



REPUBLIC OF BULGARIA

Minister of Environment and Water

OBDC-240
13 March 2015

Ref: EIA procedure for the project "The development of the Arges and Dambovita rivers for navigation and other uses"

Dear Ms Gavrilescu,

With reference to your letter №3077/GLG/29.01.2015 providing additionally the "Potential Transboundary Impact for Site Natura 2000 in Bulgaria" and "Annex" to the Appropriate Assessment Study, as a result of the consultations of the competent Bulgarian institutions the following findings have been made:

1. Impact of the project on the environment and waters in a transboundary context. According to the documentation, project activities will be carried out in the Danube River basin in Romania, Arges River and Dambovita River. More significant planned activities to be carried out include: a navigable waterway linking Bucharest with the Danube River, respectively the Trans-European Transport Corridor no. VI, with transport capacity of more than 24 million t/year; rehabilitation of the navigation canal Danube-Black Sea for direct access to the Constanta sea port; construction of hydroelectric power plants with the capacity to place under control and transit flood flows; production of about 120 GWh /year of renewable energy from hydropower; ensuring the necessary water for perspective irrigation of areas totalling up to 150 thousand hectares; development of the Oltenita Port.

In order to reduce the impact of the project on environment and transboundary waters, we propose that the Romanian authorities take into account the following conditions:

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1. *Provision of measures for reduction of the spread of sediment, increase of turbidity and their reaching the Danube River during the navigable canal construction and operation.*
2. *During design and operation of dams/reservoirs, hydro power plants, dams, corrections of river beds, dredging to increase the depth of the waterway, auxiliary equipment, etc: provision of measures to avoid floods in Bulgaria during flood flows transit through the canal and to avoid increase of the process of digging of the Bulgarian bank of the Danube River.*
3. *Implementation of appropriate organizational measures to prevent possible pollution of water bodies during construction works.*
4. *Avoidance of warehousing and storage of materials from any origin near river beds, in order to prevent pollution and discharge into the Danube River during construction works.*
5. *Interdiction of storage of material from dredging activities which threaten the state of the Danube River.*
6. *Provision at the earliest stage possible of information on incidents likely to have significant impacts on the Danube River basin in terms of flooding and water contamination, negative impact on biology, hydro-morphology and sediment respectively.*

II. Biodiversity conservation.

In addition to measures related to biodiversity conservation proposed by your side, we consider it necessary to include in the texts relevant specific deadlines and additional measures:

1. *Construction work along the rivers shall not start during the spawning season (May 15 - the middle or end of June).*
2. *Construction work shall not start in the birds breeding and rearing period (April 15-June 30).*
3. *Monitoring shall be conducted and measures for prevention and control of invasive aquatic species shall be provided.*
4. *The results of the three-year monitoring to be published on a website in English to be used by Bulgarian authorities.*

Given the above, we consider it necessary the measures and conditions proposed by the competent Bulgarian institutions to be taken into account in the EIA procedure documentation for the project.

I take the opportunity to reiterate the assurance of my highest consideration and to express readiness for a fruitful cooperation.

Yours sincerely,

*Ivelina Vassileva
Minister of Environment and Water*