Information for the attention of Implementation Committee, Convention on Environmental Impact Assessment in a Transboundary Context (Espoo, 1991)

To be sent through the Secretary to the Сonvention:

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| Date sent to the Secretary | 14 August 2023 |

# Sent by (“the source”):

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Concerning:

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| Party or Parties (States) of origin, under whose jurisdiction a proposed activity is  envisaged to take place | Republic of Bulgaria |
| Affected Party or Parties (States), likely to be affected by the transboundary impact of  a proposed activity | Republic of Greece |
| Activity (project), identified in the list of activities in Appendix I to the Convention | **1 .The Ada tepe gold mine** in operation since 2019  **2. Gold mine "Tintyava"** which will be developed at the villages of Rozino and Gugutka, Ivaylovgrad Municipality in Bulgaria, close to the border between Bulgaria and Greece  **3. The forthcoming wild mining tsunami** in the Ivaylovgrad and Krumovgrad Municipalities in Bulgaria |
| Likely significant adverse trans- boundary impact of the activity (project) | Poisoning of the transboundary Byala reka and Arda Rivers, and their tributaries /especially the tributary to Arda - Krumovitsa River/ in the region of Eastern Rhodope Mountain, and the forthcoming pollution of the transboundary Maritsa River. Pollution of the transboundary groundwater body in the area concerned.  Byala reka River and Krumovitsa - Arda Rivers are running in Bulgaria through Natura 2000 Habitats Directive Site " Rodopi - Iztochni" BG0001032, and then they enter Greece to flow into the Maritsa River which marks the border between Turkey and Greece and reaches the Greek National Park "Delta Evrou" at the Aegean Sea |
| Provisions of the Convention (Articles)  Compliance with which is being contested | **1. In the case of the "Ada tepe" gold mine the Republic of Bulgaria** has breached Articles 7and 8.  **2. In the case of the "Tintyava" gold mine the Republic of Bulgaria** has breached Article 2, paragraphs 6 and 7, as well as article 3, paragraph 1.  **3. For the case of the mining tsunami in Ivaylovgrad and Kruumovgrad municipalities the Republic of Bulgaria** has breached Article 2, paragraph 7. |
| Description of issue  - please attach supporting information | **1. The Ada tepe gold mine.** In operation since August 2019 the mine has been caught by the local authorities that waste waters were dumped directly into Krumovitsa River and the affected party Greece was not informed in breach of the terms in the letter of agreement.    **2. The forthcoming "Tintyava" gold mine project**  The ore mining and processing will include open pit extraction, crushing and flotation for the preparation of metal concentrate, which will be taken to an unknown destination/factory for final extraction of the metals.  The project is at the stage of a screening decision by the Bulgarian "competent" Regional Inspectorate of Environment and Waters /RIEW/ "Haskovo" completed and shared with the investor. The East Aegean River Basin Directorate /EARBD/ has announced the project permissible acc. to the RBMP as well.  In the instructions of the "competent" RIEW and EARBD for the preparation of the future EIA and AA reports there is not a word about assessment of the potential transboundary issues which will inevitably take place.  Both the Surface Water Body "Byala reka River" and the Groundwater Body in the area concerned are transboundary and there is not a word about this issue in the papers of RIEW Haskovo and EARBD.  Furthermore, the project's description in Bulgarian is available on the internet site of RIEW Haskovo and the Bulgarian public is informed all right, but in breach of article 3, para 1 the Greek party and the affected Greek population are not informed as early as possible , and they still remain unaware of the forthcoming ecocatastrophe as if there will be no transboundary impact whatsoever, regardless of the fact that in the EARBD papers it is stated that there will be a significant adverse impact on the surface and the ground water bodies.  The described activity falls under No14 in the list in APPENDIX I of the Convention.  **3. The mining tsunami in Ivaylovgrad and Kruumovgrad municipalities**  Currently an average **70%** of the territories of both the Krumovgrad and Ivaylovgrad municipalities are designated for search and exploration of metal ore deposits. During the search for metals hundreds of kilometers will be drilled into the ground through the transboundary groundwater body. Apart from the metals, the ground layers are heavily loaded with arsenic and other pollutants. Judging from the "Tintyava" description and from the impact on the Krumovitsa River by the existing new Ada Tepe mine already in operation in Krumovgrad, the arsenic contents appear close to the surface and exceed by far the contents of all other metals combined. Maps of all exploration areas are shown in the detailed case study - see the link in the end.  On the other hand, the existence of metal ore deposits all over the country is very well studied during the old Socialist times. The National Geolodical Fund is full of such data. This means that if a given area is designated for exploration, the developer already knows what he will find and future ore extraction is inevitable.  These activities are part of the National Mining Strategy 2030, which was not assessed under the necessary SEA and AA procedures in line with the relevant EU Directives and cumulative effects are unknown to the mining industry words.  There is a General Spatial Plan /GSP/ for the Ivaylovgrad municipality which has been assessed accordingly, but metal ore mines are not included in the Plan at all.  The Krumovgrad municipality doesn't have a GSP, and therefore no mining activities have been assessed at all, while the potential cumulative effects will be enormous. See the maps and just imagine how many kilometers of new forest roads have to be cut through...  The maps in the detailed case study clearly show the huge scale of the future mining activities. Pursuant to article 2, para.7 the party of origin Bulgaria must have put some efforts to apply the principles of EIA in a transboundary context to such vast mining development programmes for the municipalities at the Bulgarian side of the border, and the affected party Greece must have been informed as early as possible, which never happened. Some good neighbors we are, aren't we...  **Full case study on the devastating impacts of the mine on the surface and groundwater bodies in Bulgaria and North Macedonia can be found here:**  <https://dams.reki.bg/uploads/Docs/Files/ESPOO_COMMITTEE_COMPLAINT_TINTYAVA.pdf> |

form version of November 2008

*For use by secretariat:*

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| Reference number | EIA / IC / INFO / |
| Date received |  |
| Original language of information |  |
| Translation into  English by |  |
| Date forwarded to Committee |  |
| Date forwarded to  Party or Parties |  |
| Remarks by secretariat |  |
| Date first discussed by the Committee (possibly including preliminary determination  of admissibility) |  |
| Additional  information requested of source |  |

*For use by the Committee:*

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| The source of the information is known and not anonymous |  |
| The information relates to an activity listed in Appendix I to the Convention likely to have a significant adverse transboundary impact |  |
| The information is the basis for a profound suspicion of non-compliance |  |
| The information relates to the implementation of Convention provisions |  |
| Committee time and resources are available |  |