



MINISTRY OF ENVIRONMENT,  
WATERS AND FORESTS

Reg.No 2030 /CPP/ 14.04.2016

Subject: EIA Report on the investment proposal for "Gravel and Sand Extraction from Alluvial Sediments in the Bed of the Danube River, Mishka Section (462.0 km - 459.4 km), in the area of Babovo Village, Slivo Pole Municipality, Rousse Region" Bulgaria

*Dear Ms. Vasileva,*

With regard to the documents submitted by the Ministry of Environment and Water OBOC-61/February 25/2016, received and registered by the Ministry of Environment, Waters and Forests at March 04/2016 connection with the Environmental Impact Assessment Report and annexes on investment proposal project, we will communicate the following "Romanian Waters" National Administration comments:

It is necessary to take into account the following aspects, regarding the rational exploitation of mineral aggregates and protection of the environment:

- Tracking the actions of the riverbed in the perimeter area by making an annual observation program (hydro-topographic elevations), and if the mineral resource is exhausted to stop exploitation.
- Providing the measures to prevent pollution of the Danube River with oil products as a result of technological equipment operation of extraction and transportation. In case of an accidental pollution to notify the competent authorities and to act as quickly as possible for the decontamination this area.
- It is necessary that the perimeter to be delimited, throughout the works, by fixed terminal on the shore and floats on the water.
- Establishment and strict compliance of the navigation channel and of the left bank of the Danube distance protection, the excavated slopes and the maximum depth of excavation do not exceeding the level of Danube riverbed.
- The equipment in the work area to be marked in accordance with specific navigation rules
- Also, it is necessary to demonstrate (by calculations) the estimation of mineral aggregates reserves (3.1 mil.mc) specified on page 12 of the document entitled „DOVOS\_Mishka\_2015\_EN 3”.

**MS. IVELINA VASILEVA**  
*Minister*  
*Ministry of Environment and Water,*  
*Republic of Bulgaria*



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In the document entitled "DOVOS\_Mishka\_2015\_k\_EN".

**Page 49 :** It is necessary to update the information below according to the most recent JDS campaign.

The evaluation, shown in Fig. III.2.3.1.-3 (Plamen Lenov, chief expert EEA-Regional Laboratory - Veliko Tarnovo - Assessment of the Ecological Status of Surface Waters in the Bulgarian-Romanian Border Region of the Danube) uses data from "Final Scientific Report JDS-2."

Also related to the affirmation: „significant impact of dredging activities will be expressed by deepening the river channel in the area where extraction and removal of sediment from the riverbed will be performed. This will cause a temporary change of topography, composition and structure of the sediment of the riverbed.”, it is necessary to justify this claim because the gravel and sand extraction is located in the frame of River Water Body (Iron Gates 2 - Chiciu), common water body between Romania and Bulgaria. According to the assessment of hydromorphological elements, the above WB is in class 3 - moderate due to morphological conditions (especially on the composition and structure of the river bed), situation confirmed by the results of Joint Danube Survey 3.

Despite that the area of extraction is 2.6 km long and 300 m wide, comparing with the length of Water Body, due to the significant extraction works in the river 345,000 m<sup>3</sup> / year during 8 years of activity, we consider that the impact is not temporary having in view the period of works and the significant quantities extracted.

**Page 50 :** For biological elements it is necessary to indicate the status classes according to Water Framework Directive provisions because in the EIA Report uses the expression „environmental status/conditions”. In the same time it is necessary to explain term „biogenic”. Please find below the relevant paragraph:

*„The findings are the following:*

- *a total of 7 stations show abnormal environmental status, 6 of them are in poor and one in very poor environmental condition;*
- *lower status is mainly due to BQE assessment of fish and phytobenthos;*
- *lower indices of fish in the lower reaches of the Danube speak clearly for organic pollution;*
- *in the case of low phytobenthos status the reasons are impact influence of biogenic elements and changed features of the watercourse.”.*

**Page 52 :** In the context of environmental objectives, as well as for other pages where environmental objectives for 2021 are mentioned, we suggest to replace „status” with „ecological potential”.

Specific environmental objective for surface water body code BG1DU000R001 is "Preventing deterioration of ecological potential and achievement of good status by 2021. Prevention of deterioration of the chemical status and achievement of good status by 2027." The water body is excepted from achieving certain environmental objectives due to significant anthropogenic impact.

**Page 110 :** The same comment as for page 52.



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Page 112 : To replace the word „expected” with „has to be”/”have to be” and to add the word „ potential”, as follows:

*„Implementation of the project will not cause negative impacts on the regime and quality of the water body by water intake from the river and through the discharge of wastewater. Extraction works will not affect or cause a negative impact on the cross section of the riverbed - natural coasts, floodplains (sandspits), dykes and water management facilities. Implementation of the project with the strict observance of measures envisaged in it has to be ~~is expected~~ in accordance with the requirements of river basin management plans and measures regarding the Danube. Extraction of alluvial deposits from the river bed will be carried out after authorization by the competent authority, namely the Executive Agency for Exploration and Maintenance of the Danube and subject to the conditions therein. Estimates predict absence of a negative impact on water quality of the Danube in the area of IP. The activities related to implementation of the IP have to ~~are expected to~~ comply with the provisions of RBMP regarding the ecological potential and chemical status of the water body.”*

Page 171: The same comment as for page 112 regarding the replacement of word „expected” with „have to be” and adding the word „ potential”, as follows:

*“Estimates predict absence of a negative impact on water quality of the Danube in the area of IP. The activities related to implementation of the IP have to ~~are expected to~~ comply with the provisions of RBMP regarding the ecological potential and chemical status of the water body.”*

After accepting responses to the "Romanian Waters" National Administration, the Ministry of Environment, Waters and Forests will send the set of conditions that need to be considered in the final decision to be issued by the authorities in Bulgaria in accordance with article 6 paragraphs 1 of the Espoo Convention.

Please accept, Ms Minister, the assurance of my highest consideration and esteem.

Yours sincerely

MINISTER

Cristiana PAȘCA PALMER

