

REPUBLIC OF BULGARIA
MINISTRY OF ENVIRONMENT AND WATER

04-00-622

05 March 2024, Sofia

Subject: *Submission of Environmental impact assessment Study of the Wind Power Plant Project with total power 130,2 MW located in the area of „AETOKORFI" with accompanying infrastructure (road construction, external medium voltage 33kV network for the electrical interconnection to the grid) in the Municipal Unit of Trigono of the Municipality Orestiada, of the Regional Unit of Evros, Hellenic Republic, translated in Bulgarian*

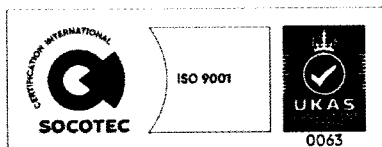
Dear Mr. Minister,

Hereby, I would like to acknowledge the receipt of letter Ref. No. YPEN/DIPA/14236/937 dated 08.02.2024 from the Ministry of Environment and Energy of the Hellenic Republic regarding the above mentioned project, transmitted to us through the Embassy of the Hellenic Republic in Bulgaria.

H.E. Mr. Theodoros Skylakakis
Minister of Environment and Energy
17 Amaliados str.
115 23 Athens
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Copy to:

Mr. Alexandros Koulidis
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We would like to express our appreciation for having responded to our request and provided us (via link) with the Environmental impact assessment Study of the Wind Power Plant Project with total power 130,2 MW located in the area of „AETOKORFI" with accompanying infrastructure (road construction, external medium voltage 33kV network for the electrical interconnection to the grid) in the Municipal Unit of Trigono, of the Municipality Orestiada, of the Regional Unit of Evros, the Hellenic Republic, translated in Bulgarian language.

At the same time, upon review of the EIA Study and its annexes, it was found that the translation of the report is unofficial, and in some places it is missing (e.g. translation of the map legends is missing), which makes it difficult to understand the content of the document. The most significant problem that prevents our pronouncement is the absence of Appendix_VII: Special Ecological Assessment Study, sent to us in 2023 only in Greek.

The project for the construction of 21 wind generators with ancillary infrastructure envisages the majority of the wind turbines to be placed along the border between the two countries, which is also the border of two protected areas -BG 0001032 "Rhodope-Iztochni" for the protection of natural habitats and the habitats of species and BG0002106 "Ivaylovgrad Reservoir" for the protection of wild birds, announced respectively by Order No. RD-267/31.03.2021 (promulgation, 43/2021) and Order No. RD- 845/17.11.2009 of the Minister of Environment and Water (promulgated, SG No. 12/2009), as well as at a distance of about 12 km from the protected area for the protection of wild birds BG 0002014 "Madzharovo", announced by Order No. 787/29.10.2008 of the Minister of Environment and Water (promulgated, SG 105/2008), part of the ecological network Natura 2000 in Bulgaria.

The subject of conservation in the protected areas are extremely sensitive species of birds and mammals, which may move to the project area and, as a result, suffer negative, even harmful, impacts - destruction of specimens and increase in mortality, loss of food and/or or hunting habitats and in suitable resting and hiding places, limiting their natural distribution range due to migration barrier effect and ultimately reducing/ceasing the reproductive capacity of their population.

The above applies to species such as Egyptian vulture, Golden eagle, Griffon vulture, Little eagle, White-tailed sea eagle, Peregrine falcon, as well as large migratory bird species (e.g. both species of storks), and bats (Great horseshoe bat, Great night bat, Long-eared night bat), registered near the planned wind farm according to the available data on the distribution of

sensitive species (Report under Article 12 of the Habitats Directive for the period 2013-2018, project "Mapping and determination of the nature conservation status of natural habitats and species according to an approved list and minimizing the risks for wild birds within the project "Mapping and determination of the Nature conservation status of natural habitats and species - phase I").

The above applies in full force also to other conservation-significant, rare and endangered species of the Bulgarian ornithological and bat fauna. Regarding bats, it should be considered that the construction of wind farms, in addition to collisions and barotrauma, also leads to displacement and loss of roosting places and habitats, loss of flyover corridors, disturbance, change in temperature and humidity of the environment, a significant change in the concentration of a food resource as insects are attracted to light, etc., and this results in bats congregating, putting them at risk.

According to the Guidance document on wind energy developments and EU nature legislation, in order to ensure the protection of biodiversity when building wind energy infrastructure it is good practice to "collect data within at least one to three years from the assessment, with the time period for baseline data collection to be determined on a case-by-case basis, taking into account the general paucity of existing data, the full annual life cycle of the species, and existing knowledge of interannual variation (e.g. where the migration of the species may be affected by weather conditions).

*Evident from the maps in the documentation, during the monitoring carried out by the Greek experts, for species such as *Aquila chrysaetos* (Rocky eagle), *Ciconia ciconia* (White stork), *Clanga pomarina* (Small crested eagle), *Ciconia nigra* (Black stork), *Buteo buteo* (Common buzzard), *Circaetus gallicus* (Serpent eagle), *Aquila (Hieraetus) pennata* (Small eagle) it was found flying over from Bulgaria in the direction of the Wind Power Plant.*

We would like to remind you that by our letter No. 04-00-622/04.10.2023, we have requested the submission of all EIA documentation in Bulgarian, including an assessment of the degree of impact on protected areas precisely in connection with the necessity for an in-depth analysis of the presented information, verification of the conclusions in the Environmental Impact Assessment Study, review and analysis of the depth of the research done on the probable degree of impact on the Bulgarian protected areas and the subject of protection in them, including on species with a high nature conservation value, as well as the extent to which good practices have been observed.

At the moment, in the absence of a Bulgarian translation of the Appendix_VII: Special Ecological Assessment Study, it is not impossible to understand the impact of the wind farm project on the Bulgarian protected areas of the Natura 2000 network and the need for Bulgaria to participate in the EIA procedure in a transboundary context.

Also, from the information presented in the EIA Report and the map material, it is not possible to identify the settlements on Bulgarian territory that could be affected by the project. For example, with regard to noise: the EIA report indicates that the nearest locality that could potentially be affected by wind turbine noise is village Huhla, Ivaylovgrad Municipality. We would appreciate the provision of a list of settlements on Bulgarian territory that have been considered as potential sites of transboundary impact.

We would like to assure you that we understand the need for a quick decision by the Greek authorities regarding the project, but without having access to Appendix_VII: Special Ecological Assessment Study it is not possible for us to reach a decision on the EIA procedure in a transboundary context for the Wind Power Plant Project.

In view of the above, please, as soon as possible, provide us with a Bulgarian translation of Appendix_VII: Special Ecological Assessment Study.

Please accept, dear Mr. Minister, the assurance of my highest consideration and readiness for successful cooperation.

Yours sincerely,

Julian Popov
Minister of Environment and Water