



REPUBLIC OF BULGARIA
Minister of Environment and Water

0800-19
02.10.2015, Sofia

Subject: *Investment proposal for "Construction of a Phosphogypsum Storage" with proponent "ELIXIR PRAHOVO" LTD*

Dear Minister,

In connection with your letter № 353-02-00515/2015-16 dated 23.07.2015 by which you notify us about the published Environmental Impact Assessment (EIA) Report concerning the above-mentioned investment proposal, we present to you our standpoint based on the consultations with the competent Bulgarian institutions:

The Danube River is the main receiver of wastewaters from the industrial site of "ELIXIR PRAHOVO" LTD and the leachate from the existing phosphogypsum storage. Its protection from pollution is regulated by the International Commission for the Protection of the Danube River. The Republic of Bulgaria and the Republic of Serbia are parties to the Danube River Protection Convention, according to which they are obliged to take all measures to protect and restore the water quality of the Danube River.

The Danube River has transboundary significance and is also of high importance for the Republic of Bulgaria since it is used for transportation, aggregate extraction, fishing, irrigation, recreation and tourism as well as in cases of high water levels for the zones for protection of the waters of islands and Danube lowlands, drinking water supplies from groundwaters in the lowlands and other factors related to the activities of the planned investment proposal. With regard to the above-mentioned, we suggest that the competent Serbian authorities take into account the following conditions when making a decision:

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- To provide measures to reduce the spread of sediments, turbidity and the pollution reaching the Danube River during the construction process of the facility;
- To implement proper organizational measures during the construction activities in order to prevent possible pollution of the Danube River;
- To provide as early as possible information about accidents that might cause significant impacts within the Danube Basin with regard to floods, water pollution and the relevant negative impact on the flora and fauna, hydro morphology and sediments. The Republic of Serbia should thoroughly and in due time notify the Republic of Bulgaria in case of an accident, so that the necessary safety and protective measures could be taken in order to prevent the negative environmental impact and the possible risk for the health of the population on the territory of the Republic of Bulgaria;
- To create and support a particular section at the Elixir Prahovo Ltd website, which should contain information regarding the results from the monitoring on the surface waters and ground waters in the region of the industrial complex.

Pursuant to Article 6 of the Convention on Environmental Impact Assessment in a Transboundary Context, we expect you to provide us with the issued Decision regarding the investment proposal "Construction of a Phosphogypsum Storage" of "ELIXIR PRAHOVO" LTD.

Let me take this opportunity to express once again my highest consideration and willingness for a fruitful cooperation.

Yours sincerely,

*Ivelina Vasileva
Minister of Environment and Water*