

REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

04-00-949 -49
28. Dec 2025, Sofia

Subject: Updated information on the Environmental Impact Assessment Report in a transboundary context for the project "Construction of a waste to energy plant at the cadastral parcels 1420/1, 1420/4, 1491/1, 1541/1, 1541/2, 1552, 5824/1, 6513/1, 6513/2 on the cadastral map of the town of Prahovo, municipality of Negotin and construction by phases of a non-hazardous waste landfill Elixir Prahovo at the cadastral parcels 2300/1, 1491/1 and 1541/1 - Prahovo, municipality of Negotin", in accordance with the Convention on Environmental Impact Assessment in a transboundary context (ESPOO)

DEAR MINISTER VUJOVIC,

I hereby acknowledge the receipt of letter Reg. № 000886163 2024/20.12.2024, dated 14 January 2025, from the Embassy of the Republic of Serbia, received by note verbale Reg. № 100-14/2025. The letter is accompanied by additional information on the Environmental Impact Assessment Report for the project "Construction of a waste to energy plant at the cadastral parcels 1420/1, 1420/4, 1491/1, 1541/1, 1541/2, 1552, 5824/1, 6513/1, 6513/2 on the cadastral map of the town of Prahovo, municipality of Negotin and construction by phases of a non-hazardous waste landfill Elixir Prahovo at the cadastral parcels 2300/1, 1491/1 and 1541/1 - Prahovo, municipality of Negotin".

After the consideration of the documentation and on the basis of the opinions submitted by the interested and competent authorities, I hereby express the following standpoint:

H. E. Irena Vujovic
Minister for the Environment Protection of Serbia
22-26, Nemanjina Str.
Belgrade, Serbia



Sofia 1000, 22 Maria-Luisa Blvd



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

Regarding the „waste" factor:

The additional documentation contains the information requested by letter No 04-00-949-36/15.11.2024 of the Ministry of Environment and Water of the Republic of Bulgaria. There is a table with the type of waste by codes and quantities, on an annual basis, that will be generated during construction, as well as information on the quantities of waste that will be treated in the incineration plant and that will be generated after incineration.

On pages 7 and 8 of the letter from the Ministry of Environmental Protection of the Republic of Serbia, explanations are provided in relation to the implementation of Article 50(3) and (4) of Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control).

On the basis of the above, we have no comments on the Waste factor.

Regarding the component „water":

The submitted additional information indicates that the request for access to surface water quality monitoring has been considered and will be implemented in conjunction with the proposed monitoring plan in the EIA. As an addendum to the submitted EIA study, recent water quality measurements have been submitted. The modelling results show that the levels of pollutants are below the permissible values, which means that emergency situations at the waste treatment plant will not lead to pollution of the Danube River even in the worst case scenario.

Regarding the „ambient air" component:

The supplemented documentation does not contain data on the results of the modelling of emissions of heavy metals - Cd+Tl and Sb+As+Pb+Cr+Co+Cu+Mn+Ni+V.

Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe (recast), (the Directive) was adopted in 2024. For the following heavy metals - arsenic, cadmium, nickel, lead - the Directive sets target values for the protection of human health to be achieved by 11 December 2026 and limit values to be achieved by 1 January 2030.

In view of this, the operator should carry out modelling of the expected impact on ambient air quality on the territory of the Republic of Bulgaria when operating the installation, showing

that these air quality limit values for the heavy metals will be met. These data need to be reflected in the revised EIA report.

Regarding human health:

The attached supplementary information addresses in detail the issues regarding the comments expressed in letter No. 04-00-949-36/15.11.2024 of the Ministry of Environment and Water of the Republic of Bulgaria. With regard to the condition "A special section should be prepared in the report which, based on the other sections in the EIA Report, analyses the potential for transboundary impacts on human health, and measures to prevent and mitigate them", it is indicated that a special section will be prepared and applied in the EIA study as a summary of the analysed potential transboundary impacts on human health and measures to prevent and mitigate them.

In view of the above, following the preparation and submission of the above mentioned section to the EIA Report, the Ministry of Environment and Water of the Republic of Bulgaria will express its final opinion after coordination of the information with the Ministry of Health of the Republic of Bulgaria.

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

Yours sincerely,

Manol Genov
Minister of Environment and Water