

REPUBLIC OF BULGARIA



MINISTRY OF ENVIRONMENT AND WATER

№ 26-00-105

Sofia 14.05.2009

Mr. Nicolae Nemirschi
Minister of Environment and Sustainable development
12 Libertatii Blvd, sector 5
Bucharest
ROMANIA

Reference: Investment proposal for „Extraction of sang and gravel from alluvial deposits in the Danube river, “Mishka” site (km 462.0 – km 459.4) in the area of Babovo village, Russe district”

Dear Mr. Nemirschi,

According to Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context, please find attached the Notification form for „Extraction of sang and gravel from alluvial deposits in the Danube river, “Mishka” site (km 462.0 – km 459.4) in the area of Babovo village, Russe district”. Please note that the deadline for response is 2 (two) weeks from the date of receiving the notification.

Yours sincerely,

Dzhevdet Chakarov, /
Minister

NOTIFICATION OF A PROPOSED ACTIVITY

“EXTRACTION OF SAND AND GRAVEL FROM ALLUVIAL DEPOSITS IN THE DANUBE RIVER, “MISHKA” SITE (KM 462.0 – KM 459.4) IN THE AREA OF BABOVO VILLAGE, ROUSSE DISTRICT”

TO AN AFFECTED PARTY UNDER ARTICLE 3 OF CONVENTION FOR ENVIRONMENTAL IMPACT ASSESSMENT IN TRANS-BOUNDARY CONTEXT

(ratified with act of 16.03.1995, State Gazette. issue 28/1995, prom. State Gazette issue 86/1999, active from 10.09.1997, amended State Gazette issue 89/1999)

1. INFORMATION ON THE PROPOSED ACTIVITY	
(i) Information on the nature of the proposed activity	
Type of activity proposed	The investment proposal refers to extraction, transportation and discharge of alluvial materials (sand and gravel) from Danube river in “Mishka” site (km 462.0 – km 459.4).
Is the proposed activity listed in Appendix I to the Convention?	NO
Scope of proposed activity (e.g. main activity and any/all peripheral activities requiring assessment)	<p><u>Main activity:</u> Extraction of alluvial materials (sand and gravel) from Danube river with floating multi-bucket dredger, transfer through dewatering sieve into self-propelled barges for transportation to port wall for discharging.</p> <p><u>Auxiliary activity:</u> Discharge of the extracted material to port site owned by the company, located in the East industrial zone of Rousse town and loading to trucks with front loader for expedition.</p>
Scale of proposed activity (e.g. size, production capacity, etc.)	The site for sand and gravel excavation in Danube river (0.597 km ²) is 2.6 km long and 350 m wide in the south-west part and up to 150 m wide in the north-east part. The extraction site will be split during work in separate blocks with dimensions 60/52 m. The capacity of extracted material will reach 345 000 m ³ p.a. Daily extraction will be 1 500 m ³ with working regime of 230 working days p.a. (9 months, 6 days per week).
Description of proposed activity (e.g. technology used)	<p>The technology for alluvial materials extraction from Danube river is based on the use of floating multi-bucket dredger type KS – 250. It has no alternative with the given conditions – presence of gravel of 150 mm.</p> <p>The extraction works in each separate block will be carried from east to west (against the current). Extraction will be carried simultaneously in the whole depth of the layer.</p> <p>During excavation of material in depth, swaths (angles) will be formed in ratio 1:2.75, which will lead to stability of the river bed (in the area) during extraction works. The formation of swaths (angles) with increase of depth will decrease the area for extraction works. The latter shall be executed in various blocks of the extracted area depending on the water level.</p>
Description of purpose of proposed activity	The investment proposal refers to extraction, transportation and discharge of alluvial materials (sand and gravel) from Danube river. The extraction of alluvial materials from Danube river bed is directly related to the company main activity – production of aggregates and ready mix concrete.
Rationale for proposed activity (e.g. socio-economic, physical geographic basis)	Main activity of “Gravel and sand pits – Bulgaria” EAD is production of aggregates – sand and gravel. In relation to the investment proposal, geophysical exploration works are performed in “Mishka” site and preliminary reserves of alluvial materials (sand and gravel) are calculated. Subject of the investment proposal is sand and gravel (alluvial materials) in Danube river bed from km 462.0 to 459.4 in the area of Babovo and Ryahovo village, Rousse District.

Additional information/comments	The investment proposal does not plan to change the existing road infrastructure in the area of port site, nor the construction of new. Water and electricity supply to the port site will be provided from existing technical infrastructure.
(ii) Information on the spatial and temporal boundaries of the proposed activity	
Location	<p>The site for extraction of sand and gravel from Danube river is from km 462.00 to 459.40, located to the north of Babovo and Ryahovo village, to the north and north-west of “Mishka” island. The area of the site (0.597 km²) is 2.6 km long and 350 m wide in the south-west part and up to 150 m wide in the north-east part.</p> <p>The area of the site is located in the Bulgarian part of the river and is within the compulsory distance from the river boat traffic.</p>
Description of the location (e.g. physical-geographic, socio-economic characteristics)	<p>A non-operational quay wall is located on the right shore of the river close to Ryahovo village.</p> <p>Distance to the shore (regulation of the villages) is:</p> <ul style="list-style-type: none"> • Ryahovo village – 1 km south-west • Babovo village – 2 km south-east <p>The distance against the current to the Danube bridge in Rousse town is 29.5 km.</p>
Rationale for location of proposed activity (e.g. socio-economic, physical-geographic basis)	<p>The area approved for the investment proposal is compliant with the following conditions:</p> <ul style="list-style-type: none"> ▪ site area shall be in the Bulgarian part of the river; ▪ site area shall be within the necessary distance from the river boat traffic; ▪ excavation area shall be within the necessary distance from the Bulgarian shore and “Mishka” island to avoid their under digging and erosion as a result from excavation works.
Time-frame for proposed activity (e.g. start and duration of construction and operation)	<p><u>Construction</u>: Port site – up to 12 calendar months</p> <p><u>Exploitation</u>: Possible working schedule of the extraction and transport equipment is:</p> <ul style="list-style-type: none"> ▪ annual working days – 230; ▪ working days per week – 7, including 6 days for extraction and 1 day for maintenance; ▪ working months – 9; ▪ working time per day – 12 hours;
Maps and other pictorial documents connected with the information on the proposed activity	<p><u>Map</u> with distance to the Bulgarian shore (regulation of the village) (Appendix № 1)</p> <p><u>Map</u> with distance to the Danube bridge in Rousse town (Appendix № 2)</p> <p><u>Plan of port</u> (Appendix № 3)</p>
Additional information / comments	--
(iii) Information on expected environmental impacts and proposed mitigation measures	
Scope of assessment (e.g. consideration of: cumulative impacts, evaluation of alternatives, sustainable development issues, impact of peripheral activities, etc.)	<p>The scope of assessment coincides with the site for proposed activity – site for sand and gravel extraction from km 462.0 to km 459.4, to the north of Ryahovo and Babovo villages, north and north-west of “Mishka” island, and port site in the East industrial zone of Rousse town, where the extracted material will be temporary stored.</p> <p>Cumulative effect from realization of the activity is not expected. Alluvial materials from Danube river are not extracted in the area of the investment proposal.</p> <p>Alternatives of the investment proposal for extraction of ballast are supply of raw materials from gravel and sand deposits under the provisions of the</p>

	<p>Underground Resources Act or from other water objects in the area under the provisions of the Waters Act. For the area of Rousse town, the investment proposal has no other alternative.</p>
<p>Expected environmental impacts of proposed activity (e.g. types, locations, magnitudes)</p>	<p>All supposed impacts from the proposed activity on the environment are of local character and with insignificant volume and scale.</p> <p>The selected technology for aggregates extraction does not have considerable impact on the quality of atmospheric air. The extraction of gravel and sand from the river bed will not lead to emissions of dust particles in the atmosphere. Transportation, discharging, temporary storage and loading will not generate dust particles emissions, as the extracted material is wet. Considering the total power of equipment to be used and the distance from the site to the villages (1 km south-west of Ryahovo village and 2 km south-east of Babovo village), the site is not expected to have considerable impact on the quality of atmospheric air in local or in larger scale.</p> <p>The technology for ballast extraction does not foresee quantity or quality changes in the parameters of river waters. Changes in negative terms will occur only for the parameter “turbidity”, which values in local scale will be considerably higher. The impact will be considerable, however in a limited – local scale, as well as with possibility for fast recovery of the water physical indicator. Realization of the investment proposal does not require usage of sources for drinking water. If needed, river water will be used for irrigation of the material. Waste water will not be generated during excavation of alluvial materials.</p> <p>Negative impact on underground water is not expected.</p> <p>The investment proposal is not related to negative changes in the geological conditions. The gravel and sand to be extracted from the Danube river bed are contemporary accumulation of alluvial materials.</p> <p>Realization of the investment proposal does not foresee faults in the adjacent land parcels and soil.</p> <p>Extraction of river materials will be executed only in the river bed without having impact on the vegetation along the shore of the island, as well as on right shore of the river.</p> <p>Realization of the investment proposal will have considerable impact mainly on the river bottom fauna in comparatively long period of time. With respect to the ichthyofauna, the possible impacts from the activity will be mainly in the migration periods of some fish species and will have insignificant and local impact.</p> <p>The territory of the investment proposal is a part of the protected area “Kalimok – Brashlen”, which is a protected area in compliance with the Protected Territories Act (State Gazette issue 133/98, amended and supplemented State Gazette issue 28/2005), as well as a part of protected area BG 00002030 “Complex Kalimok” under Directive 79/409/EEC for preservation of wild birds and protected area 0000377 “Kalimok – Brashlen” – under Directive 92/43 for preservation of nature habitats and wild flora and fauna under NATURA 2000 and the provisions of Bio-diversity Act. The realization of the investment proposal does not have impact on natural habitats.</p> <p>The impact of wastes generated during realization and exploitation of the investment proposal on the components of the environment can be classified as insignificant, temporary (during construction), permanent (during exploitation), recoverable with small local size. Separate collection of wastes generated during construction and exploitation of the investment proposal,</p>

	<p>their transportation, temporary storage and submission for activities including collection, transportation, temporary storage, utilization and/or making harmless does not have negative impact on the environment and people health.</p> <p>The investment proposal plans application of current good production practices in this area, which means inclusion in the production process of equipment and installations with good technical and environmental parameters, including acoustic ones. The activity in the site is not expected to be source of noise above the limits in acoustically sensitive territories in the region (living areas).</p> <p>During civil works and exploitation of the port site there will be no sources of vibrations in the environment. During construction and exploitation, the site will not be source of other physical factors – thermal and non-ionizing radiations.</p> <p>As a result of the foreseen extraction activity, insignificant changes will be present in the visual aspect of the river due to the presence of equipment in the natural river bed. The impacts are classified as physical, local and medium-term for the extraction period.</p> <p>There are no risk factors for people health damage by the environment.</p>
<p>Inputs (e.g. raw material, power sources, etc.)</p>	<p>The natural resource – sand and gravel, planned for extraction is with regenerative ability in the medium-term, as a result of the river natural accumulation processes.</p> <p>Water and electricity supply to the site will be provided from existing technical infrastructure.</p>
<p>Outputs (e.g. amounts and types of: emissions into the atmosphere, discharges into the water system, solid waste)</p>	<p>The activity of sand and gravel extraction from the river bed is not related to formation of dust emissions in the environment. Dust emissions will not be generated during transportation, discharge and temporary storage of sand and gravel, as the material is wet. Emissions of hazardous substances will be generated from the burned exhaust pipe gases from the extraction and transportation equipment to be used.</p> <p>Waste water will not be generated during excavation of alluvial materials.</p> <p>Acoustic discomfort in the environment will be created by the noise from the extraction and transport vehicles. The change of acoustic environment will have negative impact on potential habitats of birds in the nearby island, expressed as disturbance mainly in the birds nesting period. The activity in the site is not expected to be source of noise above limits for acoustically sensitive territories in the region (living areas).</p> <p>Single generation of the following wastes types is expected during construction: mixed construction wastes, metal wastes, solid household wastes, hazardous wastes (some of which will be generated in insignificant volumes only during breakdown change of transport and construction machines) – hydraulic oils, motor oils, gear oils, brake and anti-freeze liquids, oil filters and accumulator batteries with electrolyte.</p> <p>During exploitation, generation is expected of the following wastes types: insignificant quantities of hazardous wastes, such as non-chlorinated motor, lubrication and gear oils, waste hydraulic oils, accumulator batteries, fluorescent pipes and other mercury containing wastes; small quantities of production wastes, such as mixed metal wastes from repairs or dismantling of equipment (scrap), out of use electronic and electrical appliances, solid household wastes.</p>
<p>Transboundary impacts (e.g. types, locations,</p>	<p>Trans-boundary impacts are not expected if the technology for extraction of alluvial materials in the approved area and for discharge to port site is</p>

magnitudes)	followed.
Proposed mitigation measures (e.g. if known, mitigation measures to prevent, eliminate, minimize, compensate for environmental effects)	<p>The measures that should be taken in order to decrease the negative impacts on the components and factors of environment during realization of the investment proposal are:</p> <p><u>Atmospheric air</u></p> <ul style="list-style-type: none"> ➤ During construction: <ul style="list-style-type: none"> ▪ The provisions of Regulation № 1 for norms of accepted emissions of hazardous substances (pollutants) released in the atmosphere from sites and activities with non-mobile sources of emissions (State Gazette issue 64/2005) shall be followed and in particular art. 70 of the regulation – in cases when during demolition of old buildings and construction of new ones materials are loaded and unloaded, which are sources of dust substances; ▪ Construction machines and motor vehicles with damaged internal combustion engines shall not be allowed to work; ▪ The locations for temporary storage of bulk materials and construction wastes shall be irrigated during dry and windy weather in order to decrease dust emissions from being spread in atmosphere; ▪ The machines used during demolition of old buildings and construction works shall use only fuels that comply with the provisions of the Regulation for the requirements for the quality of liquid fuels, the conditions, order and method for their control (State Gazette issue 66/2003); ➤ During exploitation: <ul style="list-style-type: none"> ▪ The provisions of Regulation № 1 for norms of accepted emissions of hazardous substances (pollutants) released in the atmosphere from sites and activities with non-mobile sources of emissions (State Gazette issue 64/2005) shall be followed and in particular art. 70, where this is applicable/necessary, especially during storage of bulk material on the port site; ▪ The temporary storage area for extracted bulk materials shall be irrigated during dry and windy weather in order to decrease the non-organized dust emissions; ▪ The equipment for aggregates extraction and transport shall use only fuels that meet the provisions of Regulation for the requirements for the quality of liquid fuels, the conditions, order and method for their control (State Gazette issue 66/2003); ▪ Loading of transport vehicles with extracted bulk materials in excess of their dimensions shall not be allowed; ▪ Idle work of transport vehicles used for expedition of extracted aggregates shall not be allowed. <p><u>Noise</u></p> <ul style="list-style-type: none"> ➤ During construction: <ul style="list-style-type: none"> ▪ Construction works shall be performed only during the day; ▪ Idle work of construction machines shall not be allowed; ➤ During exploitation: <ul style="list-style-type: none"> ▪ The transport corridor of dump trucks from the port site through the industrial zone shall be defined. <p><u>Wastes</u></p> <ul style="list-style-type: none"> ➤ During construction: <ul style="list-style-type: none"> ▪ Generated wastes shall be collected separately and stored in temporary depots;

	<ul style="list-style-type: none"> ▪ Transportation of construction wastes to a depot assigned by the municipality; ▪ Collection of solid household wastes in metal containers and their transportation to an organized depot for solid household waste or consecutive treatment; ▪ Emergency generated hazardous wastes shall be duly transported to the site of the company executing construction works and be transferred to physical or juridical persons having permit for the activity under art. 37 of Wastes Management Act. <p>➤ During exploitation:</p> <ul style="list-style-type: none"> ▪ Generated wastes shall be separately collected and stored in covered places or in temporary sites until transportation for consecutive treatment for making harmless following the provisions of Chapter two, Section I of Regulation for the requirements for treatment and transportation of production and hazardous wastes adopted with Decree of Council of Ministers № 53/19.03.1999 on the places assigned for this; ▪ Fluorescent pipes and other wastes containing mercury shall be temporary stored separated from other wastes and in the presence of sulfur; ▪ Wastes subject to treatment for making harmless shall be submitted only to persons having permit under art. 37 of Wastes Management Act or IPPC permit for execution of this activity on the grounds of signed contract. <p><u>Specific measures:</u></p> <ul style="list-style-type: none"> ▪ Extraction of alluvial materials shall be done only within the limits of the approved site; ▪ Operation of extraction and transportation equipment that is not in proper condition shall not be allowed; ▪ Damages from occurred failures shall be immediately removed; ▪ Provision of the necessary personal protection items and control for their use; ▪ Labeling of all possible places exposing human life to risk.
Additional information/comments	--
(iv) Proponent/developer	
Name, address, telephone and fax numbers	<p>“Gravel and sand pits - Bulgaria” EAD Sofia city 1528, district Iskyr, № 6 Poruchik Nedelcho Bonchev Str. tel: +359 2 976 00 70 fax: +359 2 976 00 72 Executive director: Alexander Nakov Chakmakov</p>
(v) EIA documentation	
Is the EIA documentation (e.g. EIA report or EIS) included in the notification?	NO
If no/partial, description of additional documentation to be forwarded and (approximate) date(s) when documentation will be available	Pursuant to the requirements of art. 4, par. 1 and art. 2 of Regulation for the conditions and order for conducting Environmental impact assessment, the Regional inspectorate of environment and waters in Rousse, mayors of respective municipalities and impacted population are notified. Information is presented to the competent authority Regional inspectorate of environment and waters in Rousse for assessment of the necessity for Environment impact assessment in compliance with the requirements of Appendix № 2 to art. 6 of

	<p>Regulation for the conditions and order for conducting Environmental impact assessment. Information is presented to the competent authority Regional inspectorate of environment and waters in Rousee pursuant to art. 10 of Regulation for the conditions and order for assessment of the conformity of plans, programs, projects and investment proposals with the subject and objectives for preservation of the protected areas.</p> <p>Consultations with interested parties and affected population will be conducted in case conducting of Environment impact assessment is necessary. Preparation of assignment for the scope and content of the Report for Environmental impact assessment.</p> <p>Development of Report for Environmental impact assessment.</p>
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Additional information / comments	--
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2. POINTS OF CONTACT

(i) Points of contact for the possible affected Party or Parties

<p>Authority responsible for coordinating activities relating to the EIA (refer to decision I/9, annex)</p> <p>- Name, address, telephone and fax numbers</p>	
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List of affected Parties to which notification is being sent	
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(ii) Points of contact for the Party of origin

<p>Authority responsible for coordinating activities relating to the EIA (refer to decision I/9, annex)</p> <p>- Name, address, telephone and fax numbers</p>	
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<p>Decision-making authority if different than authority responsible for coordinating activities relating to the EIA</p> <p>- Name, address, telephone and fax numbers</p>	
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3. INFORMATION ON THE EIA PROCESS IN THE COUNTRY WHERE THE PROPOSED ACTIVITY IS LOCATED

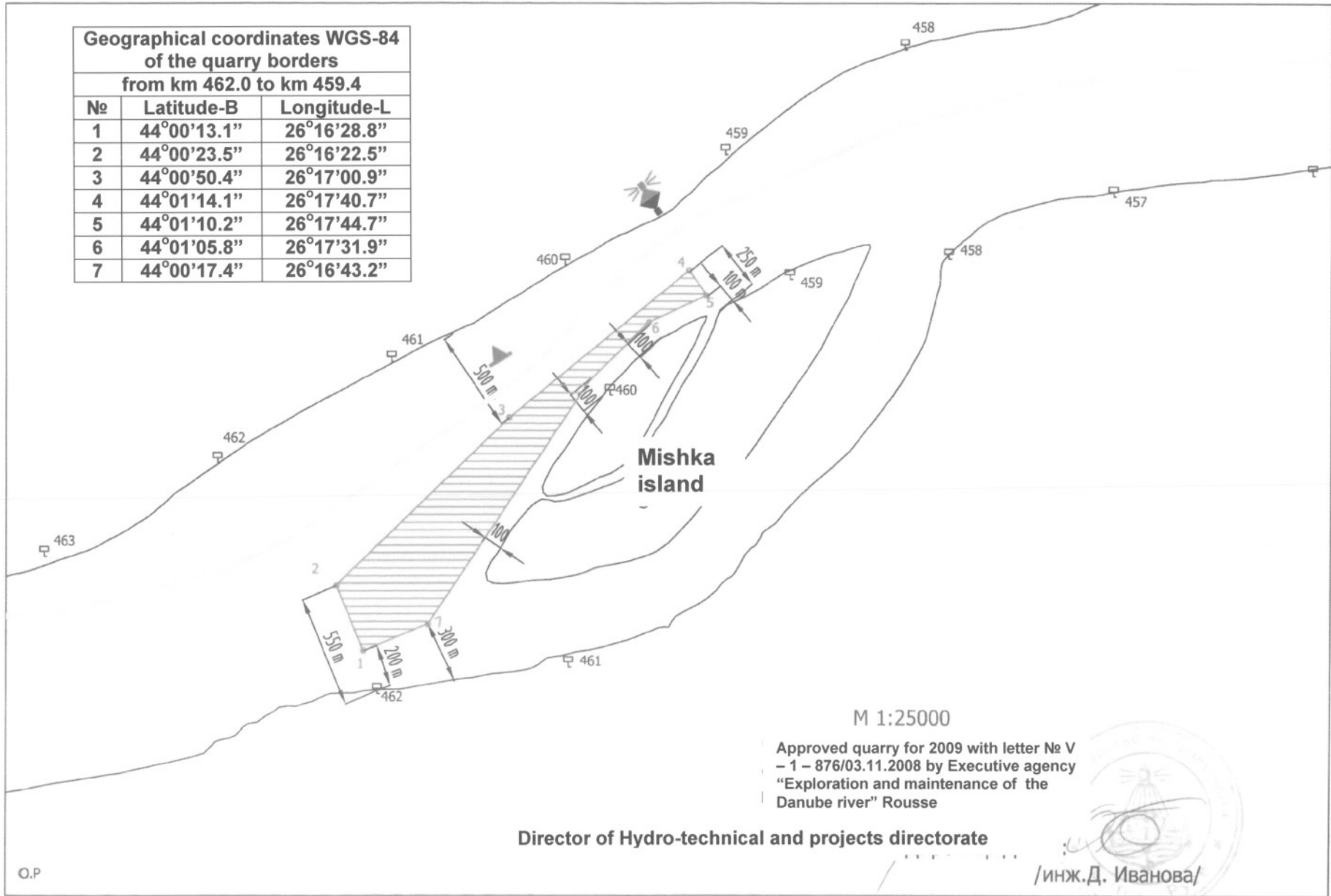
(i) Information on the EIA process that will be applied to the proposed activity

Time schedule	
Opportunities for the affected Party or Parties to be involved in the EIA process	
Opportunities for the affected Party or Parties to review and comment on the notification and the EIA documentation	
Nature and timing of the possible decision	
Process for approval of the proposed activity	

Additional information / comments	
4. INFORMATION ON THE PUBLIC PARTICIPATION PROCESS IN THE COUNTRY OF ORIGIN	
Public participation procedures	
Expected start and duration of public consultation	
Additional information / comments	
5. DEADLINE FOR RESPONSE	
Date	

**Geographical coordinates WGS-84
of the quarry borders
from km 462.0 to km 459.4**

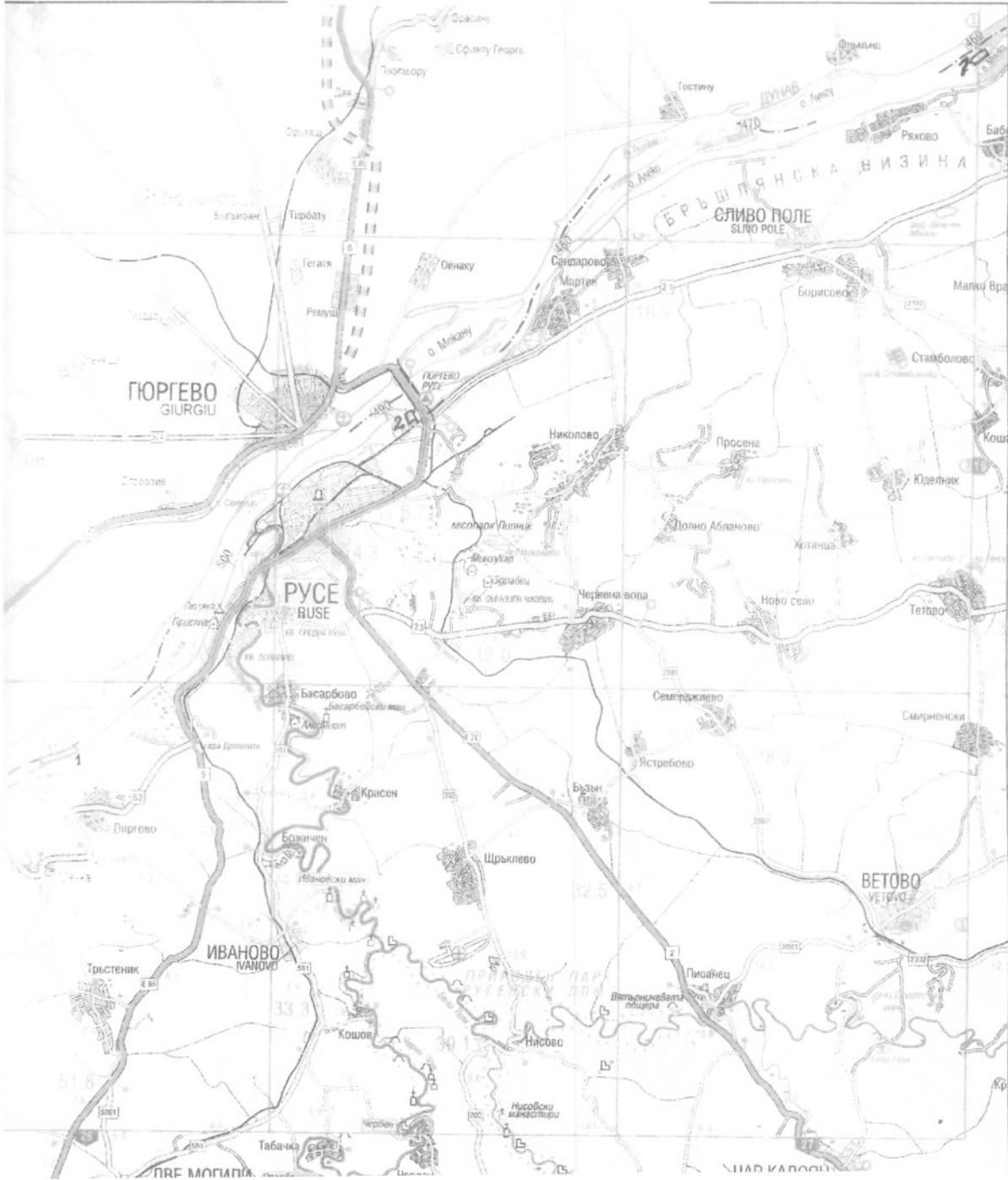
№	Latitude-B	Longitude-L
1	44°00'13.1"	26°16'28.8"
2	44°00'23.5"	26°16'22.5"
3	44°00'50.4"	26°17'00.9"
4	44°01'14.1"	26°17'40.7"
5	44°01'10.2"	26°17'44.7"
6	44°01'05.8"	26°17'31.9"
7	44°00'17.4"	26°16'43.2"



/eng. D. Ivanova/

Appendix №1

MAP
M 1:200000



ROUSSE MUNICIPALITY
DIRECTORATE "TERRITORY ORGANIZATION"
DEPARTMENT "CADASTRE AND REGULATIONS"

ОБЩИНА РУСЕ
ДИРЕКЦИЯ "УСТРОЙСТВО НА ТЕРИТОРИЯТА"
ОТДЕЛ "КАДАСТЪР И РЕГУЛАЦИИ"

СКИЦА № КР1-5250
М 1: 1000

PLAN № КР1 – 5250
М 1: 1000

НА УПИ/ПОЗЕМЛЕН ИМОТ/..... УПИ IV - 102, рп..... КВ.....
ПО РЕГУЛАЦИОНЕН ПЛАН НА Г.Р. РУСЕ..... И.З.Т. П.Р.О.З. З.Р.Н.А.
ОДОБРЕН СЪС ЗАПОВЕД 28.06.23.03.04.с. И.П.Р. П.У.
УПИ/ПОЗЕМЛЕН ИМОТ/ИМА КВАДРАТУРА..... 4.558 м².
УРЕГУЛИРАН/НЕУРЕГУЛИРАН/ И Е СОБСТВЕНОСТ НА:

1. Д.У.Б.В.А. В.Е. К.О. О.О.Д.
2. И.О.Т. А.К.Т. 119/10.11.2004, т.43, р.15904, д.9846

OF Regulated land property (RLP):.....RLP IV – 102 пп
BY REGULATION PLAN OF ROUSSE, EAST INDUSTRIAL ZONE
APPROVED WITH ORDER 2846/ 23.09.04 ИПР, ПУР
RLP AREA 4558 m²
REGULATED AND OWNED BY: Double W Co – OOD
a notary deed 119/10.11.2004, т 43, р 15904, д 9846

СКИЦАТА СЕ ИЗДАВА ПО МОЛБА ВХ.№ КР1-5250.....ОТ 13.12.2006,
И ЩЕ СЛУЖИ ЗА ПИЛОТ РИМС.
ТАКСА ОТ 30 БГН Е СЪБРАНА С КВИТАНЦИЯ:

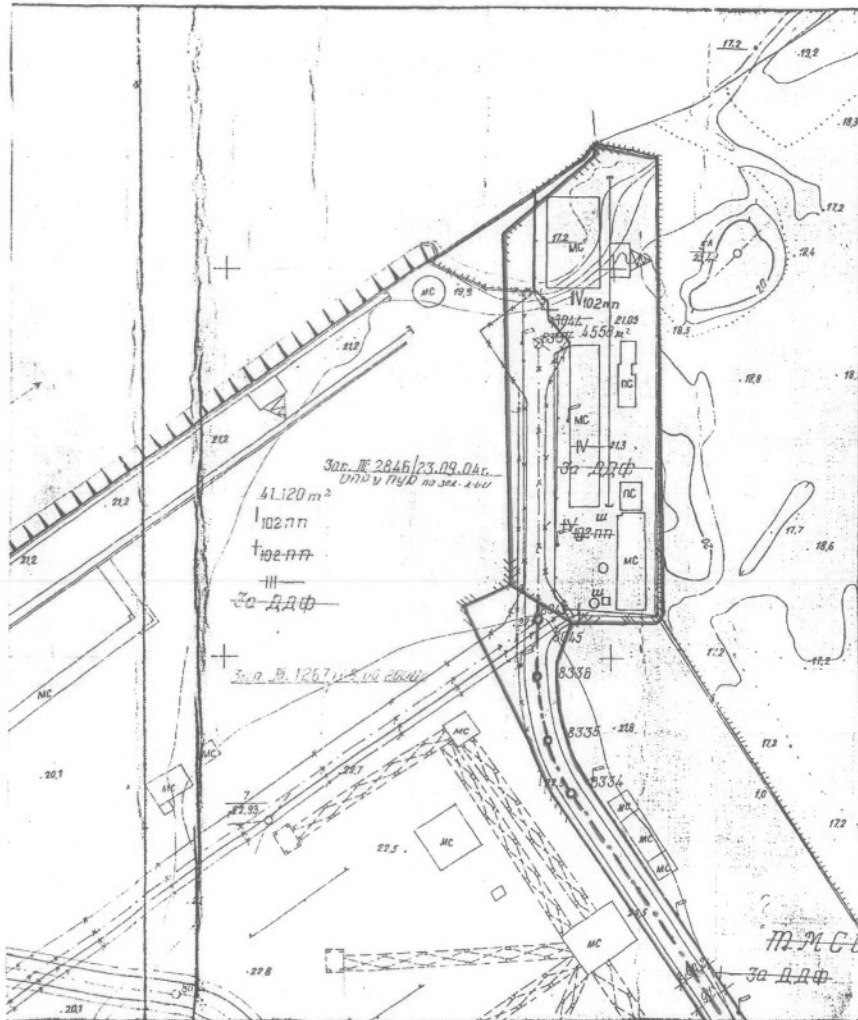
ИЗГОТВЕН.....ДАТА: 13.12.2006.

Н-К ОТДЕЛ.....

THE PLAN IS ISSUED AFTER REQUEST REF. № КР1 – 5250 OF
13.12.2006 AND WILL SERVE BEFORE NOTARY
FEE OF 30 BGN IS COLLECTED WITH RECEIPT

PREPARED BY:..... DATE: 13.12..2006

HEAD OF DEPARTMENT:.....



Appendix № 1