

**MINISTRY OF AGRICULTURE AND FOOD**  
**EXECUTIVE FOREST AGENCY**  
**REGIONAL FOREST DIRECTORATE – ROUSSE**

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Rousse, 7 Skobelev Blvd., P.O.Box 443, telephone exchange 082/821 706, Fax: 082/821 708, e -mail: rugrouse@nug.bg

Outgoing No. GF-88/19.05.2014

**TO**  
**MR. ALEXANDER CHAKMAKOV**  
**CEO**  
**GRAVEL AND SAND PITS - BULGARIA EAD**  
**SOFIA 1528, ISKAR DISTRICT**  
**6 PORUCHIK NEDELCHO BONCHEV STR.**

**Re: Investment proposal for Extraction of Sand and Gravel from Alluvial Deposits in the Bed of the Danube River, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo Village, Slivo Pole Municipality, Rousse County**

**DEAR MISTER CHAKMAKOV,**

A notification has been filed at the Regional Forest Directorate – Rousse with registration index 940/23.04.2014 by GRAVEL AND SAND PITS – BULGARIA EAD Sofia about an investment proposal of the company for *Extraction of Sand and Gravel from Alluvial Deposits in the Bed of the Danube River, Mishka Section (from km 462.0 to km 459.4) in the area of Babovo Village, Slivo Pole Municipality, Rousse* for which the preparation of an Assignment for the Scope and Content of an Environmental Impact Assessment Report is planned.

The submitted notification and its enclosures indicate that the realization of the investment proposal (IP) concerns an extraction section that is part of the bed of the water basin – the Danube River a public state property in the Mishka Section (from km 462.0 to km 459.4) to the north of the village of Babovo, Slivo Pole Municipality, Rousse County to the north and north-west of Mishka Island (Goliam Mishka – 1 and Malak Mishka – 2) and to the south of Malak Mishka Island (Mishka – 3).

The exploitation permit – *extraction of alluvial deposits (sands and gravel) from the bed of the Danube River* is in compliance with the Water Act whereas the IP will not affect lands and soils beyond the water basin. In addition to the extraction of inert materials – sand and gravel the extraction of alluvial deposits is performed periodically in critical sections for the purposes of maintaining the navigational conditions in Lower Danube. It is stated in the notification that the extraction of the inert materials from the bed of the Danube River are approved and will be supervised by the Executive Agency for Exploration and Maintenance of the Danube River.

The transportation of the excavated sand and gravel – *from the Mishka Section to the pier/industrial site of the company* – will be realized along the Danube River. The notification states that the pier is situated in a land with identification number 63427.8.1076 in district 1 of

the city layout of Rousse, Eastern Industrial Zone of Rousse and is a licensed and operating harbor for handling general and bulk cargo.

The notification is accompanied by Resolution N 3 – PR/2014 dated 06.03.2014 of the Minister of Environment and Water (hereinafter referred to as the *MOEW Resolution*) for *estimating the need of conducting an environmental impact assessments*. The resolution states that the extraction area Mishka falls within the borders of two protected zones pursuant to the Law on Biological Diversity (LBD): protected zone BG0000377 Kalimok – Brashlen for preserving the natural habitats of the wild flora and fauna and protected zone BG0002030 Complex Kalimok for preserving wild bird species. It is specified that the Mishka Section does not fall within the borders of protected territories according to the Law on Protected Territories but is in close proximity to the protected area Kalimok – Brashlen.

The MOEW Resolution also states that in relation to Art. 12, par. 1 and par. 2 of the Regulation on Compatibility Assessments the realization of the IP is permissible for the regimes determined in the orders for setting protected zone BG0000377 Kalimok – Brashlen and protected zone BG0003020 Complex Kalimok only within the borders of the extraction section – *determined according to the coordinates of the points indicated in the affixed diagram of the section with actual extraction and in the MOEW Resolution* – where the island formations along the Danube River are unaffected.

According to the provisions of Art. 31, par. 1 of the LBD and Art. 2, par. 1 of the Regulation on Compatibility Assessments the compatibility of the investment proposal with the subject and objectives of the aforesaid two protected zones must be subjected to evaluation, which will probably have a significant negative impact on the natural habitats and the habitats of the species subjected to preservation in these zones.

**Mr. Chakmakov,**

After the submitted notification was reviewed and its enclosures, including Resolution N 3 – PR/2014 dated 06.03.2014 of the Minister of Environment and Water we hereby present you with information about the forest territories within the area of Mishka Island (Goliam Mishka – 1 and Malak Mishka – 2) and Malak Mishka Island (Mishka – 3).

The forest territories on Mishka Island and Malak Mishka Island fall within the jurisdiction of the Northern Central State Enterprise – Gabrovo, Danube Territorial Subdivision State Hunting Enterprise (TS SHE) – Rousse. These territories form section 229, subsections (a), (b), (c), (d), (e), (f), (g), (h), (i), (k), (l), (m), (n), (o), (p), (q), (1) according to the forest map and the Forestry Plan of 2012 of Danube TS SHE. Some of the subsections (a), (b), (c), (d), (o), (p), (q) are natural seed vegetation of white willow and individual field elm, black and white poplar. The subsections (e), (f), (g), (h), (i), (k), (l), (n) are forest crops with forest species of white willow, poplar; the subsection (m) is a cutting area whereas subsection (1) is a backwater.

The lands on Mishka Island and Malak Mishka Island are forests – public state ownership within the borders of Protected Area Kalimok – Brashlen declared by Resolution N RD – 451/04.07.2001 of the Minister of Environment and Water (State Gazette issue 68/2001).

Recommendations for *reducing the impact on the animal species inhabiting the island* can be made after an evaluation of the level of the impact on the protected zones is conducted by experts complying with the requirements of Art. 31, par. 20 of the Law on Biological Diversity and Art. 9, par. 1 of the Regulation on Compatibility Assessments competent in the

following fields: phytocoenology, hydrobiology and ornithology in line with the aforesaid MOEW Resolution.

**ENCLOSURE:**

1. Copy of Expert Opinion with outgoing number 420/16.05.2014 of Danube Territorial Division State Forest Enterprise – Rousse.
2. Excerpt from the forest map (*from the map of the sheets and sheet map N 42*) pre-section sheet for section 229 and inventory description of subsections 229 (a), (b), (c), (d), (e), (f), (g), (h), (i), (k), (l), (m), (n), (o), (p), (q) according to the 2012 Forest Plan of Danube TD SFE – Rousse – certified copies.

Respectively yours,

*/signed/*

**ENG. SEVDALINA DIMITROVA**

**Director**

**Regional Forest Directorate – Rousse**

SEALED BY THE REGIONAL FOREST DIRECTORATE IN ROUSSE AT THE MINISTRY OF  
AGRICULTURE AND FOOD.

**NORTHERN CENTRAL STATE ENTERPRISE**  
**DANUBE TERRITORIAL DIVISION STATE FOREST ENTERPRISE**

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Rousse, 19 Maria Luiza Str., Tel.: 820 217, Fax: 820 223

ENG. I. BANOVA 16.05.2014
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REGIONAL FOREST DIRECTORATE 7000 ROUSSE, 7 Skobelev str. Registration index and date 1089/16.05.2014
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**Outgoing N 420/16.05.2014**

TO  
Regional Forest Directorate – Rousse

To your number GF – 78/08.05.2014  
Concerning the investment proposal for Extraction of Sand and Gravel from Alluvial Deposits  
in the Bed of the Danube RIVER, Mishka Section

Danube State Forest Enterprise hereby makes the following statement:

Mishka Island is a state forest territory – section 229 of Forest Plan of Danube State Forest Enterprise.

The island is a part of the protected zone Kalimok – Brashlen whereas its territory is covered mostly by trees such as the white willow and the black poplar.

Danube State Forest Enterprise is not a competent body on the assessment of the impact that the realization of the investment proposal may have on the environment.

Since no activities are planned on the territory of the Mishka Island we believe that the tree vegetation will not be subjected to a significant harmful impact.

Danube SFE, however, is not capable of making a thorough analysis of the impact that the presence of the sand extraction equipment in the region may have on the ecosystems and biological species such as harmful emissions, noise pollution, changes in the relief of the river bed, disturbing the animal species inhabiting the region, etc.

The institution that is competent to respond to the foregoing issues is the Ministry of Environment and Water through the Regional Inspectorate of Environment and Water – Rousse.

**Enclosures:**

1. Excerpt from the forest map of Mishka Island.
2. Pre-section sheet and inventory characteristics of the subsection of the territory of Mishka Island – 17 pcs.

Director: */signed/*  
**Eng. Y. Sariliev**