



## REPUBLIC OF BULGARIA

### MINISTRY OF ENVIRONMENT AND WATER

0800-68-A

20, August 2024

**Subject:** Investment proposals "Mining and Processing of Polymetal Ores from the Rozino Deposit, Tintyava PLA", located in the Ivaylovgrad Municipality, Haskovo District

**DEAR MINISTER,**

*In accordance with the provisions of Article 3(1) of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo convention, 1991), please find enclosed a notification form concerning the Investment proposals "Mining and Processing of Polymetal Ores from the Rozino Deposit, Tintyava PLA", located in the Ivaylovgrad Municipality, Haskovo District.*

*I would like to note that the deadline for response in accordance with Article 3(3) of the Espoo convention is 4 weeks from receipt of this letter.*

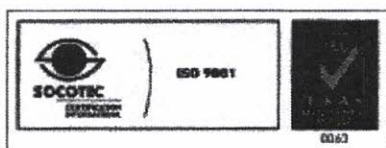
*Please accept, dear Minister, the assurance of my highest consideration and readiness for successful cooperation.*

**Annex:** A hard copy and a digital version of the notification.

*Sincerely yours,*

*Petar Dimitrov*  
**Minister of Environment**

**H.E. Mr. Theodoros Skylakakis**  
*Minister of Environment and  
Energy of the Hellenic Republic  
17 Amaliados str.  
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The format for notification to an affected Party of a proposed activity under article 3 of the Convention was adopted by the Meeting of the Parties to the Convention on Environmental Impact Assessment in a Transboundary Context by **Decision I/4** at its first meeting held in Oslo from 18 to 20 May 1998.  
This document contains excerpt from Annex to Decision I/4 (Table 1) and can only be used in conjunction with the full text of Decision I/4 and not as a stand-alone document.

## Notification to an affected Party of a proposed activity under article 3 of the Convention

<b>1. INFORMATION ON THE PROPOSED ACTIVITY</b>	
<b>(i) Information on the nature of the proposed activity</b>	
Type of activity proposed	The Investment proposal /IP/ is for "Mining and Processing of Polymetal Ores from the Rozino Deposit, Tintyava PLA" located in the Ivaylovgrad Municipality, Haskovo District, Bulgaria.
Is the proposed activity listed in appendix I to the Convention?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Scope of proposed activity (e.g. main activity and any/all peripheral activities requiring assessment)	<p>The Contracting Company intends to carry out mining and processing of polymetal (gold-silver) ores from the Rozino Deposit, Tintyava License, with a future concession area of <b>2,753,4 dka</b>, of which <b>1,179 dka</b> will be directly affect by the elements of the projects and <b>1,574,4 dka</b> will be a buffer zone with no activity. The buffer zone will provide protection for the facilities and plants and will restrict accidental access by people and animals. It will ensure compliance with the obligations arising from the Mineral Resources Act for further exploration with a view to optimal extraction of reserves and resources from the subsurface.</p> <p>The main activities considered herein are:</p> <ul style="list-style-type: none"> <li>• open pit mining of polymetal ores;</li> <li>• flotation of the ore to concentrate;</li> <li>• construction and operation of the necessary attendant infrastructure – roads, water supply, power supply, material stores, mine waste facility, etc.;</li> <li>• staged rehabilitation of the disturbed areas.</li> </ul> <p>This is a new IP and is not related to expansion or changing of the existing activity.</p>
Scale of proposed activity (e.g. size, production capacity)	<p>The mineral resources in the Rozino deposit are 13.6 million tons of ore, and the overburden is 26.5 million tons. Taking into account the time required for mining, construction of the necessary infrastructure, procedures for settling the status of the lands, investment risk, mining-geological risk and reclamation, a 35-year period of existence of the site is foreseen, with an average annual production of 0.87 million tons of ore per year. The planned maximum annual productivity is:</p> <ul style="list-style-type: none"> <li>• ore – 1.77 million tons/year or 0.72 million m<sup>3</sup>/year;</li> <li>• overburden – 3.3 million tons/year or 1.3 million m<sup>3</sup>/year.</li> </ul>



	<p>In order to ensure the processing of the planned quantities of ore, the design capacity of the Flotation plant is 1.7 million tons of ore per year.</p>
<p>Description of proposed activity (e.g. technology used)</p>	<p>The operation will be carried out in the following sequence:</p> <p><i>Construction</i></p> <p>The first two years are intended for construction, as follow:</p> <ul style="list-style-type: none"> <li>- Pre-stripping of a sufficient quantity of reserves ready for mining;</li> <li>- Completion of the ore-processing plant;</li> <li>- Completion of the Mining Waste Facility /MWF/;</li> <li>- Completion of contact water dam;</li> <li>- Completion of non-contact (conditionally clean) water dam;</li> <li>- Selective collection and storing in two top-soil stockpiles of the topsoil from the project areas. The top soil will be removed selectively from the rock overburden and will be stockpiled separately. This topsoil will be used for disturbed-area rehabilitation after operations end.</li> </ul> <p><i>Overburden removal</i></p> <p>The waste rock (mine waste) from the Rozino deposit comprises hard rock without payable components but hosting or hosted among the ore bearing rocks. Therefore, it has to be removed selectively. Millisecond delay drilling and blasting will be carried out to remove the waste rock from the ore-bearing massif and the removed waste rock will be dumped at a waste rock stockpile.</p> <p><i>Mining operations</i></p> <p>The deposit will be open-mined by means of drilling and blasting. Once stripped and prepared for mining, the ore will be detached from the massif by millisecond delay NONEL blasting. The open pit will be divided into two mining sections for timely and staged rehabilitation.</p> <p>The blasted ore will be loaded and hauled to the crushing plant.</p> <p><i>Ore Processing</i></p> <p>The process involves the following sequence:</p> <ul style="list-style-type: none"> <li>• Hauling and crushing;</li> <li>• Storing of the crushed ore (covered pad);</li> <li>• Ball milling;</li> <li>• Flotation;</li> <li>• Flotation waste thickening;</li> <li>• Concentrate thickening and filter-press dewatering;</li> <li>• Flotation waste disposal.</li> </ul> <p><i>Closure and rehabilitation of the entire site</i></p> <p>The proposed overall strategy for the decommissioning and closure of all facilities is as follows:</p> <ul style="list-style-type: none"> <li>- staged closing of facilities while ensuring that the facilities required in the closure and subsequent post-closure monitoring facilities are preserved;</li> <li>- dismantling of the plant, structures and infrastructure not identified as required for post-closure maintenance;</li> </ul>

	<ul style="list-style-type: none"> <li>- treating of generated waste according to its classification and management technology;</li> <li>- carrying out of technical rehabilitation using waste rock stockpiled during the mining;</li> <li>- carrying out of biological rehabilitation using local non-invasive species and following a pre-approved design.</li> </ul>
Description of purpose of proposed activity	Production of a gold concentrate for sale.
Rationale for proposed activity (e.g. socio-economic basis, physical geographic basis)	<p>This project is of strategic importance for the region and will bring the following contributions:</p> <ul style="list-style-type: none"> <li>• Reviving of the region and substantial increase of the rate and degree of economic development in the region and particular Ivaylovgrad municipality.</li> <li>• Substantial increase in the municipal revenue from taxes and royalty fees.</li> <li>• Improvement of the living conditions for the people from the municipality by ensuring more than 250 new well-paid permanent jobs and more than 1,000 jobs during the construction phase.</li> <li>• Securing of investment in health care, education, culture and sports.</li> <li>• Opportunity for returning of local businesses and of some local residents migrating from their birthplaces.</li> <li>• Building of a high-voltage power line for the project infrastructure, which will be of public benefit since this will improve the energy infrastructure and the energy stability of the municipality.</li> </ul>
Additional information/comments	<p>The Investment Proposal is not related to any other existing and approved activities within the impact footprint of the proposed investment.</p> <p>Developing the deposit requires a concession granted in accordance with the Mineral Resources Act /MRA/.</p> <p>Using a water body for abstraction of water requires permitting in accordance with the Water Act.</p> <p>Construction of the IP items will require permits issued in accordance with the Spatial Development Act.</p>
<b>(ii) Information on the spatial and temporal boundaries of the proposed activity</b>	
Location	The Rozino Deposit in the Tintyava License is situated 1.2 km south of the village of Rozino in the Ivaylovgrad Municipality, Haskovo Lands of the following settlements will be affected by the contour of the future License Area: Rozino, Gugutka, Ivaylovgrad Municipality, Haskovo district.
Description of the location (e.g. physical-geographic characteristics, socio-economic characteristics)	Ivaylovgrad Municipality shares a border with the Republic of Greece but not with the Republic of Turkey. The Rozino Deposit is situated approximately 13 km to the south-southwest and approximately 20 km to the east, along a straight line, from the border with the Republic of Greece.



	<p>This part of Bulgaria's territory does not border with the Republic of Turkey. Therefore, the Republic of Greece may be regarded as a potentially affected country in the meaning of the Convention.</p> <p>The area of the "Rozino" deposit is bordered to the south by the steep cliffs of the Tashlaka hill and is cut by the Byala Reka River and its tributaries, which flows into the Arda River as a regional watershed. In the area of the deposit, the average altitude is about 470 m (in its northern part) and 300 m (in the south).</p> <p>The relief in the area is low-mountainous and hilly, with flattened hills predominating. It has a well-defined lowland and valley character.</p> <p>The predominant winds are north-westerly, with an active manifestation in the valleys and grassy mountain parts. Average annual precipitation varies widely - from 800 to 1200 mm. They have an autumn-winter maximum - November, December. Often the frontal and torrential nature of the precipitation reaches 100 mm per day. Snow cover lasts 5-10 days a year. The runoff modulus is from 5 to 25 l/sec/1m<sup>2</sup>.</p>
Rationale for location of proposed activity (e.g. socio-economic basis, physical-geographic basis)	The location of the IP is determined by the presence of underground mineral resources in this area and the defined limits of the mineral resources. Accordingly, the boundaries of the future concession area have also been declared.
Time frame for proposed activity (e.g. start and duration of construction and operation)	35 years of the site's existence is expected. The first 2 years are intended for construction of the mine. Rozino deposit will be developed in two stages. After the fourth year (when the reserves of Phase 1 (East pit) have been mined out), backfilling of the seized spaces will begin and the Internal Waste Rock Dump will be formed (see Figure 2).
Maps and other pictorial documents connected with the information on the proposed activity	Maps are presented below – Figure 1 and Figure 2.
Additional information/comments	None.
<b>(iii) Information on expected environmental impacts and proposed mitigation measures</b>	
Scope of assessment (e.g. consideration of: cumulative impacts, evaluation of alternatives, sustainable development issues, impact of peripheral activities)	The EIA has been undertaken in accordance with the Bulgarian Environment Protection Act, Regulation on the terms and conditions for conducting EIA, as well as guidance issued by Bulgaria and the European Union. The proposal for mining and processing is subject to a compatibility assessment according the Regulation on the procedures for the compatibility assessment of plans, programs, projects, and investment projects, with the subject and purpose of the conservation of protected areas. The assessment therefore addresses baseline



	<p>conditions, potential impacts, proposed impact, mitigation and forecast impacts. It should be stated explicitly that the EIA procedure will involve an exhaustive analysis and confirmation of the potential impacts, including through the use of adequate mathematical and empirical models and forecasts for the worst operating conditions in the deposit and at maximum output. Measures to prevent, mitigate and, where possible, eliminate the possible impacts on the environment and on human health, consistent with the nature and extent of the assumed negative impacts, will be applied locally, in the region affected directly by the IP, to ensure that the environment and health of the population in the border areas of the Republic of Greece are not impacted.</p>
<p>Expected environmental impacts of proposed activity (e.g. types, locations, magnitudes)</p>	<p>Given the extent, scope and level of influence, the expected impact on the environmental media may be categorised as constant – reclaimable during the time of operation – of local territorial extent after the tenth year, of low intensity, without a cumulative effect and not exceeding the national and European emission limit values, without significant negative effects on human health and on the environmental media and factors. The following impacts may be forecasted for the various environmental media and factors:</p> <p><b>Ambient air</b></p> <p>Any dust and gas emissions during the various IP implementation phases will be restricted to the area of the deposit, meaning it will be local, and pollutants will settle within short distances around the operational areas. It is not possible to emit pollutants which would overcome the regional terrain features (mountainous elevations and river valleys) and reach the territory of the Republic of Greece, even less so in air-polluting concentrations.</p> <p><b>Surface and Ground Water</b></p> <p>No impacts on surface water quality or quantity are expected. The IP will construct two consecutively situated reservoirs (the second one for non-contact, or conditionally clean, water) thus eliminating any likelihood of entry into water bodies of water separated by the IP. No discharging of waste water into water bodies or into the sewerage systems of urban areas is envisaged. All collected water will be recirculated to the process circuits.</p> <p>A hydrology study of water resources in surface water bodies has been carried out with regard to the supplying of water for the process. The possibility for such water use without lowering the water quantities or disturbing the natural water inflows has been ascertained. Water use will be made possible with a permit issued in accordance with the Water Act.</p> <p>No impacts on the quality or quantity of groundwater bodies are expected. Also, a hydrogeology study in the deposit area has established that the flow of groundwater is insubstantial. Given the design depth of the pit, there is no reason to expect direct</p>

impacts on a groundwater body and to drinking water sources with sanitary protection belt areas and use permits as required by the Water Act.

Therefore, no impacts can be expected to arise and cause negative effects on water quality in the Republic of Greece.

#### ***Subsurface***

The harmful impact is concentrated mostly on the geological media, since non-renewable natural resources will be extracted. The information from the exploration and the modern best practice mining technology which will be deployed for the deposit allows the assumption that part of the IP area will be affected by the mining operations, but that the entire region will not be affected in a manner changing the sustainability of the geological media and of its qualitative features, and, even less so, causing any transboundary impacts.

#### ***Lands and Soils***

Given the nature of the operation – open mining of natural resources, the direct impacts on soils will be very local within the IP area and only in the territory of the Republic of Bulgaria. This will in no way impact the soils in the neighbouring Republic of Greece. These soils will be restored to the maximum possible extent through timely and staged technical and biological rehabilitation.

#### ***Noise***

The operations during the various IP implementation phases will increase the background noise levels in the immediate vicinity of the Project. The distance to the Republic of Greece means that no elevated equivalent noise levels can reach its territory.

#### ***Biodiversity***

As two protected areas from the Natura 2000 network will be affected, an assessment will be made of the IP compliance with the scope and goals for protection of these areas. The Byala reka River is a protected area designated for protection of wild birds and the habitats of protected bird species must be preserved and restored if their nature-conservation status requires improvement. It is inadmissible to cause any negative impacts on the areas of the national Natura 2000 ecological network which, for its part, is a reason to avoid damage to biodiversity also on the territory of the Republic of Greece. It will be possible to carry out the activities only following approval of the IP as required by the Biodiversity Act.

#### ***Waste***

The proposed method for treatment and management of waste generated by the operations does not suggest environmental risks. Flotation tailings with minimal levels of humidity will be disposed into the Mining Waste Facility /MWF/ (see Figure 2). This will eliminate any chance of pollutants entering the water, even during calamities, and reaching the territory of the Republic of Greece.



	<p><b>Landscape</b></p> <p>The significant distances from the border with the Republic of Greece and given the rolling and mountainous topography - a natural barrier to pollutants in the ambient air and a barrier to visual impacts, no visual or landscape impacts may be expected.</p> <p><b>Health risk</b></p> <p>According to preliminary data, the risk for the population following the stripping and mining of mineral resources in the Rozino Deposit is expected to be limited and insubstantial and can be further minimised by maintaining the equipment and plant in good working order and by regular monitoring. With proper modern and best practice operation, the IP is not expected to endanger the health status of the workers in the future site and of the population in the region. No grounds are present to suggest any transboundary risks for the health of the population in the border areas of the Republic of Greece.</p>
<p>Inputs (e.g. raw material, power sources)</p>	<ul style="list-style-type: none"> <li>• Gold-containing ore;</li> <li>• Plant machinery and storage vessels, pipework, tanks, etc;</li> <li>• Construction materials (brick, concrete, steel, etc);</li> <li>• Process reagents – frother - methyl isobutyl carbinol, potassium amyl xanthate, collector a404, flocculant, sodium hydrogen sulphide, copper sulphate, diesel fuel, explosives and blasting consumables;</li> <li>• Fresh water supply – surface water.</li> </ul> <p>The energy carriers will be diesel fuel (vehicles) and electricity (all other energy needs including plant electric motors, heating, lighting, etc).</p>
<p>Outputs (e.g. amounts and types of: emissions into the atmosphere, discharges into the water system, solid waste)</p>	<p><b>Gases:</b></p> <p>The operation will involve generation of dust during mining and crushing of the ore. This may cause <b>local pollution over small distances</b> from its various sources and should not have any effect on pollution in the region. Sprinklers and water trucks will be used to suppress dust emissions from the mining activities in the open pit mine and haulage on the roads between the mine and the ROM pad and stockpiles.</p> <p>Blast gases (CO, NOX, SO2, etc) will be emitted during the blasting operation which will be <b>periodically, short-lasting, local pollution over small distances</b>.</p> <p>Other harmful emissions which causing environmental and workplace pollution will be exhaust from machinery. Gaseous COx, NOx, SOx, incompletely combusted hydrocarbons, dust (soot) etc. emitted from the diesel plant and transport vehicles will be <b>local</b> in nature and will <b>not have any substantial impact on pollution in the region</b>.</p> <p><b>Liquids:</b></p> <p>Generation of the following wastewater is expected for the site: process-related and generated from the flotation and concentrate dewatering process, and ablution effluent from the mine-site</p>



	<p>workers. All this water will be recycled, using the contact-water reservoir as a buffer storage.</p> <p><b>No discharging of process-related waste water into water bodies or into the sewerage systems of urban centres is envisaged. As a general rule, no discharges to water bodies are envisaged by the Project.</b></p> <p><b>Waste:</b></p> <p>The following types of waste are expected during the operation of the investment proposal and may be divided into two main groups:</p> <ul style="list-style-type: none"> <li>- waste falling within the subject matter of the Wastes Management Act – construction waste, domestic waste, scrap, used packages, electrical and electronic waste, etc.</li> <li>and</li> <li>- mining waste falling within the subject matter of the Mineral Resources Act - waste rock from mining process and waste from flotation.</li> </ul> <p><b>No hazardous waste will be stored in the IP area</b></p>
Transboundary impacts (e.g. types, locations, magnitudes)	<p><b>Based on the preliminary assessment by environmental components and factors and the human health the substantiated likelihood of significant adverse environmental impacts on the environment on the territory of another state be present, is absent. In view of the study conducted in line with the provisions and criteria of the Convention on Transboundary Environmental Impact Assessment in the Transboundary Context, the hypothesis for conducting an EIA in the transboundary context is not justified.</b></p>
Proposed mitigation measures (e.g. if known, mitigation measures to prevent, eliminate, minimize, compensate for environmental effects)	<p>Mitigation against dust emissions and harmful gases.</p> <p>Design of a comprehensive water management scheme to minimise impact on water resources by quality and quantity aspect.</p> <p>Provision for safe and stable storage of the waste rock and the waste from flotation.</p> <p>Definition of a closure strategy to form the basis for a detailed closure plan aimed to allow establishment of a productive end-use of the site following project closure.</p>
Additional information/comments	None.
<b>(iv) Proponent/developer</b>	
Name, address, telephone and fax numbers	<p>Tintyava Exploration AD, UID 204432874, with registration address at 6570 Ivaylovgrad, 1 Shesti Septemvri str.</p> <p>Executive Director of the contracting company: Eng. Daniel Marinov</p>

<b>(v) EIA documentation</b>	
Is the EIA documentation (e.g. EIA report or EIS) included in the notification?	Yes <input type="checkbox"/> No <input type="checkbox"/> Partially <input checked="" type="checkbox"/>
If the answer to the above is no or partially, description of additional documentation to be forwarded and (approximate) date(s) when documentation will be available	Information from the EIA Notification to the Bulgarian competent authority and preliminary transboundary impact expectations are included. The scoping document may be sent upon request after receiving your answer to the present notification.
Additional information/comments	None.
<b>2. POINTS OF CONTACT</b>	
<b>(i) Points of contact for the possible affected Party or Parties</b>	
Authority responsible for coordinating activities relating to the EIA (refer to decision I/3, appendix) - Name, address, telephone and fax numbers	Mr. Alexandros KOULIDIS Head of Unit C at Directorate of Environmental Licensing Ministry of Environment and Energy 1 1 E-mail: <a href="mailto:see.dlp@moew.government.bg">see.dlp@moew.government.bg</a>
List of affected Parties to which notification is being sent	Greece
<b>(ii) Points of contact for the Party of origin</b>	
Authority responsible for coordinating activities relating to the EIA (refer to decision I/3, appendix) - Name, address, telephone and fax numbers	Ms. Gyuler ALIEVA Head of the "Environmental Assessment and Environmental Impact Assessment" Division "Environmental Assessment, Environmental Impact Assessment and Pollution Prevention" Directorate Ministry of Environment and Water 22, Maria-Luisa Blvd. Sofia 1000, BULGARIA Phone: +359 2 940 65 77 E-mail: <a href="mailto:g.alieva@moew.government.bg">g.alieva@moew.government.bg</a>



Decision-making authority if different than authority responsible for coordinating activities relating to the EIA - Name, address, telephone and fax numbers	In case of a transboundary EIA procedure – the Ministry of Environment and Water 22, Maria-Luisa Blvd. Sofia 1000, BULGARIA Phone: +359 2 940 65 77 In case of national EIA procedure – the Regional Inspectorate on Environment and Water (RIEW) – Haskovo 14, Dobrudzha str., 6300 Haskovo, Bulgaria Phone: +359 38 601 618
<b>3. INFORMATION ON THE EIA PROCESS IN THE COUNTRY WHERE THE PROPOSED ACTIVITY IS LOCATED</b>	
<b>(i) Information on the EIA process that will be applied to the proposed activity</b>	
Time schedule	Based on the requirements of the Bulgarian legislation with expected duration of 12 months.

Opportunities for the affected Party or Parties to be involved in the EIA process	Yes, in accordance with the national procedure and requirements of the Convention.
Opportunities for the affected Party or Parties to review and comment on the notification and the EIA documentation	Yes, in accordance with the national procedure and requirements of the Convention.
Nature and timing of the possible decision	EIA decision can be taken by the Minister of the environment and water (in case of transboundary EIA) or by the Director of the RIEW (in case of national EIA) for approval or disapproval of the investment proposal. 45 days after the last meeting for public hearing.
Process for approval of the proposed activity	In compliance with Bulgarian legislation: Environmental Protection Act, Regulation on the terms and conditions conducting EIA - available on internet page <a href="http://www.moew.government.bg">www.moew.government.bg</a> - key topics Preventative Activities.
Additional information/comments	The information and documentation to be exchanged during the EIA procedure with the affected party should be in English language.
<b>4. INFORMATION ON THE PUBLIC PARTICIPATION PROCESS IN THE COUNTRY OF ORIGIN</b>	
Public participation procedures	In accordance with the Bulgarian legislation the public is involved in all steps of the EIA process: <ul style="list-style-type: none"> <li>• Notification for the IP – current stage of the procedure in Bulgaria;</li> <li>• Determination of the scope and content (Terms of Reference) of the EIA;</li> </ul>

	<ul style="list-style-type: none"> <li>• Consultation on Scoping document;</li> <li>• Access to the EIA Report and the Compatibility Assessment (CA) Report for a period of 30 days;</li> <li>• Public hearing(s);</li> <li>• Access to answers on written comments and statements and those from discussion during the public hearing(s);</li> </ul>
Expected start and duration of public consultation	After the response from the Greek Party on the notification under the requirements of the Convention and at the scoping stage.
Additional information/comments	The information and documentation to be exchanged during the EIA procedure with the affected party should be in English language.
<b>5. DEADLINE FOR RESPONSE</b>	
Date	Four weeks from the receiving of the notification form.



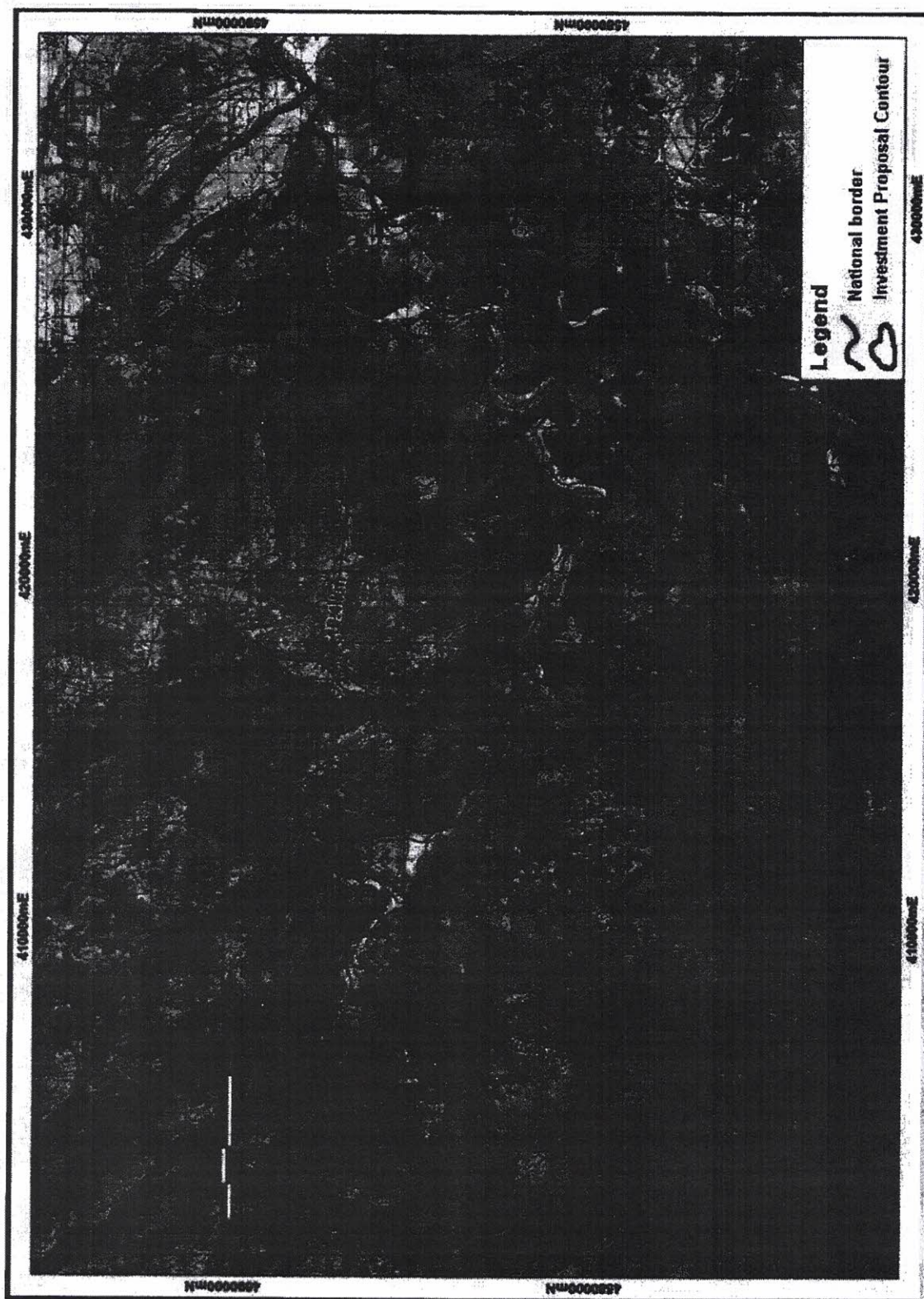
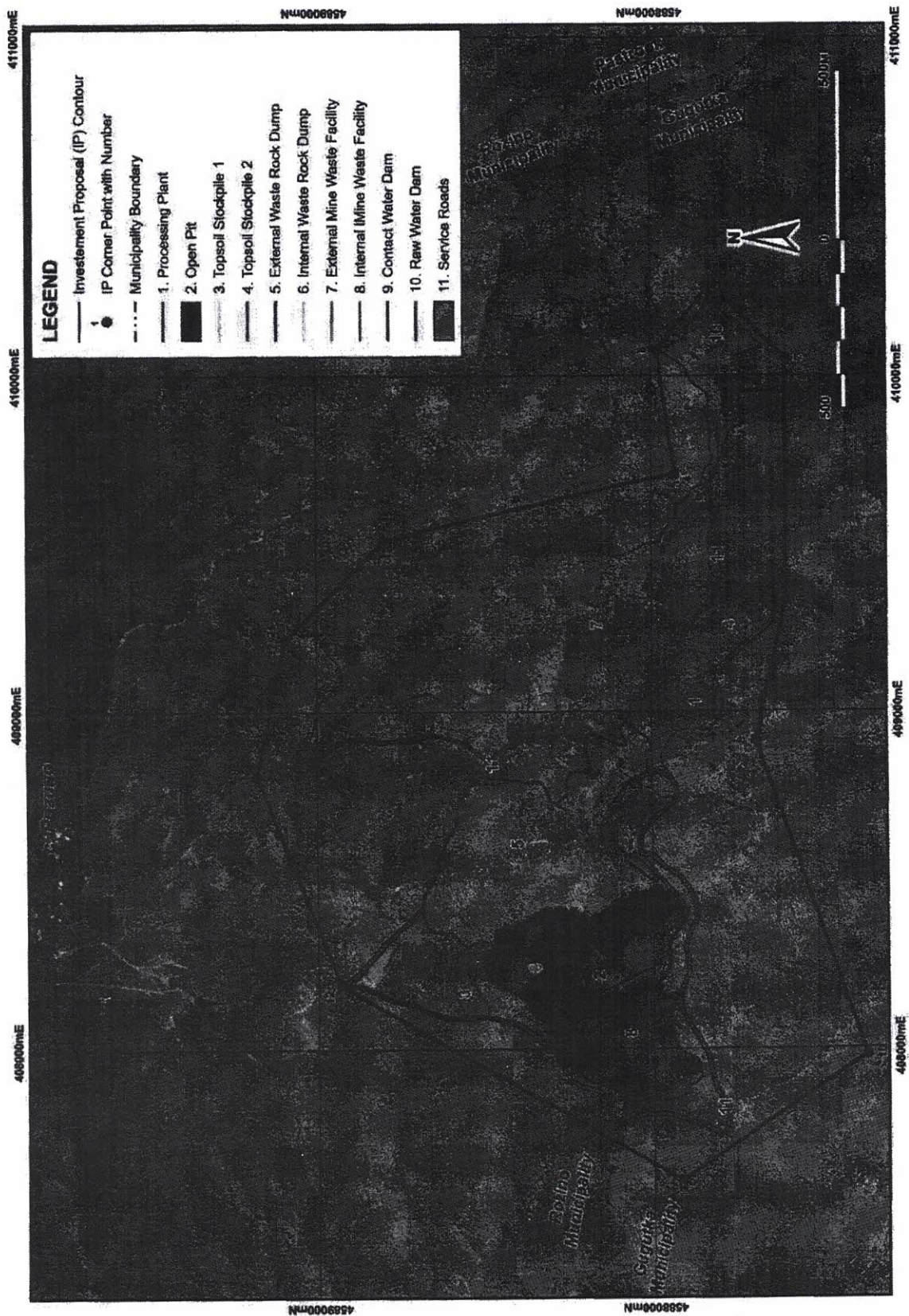


Figure 1 Location of the Rozino Deposit relative to the border with the Republic of Greece /blue contour – the project site, red contour – Bulgarian border/





**Figure 2** Location of the Investment Proposal elements