



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

OPDE-54-20
14, August 2024, Sofia

Subject: Received notification under Art. 3 of the Convention on Environmental Impact Assessment in Transboundary Context (Espoo Convention)

Dear Mr. Minister,

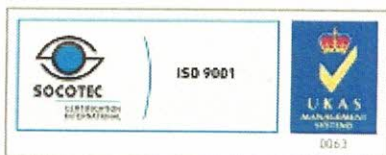
This letter is to acknowledge receipt of your letter (by e-mail) providing us with a notification under Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the project "Wind Farm with an installed capacity of 44 MW in Polemistis, Komotini and Ariane Municipalities, Komotini and Organe Municipalities, Rhodope Region, Eastern Macedonia and Thrace Region, Greece", with WPD AIOLIKI ENERGEIA 1 Single Member P.C. as the contracting authority.

H.E. Mr. Theodoros Skylakakis
Minister of Environment and Energy
of the Hellenic Republic
17 Amaliados str.
115 23 Athens
Greece

Copy to:

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The Republic of Bulgaria will participate in the EIA procedure in a transboundary context, in accordance with Article 3(3) of the Convention for the above mentioned project, as an affected party in a transboundary context.

After reviewing the information provided, we make the following recommendations and comments on the project:

1. With regard to protected species of birds included in Annex No. 3 of the Biodiversity Act:

*It was found that when zooming in on the published map (Chap. 9 - Pg. 23 of "New insight into spatial ecology of Griffon Vulture (*Gyps fulvus*) on the Balkans provides opportunity for focusing conservation actions for a threatened social scavenger", Peshev et al. 2021), the project area of the wind farm falls within the range of the Griffon Vulture (*Gyps fulvus*) territory during spring and summer migration. In spite of the observations of the experts who prepared the report on the irregular passage of Griffon Vultures through the area, the above-mentioned data confirm the presence of overlap between the area planned for the construction of the wind farm and the area used by vultures.*

The map published in the EIA report (Chap. 4 - Pg. 15) shows other licensed RES in Greek according to the EIA report on the map there are other licensed RER on the Greek territory within a radius of 10 km radius of the project (Source: RAEEY Geoinformation Map - 14.03.2024). Taking into account the information provided by the Regional Inspectorate for Environment and Water (RIEW)-Haskovo on studies for the construction of wind energy parks on the Bulgarian territory (Krumovgrad municipality) in the vicinity of the proceeding project, we consider that the likelihood of cumulative impacts and the occurrence of a barrier effect is significant, especially for migratory bird species and those foraging over long distances.

In view of the above, we expect the experts who prepared the EIA report to supplement the information in it with analysis of the possible negative impact of the construction and especially during the operation of the wind farm on birds, as well as with an assessment of the degree of impact of the cumulative effect (including barrier effect) of the specific investment proposal with other plans, programs, projects and investment proposals, including on Bulgarian territory.

The nearest protected area is BG0001032 "Eastern Rhodopes" for the conservation of natural habitats and wild flora and fauna, and the extent of the impact of the project on bats, as the only subject of conservation affected by the project has been assessed objectively in the documentation submitted by the Greek party.

In terms of protected areas for the conservation of wild birds, the closest to the project site is BG0002019 "Byala Reka", located approximately 11 km to the east in the Eastern Rhodope



region. According to published publicly available information, the Bulgarian part of the Eastern Rhodopes, including the mentioned protected area is an important part of the range of the colony of the Black Vulture colony nesting in the Greek National Park "Dadia", carrying out foraging migration (with the highest intensity in the period March-September). According to the results published by the Bulgarian Society for the Protection of Birds from the satellite tracking (<https://bspb.org/%D1%81%D0%B0%D1.%82%D0%B5%D0%BB%D0%B8%D1%82%D0%BD%D0%BE-%D0%BF%D1%80%D0%BE%D1%81%D0%BB%D0%B5%D0%B4%D1%8F%D0%B2%D0.%B0%D0%BD%D0%B5/>) of vultures nesting in Greece, the birds fly long distances in a northerly direction, with the trajectory overlapping with a protected area BG0002019 "White River", where the Black and Griffon Vultures are subject to conservation. On the other hand, the above mentioned coincidence of the Griffon Vulture territory with that of the investment proposal implies the likelihood of impact on the species (especially mortality). The fact that these vultures and some birds of prey fly considerable distances during migrations is a reason to require an impact assessment during operation without and with mitigation measures.

2. With respect to human health:

2.1. The EIA report should include a dedicated section analysing the potential for transboundary impacts, including health aspects and measures to prevent and mitigate them. The EIA report and the specialised section within it should elaborate on these issues in detail and address them in the following aspects for the affected settlements, zones and areas in Bulgaria:

2.2.1. Complete, comprehensive and well-illustrated information on the location and exact distances from the nearest settlements and other sites subject to health protection to all sites, potential sources of nuisance included in the investment proposal.

2.2.2. The current status of the various environmental and living environment factors and components in the area (ambient air, surface and groundwater, soils, noise, ionising and non-ionising radiation, etc.).

2.2.3. Identification of the risk factors for harm to the health of people from the environment and living environment during the construction, subsequent operation and decommissioning phases of all sites and facilities related to the investment proposal.

2.2.4. Detailed and comprehensive information on the extent of the expected adverse impact on individual components and factors of the environment and living environment components and factors, paying particular attention to:

- the expected noise pollution by making appropriate calculations of the expected noise levels from the operation of the facilities at the boundary of the development or residential area of the nearest settlements;



- the anticipated impact of non-ionising radiation (harmful action on electric fields and magnetic fields (MP));

- the anticipated impact of the so-called "Light Effects";

- an analysis of ambient air quality, taking into account the location of the nearest settlements in the area of the investment proposal and an assessment of the expected emissions of pollutants in a transboundary context - the potential impact, in a transboundary context, on surface water, groundwater and soil in the area due to the construction and operation of the facilities.

2.2.5. Identification of new risk factors and pollutants, if any, expected from the implementation of the investment proposal.

2.2.6. Identification of the potentially affected population and territories, areas and/or sites subject to health protection, depending on the spatial scope of the impacts on the environment and living environment.

2.2.7. Estimated assessment of the extent of the expected reduction of pollution of the environment and living environment by individual types of pollutants, if any, as resulting from the implementation of the investment proposal.

2.2.8. Characterisation of individual risk factors in terms of their impact on human health and their comparison with the current hygiene standards and requirements for the affected residential areas. Identification of the most significant risk factors for the affected population.

2.2.9. Assessment of the potential for combined, complex, cumulative and remote impact of the risk factors on the adversely affected population, taking into account the activity of other production sites and wind energy parks, including those on the territory of the Republic of Bulgaria.

2.2.10. Carrying out risk assessment of harm to human health and proposing health protection and risk management measures.

The EIA Report should be accompanied by a Technical Design and a Summary Technical Report for the project. The Non-Technical Summary of the EIA Report should be supplemented by presenting the transboundary impacts reflected and assessed in the EIA Report. The Executive Summary of the EIA Report should contain information on the potential risk factors and an assessment of the possible adverse effect of their impact on the quality of the individual components of the environment and living environment and human health, taking into account the scope of the envisaged construction, operation and maintenance activities.



Both the EIA report, including the specialised section on transboundary impacts, the technical design and the technical summary report and the non-technical summary shall be translated into Bulgaria. After completion of the documentation, it should be submitted for comments.

Please accept, Dear Mr. Minister my highest regards and readiness for successful future cooperation.

Sincerely yours,

Petar Dimitrov
Minister of Environment and Water

A large, stylized handwritten signature in blue ink is written over the printed name of Petar Dimitrov. The signature is a cursive representation of the name, with a large 'P' and 'D'.