



GOVERNMENT OF ROMANIA
MINISTRY OF ENVIRONMENT, WATER AND FORESTS

Cabinet of the Minister

No.: 6666 /G.L.G./ 21.01.2015

Ref: SEA procedure for the Romanian General Transport Master Plan (RGTMP)

Dear Ms. **Ivelina VASSILEVA**,

Allow us to take this opportunity and thank you for your letter no.99-00-222 dated 8 December 2014, regarding the willingness of the Republic of Bulgaria to participate in the strategic environmental assessment procedure (SEA) for the Romanian General Transport Master Plan (GTMP) together with your comments and proposals on the scope and content of the Environmental Report for this plan.

In this respect, we would like to inform you the following aspects:

The Environmental Report includes information on the environmental characteristics likely to be affected by the projects included in the GTMP and an analysis of the potential environmental impact of these projects on the environment factors and environmental objectives established.

To reduce potential negative effects on the environment, both during execution and during operations, several measures have been proposed in advance to eliminate, prevent, mitigate and / or compensate for such likely adverse effects, and punctual measures applicable to each project shall have to be considered in order to ensure project implementation with minimal environmental effects.

Since at this stage no information is available regarding the volume of work, the categories of works detailed designs, detailing the effects generated and the magnitude of each individual project scope cannot be completed in this stage. This will be developed at the project level in a subsequent phase, when the potential transboundary effects will be notified to the neighbouring states concerned.

Within the chapter **Potential significant environmental effects, including health, in transboundary context**, in the situation of the implementation of GTMP, additional information has been included as requested by you through the letter no. 99-00-222 / 08.12.2014.

Ms. Ivelina VASSILEVA
Minister
Ministry of Environment and Water, Republic of Bulgaria



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1. A detailed assessment of Impact of the Master Plan on the surface water and the hydro-morphology of the Danube river (including the "do Something" projects envisaged in the scenario Improvement of infrastructure of six Danube ports in trans-border areas with Bulgaria and Improvement of navigation conditions on The Danube sector Portile de Fier II – Călărași)

On the common sector Romania - Bulgaria (km 845.5 - km 375) there are 30 critical points for navigation in the minimum water depths fall below 2.5 m, minimum depth recommended by the Danube Commission.

The project for the improvement of the navigation on the Danube proposes the following types of work: dredging, protection and consolidation of banks, achievement of bottom sills, control dams.

The works on improving navigation will be made mostly on water surface (Danube) over a length of about 595 km, on the land there will be only points of temporary work, for arranging banks (protection and consolidation).

At this level of the Strategic Environmental Assessment, the technical details on how to execute these works are not known. The technical solutions will be analysed in detail within the technical project. In addition in the phase of the design the environmental impact assessment will be detailed.

The role of strategic environmental assessment is to analyse the groups and types of projects, while detailing the effects generated and the magnitude of expression of each individual project will be done at a later project phase, when the potential transboundary effects will be notified to the neighbouring states concerned.

Improving navigation conditions will not eliminate all required maintenance dredging of the fairway, but it is estimated that this will be reduce as the volume and range of achievement.

We are aware of the fact that such works may produce changes water flows determined by an increase of the fairway depth (changes in the river bed morphology - i.e. changing cross-section and longitudinal riverbed), protection and/or consolidation of banks (the banks and bed morphology changes by diggings for embedding works and for stability), the execution of various works to prevent silting (it is difficult to prevent clogging, routing works will lead to clogging of other areas virtually no risk to navigation). Some works will even lead to a minor change of flow direction and velocity etc. These effects occur on a short period of time, for some narrow areas. There will be a local impact during construction by increasing water turbidity due to mechanical excavation works in the riverbed that will lead to suspension. The impact is local, with the suspension decanting downstream, due to the high degree of dispersion and dilution, but also because of the relatively low rate of leakage speed.

In terms of quality, during the execution period there will be a certain level of mechanical impurity determined by suspensions originating from the riverbed which will subsequently be decanted along the riverbed. Major problems related to water pollution can occur, but only in case of accidents (e.g. accidental spills of petroleum products - especially fuel). A decision could be made to compel each contractor who operates on the Danube to have a minimum stock of intervention materials in case of accidental pollution. This minimum stock of materials will be established for each type of job. Each contractor may be required to have absorbent materials and oil retention dams with rapid access in case of accidents. Data on the use of toxic and hazardous substances at this stage are not known, details will be presented, as previously mentioned, during project execution phase.



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Groundwater quality will not be affected. From the quantitative point of view there will be no impacts on ground water resources.

The works on development of port infrastructure Oltenița, Moldova Noua, Giurgiu, Corabia, Orșova. may include: rehabilitation of piers, rehabilitation of roads and railways inside ports area, quay and berth modernization.

The works will be performed mainly inside the port, on the quay platform, at a distance of approximately 900-1000 m of the Bulgarian bank of the Danube and it is expected that they will not affect the Danube riverbed and will not significantly impact the water quality of the Danube.

The works needed to improve navigation conditions on the Danube and modernization of port infrastructure will be carried out on different time periods. One cannot speak of a cumulative impact during execution. However, it may be mentioned that each contractor will perform and propose for approval and execution a plan based on the requirements of the authorities. In current practical business, for the execution of works on watercourses, hydrological and meteorological weather prognosis are required by the entrepreneurs for different periods of time in order to plan the works and their execution in optimal conditions, including environmental protection works and especially on water protection (e.g. various hydraulic works cannot be performed under conditions of high waters).

Works to improve navigation conditions on Danube and the development of port infrastructure may lead to an increase in naval traffic on the Danube. This growth also depends on economic development. Theoretically, these works lead to naval traffic flows and an incensement but also, lead to reduction in travel times and reduction of risk of accidents that may cause pollution of the watercourse.

The development of port infrastructure and modernization of ports will increase the safety of cargo handling operations, mooring barges in the quays and reducing the risks of accidents leading to pollution of the Danube.

A detailed information on the assessment of the impact of the Master Plan on the surface water and hydro-morphology of the Danube River requested by you at point no.1 from the above letter, concern detail level afferent to the EIA procedure at the project level. Regarding the project "Improvement of Navigation Conditions on the Danube sector Portile de fier II – Calarasi", we remind you that Romania and Bulgaria has started the exchange of information within the Espoo Convention. This information it's refers to the project level (EIA Directive) and this was discusted and has been treated at the environmental impact assessment phase during the previous Espoo procedure.

We have the information that the project will be modified and thereupon as soon as we receive the new elements on the project we'll enter into consultations with the Bulgarian Party. This means that the issues requested in your letter no.99-00-222/ 8 December 2014 will be deepened on the project level.

When the project proposed in the strategy come to the environmental impact assessment phase and detailed engineering plans are available, Romanian Party will notify and inform Republic of Bulgaria according to the provision of the Convention on Environmental Impact Assessment in a transboundary context done at Espoo (Finland), on 25 February 1991, and article 7 of the Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of



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certain public and private projects on the environment, and will offer a change for the relevant Bulgarian authorities to review and comment the environment impact studies of the projects.

Furthermore, please be informed that the information express by you at point no.1 and 2 of the above letter, at the detail level afferent to the SEA procedure and the environmental report, the plan, the appropriate assessment of the Master Plan and also the additions/completions to Bulgarian requests are available on the official web site of the Ministry of Environment, Water and Forests: http://mmediu.ro/new/?page_id=1668.

- 2. With regard to human health a detailed information, analysis and conclusion on the extent of the possible impact on the nearest settlements on Bulgaria territory-of projects related to the expansion of the activities of Danube ports, the dredging of the river and the construction of a second bridge near Giurgiu (including with respect to air pollution, noise impact and water pollution of the Danube, hence potentially affected by water intake facilities located in the terrace of the Danube used for drinking water) shall be presented**

The "Do Minimum" scenario also called the "Reference Case" include the already approved projects, projects which are under implementation and those which have secured financing. This scenario represents the starting point for future development of transport infrastructure and for the selection of projects that are part of the scenario "Do Something".

The General Transport Master Plan does not propose any projects for the execution of other bridges across the Danube.

Transport sector	Project category	Name	Neighbour country
"Do minimum" Scenario or Reference Case			
Road (Bridges)	Road bridge rehabilitation	Giurgiu Bridge over the Danube on DN5 (National Road) km 64+884	Bulgaria
"Do something" Scenario			
Naval (Ports)	Port infrastructure development	Drobeta Turnu Severin Port (Port P-DB-S)	Bulgaria
Naval (Ports)	Port infrastructure development	Moldova Noua Port (P-MV-S)	Bulgaria
Naval (Ports)	Port infrastructure development	Giurgiu Port (P-GR-S)	Bulgaria
Naval (Ports)	Port infrastructure	Oltenița Port (P-OT-S)	Bulgaria



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Transport sector	Project category	Name	Neighbour country
	development		
Naval (Ports)	Port infrastructure development	Corabia Port (P-CB-S)	Bulgaria
Naval (Ports)	Port infrastructure development	Orșova Port (P-OV-S)	Bulgaria
Naval (waterways)	Improving navigation on the fairway	Improving navigation conditions on the Danube Porțile de Fier II - Călărași (W1) sector	Bulgaria Serbia

Specific construction work for these types of projects can create discomfort to population from areas around the working site. Road traffic / naval traffic used for carrying materials, operation of machines and equipment, floating cranes required for construction works can lead to increased noise level and air emissions concentrations on the work site. These effects have a local and temporary effect and will have an insignificant impact on health.

During the execution period the surface water quality could be affected only if accidental/ uncontrolled spills of pollutants occur on ground or in water, improper disposal of waste or improper disposal of wastewater. The only effect that can be felt on the Bulgarian bank is the increased water turbidity caused by the suspensions produced following execution works performed in the riverbed. This type of mechanical pollution has local effects of short duration.

The materials used for specific bank consolidation works or for bottom thresholds will not affect the quality of surface water, they fall within the category of inert material.

Projects included in the two scenarios will be implemented in different periods of time, the cumulative impact during the execution period in terms of air emissions, noise level, pollutants in surface water is zero.

Improvement of navigation conditions on Danube and port infrastructure development can lead to intensification of naval traffic. This growth also depends on the economic development in the next period. Intensification of naval traffic may lead to an increase in emissions in the atmosphere and increase the noise level in ports area. The generated impact will be insignificant and will not affect the population of the neighbouring states.

Works to improve navigation conditions works for the development of port infrastructure can help reduce the risk of accidents during transport or when handling goods. Although through achieving these works we estimate an increase in naval traffic, by increasing safety due to better navigation conditions is expected a reduction of the incidence of accidents and reduce the occurrence of possible pollution in the Danube.

To prevent, reduce the magnitude of the environmental effects likely to be generated by the projects included in the GTMP, the Environmental Report proposes a series of measures to help avoid, prevent



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and reduce environmental impacts and a monitoring system for its potential effects (these are included in Chapters 10 and 12 of the Environmental Report).

It is mentioned that, in accordance with the applicable environmental legislation in Romania, the execution of the proposed works will be conditioned by prior consent of an Environmental Permit and completing the environmental assessment procedure related to each project. This procedure requires that the Feasibility Study and technical execution project to be largely completed so that the potential environmental impact will be detailed. It will also require concrete measures to reduce the environmental impact, measures imposed by the Environmental Permit.

It is also stated that the procedure for environmental impact assessment, includes public consultation and for projects with transboundary effects includes public debates. If desired, at these consultations and discussions representatives of the Ministry of Environment and Water of the Republic of Bulgaria will be invited. Previously, the documentation of the environmental impact assessment will be sent for consultation.

Thus, we mention that all the requested completions by Republic of Bulgaria in the letter no. 99-00-222 / 08.12.2014, as presented above, will be included in the final version of the Environmental Report for the General Transport Master Plan for Romania.

Taking all the above into consideration, please send us your final point of view until 20th February 2015.

I am taking the opportunity to express our readiness to continue our fruitful cooperation and please accept, Ms. Minister, the assurance of my highest consideration and esteem.

Yours sincerely,

Grațîela Leocadia GĂVRILESCU

MINISTER