual assessment: For 2024, water body with code BG3MA100R270 is determined to be in good ecological status and good chemical status according to the water matrix.

1.3.3. Conclusion: For water body with code BG3MA100R270, the ecological and chemical status is maintained in accordance with point 1.3.1.

1.4. Measures in the IIURB and PUPH of the NBR.

1.4.1. Measures in the RBMP of the NBR: The measures for achieving the objectives for the protection of groundwater and surface water and water protection areas are described in the annexes to Section 7 of the ITURB of the IBR. The following measures may be relevant to the specific IP:

- Annex No. 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 areas and in designated sanitary protection zones (CO3) and buffer zones around water intake facilities/systems, action to implement the measure: DW 1 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. The measure has code DW_1;

- 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 sanitary protection zones (CO3) and buffer zones around water abstraction facilities/systems, action to implement the measure: DW 1 4 Compliance with prohibitions and restrictions in CO3 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 DW_1.

- Annex No. 7.2.1 to Section 7 of the RBMP provides for a measure entitled: Prohibition on the extraction of inert materials less than 50 m from river banks, action to implement the measure: HY_3_1 Prohibition on the extraction of inert materials less than 50 m from river banks. The measure has code NU_Z;

- Annex 3• 7.2.1, to Section 7 of the RBMP of the IBR provides for a measure entitled: Prevention of the discharge of priority substances into groundwater, action to implement the measure: GD 1 2 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_1.

1.4.2. Measures in IIUPH of the IBR: No measures are envisaged in the PWH of the IBR for the CRP area, as it does not fall within the designated areas with significant potential flood risk in



IBR, as well as in areas that may be flooded according to the maps of areas at risk of flooding, under the scenarios specified in Article 146e of the Water Act.

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

1.4.3. Specific requirements and measures for water protection areas. The entire concession area falls within the scope of protected area 33 "Rhodopes - Eastern" with code BG0001032 and 33 "Biala Reka" with code BG0002019 (with a very small part of the concession area located outside the zone), with prohibitions and restrictions introduced by orders No. RD-267 of 31.03.2021 and No. RD-575/08.09.2008.

Prohibitions and restrictions provided for in the Water Act, but not related to this type of investment intentions.

2.1. Prohibitions, restrictions, and requirements included in the Water Act:

The prohibitions of Article 118a, paragraph 1, items 1, 2, 3, and 4 of the Water Act for the protection of groundwater from pollution must be observed.

In compliance with the provisions of Article 156a, paragraph 1, item 2 of the Water Act, it is necessary at all stages of planning, design, construction, and maintenance of the facilities to be built to provide for measures to protect groundwater bodies from pollution.

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

2.2. Prohibitions, restrictions, and requirements included in subordinate legislation to the WA:

The measures in Annex No. 1 to the National Catalogue of Measures for ITURB, in the List of Activities, Prohibitions or Restrictions in Drinking Water Protection Areas in the section on groundwater, to the additional activities prohibited, should be taken into account. 2. in the buffer zone within a radius of 1000 m from the water intake facility, where there is no specified CO3, relevant to the IP (activities from the CRP). For groundwater bodies or parts thereof located in an exposed horizon (which is exposed on the surface), the following prohibitions apply:

- Activities that lead to the indirect discharge of hazardous substances into the water body from the earth's surface or between the earth's surface and the water level.
- Activities that lead to indirect discharge of harmful substances into the water body between the earth's surface and the water level.
- Extraction of underground resources, including inert and construction materials, below the water level.
- Water abstraction that creates a risk to the quantity and quality of drinking water.

Activities that are not prohibited but may be permitted if special studies (OBOC procedure) prove that they will not affect the condition of the waters in the protection zone and/or will not result in additional treatment being required to ensure the necessary quality of drinking water, To the same application, for groundwater bodies or parts thereof located in the first horizon (which is exposed on the surface) apply:

- Activities that lead to the indirect discharge of harmful substances from the earth's surface into the water body.
- Extraction of underground resources, including inert and construction materials between the earth's surface and the water level.
- Extraction of underground resources in the area of water intake for drinking and domestic water supply to the population, without specific studies and research proving that the extraction activity does not lower the groundwater level and there is no risk of deterioration in its quality.



- Construction of geological, hydrogeological, and engineering-geological research facilities, including water intake facilities for groundwater in the underground water body (aquifer).

In Appendix No. 1 to the National Catalogue of Measures for PVPB, in the List of Activities, Prohibitions, or Restrictions in Drinking Water Protection Areas in the section on groundwater, among the additional prohibited activities, 2. in the buffer zone within a radius of 1000 m from the water intake facility, where there is no specified CO3, relevant to the IP (activities from the CRP), for groundwater bodies or parts thereof located in second and subsequent horizons (which are not exposed on the surface), the following prohibitions apply:

- Extraction of underground resources.
- Activities that violate the integrity of the impermeable layer above the groundwater body;
- Water abstraction that poses a risk to the quantity and quality of drinking water.

Activities that are not prohibited but may be permitted if special studies (OBOC procedure) prove that they will not affect the status of the waters in the protection zone and/or will not require additional treatment to ensure the necessary quality of drinking water, to the same annex, for groundwater bodies or parts thereof located in second and subsequent horizons (which are not exposed at the surface) include:

- Construction of geological, hydrogeological, and engineering-geological research facilities, including water intake facilities for groundwater in the underground water body (aquifer);
- Extraction of underground resources in the area of water abstraction for drinking and domestic water supply to the population, without specific studies and research proving that the extraction activity does not lower the level of groundwater and there is no risk of deterioration in its quality.

Pursuant to Article 61; para. 1, item 1, letter "c" of Ordinance No. 1 of 10.10.2007 on the study, use, and protection of groundwater, the protection of groundwater from pollution and deterioration is carried out by applying the prohibitions under Art. 118a, para. 1 of the Water Act, prohibiting other activities on the surface and in the groundwater body that may lead to the indirect discharge of priority substances into groundwater, including the exposure of the groundwater level on the surface.

Conclusion on admissibility: The IP is **admissible** from the point of view of the RBMP and the IBR's PUPH (2022-2027), the Water Act and its subordinate legislation, **subject to the following conditions:**

- No pollution of surface and groundwater shall be allowed from the implementation and operation of the planned activities of the IP for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region.
- No wastewater, including treated wastewater, shall be discharged outside the facilities (contact water tank, etc.) of the water recycling system.
- Protection of drinking water sources in the area of the Rosino deposit, Tintyava area, in terms of their quantity and quality.
- Water abstraction from surface or groundwater shall be carried out after a permit has been issued in accordance with Article 44(1) of the Water Act.
- The construction of new facilities in a water body shall be carried out after a permit has been issued, in accordance with Article 46, paragraph 1, item 1 of the Water Act.
- The prohibitions specified in the orders of the Minister of Environment and Water for the declaration of 33 "Rhodopes - East" with code BG0001032 and SPA "Biala Reka" with code BG0002019 shall be observed.

3. Information on existing and permitted impacts of the nature of the IP.



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The East Aegean Basin Directorate does not have systematic information on existing and planned impacts of a similar nature for the area covered by the amendment and supplement to the CRP.

4. Information on available water resources in the part of the groundwater body where water abstraction is planned, the risk of groundwater pollution during the construction of new wells, and requirements for the prevention of pollution.

The IP is not related to water abstraction from groundwater.

5. Motivated assessment of the significant impact on water and aquatic ecosystems.

The planned activities under the IP for "Extraction and processing of polymetallic ores from the "Tintyava" area, located in the municipality of Ivaylovgrad, Haskovo region, would not have a significant negative impact on water and aquatic ecosystems if the provisions of the Water Act and the conditions set out in this opinion are strictly complied with and the requirements under points 2.1 and 2.2 of this

PHCMO.

6. Conclusion on the applicability of Article 93, paragraph 9, item 3 of the Environmental Protection Act. We consider that Article 93(9)(3) of the Environmental Protection Act is not applicable to the planned activities under the investment proposal for "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region," as they do not fall within the scope of Annex Kya 2 to the Environmental Protection Act. para. 9, item 3 of the Environmental Protection Act, as they do not fall within the scope of Annex Kya 2 of the Environmental Protection Act.

Yours sincerely

30. J.2026

H Vasil Uzunov

Vasil Uzunov

Rector of bD IBR

Signed by: Vasil

Uzunov

