



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

MINISTER

99-00 - 319
06 December 2012

Subject: Project „The Development of the Arges and Dambovita Rivers for Navigation and Other Uses”

Dear Minister,

With reference to your letter 3811 / RP / 19.10.2012 containing the scoping guidelines for the EIA report of the above mentioned project, we would like to express the following opinion based on consultations with Bulgarian competent authorities.

We find it appropriate to recommend the EIA report to include a separate chapter on the transboundary impact on Bulgarian territory.

Concrete impact on Bulgarian territory from the project can be expected in the Danube section after the town of Tutrakan.

H. E. Ms. Rovana PLUMB
Minister of Environment and Forests
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We recommend the chapter on transboundary effects:

- *To assess the impact on the affected Bulgarian section of the Danube River as part of surface water body RWB01 and code BG1DU000R001. To analyse the impact on the specific ecological goals for the water body in the River Basin Management Plan of the Danube River Basin District.*
- *To assess and analyse the impact of the change in the hydrological conditions due to the implementation of the project on the flow of the Danube River in the inflow section and to assess the impact on potential flood threat in the transboundary region.*
- *To assess the impact on transboundary groundwater bodies RO-BG 02 and RO-BG 04, defined on Bulgarian territory as Karst Water in Malm-Valange Basin with code BG1G0000J3K051 (part of RO-BG 02) and Karst-pore Water in Neogene-Sarmatian-Dobrudzha with code BG1G000000N049 (part of RO-BG 04) taking into account that ground water bodies are defined as potable water protection zones pursuant to Bulgarian Water Act, Art. 119a, par. 1.1. To analyse the impact on the specific goals for the groundwater bodies and water protection zones in the River Basin Management Plan of the Danube River Basin District.*
- *To analyse the potential impact on the water protection zones pursuant to Art 119a par. 1.5 of the Bulgarian Water Act, which are Natura 2000 protected areas in the Bulgarian section after influx of the Arges River – Pozharevo Island BG0000237, Kalimok Complex BG0002030, Srebarna BG0000241, Blato Malak Preslavets BG0002065, Garvansko Blato BG0002064, Kalimok-Brashlen BG0000377, Pozharevo-Garvan BG000530, Chaika Island BG00005304,*
- *To analyze the potential impact on Srebarna Reserve, which is part of Natura 2000 protected zone. This assessment is very important because Srebarna is also a UNESCO World Heritage Property, a Wetland of International Importance under the Ramsar Convention and a UNESCO Biosphere Reserve. We recommend specific measures to be included to prevent pollution of the Danube, which is a vital environment for the species in Srebarna Reserve.*
- *To include a chapter in the EIA Report on implementation of measures for prevention and reduction of the impact of the project on the Danube water body in the section after the confluence of the Arges.*

The following informational sources can be used for the analysis of the impact on Bulgarian territory:

- *River Basin Management Plan of the Danube River Basin District (accessible in Bulgarian on the website of the Danube River Basin Directorate – Pleven <http://www.bd-dunav.org/content/upravlenie-na-vodite/plan-za-upravlenie-na-rechniia-baseyn>).*
- *Results from monitoring of the Danube River available in the Executive Environment Agency of the Ministry of Environment and Water and in the Danube River Basin Directorate – Pleven.*

- Report on the state of the environment of the Regional Inspectorate on Environment and Water – Ruse - <http://www.riosv-ruse.org/>.
- Natura 2000 data base – available in Bulgarian and English at <http://www.icpdr.org/main/activities-projects/river-basin-management>.

Please accept, Ms Minister, the assurances of my highest consideration.

Sincerely,



Nona Karadjova

"За министър:	
Заместник-министър:	А. Малева
Заповед за заместване:	РД-896/30.11.10