



**REPUBLIC OF BULGARIA**

**MINISTRY OF ENVIRONMENT AND WATER**

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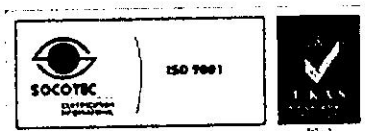
**Regarding:** *Strategic Environmental Assessment (SEA) procedure for Romania's Energy Strategy for the period 2019-2030, with a horizon up to 2050 under the SEA Protocol to the Convention on Environmental Impact Assessment (EIA) in a Transboundary Context*

**DEAR MINISTER,**

*In response to your letter No. 4184/GLG/ of 7 August 2019 and the enclosed notification within the meaning of Article 10 of the SEA Protocol to the EIA Convention in a Transboundary Context (SEA Protocol), pursuant to Article 10, para. 3 of the SEA Protocol, I would like to inform you that the Republic of Bulgaria wishes to participate in a transboundary SEA procedure for Romania's Energy Strategy 2019-2030 with a horizon up to 2050 for the following reasons:*

*- 10 investment projects in the energy sector are being planned comprising the following energy sub-sectors: nuclear energy, coal energy, gas, hydropower. The projects will cover four sub-sectors in the energy sector, which will have different time horizons as follows: 2030 for the nuclear sub-sector, 2020 and 2035 for the coal energy sub-sector and 2030 for the hydropower sub-sector.*

**Ms. Grațiela Leocadia GAVRILESCU**  
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- An investment project is also being planned in regard to the common Bulgarian-Romanian section of the Danube River: implementation of the Turnu Magurele-Nikopol Hydroelectric Power Plant, 500 MW, which is located along the Danube.

- Projects where water will be used as a natural resource will include with hydropower plans, migration corridors for fish populations, and ecological flow will be provided for rivers where future hydropower plants will be built. The design will also take into account the hydromorphological characteristics of the river, especially of the Danube.

- The links of the Strategy to other plans and programs, including EU's Energy Policy for 2020 - 2030 and the updated International Basin Management Plan for the Danube River 2016 - 2021, have been reviewed, updated and assessed.

- The impacts that may arise following the construction and operation of the projects resulting from the Strategy are as follows: during construction, the impact will be direct (change in water quality, impact on biota, change/appearance of imbalances in primary productivity, especially with regard to aquatic ecosystems). During the exploitation period, there will be indirect and long-term impact (changes in the characteristics of water flow, hydromorphological changes, changes in water temperature, reduction of the amount of sediments) on aquatic organisms and habitats closely related to water.

- Providing the opportunity for participation of the public in Bulgaria, in accordance with Article 6, para. 3, 4 and 8 of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention).

In order to assess the potential impact of the Strategy on the environment and human health on the territory of the Republic of Bulgaria, I think the SEA report should include:

1. Identification of the cumulative impact of the implementation of the Turnu Magurele-Danube hydropower plant and the FAST DANUBE project as follows:

- identification of environmental components and factors that may be affected by both projects; environmental factors likely to be affected are water, biodiversity, etc.;

- identification of the potential impacts of the sites on each environmental component/factor; location and characteristics of existing projects (territory, production and technological process, operational status, pollutants).

2. Assessment of the potential impacts of the Turnu Magurele-Nikopol hydroelectric investment project related to hydromorphological pressure - hydrological and morphological changes, such as flow disruption, change of level, interruption of river continuity, change of flow speed, altered transport of sediments whereas its implementation in the common transboundary water body of the Danube River may bring about new changes in the physical characteristics of the water body, which is intensely modified.

3. Mathematical modelling under an internationally recognised model of atmospheric air pollution from emissions into the atmosphere of sulphur dioxide, nitrogen oxides and dust during simultaneous operation with maximum load of the planned construction of new large combustion plants (LCPs), burning lignite, namely:

- Expansion of the LCP with a new capacity of 600 MW in the city of Rovinari;

- Expansion of the LCP with a new capacity of 400 MW in the city of Turceni.

It is also necessary to take into account the impact of the existing capacities of the power plants in Rovinari, Turceni and Craiova.

The modelling should determine the maximum values of listed pollutants under the most adverse weather conditions and with wind direction towards Bulgaria, in particular to the city of Vidin. The average annual atmospheric concentrations of these pollutants from power plant emissions should also be determined.

4. According to the opinion of the Ministry of Health of the Republic of Bulgaria, the documentation for the Strategy contains specialised terminology and information in the field of energy, which is why it should be translated and provided in Bulgarian. The Ministry of Health, after receiving the documentation translated into Bulgarian, will be able to consult external experts in order to assess its completeness from a health perspective.

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*In order to continue the transboundary procedure with the participation of the Republic of Bulgaria, it is necessary to provide us with the SEA documentation and the Strategy with the above mentioned notes and recommendations.  
I take this opportunity to express my respect and willingness for cooperation.*

*Sincerely,*

**NENO DIMOV**  
**Minister of Environment and Water**