



REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

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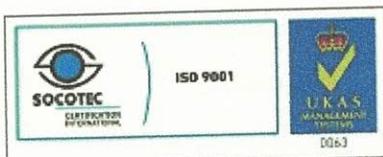
Subject: Notification under Article 10 of the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for Integrated National Energy and Climate Plan of the Republic of Serbia for the period 2030-2050 and its strategic environmental assessment.

DEAR MINISTER VUJOVIC,

With this letter I would like to acknowledge receipt of your letter Reg. No. 350-02-096/2023-03/05.07.2023 with a notification under Art. 3 of the Convention on Environmental Impact Assessment (Espoo Convention) for the "Integrated National Energy and Climate Plan of the Republic of Serbia for the period 2030 - 2050" and its Strategic Environmental Assessment. We would like to express our gratitude for being notified for the Integrated National Plan through submission of the notification under Art. 3 of the Espoo Convention.

I would like to inform you that the Republic of Bulgaria is willing to participate in the SEA procedure in a transboundary context for "Integrated National Energy and Climate Plan of the Republic of Serbia for the period 2030 - 2050", given the existence of impacts on the Danube, Timok and Dragovichitsa rivers.

H. E. Irena Vujovic
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After review of the Strategic Environmental Assessment Report and the submitted documentation, I would like to express the following comments:

1. For the planned construction of hydropower plants on the transboundary rivers, a requirement to maintain the continuity of water flows should be included, and for the rivers that fall under the Danube International River Basin Management Plan, compliance with the relevant requirements in the current plan should be ensured.

2. Transboundary water management issues cannot be fully covered by the Conventions for the Sava river and the Danube river. For Bulgaria is applicable only Danube River Protection Convention, but according to the documents and practice of the International Commission for the Protection of the Danube river, only issues of international basin-wide importance are dealt with in this format. Therefore, rivers with small catchments such as the Timok are not covered by the work of the Commission.

3. The above is also applicable to groundwater. For example, in the table on page 207, objective EO 04 Protection of surface and ground water (morphology, ecological status, quantity and quality), sub-objective SE 04.2 Sustainable use of water - Implementation of groundwater abstraction measures may affect existing water users, indicates that some other measures may indirectly affect the water use. The monitoring of the withdrawal is carried out on the basis of an acquired right in the form of a permit and on the basis of protocols for the payment of water charges.

With regard to points 2 and 3 apart from measures at national level related to the permit regime and monitoring of the use and the quality, it should also include measures for transboundary coordination, which would be facilitated by the signing of a bilateral document on cooperation in the field of water management between the competent Bulgarian and Serbian authorities.

There are uncertainties in the draft INPEC related to the plans of the Republic of Serbia with regard to the S N scenario. For example, in Figure 4.48 "Electricity sector generation transformation for the period 2020-2050", it is not clear which part of the graph is related to the NPP mentioned in the legend.

In addition, in chapter 5.4 "Impact of planned policies and measures on other Energy Community Contracting Parties and European Union Member States and regional cooperation", no cross-border impact of the possible construction of a NPP is noted.

In the Strategic Environmental Assessment Report of the Integrated National Energy and Climate Plan of the Republic of Serbia (INECP), two scenarios are presented, with insufficient information provided for the planned nuclear scenario SN. At the same time, according to item



1.4 "Indicative Mitigation and Monitoring Measures" it is stated that "With regard to activities identified as having a significant adverse transboundary impact, the "Party" or the State shall take action to ensure adequate and effective intervention of any other State activity (State) related to the other Party (State) as soon as possible and at the latest when informing the public of that activity".

The considered approach related to the expected radioactive waste includes:

Measures to improve waste management practices;

Promoting reuse and recycling and reducing the amount of waste generated (including by promoting a circular economy);

Upgraded recycling infrastructure.

A more thorough analysis should be applied to the management of potential radioactive waste from NPPs. In addition, in Section 9 Decision Methods - the impact of the proposed NPP is not addressed.

On the basis of the above, MOEW considers that in terms of radiation protection the two documents should be supplemented with regard to the construction of the NPP (SN scenario), for the expected impact on all components and factors of the environment, the population and human health, with a view to potentially affecting the Republic of Bulgaria.

All subsequent projects arising from the national plan should contain specific preventive measures to be implemented and monitored in full compliance with the requirements of current environmental and health legislation, including measures to prevent the occurrence of health risks.

Following the submission of the Strategic Environmental Assessment Report and the draft Integrated National Energy and Climate Plan of the Republic of Serbia for public access, the Ministry of Environment and Water received a statement from the Environmental Association "For the Earth"(enclosed) with comments and observations on the INPEC of the Republic of Serbia for your information and consideration.

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

Yours sincerely,
Julian Popov
Minister of Environment and Water