

REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

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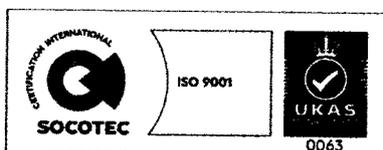
Subject: *Environmental impact assessment of the Wind Power Plant Project with total power 130,2 MW located in the area of "AETOKORFI" with accompanying infrastructure (road construction, external Medium Voltage 33kV network for the electrical interconnection with the grid) in the Municipal Unit of Trigonos, of the Municipality Orestiada, of the Regional Unit of Evros, Greece*

Dear Minister,

I would like to confirm the receipt of the documentation for the Wind Power Plant Project (ASPIE) with total power 130,2 MW at the location "AETOKORFI" with its ancillary infrastructure (road construction, external Medium Voltage 33kV network for the electrical interconnection with the grid) in the Municipal Unit of Trigonos, of the Municipality Orestiada, of the Regional Unit of Evros, Greece, received at the Ministry of Environment and Water of Bulgaria through the Bulgarian Embassy in Greece.

We would like to express our gratitude for the documentation submitted and to draw your attention on that fact that according to the provisions of the Espoo Convention, the Country of origin shall ensure the notification of the affected parties of the proposed activity that may have a significant adverse transboundary impact.

H.E. Mr. Theodoros Skylakakis
Minister of Environment and Energy
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Greece



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Pursuant to Article 3, Paragraph 1 of the Espoo Convention, the Country of origin, in order to ensure adequate and effective consultations, is obliged to notify any country which, in its opinion, may be an affected country as early as possible and no later than the date of informing the public in its own country of the proposed activity, and the notification should contain certain information.

In this specific case a letter was received (in Greek language) about the project, the Environment Impact Assessment (EIA) with accompanying documentation in English, including maps and drawings and Special Ecological Assessment Study (Appropriate Assessment) for the compatibility with the subject and objectives of the protected areas, which are in Greek.

After careful consideration of the provided information with regard to the construction of 21 wind generators with ancillary infrastructure in relation to the Bulgarian part of the European ecological network Natura 2000, it was found that the intention is to place the majority of the wind generators along the border between the two countries, which is also the border of two protected areas -BG 0001032 "Rhodope-Iztochni " for the protection of natural habitats and the habitats of species and BG0002106 "Ivaylovgrad Reservoir" for the protection of wild birds, announced respectively by Order No. RD-267/31.03.2021 (promulgation, 43/2021) and Order No. RD- 845/17.11.2009 of the Minister of Environment and Water (promulgated, SG No. 12/2009), as well as at a distance of about 12 km from the protected area for the protection of wild birds BG 0002014 "Madzharovo", announced by Order No. 787/29.10.2008 of the Minister of Environment and Water (promulgated, SG 105/2008).

The subject of conservation in the protected areas are extremely sensitive species of birds and mammals, which may move to the project area and, as a result, suffer negative, even harmful, impacts - destruction of specimens and increase in mortality, loss of food and/or or hunting habitats and in suitable resting and hiding places, limiting their natural distribution range due to migration barrier effect and ultimately reducing/ceasing the reproductive capacity of their population.

The above applies to species such as Egyptian vulture, Golden eagle, Griffon vulture, Little eagle, White-tailed sea eagle, Peregrine falcon, as well as large migratory bird species (e.g. both species of storks), and bats (Great horseshoe bat, Great night bat, Long-eared night bat), registered near the planned wind farm according to the data available in the Directorate on the distribution of sensitive species (Report under Article 12 of the Habitats Directive for the period 2013-2018, project "Mapping and determination of the nature conservation status of natural habitats and species according to an approved list and minimizing the risks for wild birds within the project "Mapping and determination of the Nature conservation status of natural habitats and species - phase I").

The above applies in full force to other conservation-significant, rare and endangered species of the Bulgarian bird and bat fauna.

Regarding bats, it should be borne in mind that the construction of wind farms, in addition to collisions and barotrauma, also leads to displacement and loss of roosting places and habitats, loss of flyover corridors, disturbance, change in temperature and humidity of the environment, a significant change in the concentration of a food resource as insects are attracted to light, etc., and this results in bats congregating, putting them at risk.

According to the Guidance document on wind energy developments and EU nature legislation, in order to ensure the protection of biodiversity when building wind energy infrastructure it is good practice to "collect data within at least one to three years from the assessment, with the time period for baseline data collection to be determined on a case-by-case basis, taking into account the general paucity of existing data, the full annual life cycle of the species, and existing knowledge of interannual variation (e.g. where the migration of the species may be affected by weather conditions)".

*Evident from the maps in the documentation, during the monitoring carried out by the Greek experts, for species such as *Aquila chrysaetos* (Rocky eagle), *Ciconia ciconia* (White stork), *Clanga pomarina* (Small crested eagle), *Ciconia nigra* (Black stork), *Buteo buteo* (Common buzzard), *Circaetus gallicus* (Serpent eagle), *Aquila (Hieraaetus) pennata* (Small eagle) was found flying over from Bulgaria in the direction of the Wind Power Plant.*

In the presented EIA, in item 2.9 Transboundary nature of the impact:, it is claimed that "with regard to the transboundary impacts of the project on the natural environment, it should be noted that the nearest protected area for avifauna is on the territory of Greece, while on the border with Bulgaria there are protected areas included in the Natura 2000 network (BG0002106 and BG0001032), which were taken into account during the "survey" and cannot be significantly affected neither during the construction nor during the operational phase of the project, as appropriate measures will be taken to protect the avifauna".

In connection with the necessity for an in-depth analysis of the presented information, verification of the conclusions in the Environmental Impact Assessment Study, review and analysis of the depth of the research done on the probable degree of impact on the Bulgarian protected areas and the subject of protection in them, including on species with a high nature conservation value, as well as the extent to which good practices have been observed, we consider it is necessary to obtain the above documentation translated into Bulgarian. The provision of documentation in Bulgarian language will contribute to the fruitful public consultations with the affected public in Bulgaria.

After receiving the above-mentioned documentation in Bulgarian and conducting public consultations, the Republic of Bulgaria will decide whether to take part in the EIA procedure in a cross-border context for the Wind Power Plant Project.

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

Yours sincerely,

*Julian Popov
Minister of Environment and Water*