

68-30/08.08.2025 Significant deficiencies and inconsistencies were identified in the quality assessment, which do not allow a decision to be made.

I. Regarding the OBOC report:

In accordance with Article 14(4) of the Regulation on the conditions and procedure for assessing environmental impacts (EIA Regulation), the quality assessment of the EIA report is negative. The following ambiguities and deficiencies were identified:

1. Regarding the "Water" component:

1.1. According to the OBOC report "Information on the consultations held and how the views submitted are reflected," it was found that some of the terms and comments expressed in the MOCB's opinion on the scope and content of the OBOC have been accepted and reflected in the report. The following have also been drafted and submitted "Report on integrated and sustainable water management," "Hydrological assessment of runoff in the Biala Rika River and its tributary Appa Dere," and "Report assessing the side effects of the explosion on the environment."

In the OBOC report, in Table XI-1. *"Information on the consultations held and how the opinions submitted were responded to,"* with regard to item ?, "Water" for points 2.6.1. -2.6.5., it is stated that the following have been submitted: *"Hydrological assessment of runoff into the Biala Rika River and its tributary, the Appa Dere," "Report on integrated and sustainable water management" and "Report assessing the side effects of the explosion on the environment,"* but after examining these documents, it was found that they do not include the required:

- the results of the determination of the hydrogeological parameters of the aquifers, as well as the determination of the filtration coefficient of the rocks in the area of the "Rozino" deposit, "Tintyava" area
- the determination of the potential risk of water infiltration from the waste storage site into the groundwater of the area;
- determination of the potential risk of water leakage from the backfilling of the excavated area with waste materials;
- assessment of the impact of blasting operations on the mechanical indicators of rock aquifers. Possibility of additional cracks appearing.
- analysis and assessment of the impact of blasting operations, analysis and assessment of the impact of ore extraction and material removal from the mine, and analysis and assessment of the impact of stored material (in the waste storage facility and during backfilling) on the water intake facilities intended to supply drinking water to the population and located in the area of the 'Rozino' deposit, covering an area of "Tintyava". This includes water intake facilities used by the water supply and sewerage company and the Municipality of Ivaylovgrad with or without established CO3.

1.2. Modeling of the water balance shows that approximately 300,000 m³ of active volume will be required for the freshwater dam, and to achieve this, the dam has been designed with a total allowable volume of 365,000 m³. The modeling shows that introducing water at a rate of 50 l/s for 5 months of the year is sufficient to supply the project based on this volume of water. According to the preliminary design, in order to compensate for the expected annual water deficit 125,000 to 300,000 m³, the facility will be supplied by a pumping station from the Apna dere river, located approximately 1.7 km east of the site. Water will be pumped directly from the Apna dere river during the wet months of the year (from January to May). Water will be pumped from the Apna dere river near its confluence with the Yupen 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 marsh. The flow rate of this spring varies between 6 and 11 l/s throughout the year, depending on the season. It has been calculated that the flow rate required to supply the village of Rozino is 0.34 l/s. The excess water from the spring, after the corresponding justification, could be pumped for the industrial needs of the project throughout the year. It is planned that water will be pumped from a naturally formed stream, without the need to construct a dam or other CMP activities that obstruct the flow of the river.

Bottled water will be provided for drinking water, while industrial water will be used for domestic needs.

There are no plans to construct a central sewerage network due to the lack of a wastewater treatment plant near the construction site.

A "zero discharge" approach has been adopted and no discharge of wastewater into surface water systems is planned.

It follows from the above that the planned water abstraction from the Appa dere river is maintained and no reduction in quantities is envisaged, nor has the possibility of reducing them been considered.

1.3. Information from the River Management Plan (RMP) for the Eastern Avgoustos region is presented in tabular form for the connection of terrestrial ecosystems with the groundwater system BG3G000PtPg049. There is no analysis of compliance with the provisions of Article 116(1)(4) of the Water Act — all waters and water resources are protected from depletion, pollution, and deterioration in order to maintain the necessary quantity and quality of water and a healthy environment, preserve ecosystems, preserving the landscape and preventing economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems, as well as the measures provided for in the 2022-2027 SDIP related to this SDIP.

1.4. The OBOC report presents information on the planned water abstraction and the potential impact on the surface water body. To fill the open reservoir for non-contact water, water from the Appa dere river is expected to be used during the period January-May, when the river has sufficient runoff, in the area of the (PS) 'Rosino' at a flow rate that will ensure a water quantity of 50 l/s (expected total volume 648 000 m³). This flow, which corresponds to approximately less than 10% of the average multi-year water quantity, ensures the ecological minimum in the river. A table shows hydrological data for the Appa Dera River. The Appa Dera River is a left tributary in the middle course of the Biala River. The total water withdrawal of approximately 648,000 m³ for the months from January to May (inclusive) represents approximately 0.54% of the average water quantity of the Biala River during this period, according to data from XMC 62800, Biala River, Dolno Lukovo village (according to the table presented).

With regard to the information contained in the OBOC report, it should be noted that the planned pumping of water from the Appa dere river to fill the open reservoir for non-contact water during the exploitation of the "Rozyno" deposit in a total volume of 648,000 m³ and is limited to the months of January to May (practically outside the active irrigation period), it is not expected to have negative transboundary impacts on the quantitative status of surface waters. The annexes to the OBOC report present a hydrological assessment of the runoff into the Biala Rika River and its tributary, the Appa Dere, near the village of Gogutka, Ivaylovgrad Municipality, Haskovo Region. The presentation is not signed. The attached hydrological assessment lacks an analysis and conclusion regarding the specific amount of water abstraction envisaged in the investment project and the impact it will have on runoff.

1.5. The OBOC report states that the IP does not affect water supply facilities and their protection zones. In the area of the future concession "Rozino," there is only one well (P-19) near the village of Rozino, on the road to the village of Fougoutka (not in use) and the "Anas" fountain "Anas" (C-1) near the village of Fougoutka (not in use). On a larger scale around the project area, other water sources have been identified, which are used for watering, irrigation, as well as others that are not in use or have dried up. 800 m east and 1800 m south of the boundaries of the future concession area "Rozino" are the facilities of the water supply and sewerage company — Haskovo PC Rozino (on the terrace of Arta Dere, PBT BG3G000PtPg049) and PS Fugutka (on the terrace of the Biala Reka River, BT BG3MA100R270), with permits in accordance with the Water Act and without specified

No assessment has been carried out to determine whether individual parts of the investment project fall
future sanitary protection
zones, in relation to the existence of water abstraction facilities for

drinking water less than 1000 meters from the boundaries of the future concession area, for which no CO3 has been established.

1.6. The OBOC report does not include information on the characteristics of hydrogeological conditions and factors (based on hydrogeological studies that have been carried out and the hydrogeological report that has been submitted to the

"Eastern Pacific Region") that affect the quantity and quality of groundwater in the area, in order to clarify the impact of the exploitation of the "Rozino" deposit on groundwater, and specifically on drinking water sources for domestic water supply in the inhabited areas of the region. The annexes to the report do not include a hydrogeological report, and the team of experts that drafted the report does not include a geologist-hydrogeologist.

1.7. The report presents information on drilling and blasting operations. An assessment report on the side effects of the explosion on the environment is attached, which is not signed and is not accompanied by a document certifying the required classification of the author. In the plan, given that the terrain where the deposit is located is hilly, the radius of the protected zone is set at a minimum of $R=450$ m. The following conclusions can be drawn from the assessment of the impact of blasting operations on people and the environment, part of which is that: The PBP technology envisaged for the exploitation of the is in line with the specifications for safe impact on humans and structures outside the danger zone during the drilling and blasting of the mine and at all three diameters of explosive boreholes provided for in the initial design (76, 89, and 102 mm) during the detonation of each drilling explosive with a separate (independent) delay interval, as the maximum mass of the drilling explosive must not exceed 30 kg, according to the calculations based on experimentally determined relationships between the static effect of the explosion and the distance and mass of the explosive. In conclusion, there is no specific reference to surface and groundwater in the area, given that there is a drinking water reservoir approximately 620 m east of the site.

1.8. The following measures are provided for in the IBR 2022-2027 SDOP:

- In Annex 7.2.1, section 7 of the IBW's PDYA, a measure is provided for under the title: Prohibitions and restrictions on activities in drinking water protection zones and designated CO3 zones and safety zones around water abstraction facilities/systems, action to implement the measure: DW 1 35 Prohibition of the extraction of underground resources, including aggregates, in a safety zone with a radius of 1000 m from groundwater pumping facilities for drinking and domestic water supply. The measure has the code DW 1.

- In Annex 7.2.1, section 7 of the IBW's PDYP, a measure is provided for under the title: Prohibitions and restrictions on activities in drinking water protection zones and designated CO3 zones and safety 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 for the designation of the zone and the list in Annex N 1 of the National List of Measures (PDYP). The measure has the code DW 1.

- In Annex No. 7.2.1, section 7 of the SDOP of the IBR, a measure is provided for with the title: Prohibition of the extraction of aggregates at a distance of less than 50 meters from river banks, action to implement the measure: NU 3 1 Prohibition of the extraction of aggregates within 50 meters of river banks. The measure has code NU 3.

- In Annex 7.2.1, section 7 of the IBRA PDY, a measure is provided for entitled: Prevention of priority substance discharge into groundwater, action for the implementation of 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, through the removal of sediments and soils covering the water system. The measure has code GD 1.

In relation to the above, the OBOC report must be completed as follows:

- All reports and annexes to the OBOC report must be signed and accompanied by documents certifying the required expertise of the report's author.

- The hydrogeological conditions and factors (based on the hydrogeological studies that have been carried out and the hydrogeological report that has been submitted to the database "Eastern Pacific Region") that affect the quantity and quality of groundwater in the area, in order to clarify the impact of the exploitation of the "Rozino" deposit on groundwater, specifically on drinking water sources for the supply of populated areas in the region. Information on the existence of water pumping facilities submitted by the Municipality of Ivaylovgrad under No. PU-01-183(3)/ 10.05.2023, the Municipality of Krumovgrad with No. N PU-01-183(4)/12.05.2023 and "V i K" EOOD, rp. Haskovo with No. PU-01-183(2)/03.05.2023. The information must be prepared by the competent legally authorized person (geologist-hydrogeologist) and the hydrogeological report must be attached to the OBOC report.

- Consider the potential impact of the investment plan on surface waters in relation to compliance with the provisions of Article 146(1)(4) of the Water Act

— all waters and water resources shall be protected from depletion, pollution, and deterioration, with the aim of maintaining the necessary quantity and quality of water and a healthy environment, preserving ecosystems, preserving the landscape and preventing economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems, as well as the measures provided for in the SDIP 2022-2027 related to this SDIP.

Assess whether individual parts of the investment plan fall within future CO3 zones II or III in nearby water sources for the supply of drinking water and domestic water to the population. If they do, it should be taken into account that there are certain prohibitions, restrictions, and limitations in cases of proven necessity, in accordance with Regulation No. 3/16.1.2000 on the conditions and procedure for the study, design, approval, and exploitation of sanitary and protection zones around water sources and water supply facilities for drinking and domestic water, as well as around mineral water sources used for therapeutic, preventive, drinking and sanitary purposes.

- The conclusions set out in the report assessing the side effects of the explosion on the environment should be supplemented to include conclusions specifically concerning surface and groundwater, given that there is a drinking water reservoir approximately 620 meters east of the site. The source of drinking water and domestic water should then be included in the scope of protection of the report.

- The report should also consider the above measures related to the investment project.

2. With regard to atmospheric air and climate:

2.1. Greenhouse gas emissions:

The OBOC report states that *"the implementation of the investment project will not contribute to climate change, i.e. no greenhouse gas emissions will be generated."* This statement contradicts the report's own conclusions, which point out that emissions will be produced during construction and operation from the diesel engines of construction and transport machinery. The text also describes standard measures to limit greenhouse gas emissions (equipment maintenance, avoiding idling, applying European standards), but there is no quantitative assessment.

Other sources of greenhouse gas emissions — from blasting, ore processing (energy-intensive processes), concentrate transport, and the operation and restoration of the waste storage site — are not considered. Therefore, the information on greenhouse gases is insufficient. A quantitative estimate of emissions in tCO₂e/year for all stages and costing based on reference indicators should be submitted.

2.2. Adaptation to climate change:

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

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

- extreme rainfall and storms - risk to the mine, waste storage area, and embankments
- droughts and heat waves - lack of water for flotation, health risks for workers
- forest fires – a real threat in the Eastern Rhodopes
 - landslides and erosion – likely to increase due to changing rainfall patterns. These risks have not been assessed, nor have specific adaptation measures been proposed (e.g., technical solutions for drainage, backup water sources, fire prevention measures,

emergency plans).

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

- National strategy for adaptation to climate change and action plan
- Long-term strategy for climate change mitigation by 2050
- European strategy for adaptation to climate change (2021).

Taking the above into account, with regard to climate change, the information in the report should be supplemented with:

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

2.4. Atmospheric monitoring is not comprehensive enough — there is no integrated long-term monitoring program. The relationship with certain climatic factors, e.g., temperature inversions, etc., has not been taken into account. The analysis is rather limited to technical parameters and does not examine cumulative effects with other sources of pollution. The relationship with risks to public health is not examined in sufficient detail.

The OBOC report does not examine the interactions between climate, air, and water in a single logical framework.

3. With regard to biological diversity:

In the OBOC report, under point IX "Description of the measures envisaged to avoid, prevent, reduce and, where possible, eliminate the significant adverse effects on the environment and human health" on page 250, we propose additions in relation to the objective described in the report *"The implementation of the measures should lead to the maximum possible conservation of the populations of plant and animal species found on or in the immediate vicinity of the IP,"* we propose:

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

3.2. On page 256, add a new measure 42 for the design and construction phases, resulting in the protection of biodiversity, with the following text

"The soil preparation activities of the investment project must begin outside the nesting and

rearing of chicks from March 15 to June 30. This is a compensatory measure for the text described on page 167 *"When activities commence during the nesting period, if there is a nest within or near the project boundaries, there is a risk that it will be destroyed or abandoned, leading to the loss of eggs and/or chicks. If this happens, the impact on the species population in the area could be significant."*

3.3. Add a new measure 43 for the design and construction phases, resulting in the implementation of biodiversity conservation, with the following text "Vehicles and machinery shall not be driven outside existing/designated roads when carrying out the relevant activities described in the IP."

3.4. Add a measure for the safety of electricity poles, in relation to the text on page 165: *"Bird mortality can also be observed on power lines. When poles of unsuitable construction are used, this can be caused by electrocution on 20 kV power lines. On power lines with higher voltages, there is no risk of electrocution, but there is a possibility of birds colliding with the lightning protection cable."*

3.5. For the five protected species described on page 167, the yellow snake eagle (*Ophisaurus apodus*), the northern goshawk (*Accipiter gentilis*), the red-breasted flycatcher (*Ficedula parva*) and the wildcat (*Felis silvestris*), enforceable, measurable, and controllable methods should be listed in the table, indicating who is responsible for their implementation and stipulating that scientific advice and monitoring must be provided during their implementation.

4. *With regard to "Soil" and "Subsurface and mineral diversity":*

4.1. The OBOC report does not include a detailed analysis of mineral diversity other than gold-bearing ores. The risk from geochemical processes (drainage, mobilization of heavy metals, etc.) is not examined in depth.

4.2. Cumulative impacts have been assessed with excessive simplification.

4.3. The description of the minerals — the main subject of the investment proposal — is inconsistent and does not provide a realistic picture of their mineral and chemical composition. Gold is mentioned as the only element intended for extraction and exploitation, without it being clear whether the comprehensive exploitation of the ores is planned, while information on silver and other precious metals is absent. In this regard:

4.3.1. How many types (or varieties) of ores have been identified in the "Rozino" deposit in the Tintyava area, and what are they? The term "ore" is an economic term and differs substantially from other similar terms, such as mining and metallization. Therefore, the types of ores to be mined in the deposit must be justified in advance according to their physical characteristics, mining technology, and enrichment of useful components. However, if there is only one type of ore for which reserves have been calculated, this must be clearly stated throughout the report.

4.3.2. It is unclear why the ore in the deposit has been classified once as polymetallic (in the title of the OBOC report), a second time as polymetallic (gold-silver) — p. 11, and a third time as semi-polymetallic gold-silver (also on p. 11).

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

4.3.3. In the OBOC report, the "Rosino" deposit in the Tintyava area is repeatedly referred to as gold-silver. Reserves of 11.3 million tons of ore with a gold content of 1.33 g/t are reported. However, there is no mention anywhere of estimated silver reserves or resources, nor of its presence in the ore. The expected final product from the implementation of the investment plan is also only gold concentrate.

The flotation process for ore enrichment is described in detail, with the target gold concentration in the final concentrate ranging between 22 and 30 g/t, depending on its content in the original ore. The method of controlling this process and determining the gold content is not described. It is unclear what the loss of gold, silver, and other useful components will be that will end up in the flotation tailings:

The presence of pyrite in the waste could cause serious environmental problems in the area.

4.3.4. It is unclear what form gold takes in the ore deposit. The answer to this question directly concerns the ore enrichment technology. The OBOC report states once that "no natural gold has been found in the ore" (p. 39), while elsewhere it describes gold found only in isolated samples (p. 85). It is very likely that most of the gold in the deposit exists as an impurity in other minerals. Given the unclear form of gold in the ore, which specific natural product (mineral or group of minerals) will be enriched through flotation in order to obtain the expected final product — gold concentrate with an Au g/t content?

4.3.5. Regarding the impact on residents:

When assessing soil contamination, only the soils within the project area are taken into account. There is no information on soils in nearby villages and agricultural areas threatened by uncontrolled dust emissions as a result of drilling and blasting activities, crushing, transport of crushed ore, grinding, and as a result of the deposition of fine dust from flotation waste. In this context, monitoring activities should be planned at selected sites to check the environment in the area before and after the start of exploitation of the deposit.

4.3.6. On page 80 of the OBOC report, the text: *"The results of the analyses show compliance with the maximum permissible concentrations in accordance with Regulation Nz 3/2008 on standards for permissible content of harmful substances in soil and standards for precautionary concentrations, MDK and intervention concentrations for persistent organic pollutants and petroleum hydrocarbons in soil for all indicators."* should be corrected. The results of the analyses should focus on *the content of harmful substances in the soil within the maximum permissible concentrations in accordance with Regulation No. 3/2008 on standards for the permissible content of harmful substances in soil and those referred to in Annex 2 to Article 4 — Standards for safety concentrations, maximum permissible concentrations, and intervention concentrations for persistent organic pollutants and petroleum products in soil for all indicators.*

4.3.7. On page 153 of the report, after the text: "The topsoil and soil cover will be separated and temporarily stored. The stored soil materials will be used to restore the soil damaged by the activity," text should be added on how the removal, storage, and utilization of the topsoil layer, and whether it will be carried out in accordance with the provisions of Section II of Regulation No. 26 of October 2, 1996, on the restoration of damaged soils, improvement of minimally productive soils, removal and utilization of the humus layer.

4.3.8. On page 254 of the report:

- Measure 27, in the sentence: "The points of temporary storage of humus within the boundaries of the area designated for this purpose *should be* determined and *marked*."
 - delete the phrase "and marked"
 - After the above sentence, the following should be added: "When the humus layer cannot be used immediately after removal, it shall be stored in humus storage areas in accordance with Article 10(1) of Regulation 26/02.12.1996.
- Measure 28, in the sentence: "Preparation of a plan and monitoring of soils in accordance with Article 29(1)(2) of the Soil Act," the word "private" should be added before the word "monitoring."
"privately owned" before the word "monitoring."

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

Text on page 122, point 11.2 Risk factors related to population and human health "Hazardous chemicals — There are no activities involving the storage and use of hazardous chemicals in the concession area or in the immediate vicinity. The nearest company posing a risk of a major accident involving hazardous

is 45 km away" is inaccurate and we suggest that it be clarified. This information contradicts the OXBC inventory list (to be used and stored) in Table V.9.1. Classification of hazardous substances in accordance with the requirements of Regulation (EC) 1272/2008 on the classification, labeling, and packaging of substances and mixtures, on page 186.

6. Upon examination of the documentation by the Ministry of Health, the following deficiencies were identified from a health perspective:

6.1. The OBOC report does not take into account all the recommendations of the Ministry of Health referred to in letter no. 26-00-2518/27.12.2024.

6.2. Following the analyses carried out on the expected impacts on environmental factors, the following were not performed:

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

- Assessment of the potential combined, complex, integrated, cumulative, and long-term effects of risk factors, both for workers and for the population exposed to adverse effects, also taking into account the activity of other production companies in the area and sections of the municipal and national road network.

- Predicted assessment of the impact after the implementation of the investment project. Review and evaluation of the health status of the population likely to be affected, with analysis and interpretation of demographic and morbidity indicators for the areas (based on the latest available data for a period of 3-5 years) where the population may be exposed to the effects of the construction and operation of the investment project.

- overall risk assessment, in a separate section, based on all the analyses and assessments included in the report, for damage to human health, with substantiated evidence that the inhabitants of the settlements will not be exposed to health risks in terms of environmental pollution, as well as a proposal for health protection and risk management measures.

6.3. The documents do not discuss radiation protection measures related to the requirements of the Regulation on radiation protection during activities with materials with increased content of natural radionuclides (Approved by Ministerial Decision No. 229 of 25.09.2012, published in the Government Gazette, issue 76 of 5.10.2012, amended and supplemented by issue 110 of 29.12.2020). In accordance with Annex N 1 to Article 1, paragraph 1 of the Regulation, the extraction and processing of polymetallic ores from the deposit covered by this IP fall within the scope of the Regulation.

6.4. The OBOC report does not examine the factor of ionising radiation and does not assess the health risk. No results on the radionuclide content in rock material and waste (mineral and floating) have been attached, either to the basic documents or to the text of Annex 9. With regard to ionising radiation, it is only stated that the natural radioactive background for the population is not expected to be exceeded, which is completely inadequate in terms of risk assessment.

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

We note that in the area of the village of Planipets, located 5 km in a straight line from the village of Rozino, Ivaylovgrad municipality, there is a former uranium mining facility "Planinets" uranium mining facility. The existence of such a facility suggests a possible increased content of natural radionuclides in the EP area. As already noted, no data from analyses of the radionuclide content in the ore of the deposit have been submitted.

Based on points 4-6 above, the OBOC report should be supplemented with information on the ionising radiation factor, including protocols

analyses to determine the radionuclide content in the rocky mass of the soil, in samples taken at different depths, as well as in the flotation tailings.

6.6. As regards atmospheric air, as indicated in the report, the main pollutants will be PM10 and PM2.5 particles. The methodology used allows for the calculation of their maximum single and average annual concentrations emitted from surfaces and linear sources, but it has a significant disadvantage, as the software used is not suitable for calculating average daily concentrations. With a total of 88 explosions per year, the risk of exceeding the average daily PM10 concentrations during these days is significant. In this context, evidence must be provided that the maximum permissible concentration (MPC) for the average daily concentration of PM10 will not be exceeded more than 35 times in a calendar year (Regulation No. 12 of July 15, 2010 on limits for sulfur dioxide, nitrogen dioxide, particulate matter, lead, benzene, carbon monoxide and ozone in the atmosphere).

The report does not contain information on the expected number of motor vehicles (MPC), transport plans and linear models for external transport flows serving the installation and for the transport of the flotation concentrate to its final destination, which estimate their contribution to organised dust and gas emissions in the residential areas through which the vehicles will pass. In this context, the OBOC report should be supplemented with the necessary information.

6.7. With regard to surface and groundwater, the OBOC report only takes into account some of the recommendations of the mandate on the scope and content of the OBOC, as set out in letter No. 26-00-2518/27.12.2024 from the Ministry of Health. The operation of the facility will require significant amounts of water, while the OBOC report does not sufficiently clarify the consequences for water hygiene and quality for the supply of drinking water in the area from the planned intensive water pumping, e.g. from the source.

"Fresh water with a supply of 50 l/s from the Apra dere river to the Rosino pumping station for the months of January to May (i.e. 5 months of the year)." On page 149, it is noted that an annual water deficit of approximately 125,000 to 310,000 m³ is expected in the supply to the facility. Under these conditions, we consider that the planned pumping of water from the Apra dere river, near the existing pumping station in the village of Rozino, is likely to create a shortage of water for drinking and domestic needs, as the absence of such a risk is not demonstrated in the OBOC report and the scientific reports attached to it. This concerns the adequacy of the water supply to both the village of Rozino and the inhabited areas along the valley of the Biala River, a tributary of the Apra Dere River. There is no documented comment on whether the data used for the analysis for the period 1961-1998 in "Table No. V.12-2 Average data for water quantities at two points on the Biala River" are currently relevant. There is no documented hydrogeological expertise on the following issues: Is there a risk of affecting the drinking water supply in the inhabited areas of the region? Will the IP reduce the flow of water sources for drinking water supply? The reference on page 268, column 3 of Table № XI-1. "Report on the assessment of the environmental side effects of the explosion" is inappropriate, as this document does not contain any text referring to the question raised in the Specification, how the use of blasting activities will affect the quantity and quality of water from drinking water sources, surface and groundwater.

waters. In the text of the OBOC report itself There is also no specific answer to this question.

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

Given the priority of protecting the purity of water resources, especially groundwater, whose quality after pollution has limited potential for recovery,

it is necessary to ensure categorically that the purity of surface and groundwater will be maintained.

Finally, it is stated that industrial water will be used for domestic purposes (cleaning toilets, etc.), but no mention is made of which water will be used for hygiene purposes (hand washing, bathing, etc.), given that this must meet the requirements of Regulation No. 9 on the quality of water intended for drinking and domestic use.

6.8. As a result of mining activities, certain potentially hazardous wastes will be generated, which could pose a corresponding risk to human health. However, this risk is not adequately addressed and assessed in the report. The OBOC report should therefore be supplemented.

It should be noted that enrichment waste, referred to in the OBOC report under the non-hazardous waste code '01 03 06 — enrichment residues other than those mentioned in 01 03 04* and 01 03 05*', represents a mirror code for hazardous waste codes 01 03 04* and 01 03 05*, in accordance with Regulation No. 2 on the classification of waste. This means that the classification of enrichment wastes under code 01 03 06 must be verified by tests in accordance with the provision, which demonstrate their non-hazardous properties after their creation. Otherwise, the waste must be classified under code 01 03 04* or 01 03 05*. In this context, the OBOC report should include a measure requiring a waste classification process to be carried out on enrichment waste, due to the existence of mirror codes.

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

As mentioned above by the Ministry of Health, the report does not include forecasts for the expected number of heavy vehicles or plans for the transport of external flows for the transport of floating condensate. There is also no assessment of the potential impact of noise and vibrations associated with these in residential areas.

In assessing the population and areas likely to be affected by the impact of individual risk factors on human health and comparing them with current health standards, the authors of the report concluded that excessive noise and vibration levels are not expected during either the pre-exploitation phase or the operation of the facility. With regard to the variable noise caused by blasting operations, a test blast was carried out and a report was submitted assessing the side effects of the blast on the environment for the project: Rosino Mine (attached to the OBOC report). The results and predictions show the impact of the explosion on the environment, based on measurements taken with specialized equipment during experimental blasting operations carried out within the planned perimeter of the Rosino mine. However, no overall assessment of the environment in the nearest residential areas has been carried out.

As work progresses underground, working conditions and the impact on the environment. For this reason, we believe that, regardless of the initial forecasts, it is necessary to include in the OBOC report a measure requiring periodic checks, updating of mathematical models with specific data on the deposit, determining the levels of impact, and, if necessary, correction of the parameters of explosive activities.

6.10. Finally, we note that the activities are planned to be carried out in an open manner, which in itself is a prerequisite for possible pollution of environmental factors (acoustic comfort, atmospheric air, including enclosed spaces, vibrations, ionizing radiation). In this context, the OBOC report should be supplemented with a more detailed assessment of the risk to environmental health and a series of measures should be proposed to prevent and reduce this impact.

6.11. Work environment:

Air pollution (page 208 of the OBOC report) in the occupational health environment
, the inhalable and respirable (PM4) fractions of dust and respirable
free

crystalline silica, rather than PM10 and PM2.5. According to Bulgarian legislation (Regulation No. 13 of December 30, 2003, on the protection of workers from risks related to exposure to chemical agents at work), it is necessary to provide for periodic monitoring of the inhalable fraction (mg/m3), the respirable fraction (mg/m3) and free crystalline silica (mass %), as well as exhaust gases from diesel engines, transport and auxiliary machinery (COx, NOx, SOx, unburned hydrocarbons, soot, various types of oils, as well as the reagents provided for in the enrichment process, in mg/m3), in accordance with the requirements of BDS EN 689:2018+A1:2019. It is necessary to detail the technical and mechanical actions to be taken to reduce levels of dust and chemical agents in the air of the working environment, in order to reduce occupational exposure to the lowest possible levels, taking into account that personal protective equipment for the protection of the respiratory organs is not a means of permanent protection for workers.

6.12. The regulatory documents described in the section "Health and hygiene issues" (on page 248 of the report), it appears that the applicable regulatory documents on health requirements were not taken into account when assessing the health risk from the implementation of the investment project.

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

7. The requirements of Article 12(1)(4) of the OBOC Regulation have not been fully met, which stipulates that the OBOC report must include a list of the experts and the team leader who drafted the OBOC report, each of whom must sign for the sections of the report they have drafted. The attached list of experts and team leader does not contain any signatures.

7.1. The declarations required under Article 12(1)(5) of the OBOC Regulation must be submitted in paper form with all the requirements for their validity, including a wet signature, while the content of the electronic form must be identical to the content of the printed form. Acceptance of documents with only scanned or electronic signatures will not meet the requirements of the OBOC Regulation.

8. The opinion of the Water Resources Directorate of the Eastern Mediterranean Coast was sought, given that Decision No. 920/31.12.2024 of the Council of Ministers approved the Management Plan for the Rivers of the Eastern Mediterranean Coast for the period 2022-2027. The Eastern Mediterranean River Basin Directorate, in letter No. OBOC-68-61/26.09.2025 to the MOCB, expressed its opinion (copy attached for information), according to which part of the project concession area, subject to IP, falls within the scope of the measure with code DW 1, code for implementation of the measure: DW 1 35 in the PUB for the Eastern Black Sea region 2022-2027, and it is necessary to exclude it from the concession area of the "Rozino" deposit the safety zone within a radius of 1000 m from the groundwater pumping facilities for drinking and domestic water supply (Rosino water intake, located in the area of the village of Pastrok, municipality of Ivaylovgrad).

II. Regarding the Mine Waste Management PLAN:

Regarding the submitted Mining Waste Management Plan (MWMP) attached to the OBOC report on the investment proposal "Extraction and processing of polymetallic ores from the "Rozino" deposit, Titiva area, Ivaylovgrad municipality", consultations were held with the Ministry of Energy. In this regard, opinion No. N OBOC-68-62/06.10.2025 of the MOCB was received, according to which, at this stage, the required information on the management of mining waste with the Mining Waste Management Plan has not been submitted.

The prepared PYMO does not reflect the contracting authority's intention for the management of mining waste in relation to the management of waste from the processing of raw materials by the enrichment plant. The information is presented as an intention, but does not reflect the capacity of the mining waste facility (MWF) — which is a storage site for residues. According to

There is no mention of the fortification works that will be constructed to ensure the stability of the waste storage site, nor is there any information on the overall physical stability of the waste storage site, for which only the area is mentioned without any additional information being provided. We would like to point out that when classifying the SMO, including the waste storage site, one of the requirements is to ensure the physical stability of the constructed facility, which is not mentioned in the plan.

The Mineral Waste Management Plan must include conditions and measures, including programs to prevent harmful effects on the environment, in accordance with the requirements of Article 22d, paragraph 5 of the Underground Wealth Law (ZPB). In accordance with the requirements contained in the content of the Regulation on the Management of Mining Waste (HYMO) in Annex No. 1, operators are required to submit such programs.

Finally, we would like to point out that when classifying mining waste, the cyanide concentration levels referred to in Article 22c, paragraph 6 of the ZPW must also be taken into account if they are used in the enrichment process.

III. With regard to the application of the indicator for assessing the degree of impact

(focB):

After examining the information contained in the report, in accordance with the quality assessment criteria set out in Article 24(3) of the Regulation on the conditions and procedure for assessing the compatibility of plans, programs, projects, and investment proposals with the subject and objectives of protecting protected areas (Regulation on the EIA), the following was found:

The impact assessment report is structured in accordance with the requirements of Article 23(2) of the Regulation on the EIA, but the information contained therein is incomplete and insufficient for a reasoned decision to be taken, for the following reasons:

1. The proposed version of the EIA does not include the requirement set out in letter No. N OBOC-68-17/18.11.2024 from the Minister of Environment and Water, the detailed analysis and assessment of the cumulative effects resulting from the numerous areas granted for exploration and/or research and the concessions for the extraction of underground resources within the boundaries of the protected area BG0001032 'Rodopi-East', and in particular in the area of the municipality of Ivaylovgrad. The report should contain a detailed analysis of the potential impacts and cumulative effect in relation to the concessions and valid exploration and/or prospecting permits and mining concessions in the protected area BG0001032 'Rodopia-East' and the protected area BG0002019 'Biala Rika'. It is necessary to supplement point II of the EIA with the following analysis:

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

'White River' for the protection of wild birds.

- Analysis of the potential impacts that may lead to cumulative effects as a result of existing concessions for the extraction of underground resources (approved investment intentions for the extraction of underground resources) within the boundaries of protected area BG0001032 "Rodopi-East" for the protection of natural habitats and wild flora and fauna and the protected area BG0002019 "Biala Rika" for the protection of wild birds

- Comprehensive analysis of the potential cumulative effects in relation to approved SDAs and other types of SDs within the boundaries of protected area BG0001032 "Rodopi-East" for the protection of natural habitats and wild flora and fauna and the protected area BG0002019 "Biala Rika" for the protection of wild birds.

In the analysis, the individual impacts that will result from the cumulative effect must be described and assessed by type and degree, depending on the species and natural habitats that are the subject of protection in the protected areas, in accordance with Article 24(3)(4) of the Habitats Directive:

- Description (characteristics, number) of other PPAs/IPs that have been taken into account (in the same area, municipality, protected area, not only of the same nature and regardless of who implemented them), in combination with which the project under assessment may have significant negative effects on the protected area.
- The cumulative effect analysis must specify: 1) the geographical boundaries within which the cumulative impact will be studied, bearing in mind that these may differ for different types of impact (e.g., impact on water resources, noise, vibrations, atmospheric air, etc.) and may extend over different distances; 2) all possible sources of impacts arising from the project under consideration, together with other sources in the specific environment and other impacts that may arise from other proposed IPPC/IPPC, the timing and phases of the IPPC/IPPC 3) the types of impacts (e.g., noise, reduction of water resources, chemical emissions, etc.) that may affect the structure and functions of the protected area, which are vulnerable to change 3) the mechanism by which the potential cumulative effect occurs (e.g., through water, air, accumulation of impacts over time or space). Where a habitat or species in the site is already in an unfavorable conservation status, or where the critical impact thresholds for the specific habitat or species elements have been exceeded (or where the site is subject to a cumulative effect that will lead to one of these situations), any additional EIA/SEA which, individually or in combination with others, adds additional impacts to these levels. The conclusions of the analysis must clearly state which elements of the project, in combination with which SDAs/SDAs, have been taken into account in reaching the decision on the combined impact. A simple statement that "there will be no cumulative effects" is not sufficient.
- The EIA submitted does not include the description in point II — Annex 11-1.
- The list of SDAs/SDAs presented in the OBOC report in "Text Annex 14 Table of cumulative effect Rosino" is incomplete in terms of approved SDAs of a similar nature within the boundaries of 33 BG0001032 'Rodopi-East', in particular in the municipality of Ivaylovgrad. This list should be supplemented with a reference to the public register containing information on ongoing or completed OBOC procedures, which is available on the MOCB website under the section preventive action/OBOC/Public registers OBOC: <http://www.moew.government.bg/bg/zrelevantna-deinost/ovos/publicni-registri-ovos/>. All approved SDAs/SDs should be taken into account in the analysis of the cumulative effect.
- Thus, for example, in the analysis presented for the assessment of the cumulative impact in combination with other SDAs/SDAs within the boundaries of 33 BG0001032 "Rodopi-East," the IP for "Extraction and processing of gold-bearing ores from the "Ada Tepe" area of the "Khan Krug" deposit, municipality of Krumovgrad, which was approved by Decision OBOC N 18-8, 11/2011 of the Minister of Environment and Water, in the analysis and determination of possible cumulative effects. In this regard, the analysis in point II of the EIA must be supplemented with the recording of the parameters, characteristics, and affected habitats and species as a result of the implementation of the EP "Extraction and processing of gold-bearing ores from the "Ada Tepe" of the "Khan Krum" deposit, municipality of Krumovgrad, approved by Decision OBOC No. 18-8, 11/2011 of the Minister of Environment and Water.

2. In point V.1.1. of the EIA for the protected area BG0001032 "Rodopi-East" for the protection of natural habitats and wild flora and fauna, a **direct impact** is noted on **17.3182** hectares (0.122% of the habitat area in the protected area) of **priority natural habitat 91AA* "Eastern forest areas with oak trees."** The conclusion for

the degree of impact at this point is assessed as "insignificant." However, the EIA does not include a justification and there is no expertise on how the direct loss of natural habitat areas will affect its conservation status (PC) in the protected area and at a biogeographical level, in accordance with Article 22 of the EIA Regulation. The assessment must be carried out in relation to all factors of the PC, also taking into account the analysis of the cumulative effect. Alternatives to the IP must be examined and evaluated in relation to the impact on the natural environment that is a priority for protection. Adequate mitigation measures must be proposed to reduce or eliminate the impact on the natural habitat. As a result of the analysis, the existence or absence of the hypothesis of Article 33 of the Biodiversity Act (ZBP) must be justified.

3. There is unclear information regarding the data presented in the EIA on pages 39-42 regarding the expected direct or indirect impact on natural habitat **6210**

"Semi-natural grasslands * r*Ptobic communities on limestone (Festuco — Brometalia)"

(*important orchid habitats). The EIA must

clarify whether the priority natural habitat (*important orchid habitats) is protected in the areas affected by the investment project. To this end, in order to determine whether the areas affected by habitat 6210 have the characteristics of priority, in accordance with the "Guide for the identification of habitats of European importance in Bulgaria," an on-site inspection should be carried out during the appropriate vegetation period for orchid species. Depending on the outcome of the field inspection, the conclusions of the EIA regarding the expected degree of impact on natural habitats should be reviewed and revised, an analysis should be submitted of how the direct loss of natural habitat areas will affect its PS in the protected area and at the biogeographical level, in accordance with Article 22 of the Habitats Directive. The assessment must be carried out in relation to all PC factors, also taking into account the cumulative effect analysis. Alternatives to the IP must be examined and evaluated in case of infringement of the habitat priority. Adequate mitigation measures must be proposed to reduce or eliminate the impact on the natural habitat. As a result of the analysis, the existence or absence of the hypothesis of Article 33 of the Law on Biological Diversity must be justified.

4. The conclusions of Part V.2. of the EIA describe the species and habitats for which a negative impact is expected — 4 types of natural habitats are affected, habitats of 30 species protected in 33 BG0001032 are affected 'Rodopia-East', fragmentation of habitats, as well as habitats of 25 species, barrier effect for 12 species, mortality of individuals of 23 species. However, the analysis and conclusions of the EIA do not assess how these impacts will affect the PC of these species in relation to all PC factors, including an analysis of the cumulative effect. The assessment must be carried out in relation to all PC factors. Adequate mitigation measures must be proposed to reduce or eliminate the impacts.

5. Similarly, with regard to the conclusions presented in Part V.2. of the EIA concerning the 23 bird species that are directly affected and are subject to protection in 33 BG0002019 "Biala Rika." However, the analysis and conclusions of the EIA do not assess how these impacts will affect the PC of these species in relation to all PC factors, also taking into account the analysis of the cumulative effect. The assessment must be carried out in relation to all PC factors. Adequate mitigation measures must be proposed to reduce or eliminate the impacts.

6. Part VI. The proposals for mitigation measures must be revised on the basis of the results of the impact analysis in Part V, as the version presented in the EIA is incomplete and does not correspond to the conclusions of the impact analysis. For example, the impact analysis for certain bird species (e.g., the golden eagle, etc.) includes mitigation measures, but these have not been included in the measures in Part VI. Proposals for

mitigation measures. This part should list all mitigation measures for all species and natural habitats for which they are proposed.

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

8. The alternatives described and attached in electronic form to the EIA in Part XIII.

Attachments, have not been attached to the submitted version of the DOSV on electronic media.

In light of the above, pursuant to Article 24(4) of the EP Regulation, **the assessment of the quality of the submitted impact assessment** report is negative, as the information submitted is incomplete and insufficient to take a reasoned decision.

In accordance with Article 24(6) of the EIA Regulation, the impact assessment report is returned for completion and revision **in accordance with the above comments.**

IV. With regard to the Convention on Environmental Impact Assessment in a Transboundary Context (Ecnoo, 1991)

By letter No. OBOC-68-28/14.02.2025 from the Ministry of Environment and Water to the company "Tintyava Exgnioreishan" AD, in point 9 *"With regard to the Convention on Environmental Impact Assessment in a Transboundary Context (Ecnoo, 1991)"*, information is provided that the Government of Serbia wishes to participate and DECLARES its participation in letter no. OBOC-68/23.10.2024 from the MOCB, regarding the environmental impact assessment procedure, as PROVIDED for in that procedure.

In this context, letter no. OBOC-68-40/19.08.2025 was sent to

The Ministry of Environment and Water to the company "Tintyava Exploration" AD, informing it that, in accordance with the principles of international cooperation for the assessment of environmental impacts, particularly in a transboundary context, it is necessary to provide a copy of the OBOC report with all annexes (including the Degree of Impact Assessment Report - DOSV) in printed and electronic form for the assessment of the quality of the report, the non-technical summary and the final version of the OBOC mission, with the comments recorded and the results of the consultations held with all the municipalities and competent services concerned, as soon as possible.

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

During the implementation of the procedure laid down in Articles 3, 4, and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context, the Republic of Greece, the State concerned, was not given the opportunity to participate. The right granted by the Aarhus Convention and Directive 2011/92 to the public concerned in the States concerned is the right to participate actively and effectively in decision-making procedures. The same right is granted to the public concerned in Bulgaria by national law. There is a state that has been established in the context of the consultation procedure on the report on the investment project "Extraction and processing of polymetallic ores from the 'Rozino' deposit, Tintyava area, Ivaylovgrad municipality." The necessary documentation for the implementation of the investment project has not been submitted.

This consultation prevents the competent environmental authority, the MOCB, from carrying out its work in accordance with the law. The opinions expressed during the consultations in the Republic of Bulgaria and the Hellenic Republic should be taken into account when preparing the environmental impact assessment report for the investment proposal of Tintyava Exploration AD, in its capacity as contracting authority.

Taking into account the above, following the necessary revision and completion of the investment proposal (IP) for the "Extraction and processing of polymetallic ores from the "Rozino" deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region, in accordance with the above comments on the OBOC and DOSV reports, and taking into account the lawful conduct of the cross-border procedure, the contracting authority for the investment proposal is required to ensure the uniformity of the content of the documentation in both Bulgarian and Greek.

V. With regard to the actions to be taken by the contractor to continue the OBOC procedure, in the EIA procedure:

The completed OBOC report and its annexes, including the completed and revised DOSV, which lists all the above-mentioned omissions, deficiencies, and weaknesses, must be submitted to the MOCB by **02.11.2026**.

We remind you that, in accordance with Article 13(2) of the OBOC Regulation, you are required to ensure the uniformity of the content of the documentation in printed and electronic form — the OBOC report and all its annexes.

In accordance with Article 25(5) of the OBOC Regulation, you are required to submit the above-mentioned reports in Greek, namely: an additional copy of the OBOC report and its annexes, completed and revised DOSV, as well as a translation of the non-technical summary.

Annex: as per the text.

20.10.2025

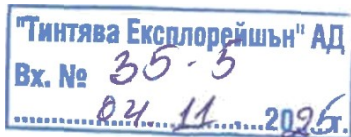
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MANOL GENOV

Minister of Environment and Water Signature:

MANOL

GENOV



РЕПУБЛИКА

БЪЛГАРИЯ

MINISTRY OF ENVIRONMENT AND WATER

30.10.2025

X OBOC-68-67/30.10.2025

No

Signature: NIKOLAY

PAPALIGOV

TO

Mr. Daniel Marinov **Director** of

"TINDIAV EXPLORATION" AD

rp. Ivaylovgrad 6570, ul. "Bulgaria" No. 66, municipality of
Ivaylovgrad, Haskovo region

Protocol No. 35/4/23.10.2025

Subject: *Environmental impact assessment procedure, including compatibility assessment for the investment proposal 'Extraction and processing of polymetallic ores from the 'Rozino' deposit, Tintyava area, municipality of Ivaylovgrad'*

Dear Mr. MARINOV,

In response to your letter no. OBOC-68-66/24.10.2025 from the Ministry of Environment and Water, we are sending you a copy of the opinion of the Ministry of Health, received under no. OBOC-68-56/10.09.2025, regarding the ongoing environmental impact assessment procedure, including the compatibility assessment for the investment proposal "Extraction and processing of polymetallic ores from the "Rozino", Titiva area, municipality of Ivaylovgrad".

Annex: as per the text.

30.10.2025

X

MANOL GENOV

Minister of Environment and Water Signature: MANOL
GENOV

Николай Панагенов
30.10.2025г.



bc

BG13gBOY141

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REPUBLIC OF BULGARIA

Ministry of Health Head of the State Health

Inspectorate

X 04-09 -119/10.09.2025

ДОКУМЕНТ,
Registered by:
Sig ed by: ELIZABETA

RUSEVA

TO

F-ЖА MARNIA GULEMBOVA

DIRECTOR

"EO, OBOC, AND POLLUTION PREVENTION"

MINISTRY OF THE ENVIRONMENT AND WATER To: OBOC-68-34/13.08.2025

To Ham No. 04-09-119/13.08.2025

Subject: Environmental impact assessment report (OBOC) for investment proposal "Extraction and processing of polymetallic ores from the

"Rozino", "Tintyava" area, located in the municipality of Ivaylovgrad, Haskovo region.

DEAR MS GULABOVA,

With reference to your letter submitted to the Ministry of Health requesting an opinion on the quality assessment of the environmental impact assessment (EIA) report for the investment proposal (IP)

"Extraction and processing of polymetallic ores from the "Rozino" deposit,

"Tintyava," located in the municipality of Ivaylovgrad, Haskovo Province, we would like to inform you of the following:

The information provided indicates that the investment project concerns the extraction and processing of polymetallic gold-silver ore from the "Rozino" deposit, "Tintyava" area, **using an open-pit** method. The ore will be processed using flotation of polymetallic gold-silver ore from the "Rozino" deposit, in the "Tintyava" area, located in the territories of the villages of Rozino and Gogutka, municipality of Ivaylovgrad, until a concentrate is obtained, which will be the final product of the facility. It is planned that the mining waste produced will be stored in mining waste facilities on the site of the investment project. It is planned that the mining waste produced will be stored in mining waste facilities on the site of the investment project. As regards post-treatment waste, it is planned to be stored after concentration to 70-75% solid matter. It is reported that this alternative is preferred over

conventional aqueous disposal in a waste storage facility, in which aqueous waste is transported via water to the waste storage facility. Internal (reverse filling) of flotation waste after treatment is planned in the investment project area.

The EP area is located approximately 1.2 km south of the nearest settlement, the village of Rozino.

Rozino.

When analyzing the quality of the EIA, the following disadvantages are noted from a health perspective

The following disadvantages:

1. The OBOC report does not take into account all the recommendations of the Ministry of Health referred to in our letter No. K• 26-00-2518/27.12.2024.

2. In section IV. "Description of relevant aspects of the current state of the environment (baseline scenario)" from page 102 to page 118, health and hygiene aspects are examined, but in relation to the current state of the environment.

3. After the detailed analyses of the expected impacts on environmental factors, there is no:

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

- Assessment of the potential for combined, complex, cumulative, and long-term effects of risk factors, both for workers and for the population exposed to adverse effects, taking into account the activity of other manufacturing companies in the area, as well as sections of the municipal and national road network.

- Predicted assessment of the impact after the implementation of the investment proposal. Overview and assessment of the health status of the population that may be affected, with analysis and interpretation of demographic indicators and morbidity indicators for the areas (based on available data for the last three to five years) where the population may be exposed to the effects of the construction and operation of the investment proposal.

- Overall risk assessment, in a separate section, based on all analyses and assessments carried out in the report, for damage to health, with substantiated evidence that residents of populated areas will not be exposed to health risks in terms of environmental pollution, as well as a proposal for health protection and risk management measures.

4. The documents do not refer to radiation protection measures related to the requirements of the regulation on radiation protection during activities with materials with increased content of natural radionuclides (Approved by Ministerial Decision *No. 229* of 25.09.2012, published in the Government Gazette, issue 76 of 5.10.2012, amended and supplemented by issue 110 of 29.12.2020). In accordance with Annex *No. 1* to Article 1, paragraph 1 of the Regulation, the extraction and processing of polymetallic ores from the deposit covered by this Regulation fall within the scope of the Regulation.

5. The IOR does not consider the factor of ionising radiation treatments, as the health risk has not been assessed. No results on the radionuclide content in rock material and waste (mineral and floating) have been attached, either in the basic documents or in textual Annex 9. With regard to ionising radiation, it is only stated that the natural radioactive background for the population is not expected to be exceeded, which is completely insufficient in terms of risk assessment.

6. The EIA does not provide for the monitoring of radiological indicators of environmental and habitat factors, as well as mining and flotation waste.

We note that in the area of the village of Planinets, located in a straight line 5 km from the village of Rozino, municipality of Ivaylovgrad, there is a former uranium mining plant. "Planinets." The existence of such a facility suggests a possible increased content of natural radionuclides in the area of the EP. As already noted, no data from analyses of the radionuclide content in the ore of the deposit have been submitted.

Based on points 4-6 above, the EIA must be supplemented with information on the factor of ionising radiation treatments, including the provision of analysis protocols for determining the radionuclide content in the rocky mass of the soil, in samples taken at different depths, as well as in flotation tailings.

7. As regards atmospheric air, as indicated in the report, the main pollutants will be PM10 and PM2.5 particles. The methodology used allows for the calculation of their maximum one-time and average annual concentrations emitted from surface and linear sources, but it has a significant disadvantage, as the software used is not suitable for calculating average daily concentrations. With a total of 88 explosions per year, the risk of exceeding the average daily PM10 concentrations during these days is significant. In this context, it is necessary to provide evidence that the average daily PM10 concentration will not exceed 35 times in a calendar year. Provision No. 12 of July 15, 2010, as amended and supplemented, (DB, No. 79/2019).

The report does not contain information on the expected number of MPCs, transport plans, and linear models for external transport flows serving the facility and for transporting the flotation concentrate to its final destination, which estimate their contribution to organised dust and gas emissions in the residential areas through which the vehicles will pass. In this context, the EIA report should be supplemented with the necessary information.

8. With regard to surface and groundwater, the **EIA** Report takes into account only some of the recommendations of the Specification, referred to in letter No. 26-00-2518/27.12.2024 of the Ministry of Health. The operation of the project will require significant amounts of water, while the report does not sufficiently clarify the consequences for the hygiene and quality of water for the region's water supply from the planned intensive pumping of water, e.g. from the source "Fresh water with a supply of 50 l/s from the Arpa dere river to the Rosino pumping station for the months of January to May (i.e. 5 months of the year)". On page 149, it is noted that an annual water deficit of approximately 125,000 to 310,000 m3 is expected in the supply to the facility. Under these circumstances, we believe that the planned pumping of water from the Arpa Dere River, near the existing pumping station in the village of Rozino, is likely to create a shortage of water for drinking and domestic needs, as the absence of such a risk is not demonstrated in the OBOC Report and the scientific reports attached to it. This concerns the adequacy of the water supply to both the village of Rozino and the settlements along the valley of the Biala River, a tributary of the Arpa Dere River. There is no documented comment on whether the data used for the analysis for the period 1961-1998 in "Table No. V.12-2 Average data for water quantities at two points on the Biala River" are currently relevant. There is no documented hydrogeological study on the following questions: Is there a risk of affecting the supply of drinking water to the inhabited areas in the region? Will the project reduce the supply of drinking water sources?

The reference on page 268, column 3 of Table N• XI-1. "Report on the assessment of the side effects of the explosion on the environment" is inappropriate, as this document does not contain any text referring to the question raised in the Specification, how the use of drilling and blasting activities will affect the quantity and quality of water from drinking water sources, surface water, and groundwater. The text of the **OBOC** Report itself also lacks expertise on this issue.

According to a letter from the NW "Eastern Pacific Region" No. PU. 01-183 —(5)

/26.05.2023r., the IP is acceptable and its implementation does not be significant significant

impact on waters and aquatic ecosystems, provided that regulatory requirements are complied with and that pollution of river beds with mineral materials and the discharge of hazardous materials from mineral extraction into surface and groundwater are not permitted. However, the **OBOC** report does not provide a clear answer as to whether the project will worsen the chemical status and alter the active reaction of surface and groundwater in the area.

It should be noted that in the aforementioned letter, the NW concludes that the SD is likely to have a negative impact on water and aquatic ecosystems in the area.

Given the priority of protecting the purity of water resources, especially groundwater, whose quality has limited potential for recovery after pollution, it is essential to ensure that the purity of surface and groundwater is maintained.

Finally, it is stated that water from the washing machine will be used for domestic purposes (cleaning toilets, etc.), but no mention is made of which water will be used for hygiene purposes (hand washing, bathing, etc.), given that this must meet the requirements of Regulation No. 9 on the quality of water intended for drinking and domestic use.

It is noteworthy that the EIA states that "The EIA has adopted the "zero discharge" approach to surface and groundwater. In this context, the opinion of the "Eastern Pacific Coast" DY on this issue should be attached to the EIA.

9. As a result of mining activities, certain potentially hazardous wastes will be produced, which could pose a corresponding risk to human health. However, this risk is not adequately addressed and assessed in the report. In this context, the EIA report should be supplemented.

It should be noted that enrichment waste, referred to in the report under the non-hazardous waste code '01 03 06 — enrichment residues other than those mentioned in 01 03 04* and 01 03 05*', corresponds to the hazardous waste codes 01 03 04* and 01 03 05*, in accordance with Regulation No.

2 on the classification of waste. This means that the classification of enrichment wastes under code 01 03 06 must be confirmed by tests in accordance with the Regulation, which will demonstrate their non-hazardous properties after they have been generated. Otherwise, the waste must be classified under code 01 03 04* or 01 03 05*. In this context, the **OBOC** report should include a measure requiring a waste classification process to be carried out on enrichment waste, due to the existence of mirror codes.

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

As mentioned above, the draft does not include provisions for the expected number of heavy vehicles or plans for the transport of external flows for the transport of floating concentrate. Furthermore, there is no assessment of the potential impact of noise and vibrations associated with these on residential areas.

When assessing the population and areas likely to be affected by the impact of individual risk factors on human health and comparing them with current health standards, the authors of the report concluded that noise and vibration limits are not expected to be exceeded during either the pre-operational stage or the operation of the facility. With regard to the variable noise caused by blasting operations, a test explosion was carried out and an Assessment Report on the side effects of the explosion on the environment for the project was submitted: Rosino Mine (attached to the EIA).. The results and predictions show the impact of the explosion on the environment, based on measurements taken with specialized equipment during experimental blasting operations carried out within the planned perimeter of the mine. "Rosino." However, no comprehensive assessment of the living environment in the nearest inhabited areas has been carried out.

As mining operations have progressed to greater depths, working conditions and environmental impacts have changed. Therefore, we believe that, regardless of the initial predictions, it is necessary to include in the OBOC report a measure requiring periodic checks, updating mathematical models with specific data on the deposit, determining the levels of impact, and, if necessary, correcting the parameters of explosive activities.

11. Finally, we note that the activities are planned to be carried out in an open manner, which in itself is a prerequisite for possible pollution of environmental factors (acoustic comfort, atmospheric air, including enclosed spaces, vibrations, ionising radiation). In this context, the EIA must be supplemented with a more detailed assessment of the risk to environmental health and a series of measures must be proposed to prevent and reduce this impact.

12. Working environment

Air pollution (page 208 of DOPOS) In the workplace, inhalable and respirable (PM4) dust particles and respirable free crystalline silica are important for health, rather than PM10 and PM2.5 particles. According to Bulgarian legislation (Regulation N° 13/2003, amended by DB No. 28 of 02.04.2024 and Regulation N° 10/2003, last amended and supplemented, State Gazette No. 28 of 02.04.2024), it is necessary to provide for periodic monitoring of the inhalable fraction (mg/m³), the respirable fraction

(mg/m³) and free crystalline silica (mass %), as well as exhaust gases from diesel engines, transport and auxiliary machinery (CO_x, NO_x, SO_x, unburned hydrocarbons, soot, various types of oils, as well as those provided for in the enrichment stage reagents, in mg/m³), in accordance with the requirements of standard BDS EN 689:2018+A1:2019. 10. It is necessary to include and describe in detail the technical measures to be taken to reduce the levels of dust and chemical agents in the air of the working environment in order to reduce occupational exposure to the lowest possible levels, taking into account that PPE for respiratory protection is not a means of permanent protection for workers.

13. The regulatory documents described in the section "Health and hygiene issues" (on page 248), it appears that the applicable regulatory documents on health requirements were not taken into account when assessing the health risk from the implementation of the SD.

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

Yours sincerely

Angela Kuit

Signed by: Angel Kunchev

DOT. DR. ANGEL KOUNTSEV, D.M.

Chief State Health Inspector



REPUBLIC BULGARIA MINISTRY OF
THE ENVIRONMENT AND WATER

12.2.2026

DOVOS-68-91/12.02.2026 y

No

Signed by VIOLETA

VAMLEVA-M/RTINOV\

TO
Mr. DANEL MARINOV DIRECTOR OF
"TPPTIAVA EXPLORATION" AD
rp. Ivaylovgrad 6570,
Municipality of Ivaylovgrad, Haskovo Region No.
01/05.01.2026 and No. 06/16.01.2026

COPY:

RIOSV — XACEOBO

BASIN ADDRESS

'PZTOCHPOBELOMORSIPE AREA'

MUNICIPALITY OF IVAYLOVGRAD КМЕТСТВО

K. ROZINO ЕМЕТСТВО K. GUGUTKA

КМЕТСТВО K. BIALGRADEK ЕМЕТСТВО K.

KONNITSI

Subject: *Assessment of the quality of the completed environmental impact assessment report, including the completed and revised impact assessment report for an investment proposal (IP) "Extraction and processing of polymetallic ores from the "Rozino" deposit, "Tintyava" area, located in the municipality of Ivaylovgrad, Haskovo region"*

Dear Mr. MARPHOB,

With reference to the aforementioned completed environmental impact assessment report (OBOC), including the attached revised and completed impact assessment report, submitted to the Ministry of Environment and Water

Sofia, 1000, 22 K. Maria Luisa Blvd. Tel.: +359(2) 940 6194, Fax: +359(2) 986 25 33



Tel.: +359(2) 940 6194, Fax: +359(2) 986 25 33



(MOCB) No. OBOC-68-69/ 05.01.2026 and supplementary documents No. N• OBOC-68-71/ 16.01.2026, we would like to inform you of the following:

1. Regarding the OBOC report.

After examining the documentation submitted, it was found that the content of the OBOC report complies with the requirements of Article 96(1) of the Environmental Protection Act (ZOOS). In accordance with Article 14(3)(2) of the Regulation on the conditions and procedure for conducting an environmental impact assessment (OBOC Regulation), the assessment of the quality of the OBOC report is **positive**, with omissions that are not material to the decision on the OBOC. The quality of the documentation was assessed in accordance with the criteria set out in Article 14(1) and (2) of the EIA Regulation, and the assessment of the supplementary EIA report identified the following inaccuracies, which need to be corrected:

1. From the Ministry of Health:

1.1. According to data from the Eastern Mediterranean Basin Directorate, the nearest sources of drinking water from groundwater in the area of the Rosino deposit are:

- approximately 1630 m south of point 7, which describes the perimeter of the future concession area, is the TK of PC for the water supply of the villages of Gougouga and Bialgradets, Ivaylovgrad municipality, Haskovo region. No sanitary and protection zones (CO3) have been established around the water intake, in accordance with Regulation No. 3 of 2000.

- Approximately 620 m east of point 6, which marks the boundary of the future concession area, is the "Rozino" water intake, located in the area of the village of Pastrook, municipality of Ivaylovgrad, for water supply and domestic use, owned by the State Forestry Service. No CO3 has been established around the water intake in accordance with Regulation No. 3 of 2000.

The Ministry of Health notes that neither the opinion of the NW nor the report on the OBOC mentions the exact distance of the PC

"Rozino" and its hydraulic installations, which are managed by the Haskovo water supply and sewerage company and serve the supply of drinking water 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 'Rozino concession area' are the facilities of ViK - Haskovo PC Rozino (on the terrace of the Apna dere) and PC Gugutka (on the terrace of the Biala reka river) facilities, without CO3 having been specified.

Approximately 620 m east of the area is a reservoir for drinking water supply, which, as can be seen from the above, belongs to the State Forestry Service and is separate from PC "Rozino."

On pages 174, 261, and 398 of the OBOC report, it is noted that a technological option is to pump a limited amount of water from the slope of the Apna dere river by constructing a pumping station in the area of the existing PC "Rozino," which is used to supply the village of Rozino with drinking water, is a technological possibility, which is unacceptable from a health point of view. The Ministry of Health notes that this option has simply been highlighted as a possibility, but has not been analyzed in the OBOC report and its annexes from a technological, hydrological, and health-ecological points of view, including the possibility that its implementation could affect the amount of water used to supply the surrounding settlements, which we consider to be an omission and such expertise must be secured.

The Ministry of Health considers that no assessment has been carried out to determine whether individual parts of the investment plan fall within future health protection zones, in relation to the existence of water pumping facilities for the supply of drinking water, for which no CO3 has been established.

In the OBOC report, in relation to the same reservoir (in some parts of the text also referred to as a "dam" or "facility"), the terms "uncontacted," "clean," "conditionally clean," "fresh," and "new" water, which should be corrected by using a single term, e.g., "clean water reservoir," and clearly

It should be clarified what all the sources of water collection and pumping are from which it will be supplied with water.

The same should be corrected and systematized for the contact tank, which, for example, on page 21 is called a "mixed water tank." In addition, on page 163 of the OBOC report, the terms "contact and non-contact groundwater" are introduced, which essentially contradicts other texts regarding the absence of contact and impact on groundwater during the implementation of the investment project.

The Ministry of Health points out that the planned system for capturing any leaks from the contact tank, which includes a drainage barrier and an injection barrier, cannot guarantee 100% that there will be no leakage of water from this tank into the clean water tank. The entry of such water contacts into the clean water tank is also provided for through overflows to the clean water facilities, dimensioned for a maximum theoretical event.

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

Furthermore, it should be noted that, in relation to the above, the report and its annexes again do not contain any documented comments on whether the data used for the period 1961-1998 in

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

The OBOC report recommends that in the event of explosive drilling at a distance of less than 300 m from a residential area, protective covers should be used as a precautionary measure so that there is no risk of rock fragments being scattered and no danger to the population and the environment. The Ministry of Health considers this recommendation to be good, as it means that IP's activity will not actually be located 1,200 meters from the nearest area subject to health protection, but at a distance of 300 meters, which is unacceptable from a health perspective.

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

After reviewing the documents submitted and Table N° XI-1. Report on the consultations held on the OBOC scope mandate and how to respond to the comments submitted, we found that the comments and suggestions mentioned in points 4.3.6., point 4.3.7 and point 4.3.8 on page 8 of letter no. 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." On the same subject, we maintain our comments, which are essentially terminological and based exclusively on the applicable and enforceable 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 in accordance with Regulation N° 3/2008 on standards for the permissible content of harmful substances in soil and those listed in Annex 2 to Article 4 — Standards for safety concentrations, MDK and intervention concentrations for persistent organic pollutants and petroleum products in soil 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 in accordance with Regulation No. 3/2008 on the permissible limits for the content of harmful substances in soil and the limits referred to in Annex 2 to Article 4 — Standards for safety concentrations, maximum permissible concentrations, and intervention concentrations for persistent organic pollutants and petroleum products in soil for all indicators.

The proposal is based on the following: The provision of Article 1 of Regulation No 3/2008 on limits for the permissible content of harmful substances in soil concerns the setting of concentrations for the permissible content of harmful substances in soil. In this sense

Harmful substances in soil do not 'comply' with these standards, but may exceed or fall below the limit of these concentrations. This is not a correction of the data, as understood by the authors of the EIA, and as stated in their comment 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 stored. The stored soil materials will be used to restore the soil damaged by the activity."*

The following should be added: The removal, storage, and utilization of the topsoil layer will be carried out in accordance with the provisions of Section II of Regulation N° 26 of 2.10.1996 on the restoration of disturbed soils, the improvement of low-productivity soils, and the removal and utilization of topsoil.

The proposal is based on: Directive N° 26 of 2.10.1996 on the restoration of disturbed soils, the improvement of low-productivity soils, and the removal and utilization of topsoil, which concerns various aspects of soil protection, in which the removal, storage and utilization of topsoil are regulated exclusively by the provisions of Section II of the Regulation.

The aforementioned Directive K.° 26 is mentioned only twice in the supplementary document for OBOC — once on page 178, where the text refers to the restoration of disturbed soils, and a second time on page 293 of Section VIII. Description of the forecasting methods or data used to determine and prepare the assessment of significant environmental effects, including details of any difficulties (e.g. technical inadequacies or lack of know-how) encountered by the proponent of the investment proposal in gathering the necessary information, as well as the main elements of uncertainty. Laws, regulations, methodologies, methodological guidelines, directives, orders, decisions, regulations, strategies, plans-programs, and bibliography used in the preparation of the EIA.

This contrasts with the view of the authors of the OBOC report, who rejected our proposal to add: "In order to avoid overburdening the report, repetitions of information already mentioned are avoided."

2.3. On page 254 of the report, in measure 27, in the sentence: "The locations for temporary storage of humus within the boundaries of the designated area shall be determined and marked," the phrase "and marked" should be deleted.

The proposal is justified as follows: In accordance with the provisions of Article 26 of the Implementing Regulation of the Law on the Protection of Agricultural Land, the explanatory note to the detailed urban plan (PYP) for the area (section) of a specific project specifies which part of the area (section) the humus layer will be removed from and to what depth it must be removed. When the topsoil cannot be used immediately after removal, the plan specifies the location, boundaries, and area for storing the topsoil. The aforementioned legislative text does not require "marking," which should be removed.

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

The proposal is justified as follows: The term *"property monitoring"* is a term used in the Land Act and, as noted, is consistent with the provisions of Article 29, paragraph 1, point 2 of the Land Act.

3. Please be advised that the current opinion of the Watershed Management Directorate has been requested.

"Eastern Pacific Region" for the eligibility of the investment plan in accordance with the regimes set out in the current River Management Plan (RMP) and Flood Risk Management Plan (FRMP) in the Eastern Pacific Region 2022-2027. From the River Basin Directorate

"Eastern Pacific Region," in letter no. N OBOC-68-88/30.01.2026 to the MOCB, which we provide for your information, the opinion is expressed that the investment proposal is acceptable from the point of view of the PDYA and PDYP of the Eastern August 2022-2027 region, the Water Law and the accompanying subordinate legislation, subject to compliance with the conditions set out in the opinion.

N. *Regarding the waste management proposal*

Following consultations with the Ministry of Energy on the submitted intention for the management of mining waste, an opinion was issued under No. OBOC-68-78/19.01.2026 was issued, which was confirmed by opinion no. OBOC-68-83/27.01.2026. According to this, based on Article 82, in relation to the implementation of Article 22c of the Underground Resources Act and the Regulation on the Management of Mining Waste, the Ministry of Energy, Directorate of Natural Resources, Concessions and Control, at this stage, accepts the prepared Draft Management Plan for Mining Waste only as a proposal for the management of mining waste. The submitted "Mining Waste Management Plan" has been drawn up, in terms of its structure and content, in accordance with the provisions of Article 22a, paragraph 1, and Article 22c, paragraph 1 of the law on underground resources and meets the requirements of the regulation on the management of mining waste.

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

After examining the information contained in the revised and supplemented impact assessment report **impact assessment report** (EIA), in accordance with the quality assessment criteria set out in Article 24(3) of the Regulation on the conditions and procedure for assessing the compatibility of plans, programs, projects, and investment proposals with the subject and objectives of protecting protected areas (Regulation on the OS) and those requested by letter no. OBOC-65/20.10.2025 of the MOCB, and on the basis of Article 39(8) in conjunction with Article 24(5)(2) of the Regulation on the OS, the MOCB **positively assesses the quality** of the additions and revision (DOSB) for the investment project "Extraction and processing of polymetallic ores from the "Rozino" deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region," taking into account the following:

1. The impact assessment report (EIA) is structured in accordance with the requirements of Article 23(2) of the EIA Regulation, as the information contained therein is up to date at the time of writing.

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

3. The EIA presents information on other plans, programs, works, and investment proposals that coexist and/or are in the process of being developed and approved, as well as an analysis and conclusions regarding the degree of cumulative effect on the subject and objectives of protection in the protected areas affected by the investment project.

4. A description has been made of the types of natural habitats, populations, and habitats of plant and animal species that are subject to protection in the protected areas affected by the implementation of the investment project.

5. The nature and degree of the expected impact of the implementation of the investment project on the natural habitats, habitats, and populations of species that are the subject of protection in the protected areas BG0001032 'Rodopia-Anatolika' and BG0002019 'Biala Rika'.

6. The EIA provides for adequate mitigation measures to reduce the impact during the implementation of the investment project, covering all stages of the investment project. Alternatives for the implementation of the investment project were also examined and evaluated.

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

8. The experts who drafted the report have attached the necessary documents and statements certifying the existence of the requirements of Article 9(1) of the Regulation on the OS.

IV. *With regard to the actions we need to take to continue the OBOC process* **OBOC process, including the conformity assessment procedure:**

Based on the above, you must take the following actions:

1. In accordance 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 mentioned, in printed and electronic form with a translation into Greek, for **the purpose of conducting consultations with the competent authority of the State concerned.**

We will inform you in due course of the outcome of the consultation with Greece, including the need to hold a public debate in the territory of the country concerned or its participation in the upcoming public debate in the territory of the Republic of Bulgaria.

2. Pursuant to Article 16(1) of the OBOC Regulation, the MOCB **DESIGNATES as interested parties** 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 Bialgradets, and the mayor's office of the village of Konnitsa, **with whom you will jointly organize a public discussion** on the OBOC report together with all its annexes, including the DOSV. To this end, you must:

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

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

2.3. Ensure public access to the OBOC documentation at least 30 calendar days before the start of the public discussion and provide a space for submitting written opinions.

2.4. To organize the public discussion, you must submit a written request to **the relevant communities AND municipalities, with a proposal for the venue, date, AND time of the meeting(s) for public discussion, for public access to documentation, AND for the submission of opinions**, as the date of the meeting is up to 60 days from the date of submission of the request. The meeting must take place within 60 days of the date of submission of the application. You must attach a copy of the OBOC report with all its annexes, including the DOSV, to the written application to the municipality of Ivaylovgrad, the mayor's office of the village of Rozino, the mayor's office of the village of Gugutka, the town hall of the village of Bialgradets, and the town hall of the village of Konnitsa, which must confirm the proposal in writing within 7 days of the application being submitted or submit another proposal. If no decision is taken within the 7-day period, the contracting authority's proposal shall be deemed to have been accepted.

2.5. The place, date, and time of the meeting(s) will be announced by the contracting authority through the media or by other appropriate means, at least 30 days before the scheduled date(s), by means of a notice in accordance with the model in Annex 3 to the OBOC Regulation.

We would like to point out that, in accordance with Article 17(1)(3) of the OBOC Regulation, **the municipalities/mayors CONCERNED with** which the contracting authority is required to organize the public debate must ensure that the population affected is adequately informed of the forthcoming public debate, **inter alia by posting a notice in a publicly accessible area of the municipality/town hall building, for which minutes SHALL BE DRAWN UP, a copy of which shall be delivered** to the MOCB.

3. Inform 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, in accordance with Article 17(1)(5) of the OBOC Regulation, the contracting authority may, at its discretion, inform other qualified persons, bodies, and organizations in writing about the public consultation meeting(s).

Please note that the MOCB will provide access to the documentation as follows:

• the OBOC report (once it has been delivered to the MOCB) via the website www.moew.yaovernment.bg/ключуова si at the address si@moew.yaovernment.bg address: si@moew.yaovernment.bg at the address www.moew.yaovernment.bg/ключуова subject: Preventive

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

- on the DOSV website at: www.moew.government.be/ключова_subject_Натрпа_2000, in accordance with the provisions of Article 16(2) of the OBOC Regulation and Article 25(1) of the OS Regulation.

Annex: as per the text.

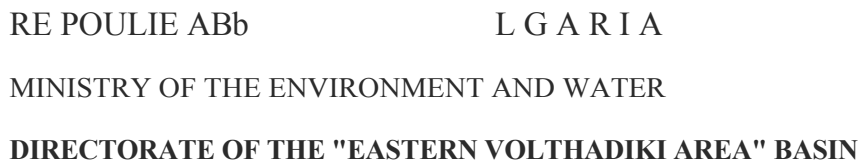
12.2.2026



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

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DEAR MS GULABOVA,

In response to Bame's letter, reference number OBOC-68-73/16.01.2026r., requesting an opinion on the quality of the supplementary report on OBOC, as well as on the acceptance of the IP in accordance with the rules set out in the current River Management Plan and Flood Risk Management Plan for the Eastern Mediterranean 2022-2027, after examining the attached materials, The Eastern Mediterranean River Basin Directorate of Plovdiv expresses the following opinion:

I. With regard to the completed 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, Haskovo region

1. On page 72 of the OBOC, it is stated that "Updated information on the status of the groundwater system is presented on the basis of the Annual Report on the status of surface and groundwater systems in the Western Black Sea basin 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 Augustus region for water management was carried out on the basis of the measured values of pollutant concentrations and pollution indicators at the monitoring points, the determination and comparison of the corresponding 5 annual average values with the corresponding quality standards of Annex No. 1 of

Regulation No. 1 of 10.10.2007 on the study, use and protection of groundwater, as well as for the comparison of the average annual values of the respective pollutants/pollution indicators with the respective permissible values for each of the groundwater systems included in the SDOP of the ZDA (2016-2021).

It should be noted that with regard to the chemical status of groundwater bodies in Iz očno-befiomo sk a for the management of the river basin:

- The overall assessment of the chemical status of groundwater bodies in the PDY (2022-2027) has been published on the website of the Eastern Pacific Basin Water Directorate, Plovdiv - https://earbd.bg/indexdetails.php?menu_id=966, Annexes in Section 4 (Monitoring and assessment of the status of surface waters, groundwater and water protection zones) - Annex 4.2.2.2.1. Obshta ozenka_him_status GW.

- According to the annual reports on the status of water for the period from 2011 to 2024, including the area of the Regional Directorate of Environment and Ecology (RDDE) Haskovo, an overall assessment of the chemical status for PBTs is provided.

- The reports on the status of water bodies in the Eastern August region are published annually on the website of the Eastern August River Basin Directorate Пловдив-https://earbd.bg/DOKLADI ZA SYSTOYANIETO NA VODNITE_TELA_NA_TERRITORIYA TA NA IIR-c762.

2. Maps are presented at an appropriate scale indicating the exact location of the investment project. It is reported that the depth of the mine is expected to reach 435 meters.

3. The EIA characterizes 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, hygiene and protection zones (CO3), and sources of drinking water for domestic use.

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 reported that the integrated approach adopts the principles of minimizing wastewater quantities, and to this end, a strategy has been developed for the minimum use of fresh water and its maximum reuse within the production site.

6. The EIA has analysed compliance with the provisions of Article 116(1)(4) of the Water Framework Directive and the measures provided for in the IBR's Water Management Plan (2016-2021) relating to this NP.

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

8. The DOPS characterizes the hydrogeological conditions and factors. The annexes present the hydrogeological assessment and the opinions of the legally authorized persons.

9. The EIA presents information on drilling and blasting operations. An assessment report on the environmental impact of the explosion is attached, subject:

"Rozino Mine, Municipality of Kerzali."

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

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



necessary for taking an appropriate decision on the degree of impact, with a technical error noted in point 1 of this opinion.

II. With regard to the eligibility of the PIR in relation to the regimes set OUT in the current River Management Plans (RMP) 2022-2027 and the Flood Risk Management Plan (FRMP) in the Eastern Balkan region 2022-2027.

1. Assessment of the permissibility of III in relation to environmental protection objectives; the measures SET OUT in the Eastern Pacific River Basin Management PLAN (EPRBMP) AND the Eastern Pacific Flood Risk Management PLAN (EPRFMP).

1.1. Characteristics AND objective of III: The IP relates to the assessment of the quality of the completed environmental impact assessment report (OBOC) for the "Extraction and processing of polymetallic ores from the "Rozino" deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region.

The contracting authority plans to extract and process polymetallic (gold-silver) ores from the "Rozino" deposit, in the "Tintyava" area, as the future concession area covers 2,753 hectares, of which 1,179 hectares will be disturbed land. The main activities included in the proposal are:

- Open-pit mining of polymetallic ores
- Processing of the ore by flotation to obtain a concentrate
- Construction and operation of the necessary accompanying infrastructure - roads, water supply, electricity supply, material storage facilities, facilities for mining waste and

др.;

- Gradual restoration of the affected areas. The duration of the concession is set at 35 years.

The objective of the investment project is the open-pit mining and processing of polymetallic gold-silver ore from the "Rozino" deposit in the "Tintyava" area. The open-pit mining process involves uncovering the natural resources, drilling and blasting (PBP), and crushing the ore. The ore will be processed by flotation until the concentrate is obtained, which will be the final product of the facility. No metal blocks are expected to be produced. The mineral waste produced will be stored in mineral waste storage facilities.

In relation to the letter from the Minister of Environment and Water No. 99-00-587/27.05.2024, pursuant to Article 98, paragraph 1 of the Environmental Protection Act, a notification was drafted and sent to inform the potentially affected country, the Hellenic Republic, in relation to the OBOC procedure and in accordance with the requirements of the OBOC Convention in a transboundary context. The notification was drafted in accordance with Decision 1/4 of the first meeting of the parties to the Convention.

By letter No. K• OBOC —68/23.10.2024, the MOCB received an official response from the Greek side, confirming its desire to participate in the OBOC procedure as an interested party. This makes the Minister of Environment and Water the competent authority for conducting the OBOC procedure. The assessment examines in detail the transboundary aspects of the impacts, with particular emphasis on the "Water" component. The letters relating to the transboundary process are set out in the annex to the EIA.

In order to ensure the completeness of the analyses and assessment for the 'groundwater' component, the contracting authority commissioned a 'Report on the hydrogeological conditions in the area of the investment project for the Rosino deposit'. This report was prepared by persons with the appropriate expertise and submitted to the MOCB by letter from the contracting authority No. 4-2/28.04.2024. There are two opinions on the report - one from BD IBR No. PU-10-182(8)/12.05.2024 and one from an expert hydrogeologist. All documents have been submitted as an annex to the EIA.



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The EIA has been prepared in accordance with Article 96, paragraph 1 of the Environmental Protection Act, in accordance with consultations held with stakeholders and the public, based on studies carried out during the OBOC process, including MOCB letters No. OBOC-68-17/18.11.2024 and No.

OBOC-68-28/14.02.2025. The study was submitted for quality assessment to the MOCB in August 2025. By letter No. OBOC-68-65/20.10.2025 (Textual Annex N• 7A), the first negative quality assessment of the report for OBOC and OS was given, pointing out certain shortcomings, resulting in the report being returned for completion.

This supplemented EIA reflects the comments made, with emphasis on the response to the comment made in point 1.5 of the MOCB letter: "No assessment has been made as to whether individual sections of the EP fall within future sanitary protection zones, in relation to 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 of all water sources around the future concession area has been carried out. At a distance of 800 m east and 1800 m south of the IP boundaries, there are facilities belonging to ViK - Haskovo PC Rozino (on the terrace of the Apna dere) and PC Gugutka (on the terrace of the Biala reka river). Information was requested from BD IBR in accordance with the ZDOI procedure. The decision to provide access to public information No. ZDOI-01-9/31.01.2025 of the Director of BD IBR states that "At present, we have no information on the existence of future P-ri or III-ti zones of CO3 in nearby water sources for drinking and domestic water supply" and, in view of this, no such assessment has been made in the report.

Regarding the reference in the letter from BD IBR Plovdiv No. N PU-01-808(2)/26.09.2025, that "Approximately 620 m east of point 6, which describes the outline of the future concession area, is the "Rozino" reservoir, located in the village of Pastrok, municipality of Ivaylovgrad, for the supply of drinking water and water for domestic use, owned by the State Forestry Service. No CO3 has been constructed around the water intake in accordance with Regulation No. 3/10.10.2000. Annex No. 7.2.1. of Section 7 of the updated SDOP of the IBR, approved 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 water protection zones and designated health and protection zones (CO3) and in safety zones around water abstraction facilities/systems, action to implement the measure: DW_1_35 Prohibition of the extraction of underground resources, including aggregates and building materials, in a safety zone with a radius of 1000 meters from groundwater pumping facilities for the supply of drinking water.

Taking into account the above, part of the concession area covered by the investment plan falls within the scope of the measure provided for in the SDIP of the IBP 2022-2027 and must be excluded from the concession area of the "Rozino" deposit, the safety zone within a radius of 1000 m from the groundwater pumping facilities for drinking and domestic water supply (water intake

"Rosino", located in the territory of the village of Pastrok, municipality of Ivaylovgrad).", in DOVOS se m av

It should be noted that the "Rosino" reservoir is located 2300 meters from the perimeter of the mine where mining will take place and 1300 meters from the boundaries of the safety zone with a radius of 1000 meters from the water pumping facility. The reservoir is located near point 6 of the perimeter of the future concession area, which is located below the clean water reservoir. From the cartographic material presented, it is clear that no mining, or PBP, can take place in the 1000-meter safety zone (without a specified CO3), as there will be an artificial water intake facility, necessary for the needs of the IP and which constitutes a clean water reservoir. The DOPOS emphasizes that mining will take place at a distance of 1300 meters from the 1000-meter safety zone (without a specified CO3) and at a distance of 2300 meters from the water intake itself, for this reason, there is no reason to exclude the safety zone around the "Rozino" water intake from the future concession area. The exclusion of this area will make it impossible to construct a reservoir



clean water, necessary for the implementation of the investment plan. Furthermore, the report points out that the catchment areas of the investment project during operation are clearly indicated and that it is clear that no mining operations are carried out in the safety zone of the "Rozino" dam.

In the EIA, the expected impacts have been assessed, setting out general and specific predictions regarding the expected potential impacts, including their degree. Based on these conclusions, recommendations and measures are proposed to reduce the impacts, resolve any future environmental problems, and ensure the safe operation of the facility, thereby safeguarding human health, the environment, and the sustainable development of the region.

The total projected area of the concession is 2,753 hectares, of which 1,179 hectares will be disturbed land. The safety zone covers 1,574 hectares. Part of the facilities will be developed on already exploited/disturbed land and no new land will be occupied, as this 'overlap' amounts to 261.9 hectares.

In accordance with the requirements set out in letter no. PU-02-231/1/18.12.2024 of the NW IBW, drainage channels are to be constructed around the mining field and open pit mine in order to collect rainwater and snowmelt from higher altitudes and prevent surface water from flowing into the mine cavity. As regards their representation on the site plan, it should be noted that they have been marked hypothetically, taking into account the current geodesy of the terrain. Their exact location will be determined after technical calculations and specific technical studies have been carried out, with a view to maximising their effectiveness in relation to the technical parameters of the overall future project. For this reason, in some places it appears that the outline of the hypothetical trenches extends beyond the proposed concession area, which will be corrected in the technical design phase and adapted to the concession area, as they will be constructed within this area.

The depth of the mine is expected to reach 435 m. According to the boreholes that have been drilled, no groundwater has been found at this depth and, therefore, no additional water flow into the cavity is expected, except for that coming from rain and snowfall.

The quantities of water entering the mine and storage facilities as a result of rainfall and snowfall will be directed to the lowest points of the respective facility. At each stage of work, a reservoir will be constructed in the mine pit to collect surface water that has entered, which will be used to irrigate the mine roads. Excessive amounts of mine water, if necessary, will be pumped and channelled to the water contact facility to replenish the recycled water. All stockpiles will be constructed and developed with slopes in individual stages, ensuring gravitational drainage of surface water back to the outer edges. A surface water drainage system will be constructed, which will direct surface water to the ore processing plant or to the contact tank. The open horizons of the pit will contribute to the gravitational redirection of rainwater and its removal outside the perimeter of the pit, which will lead to a reduction in drainage requirements during the mining of the mine.

Bottled water will be provided for drinking water needs. For sanitation and domestic use, a contract will be signed with the water supply and sewerage company to supply water from a company-owned reservoir located 800 meters from the residential areas in the OF area. There is mention of existing infrastructure with the technical capability to connect to the future project. The exact routes will be determined during the study phase.

There are no plans to build a central sewerage network due to the lack of a wastewater treatment plant near the project. As an alternative, the possibility of using mobile toilets is being considered, which will be maintained by a specialized



company, which will periodically collect the produced water according to a schedule and transport it to a licensed treatment plant. The option of designing and constructing a mobile treatment plant, adapted to the consumption of the facility, which will be removed after the facility ceases operation and is closed, was also considered.

According to the preliminary plan, in order to compensate for the expected annual water deficit in the facility's supply, estimated at approximately 125,000 to 310,000 m⁽²⁾, water will be supplied from a pumping station on the Apra dere River, located approximately 1.7 km east of the site.

It is planned to pump water directly from the Apra dere river during the wet months of the year (from January to May). Water will be pumped from the Apra dere river near its confluence with the Yupen dere river and near the existing pumping station in the village of Розино. This pumping station is designed to pump water from a spring that flows into the marsh. 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 Rozyno is in the order of 0.34 l/s. The excess water from the spring, after the corresponding justification, could be pumped for the industrial needs of the factory throughout the year. It is planned that water will be pumped from a natural pit, without the need to construct a dam or other CMP activities that obstruct the flow of the river.

Surface runoff from the open pit mine will be used as the primary water source for the production facility. This water is pumped from the open pit siphons to the OF tanks. The water stored in the reserve storage lake is the second source of water for the plant, while the fresh water reservoir is used as a supplementary water source (third source) if the water from the open pit and the reservoir is insufficient or does not meet the required quality to cover the plant's water needs.

During the exploitation phase, according to the EIA, no negative impact on surface waters is expected, as there are no objective reasons for this.

With regard to water abstraction from the Apra dere river, the report states the following:

The planned water pumping for the project's needs is seasonal, with a supply of up to 50 l/s and an operating period from January to May (5 months per year). Water pumping is planned near an existing pumping station in the village of Rozino, where the supply of drinking water to the population takes priority over industrial water use. Water pumping for the SI 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, guaranteeing the supply of water for the domestic needs of the population in the project area. The reference in the Report on Integrated and Sustainable Water Management (Text Annex Ko 11) water shortage of 125,000-310,000 m³ represents a balance between the estimated needs of the production facility in various scenarios and not an unconditional planned withdrawal of water from the Apra dere River. The basic principle of the project is the minimum use of fresh water and the maximum reuse of water in circulation.

The investment proposal for "Extraction and processing of polymetallic ores from the "Rozino," "Tintyava" area is limited to the use of groundwater only in case of necessity. The hydrogeological study carried out to date in the deposit area has found that groundwater has an insignificant supply for technological needs. For this reason, an additional study of the hydrogeological conditions and potential of the PBT is planned.

It is planned that the groundwater collected in the cavern tanks will be pumped to the facility as a priority in order to meet the requirements of the technological facility, while excess water will be pumped to the waste storage area 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 open pit mine shafts to the OF tanks.

In order to reduce the amount of filtered contact water, a decision has been made to invest in an insulating cover for the bottom and walls of the contact water tank. As a rule, no water should leak from the tank unless there is a defect in the membrane. Any water from leaks will be combined with the flow of water from the tailings storage area. Contact water that has passed through any leaks in the screen, as well as the filtration water under the base of the installation, will enter the contact tank either directly through the surface drainage or after being collected by the drainage curtain and pumped back into the contact tank.

The filtered water that has passed through the curtain will be stopped by the injection barrier. The injection curtain, in addition to being a barrier for filtered contact water, also acts as a barrier for non-contact water and prevents the two flows from mixing. The report states that non-contact filtration flows are limited to the axis of the contact water tank and are not expected to cause groundwater pollution.

With regard to drilling and pumping operations (BPB1):

The EIA report mentions the impact of PBP on water, with the results of *test blasts*. It is emphasized that the "Rosino" reservoir is located 2,300 meters from the perimeter of the mine where mining will take place and 1,300 meters from the safety zone with a radius of 1,000 meters from the water pumping facility. The diagram shows that the reservoir is located close (620 m) to point 6 of the perimeter of the future concession area, which is located below the clean water reservoir. It is clear from the cartographic material that mining, or PBP, cannot take place within the 1000-meter safety zone, as there will be an artificial water intake facility, necessary for the needs of the IP, which is a clean water tank. Attached is a report from a test explosion. The main conclusions are as follows:

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

The conclusion is that the results obtained justify the conclusion that, by complying with the recommended maximum BB mass in a delay interval, the vibration velocity at depth is not expected to be exceeded, that would have a seismic effect on groundwater and water sources, and the implementation of the investment plan will not cause negative impacts on drinking water sources that are not directly affected by mining operations.

Regarding the sub-geological conditions in the area:

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

Hydrogeological parameters and filtration coefficients

Hydrogeological studies and experimental filtration tests confirm that the aquifers in the Rosino deposit area, in the Tintyava region, have very low permeability and limited water yield. The determined filtration coefficients for the Paleogene sediments and the metamorphic bedrock range from 2.11×10^{-7} to 2.13×10^{-9} m/s, indicating very limited underground volumetric volume and lack of potential for significant groundwater migration.

Potential risk of leakage from the SMO



Based on geological parameters, low natural permeability, and planned waterproofing measures (HDPE geomembrane, drainage layers, seepage collector), it is concluded that the probability of leakage from the SMO to groundwater is minimal. The rock masses form a natural hydrogeological barrier, which, in combination with the technical measures, eliminates the risk of impact on groundwater.

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

Possible leakage during cavity backfilling

The backfill will be carried out with non-aggressive, inert, sterile rock mass, without the possibility of acid drainage. The low permeability of the rocks and the absence of local aquifers guarantee that no seepage or contamination of groundwater is expected during refilling.

Impact of blasting operations

Analysis of the structural-geological and hydrogeological conditions shows that the existing fracturing is minimally developed and hereditary. The controlled application of blasting will not create significant new aquifer fractures and will not change the mechanical or filtration properties of the aquifer rocks.

Impact on drinking water sources

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

- the absence of a hydraulic connection between the investment project zone and the water pumping facilities
- the varying depth and nature of the aquifers
- the absence of confirmed groundwater in the mine area, except for limited local

Events.

The supply of water sources will not be reduced by the activity of the NP and no change in groundwater rates is expected.

Impact on the chemical status of water

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

Summary conclusion from the report on hydrogeological conditions in the area of the investment project under evaluation:

Based on all the surveys, tests, and analyses carried out, it is concluded that:

- The hydrogeological conditions are low water permeability and limited underground runoff.
- No leakage or contamination from the SMO or reverse filling is expected.
- Blasting operations will not adversely affect fracturing and filtration properties.
- The project does not affect the supply of drinking water in the area and does not pose a risk to water pumping facilities.
- The chemical status of groundwater and surface water will not be adversely affected.

It is concluded that the exploitation of the "Rozino" 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 waters. At all stages of implementation of the investment proposal for

"The extraction and processing of polymetallic ores from the "Rozino" deposit, "Tintyava" area

"Tintyava" deposit, has a negligible impact on surface waters. The surface waters used by the Appa Dere River are in quantities of up to 10% of the average multi-year water resources.



quantities and are not expected to have negative impacts (including transboundary ones), respectively, no discharge of wastewater into surface water systems is foreseen. The "zero discharge" approach has been adopted.

- Groundwater. The implementation of the investment proposal for "Extraction and processing of polymetallic ores from the "Rozino" 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 groundwater system BG3G000PtPg049 Fractured waters - Eastern Rhodope complex.

As a technological option, water pumping from the terrace of the Apra River is envisaged through the construction of a pumping station in the area of the existing PC "Rosino".

Pumping is planned to take place at a distance of 1300 m from the boundaries of the safety zone of the "Rosino" reservoir, with a radius of 1000 m and at a distance of 2300 m from the reservoir itself, for this reason no negative impact on the drinking water protection zone is expected. A clean water reservoir will be built near the concession point closest to the well.

Mining operations will be carried out in the filtration zone, without reaching the water level. The passive flow of groundwater will be pumped to the facility as a priority in order to meet the technological requirements of the OF.

The impact on the chemical status of groundwater will be mitigated by lining the bottom and walls of the contact tank with an insulating barrier, as well as by constructing a leak collection system, which includes a drainage barrier and an injection barrier.

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The DOPOS states that the area of rp. Ivaylovgrad is adjacent to zone GR12 - the geographical area 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 area managed by the Bulgarian Water Management Directorate of Western August, where the Nestos and Despatas rivers are transboundary. The central and eastern parts border the Bulgarian IBW, where the Ardas (Ardas) and Loudas (Erythrotamos) rivers are transboundary. The Eurotos river basin is also transboundary, as it is partly located in the Bulgarian IBW RBP in the Eastern Aegean Sea (rivers and). The Maritsa (Evros) River forms the border between Bulgaria and Greece for a length of 12 kilometers, as well as between Greece and Turkey, with the exception of the section upstream of Nea Vissa, where the river flows through Turkish territory. In Greek territory, the Bala Rika River flows into the Louda Rika - Erythrotamos River.

At all stages of construction, operation, and restoration of the "Rozino" deposit, no transboundary impact is expected on the ecological and chemical status of surface waters, runoff, and water quantities flowing into the territory of the Hellenic Republic from the catchment areas of the Louda and Bala rivers.

The planned pumping of water from the Appa River to fill the open reservoir for non-contact water during the exploitation of the 'Rozino' deposit, with a total volume of 648 000 m³, is limited to the months of January to May (practically outside the active irrigation period) and is not expected to have any negative transboundary effects on the quantitative status of surface waters.

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



Minimal possibility of water from the EP flowing into water bodies. There are no plans to discharge industrial and domestic wastewater into surface water systems or the sewage network of settlements. All collected water will be used in a cycle, in technological cycles.

For the water supply of the project for technological needs, a hydrological study was carried out to determine the existence of water resources from surface water systems. It was found that such use of water is possible without causing a reduction in water quantities or disrupting the natural flow of water. The use of water will only be possible after obtaining a permit in accordance with the Water Law.

The report states that no impact on the chemical and quantitative status of groundwater bodies is expected. A hydrogeological study was also carried out in the deposit area, which found that the groundwater has an insignificant supply. Taking into account the planned depth of the mine, there is no reason to believe that there could be a direct impact on groundwater systems or drinking water sources, with corresponding hygiene and protection zones and exploitation permits in accordance with the Water Law. Taking this into account, the report states that no adverse effects on the quantity and quality of water in Greece can be assumed.

1.2. Location: The site of the ESP is located within the boundaries of the catchment area of the surface water body (BT) "Biala Rika and its tributaries" with code BG3MA100R270.

The NP is located within the boundaries of the water protection zone - 33 "Rodopia — East" with code BG0001032, defined in accordance with Article 119a, paragraph 1, point 5 of the Water Law, and included in section 3, point 3. 5. 1. of the SDOP of the IBR. The IP is located within the boundaries of the water protection zone - 33 "Biala Rika" with code BG0002019, defined in accordance with Article 119a, paragraph 1, point 5 of the NYP, and included in Section 3, point 3. 5. 2. of the PDOP of the IBR (as a very small part of the concession area is outside the zone).

The investment project does not fall within water protection zones in accordance with Article 119a(1)(1) (for surface waters), (2) and (4) described in Section 3 of the PDYP of the IBR. The "Rozino" deposit, "Tintyava" area, does not fall within the boundaries of the established CO3 around a water source from a surface water body.

The investment project "Extraction and processing of polymetallic ores from the "Rozino," in the "Tintyava" area, located in the municipality of Ivaylovgrad, Haskovo region, falls within the boundaries of the underground water system **BG3G000PtPg049 - "Puknatini waters - Eastern Rhodope complex."**

Groundwater systems have been designated as water protection zones in accordance with Article 119a(1)(1) of the Water Act. Water protection zones have been designated in the groundwater systems in accordance with Article 119a(1)(Z) of the Water Act. Parts of the northern and eastern sections of the "Rozino" deposit,

'Tintyava', fall within a vulnerable water protection zone included in Section 3, point

3.3.1 of the IBW's SDOP. The "Rozino" deposit, "Tintyava" area, does not fall within the boundaries of the established CO3 around underground or mineral water sources.

The hydrological sources of groundwater for drinking water supply in the IP area are as follows:

- Approximately 1630 m south of point 7, which describes the outline of the future concession area, is the TK of the PC "Gugutka", for the water supply of the villages of Gugutka and Byal Gradets, municipality of Ivaylovgrad, Haskovo region. No CO3 has been constructed around the water intake in accordance with Regulation N•3/10.10.2000r. No CO3 has been constructed around the water intake in accordance with Regulation N•3/10.10.2000r.

- Approximately 620 m east of point 6, which marks the boundary of the future concession area, is the "Rozino" reservoir, located in the village of Pastrok, municipality of Ivaylovgrad, for the supply of drinking water, owned by the State Forestry Service. No CO3 has been constructed around the water intake in accordance with Regulation N•3/10.10.2000r.



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The "Rozino" deposit, "Tintyava" area, is located outside the designated areas with significant potential flood risk in the NBR.

1.3. Status of water bodies and environmental protection objectives:

1.3.1. Status according to the IBR's IIURB: The surface water system with code BG3MA100R270 has been classified as being 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 ZB) is to maintain good ecological status and prevent its deterioration, maintain good chemical status and prevent its deterioration, and achieve the objectives for water protection zones.

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

1.3.2. Status according to the latest annual assessment: For 2024, the water system with code BG3MA100R270 has been classified as being in good ecological status and good chemical status according to the water matrix.

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

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

1.4.1. Measures in the NBR's POPD: The measures for achieving the objectives for the protection of groundwater and surface water and water protection zones are described in the annexes to Section 7 of the IBW's ITYPD. The following measures may be applicable to this PP:

- Annex No. 7.2.1, Section 7 of the IBW's PDYA provides for a measure entitled: Prohibitions and restrictions on activities in drinking water protection zones and designated health and protection zones (CO3) and in safety zones around water abstraction facilities/systems, action to implement the measure: DW 1 35 Prohibition of the extraction of underground resources, including aggregates and building materials, in a safety zone with a radius of 1000 m from groundwater pumping facilities for drinking and domestic water supply. The measure has the code DW_1.

- Annex № 7.2.1, section 7 of the PDYA of the IBR provides for a measure entitled: Prohibitions and restrictions on activities in drinking water protection zones and designated hygiene and protection zones (CO3) and in safety zones around water pumping facilities/systems, action to implement the measure: DW 1 4 Compliance with prohibitions and restrictions in CO3 in accordance with the order for the designation of the zone and the list in Annex 1 of the National List of Measures (SDOP). The measure has the code DW_1.

- In Annex No. 7.2.1, section 7 of the NBR's PDYP provides for a measure entitled: Prohibition of the extraction of aggregates within 50 meters of river banks, action to implement the measure: HY_3_1 Prohibition of the extraction of aggregates within 50 meters of river banks. The measure has code NY_Z.

- In Annex 3• 7.2.1, section 7 of the IBW's PDYP 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, through the removal of sediments and soils covering the water system. The measure has code GD_1.

1.4.2. Measures in the IYPH of the IBP: No measures are planned in the PWH of the IBP for the IYPH area, as it does not fall within the designated areas with significant potential flood risk in the



IBR, as well as in areas that may be flooded according to the maps of areas threatened by flooding, in accordance with the scenarios referred to in Article 146e of the Water Act.

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

1.4.3. Specific requirements AND measures for water protection zones. The entire concession area falls within the scope of protected zone 33 "Rodopia - East" with code BG0001032 and 33 "Biala Rika" with code BG0002019 (a very small part of the concession area is outside the zone), and prohibitions and restrictions have been established by Decrees No. RD-267 of 31.03.2021 and No. RD-575/08.09.2008.

Prohibitions AND restrictions PROVIDED for in the Water Law, *but not relevant to this type of investment intention.*

2.1. Prohibitions, restrictions, AND requirements INCLUDED in the Water Law:

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

In accordance with the provisions of Article 156a, paragraph 1, point 2 of the Water Act, measures to protect groundwater from pollution must be provided for at all stages of the design, study, construction, and maintenance of the planned facilities.

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

2.2. Prohibitions, restrictions, AND requirements INCLUDED in subordinate legislation of the LY: The measures in Annex No. 1 to the National Catalog of Measures for

ITURB, in the List of activities, prohibitions or restrictions in drinking water protection zones in the section on groundwater, to the additional activities prohibited, 2. in the safety zone within a radius of 1000 m from the water intake facility, when CO3 related to IP (activities from CRP) has not been specified. For groundwater systems or parts thereof that are within sight (visible on the surface), the following prohibitions apply:

- Activities leading to the indirect discharge of dangerous substances into the water system from the earth's surface or between the earth's surface and the water level.
- Activities leading to the indirect discharge of harmful substances into the water system between the earth's surface and the water level.
- Extraction of underground resources, including aggregates and construction materials, below the water table.
- Water abstraction that poses a risk to the quantity and quality of drinking water.

Activities that are not prohibited but may be permitted if specific studies (OBOD procedure) prove that they will not affect the status of water in the protected zone and/or that they will not require additional treatment to ensure the required quality of drinking water. In the same annex, for groundwater systems or parts thereof located in the first horizon (which is exposed at the surface), the following are included:

- Activities leading to the indirect discharge of harmful substances from the earth's surface into the water system.
- Extraction of underground resources, including aggregates and construction materials between the earth

RELATIONSHIP WITH THE WATER TABLE.

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



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

In Annex No. 1 of the National List of Measures for the Protection of Drinking Water, 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 the safety zone within a radius of 1000 m from the water abstraction facility, when no CO3 has been specified, related to IP (activities from the CRP), for groundwater systems or parts thereof located at second and subsequent levels (which are not exposed at 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 specific studies (OBOC procedure) prove that they will not affect the status of the waters in the protected zone and/or that no additional treatment will be required to ensure the required quality of drinking water, the same annex, for groundwater systems or parts thereof located at second and subsequent levels (which are not exposed at the surface) includes:

- Construction of geological, hydrogeological, and geotechnical research facilities, including facilities for pumping groundwater from the groundwater system (aquifer)
- Extraction of underground resources in the water pumping area for the supply of drinking water and domestic water to the population, without specific studies and research having proven that the extraction activity does not reduce the level of groundwater and that there is no risk of deterioration in its quality.

According to Article 61(1)(1)(c) of Regulation No. 1 of 10.10.2007 on the study, use, and protection of groundwater, the protection of groundwater from pollution and deterioration is achieved through the application of the prohibitions in Article 118a(1) of the Water Law, 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, are prohibited.

Conclusion on eligibility: The investment project is **eligible** under the SDOP and SDYP of the IBP (2022-2027), the ZB and the **accompanying** subordinate legislation, **provided THAT THE following conditions ARE MET:**

- No pollution of surface and groundwater is allowed from the implementation and exploitation of the planned activities of the investment project for "Extraction and processing of polymetallic ores from the "Rozino" deposit, "Tintyava" area, located on the territory of the municipality of Ivaylovgrad, Haskovo region.
- Not to allow the removal of wastewater, including treated wastewater, outside the facilities (contact tank, etc.) of the recycled water use system.
- Protection of drinking water sources in the area of the Rosino deposit, Tintyava region, in terms of their quantity and quality.
- The abstraction of water from surface or groundwater must be carried out after a permit has been issued in accordance with Article 44(1) of the Water Act.
- The construction of new facilities on a water body must be carried out after a permit has been issued, in accordance with Article 46(1)(1) of the Water Act.
- The prohibitions referred to in the decisions of the Minister of Environment and Water for the designation of 33 "Rodopia — East" with code BG0001032 and ZZ "Biala Rika" with code BG0002019.

3. Information on existing AND permissible impacts arising from the nature of the investment project.



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The Eastern Mediterranean River Basin Directorate does not have systematic information on existing and expected impacts of a similar nature for the area covered by the amendment and supplement to the WMP.

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 the requirements for pollution prevention.

The investment project is not related to groundwater abstraction.

5. Justified assessment of significant impact on waters AND aquatic ecosystems.

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

6. Conclusion on the applicability of Article 93(9)(3) of the Environmental Protection Act.

We consider that for the planned activities under the investment project 'Extraction and processing of polymetallic ores from the 'Rozino' deposit, Tintyava area, located in the municipality of Ivaylovgrad, Haskovo region, Article 93(9)(3) of the ZOOS does not apply, as they do not fall within the scope of Annex Kc 2 of the ZOOS.

Yours sincerely

30.1.2026

X Vasil Uzunov

Vasil Uzunov
Rector of the University Signed by:
Vasil Uzunov



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