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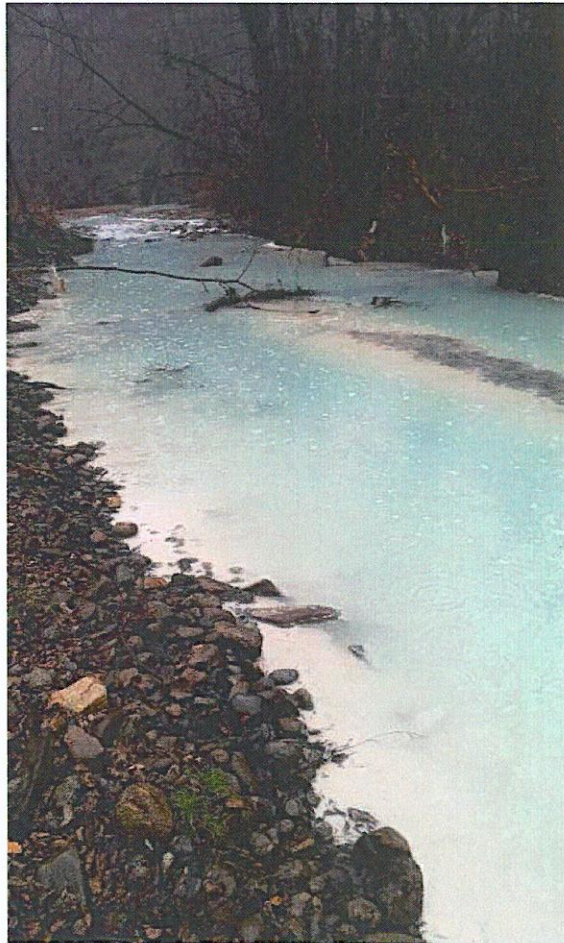
“Balkanka” Association, Sofia, Bulgaria
“Nature has all the time in the world, we do not”.

COMPLAINT

TO

THE COMMISSION OF THE EUROPEAN COMMUNITIES

CONCERNING FAILURE TO COMPLY WITH COMMUNITY LAW



Representative for this complaint:

dipl.eng. Dimiter Koumanov,
Member of the board



Sofia, Bulgaria
30.04.2020

INTRODUCTION

This is a special Complaint to the Commission of the European Communities concerning huge violations of the basic EU principle for the Rule of Law committed in Bulgaria.

At the beginning we should underline the fact that a basic Complaint and more than ten consecutive appendixes have already been lodged with DG ENV, concerning constant breach of the EU Water Framework Directive, the Habitats Directive, as well as the SEA & EIA Directives, committed by the Bulgarian environmental authorities ever since our country has become an EU Member State. Based on the illegal small hydropower development in Bulgaria, these complaints are very slowly being dealt with under **EU Pilot application reference EUP(2017)9183** for 5 /five/ years now, without any, even the slightest progress, whatsoever. Should DG ENV have acted a bit more promptly, we are positive that the crimes that happened in the last two years in Bulgaria could not have happened at all.

Furthermore, there is another horizontal Complaint of ours lodged with DG ENV in November 2019 based on the constant ongoing destruction of the riverbeds in Bulgaria, aiming to extract more and more river sediments, as well as to cut more and more riverside forests only to the profit of a few politically connected individuals. We were kindly informed by DG ENV that this particular Complaint is registered under reference number **CHAP (2020)00023**. Hopefully, in the next five or more years there will be some humble reaction from DG ENV on this issue too, when it will be too late again.

Still, in this new document we will show how the rivers in Bulgaria are being poisoned, right in front of the wide opened eyes of the "competent" state authorities, possibly encouraged to commit as many infringements of the EU legal framework as possible by the idle reaction of the EU institutions to our previous complaints. The basic EU principles written down in the Treaty on the Functioning of the EU, namely "*The Polluter Should Pay*", "*Environmental Damage Should As a Priority Be Rectified at Source*", and the call for "*Prudent and Rational Utilisation of Natural Resources*" mean absolutely nothing when it comes to saving costs and penalties for the polluters in our country.

We will show hereafter many rivers killed by our proud investors due to the uncontrolled discharge of industrial waste waters directly into the rivers, while many signals are sent by local people to the competent institutions with quite a few reactions of the controlling state authorities. Usually the perpetrator stays unknown and in the rare cases when he's being caught, the penalties are so small that they are anything but "*proportionate, effective and dissuasive*" as required by the EU WFD article 23. Penalties are only causing smiles among the criminals and nothing else.

We will also show how measures in the River Basin Management Plans /RBMPs/ aiming to improve the situation and reducing the pollution of the rivers are deliberately not implemented, and we will prove again that proper EIA/AA recommendations are constantly disregarded during the approval, authorization and operation of environmentally harmful undertakings.

Two basic lines are in the focus of this document - pollution coming from the mining industry which is deliberate and constantly ongoing, and other cases of pollution caused by occasional industrial and urban waste waters discharge, which are quite common. The generic factor in both cases is corruption among the high ranked state officials as well as the deficiencies in the relevant legal framework, which are deliberately not amended by the government in favor of all politically connected investors.

In this respect we must underline the fact that there is a reasoned opinion of the Commission, dated 7 March 2019, which states the following:

*The Commission urges **Bulgaria** to correctly enact EU rules on the management of waste from extractive industries into national law. The Extractive Waste Directive ([Directive 2006/21/EC](#)) aims to prevent or reduce the adverse effects of waste from extractive industries on the environment, and in particular water, air, soil, fauna and flora and landscape, and reduce any risks to human health resulting from its management.*

Here is a link to the announcement:

https://ec.europa.eu/commission/presscorner/detail/en/MEMO_19_1472

The most interesting statement in the communication from the Commission, however, is the following intention:

If Bulgaria fails to act within **two months**, the case may be referred to the Court of Justice of the EU.

The case might have been referred to the Court, but of course it wasn't - more than one year later /instead of two months/ - and this comes to explain the obvious fact that our officials are only laughing when they hear anything from the Commission... Sadly, it also undermines the faith of normal people that the Rule of Law principle of the EU means anything at all.

Anyway, this is a brand new, full scale Complaint, which has nothing to do with any of our previous complaints concerning the illegal development of small hydropower or the "cleaning" of the riverbeds, lodged with DG ENV so far. This new Complaint is based on the pollution of the rivers, directly causing deterioration of the ecological and chemical status of the surface water bodies in constant breach of EU WFD article 4. And when the rivers get poisoned, it is also obvious that the ground waters are adversely affected while at the same time we have a lot of groundwater drinking water sources in the terraces along the rivers here in Bulgaria and a lot of problems with the pollution of these sources as well.

This complaint is based on the fact that the basic EU principles are being constantly breached in Bulgaria, industrial enterprises constantly poison our rivers, almost never get caught and in the rare case whenever they get caught, they get away with funny penalties encouraging them to keep on committing the same crime over and over again.

Therefore, we insist that this particular Complaint will be taken into consideration by DG Environment of the European Commission as a new complaint requiring the fastest reaction possible.

In the end of this section we must point to the Commission that only the most significant and devastating cases of river pollution will be disclosed in the document below. Due to the lame excuses of the controlling institutions, it is the common practice of every kind of industrial activity and enterprise here, no matter big or small, to discharge its waste waters and/or its garbage in the river running nearby and afterwards to get away with it. Should we try to describe all the cases announced in the media, we will never finish the complaint.

Acknowledgements

We dedicate the following document to all the poor people in Bulgaria, living along their poisoned dead rivers, sentenced by the corrupt governments not only to destruction of their chances for local development based on agriculture and livestock breeding, tourism etc., but to real physical extinction due to the pollution of their drinking water sources in the name of Grand Corruption.

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ACRONYMS:

MOEW	- Ministry Of Environment and Waters of Bulgaria
RIEW	- Regional Inspectorate/s of Environment and Waters
RBD	- River Basin Directorate/s
BDDR	- Basin Directorate Danube River
EARBD	- East Aegean River Basin Directorate
WARBD	- West Aegean River Basin Directorate
WA	- Water Act
EIA	- Environmental Impact Assessment
AA	- Appropriate Assessment
RBMP	- River Basin Management Plan
WWTS	- Waste Water Treatment Station

I. IDENTITY AND CONTACT DETAILS

1. Name:

“Balkanka” Association, Sofia, Bulgaria

2. Sector / field of activity and location(s) where active:

“Balkanka” Association is a non-profit, non-governmental organization, registered in Bulgaria for action in public benefit, on 07 August 2013, company file 203/2013 of the Sofia City Court, UIC 176566443. The main objectives of “Balkanka” are protection and conservation of river biodiversity, with a focus on conservation and restoration of indigenous Balkan brown trout /*Salmo trutta*/ populations in Bulgarian rivers.

3. ADDRESS OR REGISTERED OFFICE

3.1. Surname and forename of complainant:

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4. Correspondence from the Commission can be sent to the complainant

5. Member State or public bodies alleged by the complainant not to have complied with Community law:

The Bulgarian Ministry of Environment and Waters (MOEW) and its inferior RBDs and RIEWs - all of them in the country

II. DESCRIPTION OF THE SUSPECTED INFRINGEMENT OF UNION LAW

A. Constant poisoning of rivers by the mining industry in Bulgaria

Metal ore mining is the most favorite to all governments industry in Bulgaria through the years. Apart from the uncontrolled environmental harm it causes, this industry is rewarded with the lowest royalties in the in the whole world - they are deliberately kept top secret information by all governments, but media reports talk about only 1.5% of the metals produced. At the same time 99% of the production is exported, which means that the resources of a European Member State are lavished only to the profit of a very few politically connected companies and politicians. Such benefits are never received for nothing, while the benefit to the society is close to Zero in the end, when the resources get exhausted.

However, the economical "benefits" to the society don't fall into the scope of this complaint. It is the Price we have to pay with our dead rivers, poisoned surface and ground waters, soils, air and the lost forever chances for any other kind of local development. These "benefits" will be available for us and our successors until the very end of time.

A1. The Topolnitsa River Case

Possibly, this is worst case of all. Topolnitsa River is having the bad chance to flow through the most polluted mining and industrial region in Bulgaria, with several mining and processing enterprises and smelters in operation. We will describe here all sources of river pollution one after the other starting from the springs of the river. The first two sources of pollution are not from mining enterprises, but we will start with them nevertheless, in order to address the cumulative effects:

A1.1 The town of Koprivshtitsa urban waste waters

The river starts in the region of the town of Koprivshtitsa, which is a very popular historical monument attracting many tourists all year round. The town does not have Waste Water Treatment Station /WWTS/ and the urban waste waters are dumped directly into the river without any treatment whatsoever. Here is just one media report on the matter out of many:

https://vestnikstroitel.bg/municipality/178141_koprivschica-turisticheska-destinaciya-s-vzrozhdenski-duh/

Here is a short citation:

The construction of the WWTS has started 10 years ago, but the construction site was frozen...

The reason is that the municipality does not have the money or, rather, doesn't want to waste them on waste water treatment.

So this is the first source of Topolnitsa river pollution, which should be taken into consideration in the light of the overall cumulative effects. Regardless of the season, all year round during low water periods with lots of tourists in the town, the stench along the river is unbearable.

The surface water body in this river section is in a moderate ecological status and unknown chemical status acc. to the East Aegean RBMP2016-2021 with no measures to improve the situation whatsoever, like treatment of the urban waste waters for example.

In the old East Aegean RBMP2010-2015 there is a measure concerning the construction of a WWTS for the town of Koprivshtitsa listed in the Plan. This measure was Not implemented within the deadline - the end of 2015 and was Not transferred to the new RBMP 2016-2021 for no reason at all. Currently the building of the WWTS is almost ready, but is not equipped.

In the end of this river section the Dushantsi Dam is built to provide water for industrial purposes in the region. For now this dam actually holds back part of the polluted waters, but that will not last for long. With the future growth of tourists in the area of

Koprivstitsa, the Dushantsi dam itself will turn into a ticking ecological bomb with delayed detonation.

A1.2 Dushantsi village urban waste waters

This village stands some 500 meters below the same Dushantsi dam.

On February 1st 2016 we discovered that the brand new Dushantsi WWTS is not working. The new Dushantsy village sewerage system was collecting all the waste waters of the village, discharging them directly into the river.

Proof:

Watch the next videos, please:

<https://www.youtube.com/watch?v=Gug-LsXv0fk> - the exhaust pipe that comes from the new WWTS is dry.

https://www.youtube.com/watch?v=laRf4_0DYKM - the exhaust pipes that come from the village, passing by the new station and discharging the wastewater into the river.

A signal was sent immediately to MOEW, on the grounds that during low water the polluted water can kill the entire river life, as well as the animals that drink the same water - wild and domestic, since there are large herds of cattle in the region. We also did some research, to discover that in December 2014 RIEW Sofia has caught the infringement and ordered the new WWTS to start operation. The same has happened in December 2015 again - the station was caught by RIEW still not working.

The MOEW answer to our signal dated 26th February 2016 claimed that a new inspection by RIEW Sofia together with EARBD confirmed our observations and a new deadline was set for the WWTS to start working - 17th February 2016.

Proof:

The answer of MOEW:

http://dams.reki.bg/uploads/Docs/Files/Dushantsi_answer.jpg

On 27th May 2016 we carried out a new inspection of own, only to find that nothing has changed and the wastewater is discharged directly into the river again:

Here are the new videos - the dry pipe coming from the WWTS

https://www.youtube.com/watch?v=T-RJung_rFo&feature=youtu.be

<https://www.youtube.com/watch?v=-IACitLY-Ek&feature=youtu.be>

The exhaust pipes and the wastewaters passing by the station once again:

<https://www.youtube.com/watch?v=0y-jMtsHXAI&feature=youtu.be>

The new Dushantsi village sewerage system together with the new WWTS, were financed through the Operative Programme Rural Development of the European Union. The exact budget is not written on the signboard, but local people say it's worth some five million EURO:



Now - here is a case in which a lot of European money was wasted not only without any positive effect, but the situation has become much worse. Prior to the construction of the new sewerage system of the village, for each house the waste waters were collected in small pits and then were drained into the grounds. Thus, these waters reached the river more or less filtrated. Currently the same waters are thoroughly collected and discharged directly into the river without any treatment and purification. This can be very harmful to wild life and to domestic livestock, especially in dry summer months, when herds of cattle are roaming in the fields surrounding the river, thus supporting rural development in the worst possible way.

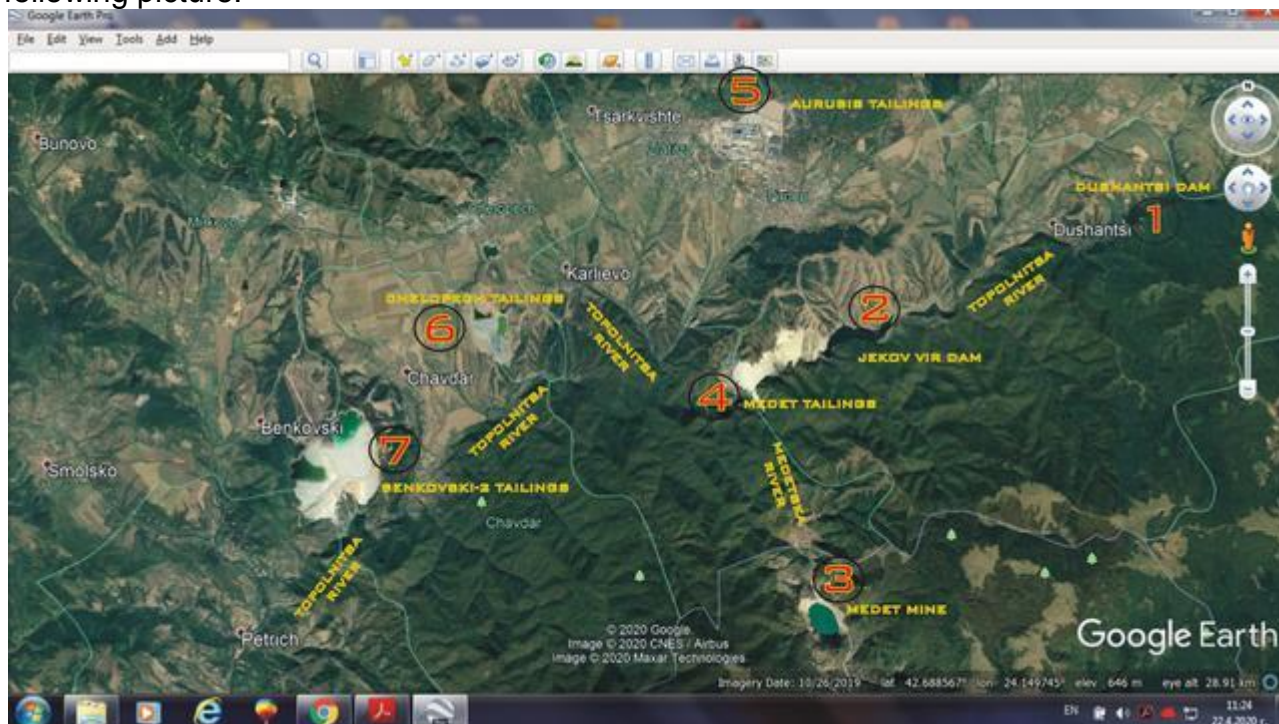
On April 21st 2020 we carried out another inspection only to find that there is no improvement whatsoever. The state authorities didn't do anything so far and the warranty period of the new WWTS equipment has expired already... Here are the same short videos, taken on 21.04.2020:

<https://www.youtube.com/watch?v=vG9ADBIgyQU&feature=youtu.be>

<https://www.youtube.com/watch?v=FLnlzis-dPw&feature=youtu.be>

And now we come to the mining industry devastating impact. A few kilometers downriver after the Dushantsy village there is another old dam - Jekov vir, which is used again for industrial purposes. This dam is another barrier disrupting the river bio corridor. Right below this dam there stands the tailings pond of the old Copper Mine - Medet, which is not functioning since 1992. The Medetska River flows into Topolnitsa River below the tailings pond and Medetska is the most poisoned river in the world!

All mining and processing enterprises in the area concerned are displayed on the following picture:



To be enlarged and studied in detail this picture can be downloaded from the following link:

https://dams.reki.bg/uploads/Docs/Files/TOPOLNITSA_POISONS.jpg

The picture shows the following items:

1. Dushantsi Dam
2. Jekov Vir Dam
3. Old Medet Copper Mine
4. Medet Mine Tailings Pond

5. Aurubis Processing Factory Tailings
6. Dundee Precious Metals Gold Mine Tailings near Chelopech
7. Elatsite Med Copper Mine Tailings

It should be also taken into consideration that the Topolnitsa River flows into the Topolnitsa Dam some 20 kilometers down the village of Petrich. Topolnitsa dam is used for irrigation of the whole Tracian Region, which is famous as the Vegetable Garden of Bulgaria.

So here we come to the mining part of this complaint.

A1.3 The devastating impact of the old copper mine "Medet".

This mine was decommissioned in 1992. It was the biggest open pit copper mine in Bulgaria. Currently its enormous pit is full of poisoned water directly draining slowly but constantly into the Medetska River which is passing by. The blue water can even be observed in the picture above at point No3.

The current state of the mine poses an immense risk if the steep slopes collapse into the pit, as this will cause an overflow of great amount of poisonous water into the Medetska River. Actually the process has begun and a big piece of the slope has already collapsed into the pit.

This high risk motivated the government to finally issue a decision in April 2018 concerning the financing of WWTS for the Medet Mine waste waters management. Here is the announcement in the media:

<https://clubz.bg/66269->

[kabinetyt odobri eko antracit da izharchi desetki milioni za ekoshteti](https://clubz.bg/66269-)

And here is a short citation:

Part of the proposed activities will also be directed to sites in critical condition, caused by landslides, lack of overflow facilities, destroyed infrastructure. All projects are of high public importance and have a long-lasting impact on large territories as well as on the population in the areas affected.

Of course, as of today none of the activities were executed. In fact, they have not even started. The result can be watched in the following BTV reportage, dated 21.01.2020:

<https://btvnovinite.bg/predavanja/tazi-sutrin/blizo-tri-desetiletija-vodite-na-r-topolnica-sa-silno-zamarseni.html>

The video holds evidence for the collapse of part of the rocky slopes into the pit, the yellowish - blue color of the river, as well as some results from the testing of the waters in Topolnitsa River right below the confluence with Medetska River. The results show **Copper contents 700 times above the limit, Manganese - 99 times and Aluminum - 98 times above the limit!** The blue-gray color of the river can also be watched on the front page picture of this document.

Furthermore, in the East Aegean RBMP 2010-2015 there were many measures assigned to the Medet Mine and to the surface water body - Medetska River, the most important of which is:

Management program and treatment of waters below old mines and tailings ponds

This measure's budget was **2.154 million EURO** and the state institution responsible for the implementation was the good old MOEW. Of course, this measure was Not Implemented.

Moreover, the same measures for the Medetska River are present in the current East Aegean RBMP 2016-2021, and are not implemented this far, which is no surprise to anyone. The relevant measures for Medetska River in the current RBMP are:

Construction of collection and drainage systems in the area of tailings and mines with non organized emissions.

Construction of WWTS for the treatment of mining waste waters.

IMPORTANT:

The deadline for these measures' implementation in the RBMP is - 2017 and they are not implemented yet. Currently the company responsible for the rectification of the Medet Mine devastating impact is the state owned company EcoAntratsit, which receives millions of Euro per year for the purpose. Needless to say that after the above TV broadcast NO inspection was carried out by the "competent" EARBD and RIEW and NO penalty was imposed on the company responsible. To our knowledge, EARBD has fined the company only once with 1000 Euro few years ago...

As for the Medet Tailings /item No4 on the above map/, some partial recultivation has been carried out according to the media, but the process was not finalized.

In the end of this section we will underline the fact that the Medet Mine was decommissioned in 1992 and we are in 2020 now, i.e. 28 years after the termination of its operation, and we are somewhere around 13 years after the accession of Bulgaria in the good old EU as well, with all those nice directives to be implemented. Water should have been a *Heritage*, remember?

A1.4 Aurubis metal ore processing factory and smelter

This is the biggest copper processing factory in Bulgaria, owned by a German company today. Through the years it has caused devastating pollution of the air, the soil and the rivers in the region. Currently, despite some efforts of the management, the impact is nearly the same.

Here are some media reports:

2011:

<https://dariknews.bg/novini/bylgariia/poluchen-e-signal-za-zamyrsqvane-na-reka-sanyrdere-759284>

2013 - watch the next two videos, please:

https://www.btv.bg/video/shows/btv-reporterite/videos/btv-reporterite-ekologichni-voini-chast-1.html?fbclid=IwAR2JW4-pQQ2Tjd3UANKqgTp3ISmofLOywREk_Is4P0k-VcvGIXtV2sfVU_Q

https://www.btv.bg/video/shows/btv-reporterite/videos/btv-reporterite-ekologichni-voini.html?fbclid=IwAR1tcqDV60CMZ7RourJ0t22mF12_DgkX3pZnF2FNITEiKBXMNXp4cfWiltQ

IMPORTANT:

At 08:45 in the first of the above two videos from 2013 you can find proof that in 2011 the company Aurubis was fined for exceeding the emission limits of polluted waste water in the river with **102 BGN** which is **51 Euro**. Yes, you heard that right - **51 Euro fine** for poisoning a river, according to an official document in the good old EU, in the 21st Century! Again in 2012 the company was fined, this time with 2250 Euro for constant poisoning of the waters throughout the whole year...

Acc. to the actual East Aegean RBMP 2016-2021, the Aurubis Company is supposed to fulfill the following obligation:

Implementation of own monitoring of surface, ground and waste waters in the area of landfills of hazardous waste and provision of information for the waste pressure on the waters...

Thus, the eventual perpetrator, who gets fined with 51 Euro when he's being caught, is supposed to self control, self catch and self report himself to the competent state authorities for the eventual crimes committed? Sounds quite reasonable, doesn't it?

A1. 5 Dundee Precious Metals Gold Mine and Factory in the village of Chelopech

Again, this is an old Gold mine from socialist times. In the past its impact used to be as devastating as possible. It is described in the above videos too and here is another source of information from 2011:

<http://www.bluelink.net/novini/organizirana-prestapna-grupa-mezhdu-dandi-i-pravitelstvoto-na-r-balgariya.html>

Here is a short citation:

The Ministry of Environment and Waters allows Chelopech Mining to discharge the same abrupt type of tailings discharge from the pipeline to the Kachulka dam, with several such signals being submitted this year.

However, unlike all the other cases in this document, media reports on some kind of new pollution are not available and local people tell us that for the last seven years or so the current owner of the company - Dundee Precious Metals - has implemented many improvements and there are no new cases of air, soil or surface water pollution. This is some good news, proving mission towards improvement possible, but it was not achieved due to the efforts of the state authorities.

Still, the Kachulka tailings pond is old and further impact on the ground water body is unavoidable and irreparable. According to the actual East Aegean RBMP 2016-2021, the chemical status of the Topolnitsa groundwater body is "BAD" and there is the same good old measure in the RBMP:

Monitoring of the results of the local monitoring network of the tailings ponds

This measure is applicable to all the tailings ponds in the area concerned and it falls within the obligations of the owners of the enterprises again...

Cumulative effects on the groundwater body and the drinking water sources caused by all the tailings and the poisoned rivers in the area will be discussed and proved further in this document.

A1. 6. The Benkovski-2 Tailings Pond devastating impact.

Again, this is an old tailings pond from Socialist times, belonging to Elatsite Med Company, which is still in operation today. The wall was upgraded several times. Since 2000, there are several reports on waste waters dumped directly into the Topolnitsa River. The most recent and brutal case happened this year on 21.03.2020. Here is a BTV video footage

<https://btvnovinite.bg/bulgaria/reka-topolnica-kraj-panaqjurishte-posivja-tarsjat-iztochnika-na-zamarsjavane.html>

The date was 21.03 and upon a signal of ours and the local people EARBD has carried out immediate inspection only to find another "unintentional" accident in the tailings. Usually they are not catching anyone and perpetrators stay unknown, but this time the reaction was fast and we have informed EARBD in advance about the source.

However, 20 kilometers of the river were full of toxic bluish-gray mud, meaning that the amount of waste water dumped into the river was so big, that it could have happened only as a result of a breakdown of the wall. And the "accident" was recovered immediately upon the inspection of EARBD, which leads to the conclusion that simply the exhaust pipes were shut down and there was not a single problem in the wall.

An EARBD report on the results of testing the water samples from the river below the tailings shows **copper contents 25 times above the limit, manganese - 3 times and aluminum - 5 times above the limit.** Still, one month later, on the EARBD internet site there is no information about any penalty imposed, if there was any penalty at all, of course.

In the end of this section it should be noted that the Toplonitsa River has been poisoned many times in the last two decades, but the impact never was as fearsome as in the last case and, apart from the Medet Mine waste waters, every time the perpetrator was unknown.

Having in mind cumulative effects, another two small hydropower plants operating along the same river section should be taken into consideration. The Kaleto HPP is below the Medet Tailings and Topolnitsa HPP is around two kilometers below the Benkovski tailings pond. These two plants are not of any help to the river's self cleaning abilities, but on the contrary.

A1.7. The results

The results are devastating - surface and ground waters are poisoned everywhere in the area and we have no reason to believe that the soil is not.

Here is a link to a scientific report on the poisoned drinking water sources of the Poibrene village with arsenic:

<https://www.solvo.bg/wp-content/uploads/StatiaPoibrene.pdf>

Poibrene village is located along the river in the end of all the above industrial polluters, right at the tail of the old Topolnitsa dam.

According to the actual East Aegean RBMP 2016-2021, the chemical status of the groundwater body is "BAD" and the measures, listed in the RBMP are Not implemented nonetheless!

Local people are complaining that the water in Topolnitsa River, which is in a Very Bad ecological status and in bad chemical status acc. to the RBMP, is not suitable for irrigation and for livestock breeding, which is quite obvious too. Even flies are not flying over the rivers in the area during summertime, and the state does nothing, and the companies keep poisoning the rivers every now and then!

However, the biggest problem actually is the status of the poor old Topolnitsa Dam, where all those poisonous amounts are accumulated to be used for irrigation of the biggest Vegetable Garden in Bulgaria - the Thracian Field. One happy day, when the poisons jump over any reasonable limits, the production of vegetables in Bulgaria will be fully compromised for good. Possibly the time will match the timeline for decommissioning of all those mines, when the resources will be exhausted, investors will run away to poison waters somewhere else and everybody in the area will live happily ever after...

Finally - what about the medical status of the population in the area?

Here is one source of information - the National Report on the Environmental status in Bulgaria:

<http://eea.government.bg/bg/soer/2009/4health/1air-health>

And here is just a short citation, concerning the respiratory diseases of the population:

Areas with increased health risk related to air pollution are the cities of Zlatitsa and Pirdop. They are included in the 2008 List of Risky Areas, approved by Council of Ministers Decision No. 822 of December 19, 2008.

In the light of the current Corona Virus crisis, respiratory diseases are some great matter of concern, aren't they?

Nevertheless, no state authority has ever checked the impact of the poisoned waters both on human population and on the wild and domestic animals in the area. Here is a link to a scientific article on the environmental status of Topolnitsa River catchment area, which properly describes all problems:

<http://web.uni-plovdiv.bg/slaveyapetrova/Publications/6.%20Yancheva%20V.,%20S.%20Petrova,%20I.%20Velcheva,%20E.%20Georgieva.%202011.pdf>

Here is a short citation from page 4 translated:

*Other pollutants in the area are the Elatsite Med Copper Mine and the Elshica Mine. **There is also dust pollution from the Benkovski 2 Tail of Elatsite MED.***

Existing mines represent geochemically and biochemically active systems that have negative impact on all environmental components. In result, formed ore deposits are active surfaces that determine conduct of complex chemical and biological processes in surface and groundwater, as well as in the air. These processes are characterized by oxidizing copper and ferrous sulphides to copper and iron cations, hydroxides and sulfates. Some of these products are soluble (sulphates) and others are insoluble (iron hydroxides) (Dimov and Hristov, 1998).

The most interesting conclusion to confirm all our statements can be found in the end of the study - the translated in English Abstract:

ABSTRACT

*The region (air, soils and waters) where the Topolnitsa River and the Topolnitsa Dam are located, has been contaminated for many years. The main sources of contamination are the copper mines, metallurgy plants, non-ferrous smelters and mine tailings that have been left after the metals of interest such as: lead, zinc, copper, silver, gold and others have been extracted from the mineral rocks that contained them. **The water of the river and the dam, which has been polluted for several decades with heavy metals, is used for drinking, irrigation of agricultural lands and fishing.** However, the data on the levels of pollution of the environment and the effects of these metals is very old or limited. Therefore, it is crucial that a full investigation and monitoring programs are carried out.*

To the scientists full monitoring it's crucial, but the implementation of measures in line with the objectives of the EU WFD must be undertaken too, and that is also crucial, while the pollution is still ongoing and constantly increased in front of the wide opened eyes of our state officials!

A2. The Luda Yana River

This River runs in the same area to the south of Topolnitsa. It is regularly poisoned by the Asarel open pit copper mine which once was part of the state owned Asarel-Medet mining company. Currently Medet is closed and private owned Asarel mine is in very active operation, being the biggest copper mine in Bulgaria today.

Through the years poisonous substances are dumped into Luda Yana and its tributaries on a regular basis and fish populations are erased every now and then. When life returns back into the river from the big Maritsa River, there comes the next pollution over and over again.

Usually any news of dead fish in the river end up with another unknown perpetrator, that was not caught by the controlling authorities. However, occasionally they still manage to catch the polluter blood handed and that is always the Asarel tailings with another "unintentional" accident. Here is an article from **2014** for proof:

<https://www.bluelink.net/novini/nova-promishlena-avariya-na-asarel-medet-koyato-otrovi-za-poreden-pat-reka-luda-yana.html>

In this article two previous violations from 2010 are disclosed, one of which ended with a **fine worth 2500 Euro** and the other one was covered by the local RIEW Pazardjik. There is also proof that the drinking water sources of the Popintsi village are located in the terraces along the river.

Another case when the perpetrator was Not caught, happened in **2018**. Here is the proof:

<https://bnr.bg/plovdiv/post/100986168/otkriha-zavisheni-stoinostit-na-cvetni-metali-v-rekite-krai-panagurishte>

Here is the translation for you:

The results of the samples taken a week ago show high levels of copper, manganese and zinc found in the Asarelska and Luda Yana rivers near Panagyurishte and Strelcha. Tests have also found high levels of insoluble substances. The ecologists' overall finding is that the river is in poor ecological condition. No polluter is found. The explanation of the experts is that the increased turbidity of the water is a consequence of the intense rainfall.

So only an intense rainfall can bring *copper, manganese and zinc* into a river according to RIEW's experts by mere bad chance and no one is responsible? Looks like *copper, manganese and zinc* are growing on the trees here in Bulgaria!

These are not the only cases when tons of dead fish was found along the river. The only explanation possible can be found in the fact that the owner of the Asarel copper mine is one of the richest, most powerful and politically connected individual in our country, which is famous with the highest level of corruption in Europe according to Transparency International.

Another case happened in July 2019, this time caused by another copper mine - Tsar Asen. Here is the news about it:

<https://www.marica.bg/region/smolqn/rudnik-car-asen-zamrsi-luda-gna-izpluva-mrtva-riba>

IMPORTANT:

Funny thing is that in the current East Aegean RBMP 2016-2021 for the surface water body there are only measures to protect the riverbanks from erosion and another one requiring:

3. Study of the river bed and implementation of measures to restore its natural state

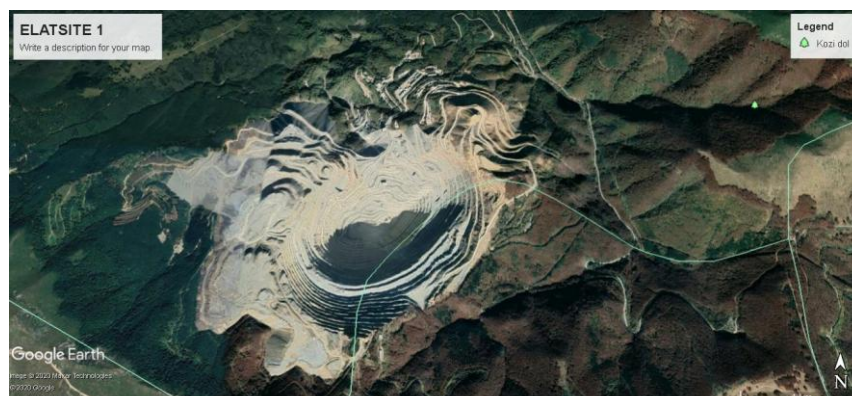
We figure that any kind of studies should be conducted prior to the preparation of the RBMP where reasonable measures should be listed to improve the status, but that is not the point. The point is that there should have been measures in the RBMP for prevention/rectification at source of new accidents and other stuff like that! Those measures should have fallen within the responsibilities of the owner of the mine, of course, but EARBD was so afraid to assign anything to the responsibilities of the guy.

A3. The Malak Iskar River Case

Malak Iskar River flows in the North slopes of the Balkan Mountain, opposite to Topolnitsa River, which flows in the South side of the Balkan.

Another old copper open pit mine from socialist times is in operation in the catchment area of Malak Istar River, above the city of Etropole - the Elatsite Med Mine. The extracted metal ores are transported southwards through a tunnel to a processing factory near the city of Mirkovo in the catchment area of Topolnitsa River. Flotation waste waters are dumped in the Benkfovski-2 Tailings, described in the previous section. Thus, the devastating impacts of the Elatsite Med mine are spread on both sides of the Balkan.

The impacts on the Malak Iskar River are caused mainly by the poisoned drainage waters coming from the open pit as well as by the surface waters washing the deposits of processed waste materials dumped on the hills surrounding the pit. Here is what the pit looks like:



In the west and north sides of the pit, deposits of processed waste materials are clearly visible. They can be watched from the road too:



The Malak Iskar River is also visible to the right of the pit, as well as the first out of three operational new small Hydropower Plants downriver.

Now for this particular river we have sent many signals to the controlling BDDR concerning the small HPPs. The first signal was dated 04.10.2014 - here is a link to our pictures and videos taken at the time:

<https://dams.reki.bg/0101-dam/2014-10-04>

In this signal there is a video of the bluish-grey moody color of the water flowing into the lake.

https://www.youtube.com/watch?time_continue=7&v=fQfbmV2Vp3k&feature=emb_logo

Needless to say that during most of our inspections no water was released below the intake, which is helpful in order to see the light gray color of the riverbed bottom substrate:



This is not the normal color of a healthy river's bottom substrate!

Furthermore, in most of our signals we have pointed out to BDDR that the water is polluted and there was no reaction from BDDR on this issue whatsoever. They never took water samples to check what's going on. The last case was in July 2019 and here is what the water looks like during low water period:



Now, acc. to the actual Danube River RBMP 2016-2021 the surface water body in this section is in a very bad ecological status and in a bad chemical status. There are several measures in the RBMP like rehabilitation of existing WWTS and introduction of new technologies for the use of recycled waste waters etc. which are looking very well on paper.

In September 2014 a new WWTS under the Elatsite Med copper mine was set into operation, but this led to no improvement whatsoever. On the contrary - the color of the river remains absolutely the same and BDDR constantly refuses to check new water samples upon our signals.

Of course, the idle behavior of BDDR has brought the next huge ecocatastrophe in August 2018, when the entire life in the Malak Iskar River - around 30 kilometers till the confluence with the Iskar River was killed. Here is the Media coverage for proof:

<https://www.youtube.com/watch?v=hGldQwjjSfc>

This has happened during high water after heavy rainfall in the catchment area of the river, leading to the conclusion that poisonous substances dumped on the hills surrounding the mine were washed into the river, or a massive abrupt discharge of such accumulated substances has taken place.

As usual, the inspection of both BDDR and RIEW Sofia found that everything is perfect and the gray moody water coming from the WWTS and from the open pit drainage system was "inside the limits". Still, the entire river life was killed in front of the eyes of local people. The reason is very simple - the owner of Elatsite Med, Mr. Colo Vutov, is another very powerful, politically connected individual, untouchable by no one in this country!

In the end of this section it should be noted that there are three operational small HPPs above the city of Etropole and another four of five future pieces below the city along the entire river. Due to this fact, the river self cleaning ability is fully compromised. Usually no water is running below the intakes during low water periods and this is another issue to be taken into consideration when cumulative effects are addressed.

However, The Malak Iskar River above the city of Etropole is the second most poisoned river in Bulgaria after Topolnitsa, and our state authorities are doing absolutely nothing about that. Elatsite Med has never been caught in violation of the law and will

never be. Obviously, in case the mine is not to blame, the only other possibility is that the river has deliberately killed itself, committing suicide...

The objective for the surface water body set in the actual Danube River RBMP 2016-2021 is to achieve good ecological and good chemical status till 2027 and this is mission impossible, because no one is doing anything! They don't even react to signals for Christ's Sake! Starting from very bad status, you cannot achieve good status of a river by doing nothing and closing your eyes at outrageous violations of the law, can you?

Note:

From now on we will present briefly several other cases of poisoned rivers in the Rhodope Mountain river basin, which by far will not complete the list of poisoned by the mining industry rivers. These are the most severe cases only - all of them in the East Aegean River Basin within the "competence" of EARBD.

A4. The Yugovska River Case

This river has the bad chance to pass nearby the "Laki Invest" metal ore processing factory and tailings pond. Through the years there were many cases of uncontrolled discharge of tailings' waters into the river. The most recent three consequent cases happened in February 2020. The first pollution happened on 06.02.2020:

<https://www.marica.bg/region/asenovgrad/mazni-petna-izpluvaha-ot-vodite-na-r-chaq-ribata-izmira>

On 11.02.2020 local media reported the next case of polluted water and dead fish along the river:

<https://tvsatcom.bg/novini/asenovgrad/avariya-v-hvostoprovod-na-laki-invest-eood-e-dovela-do-zamarsyavane-na-vodite-na-rekite-yugovska-i-chepelarska-dnes-sledobed/>

The conclusion of the controlling state authorities was that there has been another "accident" with the tailings pipeline, as usual. The same has happened so many times in the years before, but this time the public got so angry that the controlling EARBD and RIEW Smolyan were pushed to carry out another unexpected by the owner inspection on 20.02.2020 and finally managed to catch the crime. Here is the news about that:

<https://btvnovinite.bg/bulgaria/koktejl-ot-metali-vav-vodite-na-reka-jugovska.html>

According to the test results of water samples concentration of cyanide was 100 times over the limit!

However, this is the first time when this factory has ever been caught and if it wasn't for the angry people, the initial explanation - "unintentional accident" would have worked again as always! The director of the factory and the operator of the tailings got arrested and there is an investigation of the prosecutor's office for intentional poisoning of the river currently going on. Most probably it will lead to nowhere, because the owners of the factory are very powerful, politically connected persons again.

There are no traces of any administrative penalty imposed in both cases by the environmental authorities. Funny thing is that, acc. to the media, perpetrators were warned the previous evening and they were so arrogant to keep discharging poisons in the river, believing they are still untouchable by no one! And this was not the first time when the factory poisons the river and it won't be the last for sure.

A5. The Batanska River Case

Another mine near the city of Madan has recently been caught by EARBD dumping poisonous waste waters into the Batanska River. Here is the official announcement on the internet site of EARBD:

https://earbd.bg/indexdetails.php?menu_id=81&elem_id=1822&fbclid=IwAR170dmOjcaRxCbKAW-ZkhrwJHsAhAAzrL87_3j1jy0C33pRbfjDLsuCq5w

According to the announcement it is an "unintentional accident" due to a flooding of the mine tunnels as usual. Penalty is not announced but will not exceed 1000 - 2000 Euro at the most. That is why the next "unintentional accident" will be coming very soon.

A6. The Varbitsa River Case

This is another case of a river being largely poisoned almost every year by the nearby tailings pond called Erma Reka. Here are just a few announcements:

March 2017 - twice

<http://www.desant.net/show-news/38647>

November 2017

<https://www.smolyan.bgvesti.net/news/421526/hvostohranilishteto-erma-reka-otnovo-pusna-otrovi-v-reka-golyama>

March 2020

<https://www.mediapool.bg/hvostov-pyasad-otsveti-v-byalo-reka-varbitsa-krai-zlatograd-news304304.html>

In the last case there was a reaction on behalf of EARBD announced on its internet site, which is very interesting:

https://earbd.bg/indexdetails.php?menu_id=81&elem_id=1810

First it states that the water samples taken showed a very small excess of lead contents over the limits in the waste waters, which means that EARBD didn't catch the crime as this is the usual status of the discharged water. We must admit that catching such crimes on time is not easy at all - usually the toxic discharge comes from exhaust pipes that stay open for a few hours and can very easily be closed in no time.

BUT, the above EARBD announcement also states that this enterprise has several mining units that are not operational today and the samples taken from the rivers Erma and Gidyurska show **zinc contents 53 times over the limit, manganese contents 16 times and cadmium contents 12 times over the limit!**

These two rivers are tributaries to the main Varbitsa River which shows **before and after the city of Zlatograd zinc and manganese contents 5 - 8 times over the limit, cadmium, cyanides and iron contents 2-3 times over the limit etc.**

And Varbitsa River is used for irrigation and livestock breeding, and groundwater drinking water sources are located in the terraces of the river too!

In the current East Aegean RBMP 2016-2021 for the surface water body - Varbitsa River from the springs to the city of Zlatograd - there are several measures to deal with the problem:

Improving the operation and management of tailings ponds in terms of water management

Implementation of own monitoring of surface, ground and waste waters in the area of landfills of hazardous waste and provision of information on water pressure

Construction of collection and drainage systems in the area of tailings and mines with non organized emissions

Modification or termination of permits for discharge of industrial wastewater as a result of the review of the permits.

Judging from the frequent poisoning of the river each year, none of these measures were implemented so far and they will never be.

A7. SUMMARY

We will stop here with the cases of river pollution caused by the mining industry, because we got tired. Other cases like the above have taken place along:

The Madanska River

https://btvnovinite.bg/bulgaria/signal-reka-kraj-madan-pobelja.html?fbclid=IwAR2uOKLP7Xk-WndI8T-S1LCYCCK_6IEK7vp917HniGxNyymBkC5-JtI3H9I

The Mede dere River

https://www.marica.bg/region/parvomay/globqvat-firmata-zamrsitel-v-strelcha?fbclid=IwAR0f03FK0nCAQr3wFPRJ-bDIFzXb8P1wXah6m3VUOFnj3I1UcrPtT_Kxzy8

... and along many other rivers as well. We didn't even show here what is happening in many other regions like the West part of the Balkan Mountain, the Osogovo Mountain and many other mining regions.

Focused only on the metal ores' mining this complaint is based on, we didn't even say a word about coal mining and about the extraction of construction materials and their impact. There are many infringements of the EU WFD, the Bulgarian Water Act and the current RBMPs committed by these industrial activities and one day we will bring them to the attention of the European Commission too...

In the end of this section, to complete the metal ore mining part of this complaint, we must summarize our findings, namely that in most of the cases criminals are not being caught at all. Many other cases are not even reported by the media or by the local people, because they are afraid. In the very rare cases when crimes are caught on time, they are declared by the competent authorities always unintentional with just a few exceptions.

Relevant measures are not included in the RBMPs and are not implemented if they are listed, penalties are funny, polluters don't pay and environmental harm spreads everywhere instead of being rectified at source! We have proved here a penalty of **51 /fifty one/ Euro** imposed for a poisoned river, for Christ sake!

At the same time many drinking water sources and all chances for local rural development are set at risk or fully compromised and our proud mining operators supposedly pay royalty of 1.5 /one and a half/ percent of the extracted metals!!! Is it worth for an EU Member state to give away so cheap its natural resources at the price of its dead rivers, poisoned soils and air, and at the price of its sick population, only in the name of Grand Corruption? We really hope that DG Environment will find The Answer to this question somewhere in the next five to ten years or maybe even more!

B. Corrupt implementation of the EIA/AA procedures for the mining industry.

EIA/AA procedures in Bulgaria are corrupt more than everything else in the country!

There is one simple reason for that - the environmental and social impact assessments are carried out by teams of "*independent*" experts *paid by developers*, mitigation measures are proposed in the same "*independent*" reports, *paid by the developers*; Environmental and Social Management Systems /ESMS/ development and effective use are conducted always by the same "*independent*" experts that are getting *paid by the promoter* again. The richer and more greedy the investors the more and more corrupt the procedures.

That is why problems were always underrated, mitigation measures are only aiming to "mitigate" expenses for developers and the post construction monitoring always

shows that everything is perfect, otherwise it may turn out that the experts didn't know what they are doing at the beginning of the project and then disgruntled operators shall not pay.

So the application of those European EIA/AA procedures in recent years did not lead to any improvement, because the quality of the EIA/AA reports is Zero!

And when environmental harm becomes a proven fact, the experts are never held responsible for anything! Investors are not held responsible either if and when they do not implement some part of the mitigation measures prescribed in the reports.

But the European Commission is pretty well aware of the fact. There are several infringement procedures undergoing currently against Bulgaria as follows:

- Concerning the poor quality of all EIA reports

"March 2019 infringements package: key decisions". Check section 3. Environment:

[http://europa.eu/rapid/press-release MEMO-19-1472_en.htm](http://europa.eu/rapid/press-release_MEMO-19-1472_en.htm)

Regarding the Environmental Impact Assessment issues, here is a short citation:

*In **Bulgaria**, certain elements regarding screening decisions, Environmental Impact Assessment reports and information to the public do not adequately reflect EU standards, and the monitoring of projects with significant adverse effects falls short of requirements.*

- Concerning the total failure to comply with the EU Habitats Directive

July 2018 infringements package: key decisions - Section 4. Environment can be found here:

[http://europa.eu/rapid/press-release MEMO-18-4486_en.htm](http://europa.eu/rapid/press-release_MEMO-18-4486_en.htm)

Here is another citation extracted from the key decisions in 2018:

Commission asks BULGARIA to improve implementation of EU nature legislation

..... The issue was first identified a decade ago, and although Bulgaria has since taken some measures to address the issue, this structural problem persists and the Commission regularly receives complaints about plans and projects that are authorised on the basis of inadequate assessments, or even in the absence of appropriate assessments.

- Concerning the total failure to comply with the EU Water Framework Directive

Here is a very interesting report on the issue:

https://ec.europa.eu/info/sites/info/files/annex_com_report_recommendations_en_2.pdf?fbclid=IwARoxCxRQ-a8ie-s25wE_7voNhozS1Szy_XAeOWJsN_nh1GNfxoliBu7Z9Xk

The recommendations for Bulgaria can be found on page 3, together with the following short citation:

Based on the findings emerging from its 2nd RBMPs, Bulgaria is particularly encouraged to:

- *Improve its own monitoring capacities with a view to lower its dependence on expert judgment for assessing the ecological status/potential of its water bodies.*
- *Base the use of exemptions under Article 4(7) on a thorough assessment of all the steps as required by the WFD and transparently indicate, in all RBDs, which are the justifications for invoking the exemptions under Article 4(7) WFD.*

So, here we will disclose some additional information, concerning the quality of EIE/AA procedures for the mining industry as well as the implementation of the EU Directives, hoping to add a little bit of steam to the efforts of the EC in order not to lose the momentum, which pitifully seems to have happened again.

B1. The Trun Gold mine case

This is a case we were so happy to inform the EC of in January 2017 in a special Complaint but, pitifully, DG Environment didn't pay attention at the time. It was our fault because we hoped that it will be taken into consideration together with the other complaints based solely on the hydropower issues and we were wrong. Now, since the current document is based on the pollution of surface and groundwater bodies caused mainly by the mining industry, we figure now it is the right time to bring the case to the attention of DG ENV again.

Full description of the case from 2017 can be found in the following link:

https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_4_%20DRAFT3.pdf

There is a very interesting development in this case. In the middle of 2017 there was a Referendum in the affected municipality of Trun. 67% of the population took part in the vote and 93% of the voters claimed that they Do Not Want any kind of metal ores mining activities in their municipality. The reason is that local people know pretty well about the large uranium contents in the rocks in the area and still remember how many people died of cancer during socialist times when the old gold mine Zlata was functioning.

Now, Referendums are the highest form of public consultation possible! With such a high activity of voters and the unconditional rejection of the project, the EIA/AA procedure should have been terminated by the competent MOEW and RIEW Pernik at once, but of course it wasn't! This is another issue concerning all EIA/AA procedures here - public consultations are either kept secret to the local people, or their negative opinion is not taken into consideration at all, with a very few exceptions.

Instead of total unconditional termination of the procedure, in the middle of 2017 the investor was allowed by the state authorities to freeze the EIA/AA procedure on the grounds that he has brought some of the measures listed in the new at the time Danube River RBMP 2016-2021 in the Supreme Administrative Court /SAC/ and prefers to wait for the decision of the court. Court decision was announced at the beginning of 2019. It was in favor of the investor, clearly stating that the measures were quite reasonable, but the administrative procedure was misconduct as consultations with the investor were not held on time.

After the decision of SAC, a year and a half later, there is absolutely no progress of the EIA/AA procedure whatsoever! What are these people waiting for - the roof to fall or what?

This is another symptomatic case, proving how MOEW is misleading investors that their harmful projects stand some chances to be developed, disregarding local population's refusal to agree. Investors' hopes grow, pushing them to spend more and more expenses to support corruption, believing MOEW that in the end everything will be OK. What they do not take into account is that local people in the Trun region are very well aware of the future devastating impact of such mine on their chances for local development and they are stubborn, dedicated, stand up guys! The avalanche of news concerning all the poisoned by the mining industry rivers elsewhere in the country are really inspirational to motivate the local people's fight.

One happy day an approach like that will inevitably lead to real physical encounters if the project is approved and diggers come around in the area of Trun. Especially because after the referendum there are several positions of the investor published in the media, stating that any referendum on such matters doesn't mean a thing and local people do not have the right to stop the project. Is that true - Even in an EU Member State, even in the 21st Century?

Actually, this is the biggest problem of the mining industry today - the belief that they can poison every river constantly, deliberately, everywhere, always getting away with fake explanations like "unintentional" accidents, receiving those miserable penalties in the rare cases when they are being caught, and, finally, that this will go on forever?

Currently, their devastating reputation precedes them everywhere and local people always fight - it is as simple as that.

Anyway, the main point here is that a local Referendum on a given environmentally harmful undertaking was totally ignored by MOEW which undermines the very meaning of "public consultation" during EIA/AA procedures in Bulgaria. Here is proof for the Referendum and its result:

https://www.dnevnik.bg/bulgaria/2017/06/11/2987104_jitelite_na_trun_reshiha_s_referendum_da_niama/

B2. Kroumovgrad gold mining enterprise

Now, this is a case showing how recommendations and measures proposed by the EIA/AA experts in their assessment of another new gold mine Are Not Followed. These measures were proposed to reduce the overall negative impact and to make the project acceptable.

The Kumovgrad gold mining project has long history. Its development took around ten years to overcome the resistance of local people. The project consists of six mining areas, only one of which is currently in operation. Project was developed by Balkan Mineral Mining Company and currently is managed by Dundee Precious Metals - a Canadian private owned company. The same company operates the Chelopech gold mine, ore processing factory and tailings in the catchment area of Topolnitsa River mentioned in section A1.5 of this document.

Finally, after several law suits, MOEW's controversial positive EIA/AA decision, which was brought in court by many local and environmental NGOs, was confirmed by the Supreme Administrative Court. Here is a link to the official internet site of the procedure in the Register of EIA/AA procedures in Bulgaria:

<http://registers.moew.government.bg/ovos/lot/7560>

Note that there were 68 /sixty eight/ negative statements against the EIA/AA reports submitted by many NGOs during the public consultation, but the project was approved by MOEW nonetheless.

The most interesting document in the entire procedure is the Appropriate Assessment of the project's implications on Natura 2000 Birds Directive site Krumovitsa BG0002012 and on the Habitats Directive site Rodopi - Iztochni BG0001032. Here is a link to the AA report:

[https://dams.reki.bg/uploads/Docs/Files/Ada Tepe Final Report BG Dopalneno.pdf](https://dams.reki.bg/uploads/Docs/Files/Ada_Tepe_Final_Report_BG_Dopalneno.pdf)

In the above Assessment, apart from the Zero Alternative, two other alternatives are discussed.

Alternative No1 - only 85 hectares of Ada Tepe mining section are utilized;
and

Alternative No2 - the whole concession area -165 hectares of Ada Tepe mining section are utilized

Concerning the quality, this is the best AA report we have encountered ever and we have seen everything in our vast experience. First - the experts were honest enough to admit that there will be some negative impact, unlike every other report we have studied. Second - they have chosen and recommended Alternative No1 which is expected to be less harmful, regardless of the fact that it is less favorable to the client. Third - on page 48 in section 4.4.1 of the report the following important recommendation is specified:

4. Possible cumulative effect will occur in case of new developed mining fields and in case of appearance of other investors in the region, which will cause significant negative impact at site's level.

In Bulgarian:

4. Възможен е кумулативен ефект при увеличаване на разработваните находища и при поява на други инвеститори в района, което ще причини значително отрицателно въздействие на ниво зона.

The same recommendation is written down in a more specific way in section 5 of the report on page 66, where mitigation measures are discussed. Here is a short citation:

5. Other investment proposals in the Site concerned within the territory of the municipality of Krumovgrad, which affect habitats and species - subject to protection in the Site, or are located within the Site or within a radius of less than 100 m from its borders, in the expected area of impact, that may have cumulative or synergistic with the expected impacts of this investment proposal effect, should not be allowed.

Expected benefit: Elimination of the cumulative effect of increasing the anthropogenic press on this part of the Rodopi - Iztochni Habitats Directive Site, as well as for the Site as a whole, and preventing any further negative impacts on the habitats and species in the Site.

In Bulgarian:

5. Да не се допускат други инвестиционни предложения в зоната на територията на община Крумовград, които засягат местообитания и видове – предмет на опазване на зоната или се намират в зоната или в радиус по-малък от 100 м от границата ѝ, в определената зона на въздействие, чието влияние може да има кумулативен или синергичен ефект с очакваните въздействия от настоящото инвестиционно предложение.

Очакван ефект: Отстраняване на кумулативния ефект при увеличаване на антропогенната преса върху тази част от зона „Източни Родопи” и за зоната, като цяло и предотвратяване на всякакъв вид по-нататъшни отрицателни въздействия върху местообитанията и видовете в зоната.

These recommendations mean that Only Alternative No1 with the reduced mining development area, Only in the Ada Tepe mining section, are acceptable in terms of expected cumulative effects on the Site concerned within the boundaries of the municipality of Krumovgrad. Any future enlargement of the Ada Tepe mining section beyond Alternative No 1, or any future development of any of the rest five mining sections within the concession contract which fall within the boundaries of the municipality of Krumovgrad, will have significant negative impact on the Natura 2000 Habitats Directive site Rodopi - Iztochni BG0001032!

These were the conditions under which the AA report for the project was approved and the project itself received green light to proceed.

However, Khan Krum mining area consists of six mining sections according to the information on the concession contract, specified on page 2 of the above report. These mining sections are - Ada Tepe, Kaklitsa, Kupel, Sarnak, Sinap and Skalak.

Obviously, according to the AA report on the Ada Tepe project's implications, any future development of any of the other five mining sections within the Khan Krum mining area will have significant negative impact and the objectives for the designation of the affected Habitats Directive Site will be fully compromised. So these five new mining sections must not be developed otherwise huge breach of the Habitats Directive will be constituted - is that right, dear friends from DG Environment?

Based on the above facts, any normal mind would be misguided to believe that there will be no future mining sections, areas, enterprises etc. in the whole area of the Krumovgrad municipality.

Much to our surprise, for the last six months MOEW's internet site is full of announcements concerning AA procedures considering the new investment plans of Dundee Precious Metals to continue the exploration and the search for gold in the other mining sections of the big Khan Krum mining field, besides Ada Tepe.

Here is the letter of MOEW to the investor for the start of the AA procedure, for the mining sections Sarnak, Sinap and Kaklitsa:

<https://www.moew.government.bg/static/media/ups/articles/attachments/NSZP-319%20ot%2007.08.20192714bd2871bc52f6c7b1a5d468e21fbe.pdf?fbclid=IwAR3Q4dVJAAamDOfqm7pSC1HBZGPP4erZFivbotRAvhZUGhoSKS0WdfhBRKY>

At the same time EARBD has issued positive Statements of compliance with the RBMP for the spatial development plans for the same mining sections which are part of the big Khan Krum mining field. So everyone who still believes that EIA/AA procedures and reports mean anything at all in our country was cooked, swallowed and spit out by our proud MOEW and by the investor, of course.

Moreover, there is another letter of MOEW to the investor for the start of another AA procedure for the exploration and the search of gold in another big mining field - **Lada, which falls within the boundaries of the same Krumovgrad municipality, in the same Natura 2000 Habitats Directive Site!** Here is the announcement:

https://www.moew.government.bg/static/media/ups/articles/attachments/NSZP-422_12.09.201991446a11a66baa4c02cf4055716df434.pdf

Now, what is going on here, dear friends? Ada tepe mining section was approved under the undisputable condition that only this section, only with reduced capacity, will be developed in the area of Krumovgrad! Under this condition the Supreme Administrative Court has overruled several objections!

And now the other mining sections will be developed, disregarding the only possible conditions aiming to reduce and mitigate the effects of Ada Tepe alone, as well as to avoid cumulative effects with other future projects of the same kind in the same area!

And another big mining area - Lada - with an unknown number of mining sections will be developed in the same municipality?

This is how EIA/AA procedures in Bulgaria work. Therefore, we hereby urge DG Environment to take prompt action on this matter! Here "prompt" means less than five years, of course, otherwise it will be too late again!

To help DG Environment to better understand the problem, we will underline that the same Dundee Precious Metals is going to develop at least one other big mining field in another municipality within the boundaries of the same Natura 2000 Habitats Directive site Rodopi - Iztochni BG0001032. This mining area is called Chiirite and the AA procedure for the exploration plan has already started:

https://www.moew.government.bg/static/media/ups/articles/attachments/NSZP-422_12.09.201991446a11a66baa4c02cf4055716df434.pdf

Finally, we must go back to the Ada Tepe AA report again. On pages 3-6 of the report there is a fearsome table of all the rest active or future investment plans for metal ores and/or construction materials' mining exploration within the boundaries of the same Natura 2000 Habitats Directive site Rodopi - Iztochni BG0001032. The overall number of such mining investment plans is **55** pieces, not counting Ada Tepe.

This means 56 /fifty six/ present and future mining enterprises in a single Natura 2000 Habitats Directive site in the good old EU? What is the meaning of this Natura 2000 Network, damn it! All this only means that the entire Rhodope Mountain will be turned into one big mining open pit and will simply cease to exist...

In the very end of this section we will share our huge disappointment for the proven fact that Dundee Precious Metals Co is financially supported by our friends from EBRD. It means that European Values like the Rule of Law are totally disregarded by European financial institutions. Judging from our own experience with the support of EBRD for the devastating hydropower industry in our country, we wonder - does the EBRD ever support some undertakings that do Not cause social and environmental harm? What are these guys doing?

Maybe the explanation is hidden behind the news for the huge success of the Ada Tepe enterprise - for the last six months of 2019 alone, 57 000 oz of gold have been produced. At a supposed royalty of 1.5 percent, this would mean that a European Member state is entitled to receive 855 oz, and the rest 56 145 oz have been exported out of the European Union. The deal of the Century, so to say, not counting the environmental impact, financed with European money...

Here is the news for the big European "success":

<https://www.economic.bg/bg/news/12/dundee-precious-otchete-rekorden-dobiv-na-zlato-v-balgariya.html>

Nevertheless, we still allow ourselves to hope that EBRD, following its own ESP, will not support the other dreams of Dundee Precious Metals to turn the entire Eastern Rhodope Mountain into a big mining field, otherwise environmental requirements and conditions, under which Ada Tepe has been approved will be totally ignored.

IMPORTANT:

Natura 2000 Habitats Directive site Rodopi - Iztochni BG0001032 is just one example of what is actually happening today in our country. Since the beginning of 2013, to date there are more than 80 new applications and/or permits concerning investment plans for exploration and search for metal ores in the country! In the attached table all these plans are listed:

https://dams.reki.bg/uploads/Docs/Files/METAL_ORES_EXPLORATION_TABLE.pdf

In the right hand column of the table the exploration area is specified, but pitifully for 1/3 of all investment plans such data is not available. The other 2/3 of the plans with specified area form a total area of 3765 square kilometers.

Presumably, within a normal extrapolation for the unknown areas, this would mean that around 5 600 square kilometers are currently being, or soon will be explored.

And this means that approximately 5 percent of the entire territory of the country is designated for the development of future metal ores' mining undertakings! That is - without taking into account the mines in operation!

Of course, this is happening without any Strategic Environmental Assessment of the National Strategy for the development of the mining industry released in 2015. An Appropriate Assessment of the Strategy has not been carried out either, while most of the present and the future mining undertakings fall within the boundaries of Natura 2000 Habitats and Birds Directive sites!

NOTE:

To explain the numbers we must reveal that exploration areas for the search of metal ores vary from 2 to 195 square kilometers, with a limit of 200 square kilometers acc. to the law. According to the competent Ministry of Energy register, such new plans exist for

81 undertakings /see the table above/. However, there are cases when more than one such plan exists for a single municipality - like in Krumovgrad for example. That is why the numbers are somewhat approximate, but the tendency is clear. This is a matter of a future study of ours and we will ask the state for information, but it will be a very difficult task. Either way, the tendency is obvious and undisputable - the whole country will turn into a big open mining pit one day, and we are talking only about metal ores' mining here, not taking into account all other mining and extraction enterprises!

C. Other recent cases of river pollution

Pollution of the rivers in Bulgaria is caused not only by the mining industry, of course. It is a common practice of every industrial enterprise to dump its waste waters or other garbage directly into the river running nearby, knowing that such crime will get away quite easily, either by not being caught by the controlling institutions or the penalty will be negligible.

Penalties are so small, that it is easier and cheaper for the perpetrators to pay the funny fines, rather than to waste expenses on waste treatment. There are no exceptions on this issue, regardless of the fact that certain conditions on waste treatment are always listed in the general permits. Usually it takes few minutes to throw the garbage into the river, thus such kind of actions are not easy to be registered and captured, we have to admit that. BUT there are many cases in which the state authorities are deliberately closing their eyes in accomplice with the perpetrators - the more powerful and connected the criminal, the more cooperative the institutions.

The same goes for the urban waste waters - we have several cases of not working new urban WWTS here, for which a lot of European funding has been wasted. One of them was reported in section A1.2. of this document - the village of Dushantsy brand new WWTS. Here is proof for another one - the new WWTS for the city of Gorna Oryahovitsa reported in a NOVA TV footage from 2017:

<https://nova.bg/news/view/2017/06/16/185209/%D0%BD%D0%B5%D0%BF%D1%80%D0%B5%D1%87%D0%B8%D1%81%D1%82%D0%B2%D0%B0%D1%82%D0%B5%D0%BB%D0%BD%D0%B0-%D1%81%D1%82%D0%B0%D0%BD%D1%86%D0%B8%D1%8F-%D0%B8%D0%B7%D1%85%D0%B2%D1%8A%D1%80%D0%BB%D1%8F-%D0%BB%D0%B8-%D1%83%D1%82%D0%B0%D0%B9%D0%BA%D0%B0%D1%82%D0%B0-%D1%81%D0%B8-%D0%B2-%D1%80-%D1%8F%D0%BD%D1%82%D1%80%D0%B0>

Usually new WWTS are not working to save expenses to the municipality involved, either if some part of the equipment needs to be repaired, or just to save costs for electricity, or both.

As for the industrial pollution, here we will present just a few symptomatic cases from the last two years to prove our observations.

C1. The Struma River

This one is the most severe case we have ever encountered. In the last year and a half within the city limits of the town of Pernik, 30 kilometers away from Sofia, there have been numerous cases when the river was running in all colors of the rainbow. Here is proof for just a few of them in the last six months:

August 2019:

<https://www.vbox7.com/play:7310419384>

20 September 2019:

<https://www.facebook.com/CROO.Pernik/videos/777577799328539/>

30 September 2019:

<https://www.facebook.com/CROO.Pernik/photos/a.432993417075223/939484646426095/?type=3&theater>

02 October 2019:

<http://www.desant.net/show-news/41829>

21 October 2019:

<https://www.facebook.com/CROO.Pernik/videos/456368008610554/>

27 October 2019:

<https://www.facebook.com/CROO.Pernik/photos/a.432993417075223/961529180888308/?type=3&theater>

November 2019:

<https://www.facebook.com/CROO.Pernik/photos/pcb.989509598090266/989509568090269/?type=3&theater>

24 April 2020

https://zapernik.com/2020/04/24/100200/%d0%bf%d1%80%d0%b8%d1%80%d0%be%d0%b4%d0%be%d0%b7%d0%b0%d1%89%d0%b8%d1%82%d0%bd%d0%b8%d1%86%d0%b8-%d1%80%d0%b5%d0%ba%d0%b0-%d1%81%d1%82%d1%80%d1%83%d0%bc%d0%b0-%d0%be%d1%82%d0%bd%d0%be%d0%b2%d0%be/?fbclid=IwAR1BwJ3W0d7vdYMMOe0Fr9oQtHccXXu8QLq5gxtOxvrD7KPSpr68hn4i_wA

There are pictures of the river in each of the above links and pictures speak for themselves. This is happening inside the town of Pernik where all the industrial factories and enterprises have washed their dirt into the river. Lots of signals were sent by the citizens to the controlling RIEW Pernik and rare test results of water samples always showed that everything is perfect according to the arrogant RIEW - like they were making fun of people's concerns! Since the headquarters of RIEW Pernik are inside the town some 20 meters away from the river, we find that the case represents thorough, deliberate misconduct of obligations by the same RIEW! Many signals were sent to MOEW as well and there was No reaction either, which means that the ministry itself has backed and even inspired the perpetrators. This never happens for free in the most corrupt EU Member State!

The result has inevitably come - in September 2019 tons of fish have died in the famous Pchelina Dam, which lays some 20 kilometers from the city of Pernik downriver. Here is the proof:

<https://dariknews.bg/novini/bylgariia/tonove-umriala-riba-izpluva-v-iazovir-pchelina-kraj-pernik-2186746>

Now, in our previous communication with the Commission we have warned that the Pchelina dam is a ticking bomb with delayed detonation, full of poisonous deposits the accumulation of which dates from the old Socialist times and is ongoing nowadays with furious acceleration. The bright future of the Struma River below the Pchelina dam should be studied together with many other current and future industrial investment plans - mainly for operational and new mines - both in Bulgaria and Serbia, we have had the chance to warn DG Environment about in the end of 2018. Here is our complaint on the issue:

https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_8_DRAFT5.pdf

As for the urban waste waters - the city of Pernik /73 000 citizens/ together with the cities of Radomir and Batanovtsy, have very old WWTS, which are not working properly and all the urban waste waters are flowing into the Struma River and from there -

into the Pchelina dam again. Of course, part of the waste waters of the municipality of Pernik is dumped directly into the river without any treatment whatsoever.

Needless to say that in the West Aegean RBMP 2016-2020 there are many measures for the Struma River in the area concerned, such as monitoring of the water quality etc. For the Pchelina dam itself there are many measures too, the most important of which is:

Measures for phasing out of emissions, discharges and losses caused by priority hazardous substances or for reduction of emissions, discharges and losses caused by priority substances.

For the urban waste waters there are many measures too - like the construction or of new WWTS or modernization of existing old WWTS etc.

Of course all the measures are looking very good on paper, but as of today none of them is implemented within the deadlines specified in the RBMP. On the contrary - every poisonous industrial and urban waste was, and still is, dumped directly without any treatment and purification into the Struma River to reach the Pchelina dam with no problem at all.

Possibly, due to the immediate reaction of the EC to our complaint in the link above, instead of taking any measures to improve the situation, with the explicit consent of our institutions more and more poisons are poured in the Struma River and the Pchelina dam every next month! And this dam once used to be a famous spot for recreation, bathing and for water sports... Currently the poor dam can be used for epilation only, if someone is crazy enough to try and swim there.

Note:

In the next cases we will briefly display only a very few other cases of industrial pollution out of way too many in the last couple of years - otherwise this document will never be finished. The next cases are known with the fact that perpetrators were not caught or they got away with a very small penalty with only one exception.

C2. The Maritsa River

Through the years this big river has suffered the same pollution as the other rivers described in this complaint. Here is proof for just a few of the cases that happened only in the last year:

25 January 2020

<https://news.bnt.bg/bg/a/neizvestno-veshchestvo-otrovi-ribata-v-r-maritsa>

This case became famous as it is the first case in which the District attorney's office started an investigation of the crime, because poisoning of a river is considered crime according to the National Penal Code. It is the first case ever, in which EARBD and RIEW Pazardjik have done a very good job together. Pitifully this is only an exemption.

However, this case got also famous with the fact that the investor has received a lot of EU funding as a beneficiary in several European projects through the years. Here is the proof about that:

<https://www.marica.bg/region/pazardjik/zamarsilata-reki-firma-sochena-za-primer-kato-beneficient-po-evroproekti>

The case is symptomatic for another reason too. A thorough scientific hydro biological study, part of a project supported by "Active Citizens Fund" of the Financial Mechanism of the EU, has been carried out to assess the ecological status of the affected section of the river after the "accident". Here is a link to the final report:

And here are the conclusions:

1. The toxic pollution of the Maritza River on 01/25/2020 is certainly a result of the discharged poisonous waters in the Pishmanka River /Pishmanka is a tributary to Maritsa/.
2. The length of the poisoned section of the Maritza River, which is exposed to an acute toxic effect, is approximately **26 km** and covers the course of the river from the confluence of Pismanka River to the confluence of the Vacha River.
3. The toxic pollution on 01/25/2020 has had a sharp lethal effect on fish and free-living invertebrates in the Maritza River.
4. **As a result of the incident on 01/25/2020, all fish and almost all free-living invertebrates in the acutely affected area have died.**
5. Sublethal effect in fish and occurrence of free-living invertebrates appears for the first time 24 km down the Maritza river, from Pishmanka River estuary.

Pitifully MOEW proudly refused to take this study into consideration during the administrative penal procedure as an independent proof for the environmental harm, which is no surprise to anyone.

Here are two other cases of poisoned waters in the Maritsa River:

04 February 2020

<https://www.plovdivmedia.com/147909.html>

<https://www.marica.bg/plovdiv/gradat/izlivame-v-marica-cqlata-mendeleeva-tablica-predi-da-piem-voda-ot-neq>

May 2019, this time by an unknown perpetrator:

<https://www.marica.bg/plovdiv/gradat/nezabavna-proverka-na-r-marica-izvrshiha-eksperti-ot-riosv-plovdiv-i-bdibr>

And here are four other cases of poisoned Maritsa tributaries:

Vacha River in December 2019

<https://www.marica.bg/balgariq/globqvat-nek-zaradi-zamarsqvaneto-na-reka-vacha>

This case is interesting for the fact that the state owned National Electric Company has caused the damage.

Potoka River in October 2019

<https://www.marica.bg/plovdiv/gradat/riosv-plovdiv-i-baseynova-direkciq-ustanoviha-zamarsitel-na-reka-potoka>

Stryama River in September 2019

<https://www.marica.bg/region/rakovski/ekoinspektori-proveriha-signal-za-umrqla-riba-v-reka-strqma>

Stara reka River in May 2019

<https://www.marica.bg/plovdiv/gradat/mrtva-riba-izpluva-v-stara-reka>

We figure these cases will be enough to prove our point, otherwise we can continue endlessly. In most of the above cases perpetrators have been caught, but the penalties imposed were obviously anything but "*effective, proportionate and dissuasive*". In Bulgaria penalties are actually motivating rather than anything else, since similar crimes keep happening almost every week.

Final Note:

At the start of the preparation of this document we had intentions to describe what's happening to many other rivers, but got deadly tired instead. In fact, all the other big rivers in Bulgaria are in the just the same state like Maritsa River. Should DG Environment be interested and if there is any need for more evidence from us, just give us a hint please, and we will flood the Directorate with additional information to complete and proof our case.

And here is our final proof - a diary farm in the village of Manole has been caught by EARBD dumping "accidently" as always all its waste waters into the Cherna River /another tributary to Maritsa/ three times in a row from 2018 till now. The fines imposed vary between 2000 and 2500 Euro and are not leading to any improvement at all. Here is the official announcement on EARBD internet site, dated 28.04.2020:

https://earbd.bg/indexdetails.php?menu_id=81&elem_id=1834

Needless to say that the entire Maritsa River and most of its tributaries fall within the boundaries of several Natura 2000 Habitats and Birds directive sites specially designated for the protection of water dependent birds and priority riverine habitats and species...

D. Union laws (e.g. Treaties, regulations, directives, decisions) or principles underpinning Union law that we believe to have been breached by the authorities of the country

Treaty on the Functioning of the European Union

- **Article 191**
- (ex Article174 TEC)
- 1. Union policy on the environment shall contribute to pursuit of the following objectives:
 - - preserving, protecting and improving the quality of the environment,
 - - protecting human health,
 - - prudent and rational utilisation of natural resources,
 - - promoting measures at international level to deal with regional or worldwide environmental problems, and in particular combating climate change.
- 2. Union policy on the environment shall aim at a high level of protection taking into account the diversity of situations in the various regions of the Union. It shall be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source and that the polluter should pay.
- **Directive 2001/42/EC** of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment:
- **Directive 2000/60/EC** of the European Parliament and of the Council establishing a framework for Community action in the field of water policy
- **Council Directive 92/43/EEC of 21 May 1992** on the conservation of natural habitats and of wild fauna and flora
- **DIRECTIVE 2011/92/EU** OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the assessment of the effects of certain public and private projects on the environment
- **DIRECTIVE 2014/52/EU** OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment

E. Does the EU country concerned receive EU funding relating to the issue that prompted your complaint, or may it receive such funding in future?

Yes, a lot of it. We are not sure how much, but Bulgaria receives a lot of EU funding for environmental protection which usually gets split in different corruption schemes, but DG Environment is pretty well aware of the fact. The same goes for the development of the Natura 2000 Network, which really means nothing in Bulgaria.

Huge amount of EU funding is also wasted and split in different corruption schemes for the "sustainable development" of environmentally harmful subsidies as well.

III. LIST OF DOCUMENTS / EVIDENCE

All the evidence concerning described infringements is included where appropriate in the document above in the form of links to pictures, videos and documents.

IV. APPEALS/LEGAL ACTIONS/ OTHER ACTIONS

Concerning the pollution of the rivers and the poor implementation of all applicable to the mining industry EU environmental directives, we have not contacted any of the EU institutions insofar.

We do not believe that SOLVIT is better placed to deal with this problem.

V. CONFIDENTIALITY – DATA PROTECTION

We authorize the Commission to disclose the identity of Balkanka Association and/or the identity of our representative in its contacts with the Bulgarian state authorities, against which we are lodging this complaint.

Moreover, we have sent copies of all our previous complaints to our state authorities, so they are pretty well aware of our actions. Having nothing to hide, in due course we will send a copy of this document too.

VI. SUMMARY

Ladies and gentlemen,

We can continue almost endlessly with the above list of "accidental" cases of river pollution, but that should be enough for now. As for the reason of the crazy poisoning of our rivers - it was explained already. It is the Grand Corruption ruling the entire country with the explicit support of the European Commission.

But here we have to underline the most important facts:

1. In many of the cases poisoning of rivers is not being caught by the controlling state institutions. Some of the most corrupt investors are untouchable by state officials.
2. Penalties for proven river poisoning are funny. They are anything but *effective, proportionate and dissuasive* in breach of EU WFD article 23. In fact these penalties are encouraging environmental harm.
3. Appropriate measures to prevent further pollution are usually not included in the RBMPs with quite a few exceptions. The aim is to save expenses for powerful greedy investors.
4. Special measures included in the RBMPs are not implemented.
5. Independent scientific reports are rejected by MOEW if they are not in favor of investors.

6. All EIA/AA procedures are false, especially when mining undertakings are at stake.
7. Reasonable EIA/AA conclusions and recommendations, rare as they are, are never implemented.
8. Public consultations don't mean a thing!
9. Referendums don't mean a thing!
10. Natura 2000 Network doesn't mean a thing!
11. Urban waste waters are not properly treated or are not treated at all. Lots of EU funding has been wasted on new urban sewerage systems and WWTS which are not working.
12. Too many large scale metal ores' mining activities are currently in operation and are constantly poisoning our rivers, untouchable by no one!
13. Another approximately 5 percent of the territory is designated for exploration and search for metal ores. In our good old National Geological Fund from socialist times all necessary information is available, which means that in those 5 percent of the territory everything important is pretty well known and exploitation of those metal ores is inevitably coming forth.
14. Old mines' devastating impacts are not taken care of.
15. The National Development Strategy for the mining industry Was Not subject to SEA and AA in line with the relevant EU legal framework - the SEA Directive and the Habitats Directive!
16. Some of the most controversial mining enterprises are financed by European financial institutions and mechanisms.
17. Royalties are more than funny to say the least! Precious natural resources of an EU Member State are being exported out of the EU for only 1.5 percent of their value. In this context *Prudent and rational utilisation of natural resources* is a myth and doesn't mean a thing.
18. Environmental and social harm, namely the dead rivers, poisoned surface and groundwater water sources, health risks and harm for the population, lost all other chances for local rural development and tourism etc., received in return of the *utilisation*, is disproportionate and irreparable.

The one and only Reason is Corruption vastly spread among our governments, all of them supported by the European Union itself!

So here is our strong advice to all recipients of this Complaint:

Although it is too late already, the European Commission should quit supporting the Corruption in our country, at least until we turn into a normal, law abiding EU Member State!

Finally, we would like to kindly urge DG Environment of the EC to take prompt action in regards to all infringements of the basic European principle for the Rule of Law disclosed in this document. Having in mind how much has been done in no time dealing with all our previous complaints lodged so far, we must also point to DG ENV that:

The only thing necessary for the Triumph of Evil is for good men to do nothing...
Otherwise we'll keep fighting Evil alone!

Thank you all for your kind understanding and cooperation.

"Nature has all the time in the world, we do not".

Place, date and signature of complainant/representative:

Representative for this complaint:

/dipl.eng. Dimiter Koumanov/
Member of the board

Sofia, Bulgaria
30.04.2020

