

**REPUBLIC OF BULGARIA**  
**MINISTRY OF ENVIRONMENT AND WATER**

**OBOC-144 -20**  
**15 December 2025, Sofia**

**Subject:** Notification for investment proposal „Removal of sediment deposits by floating vehicle from the renewable stock of the Danube river in a section from km 386.500 to km 386.000”, pursuant to Article 3 of the Convention on Environment Impact Assessment (EIA) in a transboundary context

**DEAR MINISTER BUZOIANU,**

*In accordance to the requirements of Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context, please, find enclosed a notification of an investment proposal for the „Removal of sediment deposits by floating vehicle from the renewable stock of the Danube river in a section from km 386.500 to km 386.000”.*

*We would highly appreciate it if you could inform us of your intention to participate in the environmental impact assessment procedure within 30 days of the date of receipt of this letter.*

**H. E. Diana-Anda BUZOIANU**  
**Minister of Environment, Waters and Forests of Romania**  
12 Libertatii Blvd.,  
Sector 5, Bucharest, Romania



Certificate No: BG/1398Q/1411

Sofia 1000, 22 Maria-Luisa Blvd



Phone: +359 2 940 6194, Fax: +359 2 986 25 33

*We will be grateful to receive information and requirements on your part regarding the expected transboundary environmental impact of the proposed activity in the investment proposal.*

*Please accept, Honourable Minister, the assurance of my highest consideration and readiness for successful future cooperation.*

*Attachment: Notification pursuant to Article 3 of the EIA Convention.*

*Yours sincerely,*

**Manol Genov**  
**Minister of Environment and Water**





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<translations>

Translation from Bulgarian

**Notification of a proposed activity to the Party concerned pursuant to Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context**

<b>1. INFORMATION ON THE PROPOSED ACTIVITY</b>	
<b>( i ) Information on the nature of the proposed activity</b>	
Type of activity proposed	Removal of sediment deposits by floating vehicle from the renewable stock of the Danube river in a section from km 386.500 to km 386.000.
Is the proposed activity included in Annex I to the Convention?	yes <input type="checkbox"/> no <input checked="" type="checkbox"/>
Scope of the proposed activity (e.g. core activity and any/all peripheral activities requiring assessment)	<p>Deposits will be removed by means of a floating technical device (drill) owned by the contracting authority.</p> <p>The removed sediment deposits will be transported along the river by means of non-self-propelled barges to an own port in the city of Silistra, where they will be stored and processed.</p> <p>No shore activities are foreseen in the area of the section.</p>
Scale of the proposed activity (e.g. size, production capacity)	The section for extraction of sediment deposits is located in the bed of the river Danube, near the fairway, in the Chayka section, from km 386.500 to km 386.000 and has an area of 4,878 m <sup>2</sup>
Description of the proposed activity (e.g. technology used)	<p>Sediment deposits (sand and gravel) will be extracted under water by floating means: multi-bucket drill Dnepar with a capacity of about 250 t/h. The removed material is loaded in non-self-propelled sections (barges) and transported by water to an own port.</p> <p>The multi-bucket drill is designed specifically for the extraction of aggregates from the dynamic reserves (sediment deposits) of large navigable rivers and is the most sparing for the river and the aquatic inhabitants.</p> <p>The dredge structure consists of buckets, each with a volume of 0.3 m<sup>3</sup>, which are slowly lowered to the bottom, turned and scooped some of the aggregates, after which the bucket is turned upside down and the inert mass is exported. Thus, under the action of water pressure, the fallen aggregates in the bucket are retained in it. The removal, scooping and lifting of the buckets is done slowly in order to minimize loosening of the material on the bottom.</p>



9001:2015



17000:2015



18587:2017

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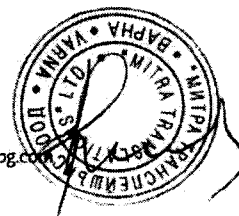
9000 Варна, ул. „Цар Асен“ 11а, офис #4 | +359 878 61 20 21 | info@mitra-bg.com

9000 Варна, бул. „8-ми Приморски полк“ 80-82 | +359 895 45 07 55 | office\_varna@mitra-bg.com

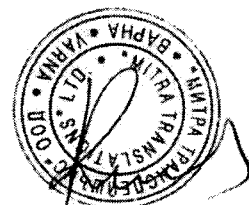
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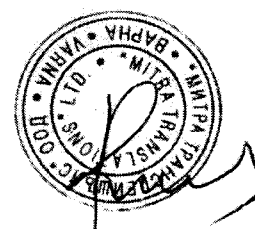
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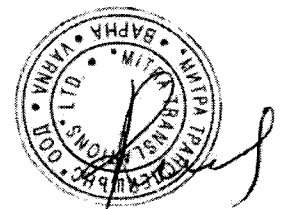
	<p>The removed sediment material is loaded on barges and transported to the production site of the contracting authority in the city of Silistra.</p> <p>There is no storage of removed sediment deposits on the shores.</p> <p>The buckets of the drill are adapted only to scrape the top layer of sediment materials and do not have the ability to break or destroy the bottom. When a rock is reached, the work is stopped and the depth of descent of the dredge is adjusted.</p> <p>The removal of sediment deposits shall be carried out gradually, seasonally, periodically, and the entire area of the proposed section shall not be exploited at once. The extraction section is the border of one area of the river in which the placement of the drill is allowed. During the specific season, the drill moves within the boundaries of this section.</p> <p>The method of extraction guarantees the removal of sediment deposits from the dynamic stock of the river, without affecting the hard bottom (waterproofing).</p> <p>The construction of the drill allows the extraction of sediments only in the direction of the river bottom (perpendicular to the vessel) as it is technically impossible to dig on a slope in the direction of the banks. The removal takes place on the principle of weaving - consecutively, from one end of the section to the other (in width), then there is a slight shift upstream and again removal from one end of the section to the other. The upper layer of the accumulated aggregates with a thickness of about 60 cm is removed. This method is the most favourable for extraction, as it does not disturb the bottom of the river, creates a gradual deepening of large areas without the formation of pits, and the section is restored within 2-3 months after the cessation of extraction.</p>
<p>Description of the purpose of the proposed activity</p>	<p>The purpose of the investment proposal is to obtain a permit for the removal of sediment deposits from the Danube River, which is issued by Executive Agency for Exploration and Maintenance of the Danube River - Bulgaria (EAEMDR).</p> <p>The proposal is aimed at carrying out the main activity of the contracting authority - extraction, processing, realization of aggregates, ship transport and ship agency on the Danube river.</p>



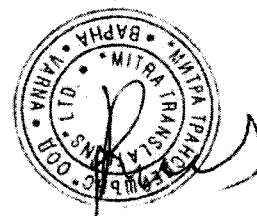
Justification for the proposed activity (e.g. socio-economic basis, physio-geographical basis)	<p>The removal area is near the contracting authority's own port, where unloading, processing and storage will be carried out.</p> <p>The need to perform extraction in this section is dictated by the need to provide sufficient places for removal of aggregates for the main activity of the company.</p> <p>At the same time, the removal will also achieve the following positive effects:</p> <p>The accumulation of sediments in a section of the river creates prerequisites for a gradual reduction in the depth of the section (the appearance of shallows and thresholds). As a result, the section and the patency of the river sections are reduced. This has a negative impact on navigation in them.</p> <p>On the other hand, the accumulation of sediments, especially in the sleeves between the islands and the riverbank, creates real prerequisites for bank overtopping and flooding of the coasts in high water levels, as well as increasing the erosion of the coasts due to the abrasiveness of the water carrying sediments.</p>
Additional information/comments	none
<b>(ii) Information on the spatial and temporal boundaries of the proposed activity</b>	
Location	Geographical coordinates of the boundary points of the extraction section:



	<p>1 44°08'16.56" 27°08'26.68"</p> <p>2 44°08'14.45" 27°08'37.33"</p> <p>3 44°08'13.85" 27°08'37.00"</p> <p>4 44°08'15.94" 27°08'26.41"</p> <p>The section is located near the thalweg of the river and the border with Romania, 475 m from the Romanian bank of the Danube river.</p>
Description of the location (e.g. physio-geographical characteristics, socio-economic characteristics)	<p>The section is located in the bed of the river Danube from km 386.500 to km 386.000 and has an area of 4,878 m<sup>2</sup></p> <p>It is 450 m from the Bulgarian coast, 475 m from the Romanian coast, about 650 m from the Bulgarian island of Aydemir and about 3,500 m from the Romanian island of Ostrovl Ciocanesti.</p> <p>The closest settlement to the boundaries of the extraction section is the village of Aydemir, Silistra municipality. The end point 1 of the section is about 3,900 m from the nearest residential building in the village. In Romania, the village of Rasa is about 8 km away, and the city of Kalaras is about 14 km from the sediment deposits removal section. The section is adjacent to the borders of two protected areas: PA Chayka Island with code BG 0000534 on the territory of the Republic of Bulgaria and PA ROSCI 0131 Oltenita-Mostistea-Chiciu on the territory of the Republic of Romania.</p>
Justification of the location of the proposed activity (e.g. socio-economic basis, physio-geographical basis)	<p>The section is outside the boundaries of Natura 2000 protected areas and in relative proximity to the contracting authority's own port.</p> <p>It is remote from habitats subject to conservation in protected areas.</p> <p>It falls into a section of the critical for navigation area Chayka.</p>
Time frame for the proposed activity (e.g. start and duration of construction and operation)	<p>The section will be operated after obtaining a Permit under the Waters Act from the Director of EAEMDR. Permits are valid - until the date of application of the current River Basin Management Plan (2022-2027)</p> <p>The extraction will take place in the period June - November outside the breeding season of the fish, in accordance with the prohibitions of the EAFA.</p>



	<p>The extraction will be carried out only during a period with favourable water levels in the section, which allow the work of the drill. It can work at optimal depths of 4 to 9 m, and at lower water levels and at high water levels with greater depths, the extraction is practically impossible.</p> <p>When the dynamic stocks are exhausted, the extraction will be stopped until their recovery. It usually takes 1-2 years.</p>
Maps and other pictorial documents related to the information about the proposed activity	<p>Diagram of the section and geographical coordinates issued by EAEMDR</p> <p>Satellite photo with the location of the section and distances</p> <p>Maps with location of the plot against mapped habitats subject to conservation in ROSCI 0131 Oltenita-Mostistea-Chiciu</p>
Additional information/comments	none
<b>(iii) Information on the expected environmental impacts and proposed mitigation measures</b>	
<p>Scope of the evaluation (e.g. consideration of: cumulative impacts, assessment of alternatives, sustainable development issues, impact of peripheral activities)</p>	<p>No harmful emissions are expected when performing the activity. The activity does not emit wastewater, emissions to ambient air, waste. Noise emissions would not reach the nearest settlements.</p> <p>The planned activity does not provide for the storage or transportation of aggregates on shore. Repair of vessels in the area of extraction is not envisaged. The contracting authority has its own port in the city of Silistra, where these activities will be carried out.</p> <p>Sediment materials are removed in a damp state, loaded onto vessels and transported to the port. No fugitive emissions are expected in the area of the section.</p> <p>The technology of extraction and the construction of the drill excludes shore impact, demolition of the bottom or other morphological changes in the extraction areas. Only sediments deposited on the bottom of the river are removed.</p>



When mining with a bucket drill, it is not possible to destroy the bottom of the river (composed of rocks), unlike mining with the so-called dredge or other facilities designed to deepen them.

The extraction of aggregates is an activity that cannot lead to a change in the hydrological regime of the river, as it does not have the potential to change the level, amount of water, speed and section of the river.

The removal of sediment deposits from the river bed will not lead to the depletion of this natural resource.

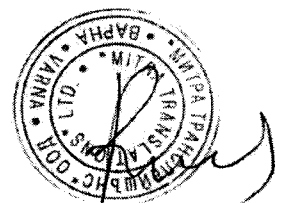
The location of the extraction section is consistent with the shipping activity on the Danube river, and its coordination by the EAEMDR ensures that they would not affect it.

The planned extraction site is remote and does not affect built hydro-technical facilities, the extraction does not pose a danger to their condition.

The implementation of the investment proposal will have an impact mainly in terms of the aquatic fauna distributed in the Danube River, which is a border river.

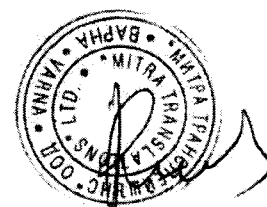
With the removal of sediment materials, it is possible to destroy bottom aquatic inhabitants - river mussel (*Unio* sp.), some snails and larvae of mayflies, and others located in the extraction area. These species are widely distributed in the river and are not subject to conservation and protection.

The fish fauna will not be affected by the planned activity. The section is located in the river bed, almost next to the fairway, where there are no places for refuges, feeding and reproduction of the fish inhabitants common in the river.

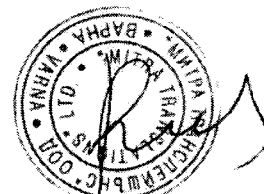




	<p>The removal of sediment materials with a bucket drill is the most gentle method of dredging for the fish population. The buckets of the drill are open, descending slowly to the bottom, scooping gravel and slowly moving upwards. Thus, if a fish accidentally falls into the bucket, it has the opportunity to escape during the bucket's slow upward movement.</p> <p>The activity of extraction of aggregates from the riverbed of the Danube river is guaranteed <u>not to be carried out during the spawning period of the fish</u>. Annually, the Executive Agency for Fisheries and Aquaculture prohibits fishing and any activities in the water body (including the extraction of aggregates) during the fish breeding period (April-June).</p> <p>The planned area for removing sediment deposits from the river bed is significantly distant from habitats subject to conservation in PA on the territory of Romania: ROSCI 0131 Oltenita-Mostistea-Chiciu - declared for the conservation of natural habitats and wild flora and fauna and the activity would not negatively affect them.</p> <p>No negative impacts on the nearby PA on Romanian territory are expected, no harmful impacts on the species subject to conservation in the area are expected.</p>
Expected environmental impact of the proposed activity (e.g. species, locations, dimensions)	During and after the implementation of the investment proposal, negative impacts on the environment and the population are not expected.
Inputs (e.g. raw materials, energy sources)	<p>The investment proposal represents extraction of natural resources - deposits from the dynamic reserves of the Danube river.</p> <p>The removal of sediment deposits from the dynamic reserves of the Danube River will not lead to the depletion of this natural resource. The process of deposition is dynamic and constant over time.</p>
Outputs (e.g. quantities and types: emissions to the atmosphere, discharges to the water system, solid waste)	No harmful emissions are expected to pollute the ambient air.



	<p>The investment proposal does not include storage of the extracted sediment materials, but only extraction, transshipment and transport. The sediment materials are wet and do not create prerequisites for dust spreading during transportation.</p> <p>Ship machinery meets all European standards, which guarantees minimum emissions into the environment.</p> <p>Municipal waste will be transported to the port of the contracting authority Port Polaris-8 - Silistra and will be treated in the order adopted by the company.</p> <p>Production waste - will not be generated. No repairs or other work will be carried out on the vessel. If the facilities need to be repaired, they will be transported to the port in the city of Silistra and will be repaired there.</p> <p>No wastewater generation is expected.</p> <p>Noise emissions are not expected. The engines of the vessels available to Polaris - 8 OOD are silenced. To reduce the noise from the rollers of belt conveyors, plastic instead of metal rollers are used. Thus, the noise emitted in the environment by the work of the drill is in the range of 70-80 dBa.</p>
Transboundary impacts (e.g. types, locations, dimensions)	<p>The proposal is <b>not of a cross-border nature</b>, although it is located in the Danube River, which is a border river.</p> <p>The section is located near two Natura 2000 protected areas - one on the territory of Bulgaria and the other on the territory of Romania.</p> <p>The planned activities will be carried out in a section located on the territory of the Republic of Bulgaria. The assessment of the potential impacts on the environment and the population shows a small territorial scope - only within the boundaries of the section under consideration. No harmful emissions are expected when performing the activity.</p>



The activity does not emit wastewater, emissions to ambient air, noise emissions that would reach the nearest settlements.

The planned activity does not provide for the storage or transportation of aggregates on shore.

Sediment materials are removed in a damp state, loaded on vessels and transported to the port of the contracting authority. No fugitive emissions are expected in the area of the section.

The technology of extraction and the construction of the drill excludes shore impact, demolition of the bottom or other morphological changes in the extraction areas. Only sediments deposited on the bottom of the river are removed.

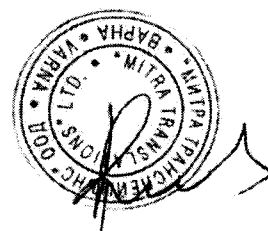
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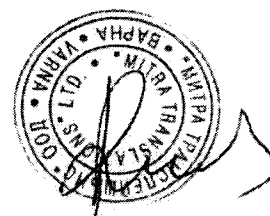
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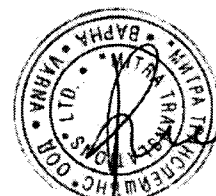
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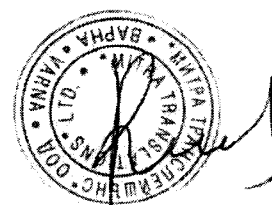
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Proposed mitigation measures (e.g. if known, mitigation measures to prevent, eliminate, minimize, offset environmental impacts)	<ul style="list-style-type: none"> <li>- performing mining activities only during daylight hours;</li> <li>- prohibition of activity in the period April - May - spawning period of fish, regulated by Bulgarian legislation</li> <li>- not to allow repair of vessels and equipment in the river, and for this purpose the damaged machines are transported for repair to the port of Polaris-8 OOD in the city of Silistra.</li> <li>- all waste generated on the vessels should be collected and transported to the port of Polaris-8 OOD in the city of Silistra and to be treated in accordance with the permit documents under the Waste Management Act of the company;</li> </ul>



	- When carrying out dredging activities, as well as in order to ensure safe manoeuvring of all vessels in the area of the river where the section is located, the Danube Navigation Rules shall be observed.
Additional information/comments	none
<b>(iv) Initiator/Developer</b>	
Name, address, telephone and fax	POLARIS - 8 Ltd., city of Varna, 12 Petar Raychev Str., office 3 Telephone and e-mail: 086/820-134, 086,820-130, polaris8@abv.bg Manager: Vladimir Rashkov
<b>(v) EIA documentation</b>	
Is the EIA documentation (e.g. EIA or EIA report) included in the notification?	yes <input type="checkbox"/> no <input checked="" type="checkbox"/> partially <input type="checkbox"/>
If the answer to the above question is negative or partial, a description of the additional documentation to be submitted and (approximate) date(s) on which the documentation will be available	Additional information will be sent on request when it is prepared.
Additional information/comments	none
<b>2. CONTACT POINTS</b>	
<b>( i ) Contact points for the possibly affected party or parties</b>	
Body responsible for coordinating EIA activities (see Decision I/3, addendum) - Name, address, telephone and fax	Ministry of Environment, Water and Forests of Romania Bvd. Libertatii nr. 12, Sector 5, Bucuresti Fax: 004 021 408 9615 Telefon: 021/408 9642 E-mail: registratura@mmediu.ro
List of countries concerned to which notification is sent	Republic of Romania
<b>(ii) Country of origin contact points</b>	
Body responsible for coordinating EIA activities (see Decision I/3, addendum)	Ministry of Environment and Water 22 Maria Luiza Blvd. Sofia, 1000



- Name, address, telephone and fax	Bulgaria
Decision-making body, if different from the body responsible for coordinating EIA activities	-
- Name, address, telephone and fax	
<b>3. INFORMATION ON THE EIA PROCESS IN THE COUNTRY WHERE THE PROPOSED ACTIVITY IS LOCATED</b>	
<b>( i ) Information on the EIA process to be applied to the proposed activity</b>	
Time schedule	Based on the requirements of Bulgarian legislation
Opportunities to involve the affected party or parties in the EIA process	Yes
Opportunities for the affected party or parties to review and comment on the EIA notification and documentation	Yes
Essence and timing of the possible solution	In accordance with the Bulgarian legislation
Process of approval of the proposed activity	In accordance with the Bulgarian legislation
Additional information/comments	Further information on the EIA procedure can be found on the MoEW website: <a href="http://www.moew.government.bg">www.moew.government.bg</a>
<b>4. INFORMATION ON THE PROCESS OF PUBLIC PARTICIPATION IN THE COUNTRY OF ORIGIN</b>	
Procedures for public participation	<p>The competent authority or an official authorized by it shall designate the affected municipalities, districts and/or mayoralties with which the contracting authority shall organize a public discussion of the EIA report and its annexes.</p> <p>The contracting authority shall provide one copy of the EIA report with all annexes thereto to the municipalities, districts and/or mayoralties designated by the competent authority. The affected municipalities, districts or mayoralties confirm in writing the place, date and time for the meeting(s) for public discussion, the place and time for</p>



	<p>public access to the EIA report and its annexes, as well as the place to provide written opinions or make another proposal. The contracting authority shall announce them in the mass media and/or in another appropriate way at least 30 days before the meeting(s).</p> <p>The contracting authority shall notify the competent authority in writing of the place, date and time for the meeting(s) for the public discussion, for disclosure by the competent authority through its website, at least 30 days before the meeting(s) for public discussion.</p>
Expected start and duration of the public discussion	<p>A start date is considered to be the date on which the first public discussion meeting will be held, cobbled together with the relevant affected municipalities, districts and/or mayoralities.</p> <p>The duration depends on the number of meetings for public discussion.</p>
Additional information/comments	none
<b>5. RESPONSE DEADLINE</b>	
Date	4 weeks from the date of receipt of the notification.

*I, the undersigned Rosen Georgiev Slavov do hereby certify that this is a true and correct translation I have made from Bulgarian into English of the document attached hereto. The translation includes 13 /thirteen/ pages.*

*Translator: Rosen Georgiev Slavov*

