



УКРАЇНА  
МІНІСТЕРСТВО ОХОРОНИ НАВКОЛИШНЬОГО ПРИРОДНОГО  
СЕРЕДОВИЩА УКРАЇНИ

03035, м. Київ-35, вул. Урицького, 35  
тел. : ( 044 ) 248-49-33; факс : ( 044 ) 206-31-07

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На № \_\_\_\_\_ від \_\_\_\_\_

Kyiv, 25 June 2009

Dear Mr. Sauer,

First of all I would like to thank you for the constructive cooperation with Ukraine and in particular with the Ministry of Environmental Protection of Ukraine.

Ministry appreciates steps taken by the Committee to identify projects of the Moldovan Party as to their in compliance with the provisions of the Espoo Convention.

The issues raised will enable the Committee to analyze the transboundary impact of activities in the Danube Delta, considering not only the Ukrainian Party activity, but also the activity of the Moldovan Party.

Ukraine submits the information (see the attached files) with reference to your letter dated April 7, 2009 № Ref.EIA/INFO/3 concerning furnishing the Secretariat of the Espoo Convention with the information about Giurgiulesti Port in the Republic of Moldova close to the borders with Ukraine and Romania.

Moreover, Ukraine would like to assure that it would, in case of necessity, transmit all the relevant materials; Ukraine is willing to answer any questions of the Committee and will provide the explanations on the procedures.

H.E.Mr. Matthias Sauer,  
Chair, Implementation Committee,  
Convention on Environmental Impact Assessment  
in a Transboundary Context  
Federal Ministry for the Environment,  
Nature Conservation & Nuclear Safety  
Alexandr str. 3, D-10178 Berlin, Germany

I would like to avail myself of this opportunity to renew to you the assurance of my highest consideration.

**Attachment:**

1. Regarding the actions that take place in Giurgiulesti International Free Port \_\_\_pages
2. Regarding the transboundary EIA procedures and the relevant report on them \_\_\_pages
3. Regarding the environmental consequences of construction in the area of Giurgiulesti International Free Port \_\_\_pages

**Sincerely,**

**Deputy Minister**

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line and a small flourish.

**D.Gursky**

## **Regarding the actions that take place in Giurgiulesti International Free Port**

### ***Historical information on the activities at the port***

In 1994, the Republic of Moldova Government (RM) adopted the Resolution № 495 “On the construction of oil terminal on the Danube river”, and in 1995, the resolution “About the concession contract on the construction and operation of the oil terminal in the village Giurgiulesti” was signed by Government and approved by the Republic of Moldova Parliament. The capacity of the terminal was 2.1 million tons oil products per year, including 1.5 million tons of light oil and 0.6 million tons of fuel oil.

Joint Moldovan-Greek Company JSC «TERMINAL» was created in order to implement this project. In 1994 «Serroserving» and «TRITON» (Greece) produced techno-economic study of the 2.1 million tons petroleum products per year capacity oil terminal, based on which the company «FREDERIC R. HARRIS »(Netherlands), with the participation of« KPMG KLINVER SA MANAGEMENT + CONSALTANTS (Netherlands) and SA «IPTANA» (Romania) on the task of the European Bank for Reconstruction and Development and financing «TASIS», in 1995 developed the economic and financial analysis of sea-river terminal products.

In 1996, companies JSC «CEPROSERVING», «TRITON» (Greece) with the technical consultants from «TECHNOVAX» LTD (Greece) produced the technical project.

Oil terminal construction began in 1997, and in 2000 the terminal was built at 60% completion, but the project was suspended due to the lack of funding. Since the entry into force in 2001 of the Treaty between Ukraine and Moldova “On the state border”, Moldova has expanded terminal building in the plot, which, according to the said Treaty, went to the RM.

In December 2004 the Government of the Republic of Moldova and the Azeri company LLC «Azpetrol», LLC «Azertrans» and «Azpetrol Refinery» signed the agreement pursuant to which assets of an unfinished oil terminal moved to the property holding company «AZERTRANS». The company was committed to finish the construction of the oil terminal in 30-months period and build 50 petrol stations, and over 7 years to build a refinery, cargo and passenger port terminals.

According to this the Republic of Moldova law «On international free port Giurgiulesti» was adopted in 2005. This port includes the following items:

Oil terminal;

Cargo and passenger terminals;

Refinery.

The construction of the terminal was activated after the sale of oil companies that were involved in this project to the Dutch company in late June 2006.

Given the mentioned above, the adjustments were made to the project of oil terminal in 2006. The general plan was changed as well.

### ***Current state of activities at the port.***

#### **Port general description:**

Port was put into operation on 26 October 2006. The port received its first tanker in September 2007. It covers the territory of 35-40 acres (120 hectares in the future). The port has three terminals: the oil, cargo and passenger; plant for production of bioethanol (according to the project had to be refinery), and maintenance of the port infrastructure.

#### **Oil terminal:**

Oil terminal ,introduced to the exploitation in 2007, has already received 7 thousand tons of oil products. Oil terminal is able to receive ships with the water tonnage capacity of up to 10 thousand tons (berth depth - 7 meters), the object is connected by the system of pipes with the reservoir tanks and auto filling station. It is possible to overload three kinds of petroleum products simultaneously. In storage tanks located at a distance of 300 m from shore of the Danube River, at an altitude of 22 m eight tanks are located, total capacity of up to 63.6 thousand cubic meters.

Maximum handling capacity of oil terminal is 2 million tons per year, and output terminals for the storage of petroleum products are 60 thousand tons. Unloading oil terminal capacity is over 1000 cubic meters per hour for gasoline and diesel fuel and 750 cubic meters for fuel oil.

#### ***Cargo terminal:***

Construction of cargo terminal continues today, but it is already in the final stages of completion. The estimated completion term is mid-2009 or 2010. After the completion the port will consist of 800-meter berthing wall, one oil and four cargo berths. Oil and a cargo berths are located on the Danube River and can receive ships up to 120 meters long. Other cargo berths will be located on the Prut River allowing barges to take the draft at 3.5 meters. Cargo turnover capacity of the terminal estimates 500 thousand tons per year;

#### ***Passenger Terminal:***

Passenger terminal was put into operation together with the first pier (can moor vessels up to 120 meters) and the opening line of passenger traffic Giurgiulesti – Istanbul in March 2009. According to the project calculations, passenger flow through the Port will be 10 thousand people per year, and major passenger transport routes will present the tours on the Danube River, the transportation of passengers to the ports of Romania, Bulgaria and Ukraine. While oil and cargo port complex is under the control of private bodies, the passenger terminal is of public ownership;

#### **Production of bio-ethanol (according to the project had to be Refinery)**

Preliminary plans were to build the refinery. In June 2007 the Government of Moldova has decided to build the plant for bio-ethanol production instead of the refinery that was approved in International Free Port Giurgiulesti project. Currently, construction has already begun and should be completed by 2012.

#### **Storage of grain (elevator) (The project had to be in the cargo terminal):**

For the grain handling through the grain terminal the facilities with the capacity of 45 thousand tons per year and warehouse area of 2000 sq.m. were

constructed. Construction of the grain terminal in the cargo terminal is almost completed, and it was to begin its work in late May 2009.

### **Other items to be built in the port and around the port.**

In early 2007 the "Kahul-Giurgiulesti" railway was approved and built with the aim of the infrastructure development around the port and increasing its investment attractiveness. The facility was built and put into operation in July 2008. This railroad connected port network of the Danube River with the net of national railways.

Total area of land that was approved for the construction of the branch, is 223 hectares, the amount of land was about 2.2 million m<sup>3</sup>. When laying the railroad numerous fishing farm dams on the Prut River were used.

Intensity of passages after putting into operation of the railroad estimates 6-7 trains per day. In the future, this number may increase to 15-20 trains per day due to the number of patrol increasing, better blocking, etc.

Long term plans of the port complex development were produced along with the implementation of the above projects. In particular, the construction of additional freight terminals is planned at the Prut River. The Prut River is to be reconstructed as the navigation route till Kantemyr city. Today the interest in building a terminal for handling coal was already expressed.

Simultaneously, there are plans of the hotels construction, and the surrounding villages infrastructure development. In 2007, along with the railroad Kahul-Giurgiulesti, it was decided to build the highway along the railroad, but due to the lack of funds operation of the project was terminated.

Other plans for infrastructure development are related to the construction of a small airport and industrial park.

By 2010, the Moldavian Party plans to complete construction of the terminal for general cargo. It is anticipated that this will be three-module transportation infrastructure, which will consist of three berths (grain terminal, container terminal and the terminal for general cargo), auto and rail traffic. Storage facilities, fixed cranes and specialized equipment for loading, unloading grain, containers, general cargo are also being built.

## **Regarding the transboundary EIA procedures and the relevant report on them**

### **Procedures regarding the transboundary EIA for the oil terminal and the relevant info about them.**

#### ***Memo:***

In 1994, the Republic of Moldova Government (RM) adopted the Resolution № 495 “On the construction of oil terminal on the Danube river”, and in 1995, the resolution “About the concession contract on the construction and operation of the oil terminal in the village Giurgiulesti” was signed by Government and approved by the Parliament of Republic of Moldova. The capacity of the terminal was 2.1 million tons of oil products per year, including 1.5 million tons of light oil and 0.6 million tons of fuel oil.

Oil terminal construction began in 1997, and in 2000 the terminal was built at 60% completion, but the project was suspended due to the lack of funding. Since the entry into force in 2001 of the Treaty between Ukraine and Moldova “On the state border”, Moldova had expanded terminal building in the plot, which, according to the said Treaty, went to the RM.

The construction of the terminal was activated after the sale of oil companies that were involved in this project to the Dutch company in late June 2006.

Given the mentioned above in 2006, the adjustments were made to the project of oil terminal. The general plan was changed as well.

The Republic of Moldova ratified the Espoo Convention on the 04.01.1994. The Ukraine has ratified the Espoo Convention on the 19.03.1999.

### **Specific procedural steps on transboundary EIA for the oil terminal project and the relevant info about them**

After the initiation of the further oil terminal construction by Moldavian party, the Ukrainian side has repeatedly drawn attention of Kishinev to the need for findings of the examination of possible oil terminal construction project environmental impacts on the environment in a transboundary context, according to the requirements of Espoo Convention.

Ukrainian side has motivated its position by the fact that the activity mentioned above is listed in the Appendix I of the Convention, particularly in paragraph 16, also the terminal had to operate within the port, which also falls under paragraph 9 of the Appendix.

The Ukrainian side had also taken note of paragraph 3 of Article 2 of the Convention that provides the following: The Party of origin shall ensure that in accordance with the provisions of this Convention an environmental impact assessment is undertaken prior to a decision to authorize or undertake a proposed activity listed in Appendix I that is likely to cause a significant adverse transboundary impact.

According to the Article 1 «Definition», the term "planned activity" is understood as any activity or any significant change in one or another activity that

requires a decision by the competent authority according to the national procedures used.

As noted above, in 2006 the Moldavian party made technical adjustments to the oil terminal project. The general plan was changed as well.

Therefore the significant change of activity took place, ie in the construction of oil terminal.

In addition, paragraph 6 pg.2 Convention stipulates Party of origin in accordance with the provisions of the Convention to give the public in the areas which are likely to be affected, the opportunity to participate in appropriate procedures to evaluate the impact of planned activities on the environment and ensure that this opportunity provided the public affected parties, was equivalent to the opportunity provided by the public sides origin.

From the mentioned above, the following conclusion could be made: Moldavian party was obliged to initiate the procedure provided for in art. 3-7 of the Convention before the construction, in particular before the decision on sanctioning of the required activity was made or providing the competent authorities have permitted the construction of the port in the Giurgiulesti area.

Moldavian side did not initiate the procedures outlined above, and construction of oil terminal begun, therefore it was decided to authorize or implement planned activities in contravention of article 2 of the Convention and international obligations stipulated art. 3-7 Convention were not fulfilled.

Moldavian side tried to initiate the procedure under the Article 4 of the Convention, while maintaining the construction of that terminal.

In June 2006 materials on EIA from the 16 May 1996 were finally transferred to the Ukrainian side. These materials did not contain information of the transboundary nature and did not consider aspects of the construction and exploitation of oil terminal possible impact in Ukraine. Relevant remarks about EIA were delivered to the Moldavian party in July 2006.

It is necessary to stress that EIA, sent to the Ukrainian side, did not meet the requirements of the Article 4 and Appendix II of the Convention.

Moldavian side sent a response to the comments in September 2006. These responses did not contain specific explanations, instead they included reference to the fact that the suggestions of the parties will be taken into account during the development of the new EIA for the «International free port Giurgiulesti» project.

In October 2006 the Ukrainian side requested additional information from multiple points. But until now the answer to this appeal has not been reported.

### **Procedures concerning transboundary project on EIA International free port Giurgiulesti and the info about them.**

In 2005, the Republic of Moldova adopted the law «About the international free port Giurgiulesti» (hereinafter the Port). This port should include the following items:

- Oil terminal;

- Freight and passenger terminals;

Refinery.

According to this law in 2006 Moldavian side began the construction of the cargo and passenger terminal, as well as continued construction of oil terminal under the project «International free port Giurgiulesti» (hereinafter - the Port) in the contradiction with the provisions of Espoo Convention (hereinafter - the Convention).

The Ukrainian position is motivated by the following. Paragraph 3 of Article 2 of the Convention provides the following: The Party of origin shall ensure that in accordance with the provisions of this Convention an environmental impact assessment is undertaken prior to a decision to authorize or undertake a proposed activity listed in Appendix I that is likely to cause a significant adverse transboundary impact.

The construction of the Port is listed in the paragraph 9 and 16 of the appendix I of the Espoo Convention.

In addition, paragraph 6 article 2 of the Convention stipulates Party of origin in accordance with the provisions of the Convention to give the public in the areas which are likely to be affected, the opportunity to participate in appropriate procedures to evaluate the impact of planned activities on the environment and ensure that this opportunity provided the public affected parties, was equivalent to the opportunity provided by the public sides origin.

From the mentioned above, the following conclusion could be reached: Moldavian party was obliged to initiate the procedure provided for in art. 3-7 of the Convention before the construction, in particular before the decision on sanctioning of the required activity was made or providing the competent authorities have permitted the construction of the port in the Giurgiulesti area.

Moldavian side did not initiate the procedures outlined above, and construction of oil terminal begun, therefore it was decided to authorize or implement planned activities in contravention of article 2 of the Convention and international obligations stipulated art. 3-7 Convention were not fulfilled.

Moldavian side did not suspend the construction of the Port and in August 2006 sent the Notification about the planned activities of the International free port in the Giurgiulesti, therefore the Moldavian side made the attempt to initiate the procedure under the Convention.

The Notification included the following kinds of activities:

Oil terminal;

Cargo and passenger terminals;

Refinery.

In August of that year the Ukrainian side agreed to participate in the EIA procedure according to the requirements of the Convention.

Along with this it is necessary to pay attention to the fact that the Notification sent by the Moldavian side did not meet the requirements of the Convention art. 3, since no such information was included:

- information on planned activities, including any available information on its possible transboundary impact;
- information about the nature of the possible solutions.

Thus, despite the absence of findings by Ukrainian experts as for the impact of construction on the environment and the safety of ships in the area, in early 2007 Kishinev officially began operation of oil terminal.

In October 2007 EIA of cargo and passenger terminal was transferred to Ukrainian side. In the EIA no information on the oil terminal and (as it was already constructed) and oil refinery was mentioned. The Ukrainian side stressed that the listed materials were provided by Moldova pass the deadline and after repeated inquiries by Ukraine.

Also it is necessary to stress that the EIA documentation of cargo and passenger terminal of International Free Port Giurgiulesti, sent to the Ukrainian side does not meet the requirements of the Article 4 and Appendix II Convention.

According to the article 4 of the Convention environmental impact assessment documentation to be submitted to the competent authority of the Party of origin shall contain, as a minimum, the information described in Appendix II.

The mentioned above documentation did not contain anything listed in Appendix II but instead EIA by the Moldavian side was merely the hydrological research of River Prut and Danube.

We would like to provide some additional information on the construction of the cargo terminal. The construction is continued up to date, but it is already in the final stages of completion. Estimated completion time is mid 2009 or early 2010.

Passenger terminal is put into exploitation in March with delivery of the first berth.

As for the refinery, It should be pointed out that preliminary plan was to build port refinery. In June 2007 the Moldovan Government decided to build a plant for the production of bioethanol instead of refinery that was included in the International Free Port Giurgiulesti project. Currently, construction has already begun and should be completed by 2012. No procedure provided by the Convention on construction plant for the production of bioethanol was initiated.

#### **Storage of grain (elevator) (The project had to be in the cargo terminal).**

No procedure provided by the Convention on the construction of grain storage (elevator) was not launched, though under the Notification on the project «International Free Port Giurgiulesti» Moldovan side has provided the consent for the beginning of the procedure of the project EIA.

Construction of the grain terminal in the cargo terminal is virtually complete, and the expected date of the introduction to the exploitation is the May 2009.

According to the mentioned above the construction of bioethanol production plant and storage of grain (elevator) of the International Free Port Giurgiulesti was conducted in contravention and is not in accordance with the provisions of Espoo Convention.

#### **Transboundary EIA procedures for railway root project Cahul-Giurgiulesti and the relevant info.**

In early 2007 the railway root Cahul-Giurgiulesti was approved and the construction was initiated with the aim of development of infrastructure around the port and increasing its investment attractiveness. Construction of the said railway root

was held in the contradiction and not in accordance with the provisions of Espoo Convention.

The Ukrainian position is motivated by the following. Paragraph 3 of Article 2 of the Convention provides the following: The Party of origin shall ensure that in accordance with the provisions of this Convention an environmental impact assessment is undertaken prior to a decision to authorize or undertake a proposed activity listed in Appendix I that is likely to cause a significant adverse transboundary impact.

The construction of the railway root is listed in the Espoo Convention paragraph 7 of the Appendix I. Moldavian side did not initiate the procedures outlined above, and construction of the railway root begun, therefore it was decided to authorize or implement planned activities in contravention of article 2 of the Convention and international obligations stipulated art. 3-7 Convention were not fulfilled.

The construction was completed and introduced into exploitation in July 2008. The railway line mentioned above connects the port on the Danube River with the net of the national railroads.

## **Regarding the environmental consequences of construction in the area of Giurgiulesti International Free Port**

### **Oil terminal**

According to the Moldovan Party's statement, pollution caused by the terminal was significantly minimized due to the 3 mm thick membrane under layer of soil, with the help of which all waste water will be directed to cleaning stations. However, according to experts' estimates, this membrane is only one kind of standard safety measures at construction sites of this type. It does not provide any guarantees in emergency situations.

Given the considerable velocity of the Danube in the area of construction, the experts expressed doubts about possibility of conducting effective emergency operations. In this context, the absence of coastal bucket, 15 m sunk in the bank (stipulated by the project), adversely affects the safety of navigation in the area.

Analysis of possible environmental impacts of the project demonstrates that building the oil terminal is a potential danger to the environment taking into consideration the following circumstances:

- absence of the locked port harbor makes impossible rapid location of emergency oil spills. Given the volume of oil to be transshipped through the Terminal in Giurgiulesti, in case of a serious accident Ukraine will suffer significant economic and environmental losses;
- not meeting standards for the gaps between dock walls on one bank (not less than 300 m), and also between the location of ships raid and port facilities (not less than 5 km), worsens navigation conditions, and therefore can lead to ships accidents and spill of hazardous products. Oil pier is in dangerous proximity to the shipping channel, which also increases the risk of accidents;
- location of facilities at 5 km distance upstream from the port of Reni, where transshipping of flammable cargoes (coal, coke, petroleum products, etc.) takes place, that in case of oil spill or catching fire will worsen significantly the environmental situation;
- location of facilities in close proximity to the Ukrainian drinking, fishery and irrigation water supply points, used by settlements of the Danube region;
- in case of emergency situations, emission of hydrocarbons may increase in several hundred times in comparison with maximum permissible level, as well as emission of oil combustion products, causing pollution of air and fishery basins, as the Danube riverside is the place of industrial fish spawning and its forage base;
- increased seismic activity of the region, and the inability to resist the seasonal floods. Thus, the area of the unfinished terminal was flooded not once when water level reached the 6 meters mark. In this regard, it is not possible to predict the consequences of a situation when flood emergency coincides with oil spill at the terminal.

As a result of the Terminal exploitation (transshipping, cleaning of equipment and oil tankers, ballast water dumping etc.) some oil will get into environment and directly into the Danube.

The scale of pollution will depend on level of the Terminal engineering support, availability and quality of treatment facilities, compliance with operational standards. It should be noted that the technology inherent in the project, according to experts, does not ensure the high level of waste waters cleansing. As a result, the Danube will be polluted with water in which the oil products concentration reaches 8-12 mg/liter (normal - 0.05 mg/liter).

### **“Kahul-Giurgiulesti” railway**

Total area of land that used for construction of the railway branch estimated 223 hectares, the amount of earthworks - approximately 2.2 million m<sup>3</sup>. When laying the railroad numerous fishing farm dams on the Prut River were used.

Intensity of passages after putting into operation of the railroad estimates 6-7 trains per day. In the future, this number may increase to 15-20 trains per day due to the number of patrol increasing, better blocking, etc.

It should be noted that still the activity of Moldovan and Romanian environmental protection organizations can be observed, which do not stop speaking against this construction. Thus, according to environmentalists, during the railway construction no studies of its impact on the environment were conducted; this may lead to environmental disaster. Environmentalists also stress that the “Kahul – Giurgiulesti” railway runs through the Prut River flood plains – the natural reserve "Lower Prut Flood Plains". Experts note that the impacts of ecology were completely ignored; bird colonies and fish spawning places suffer the most significant damage.

In addition, local authorities and citizens express their concern for a number of issues associated with the operation of the railroad. The particular concern is expressed about the illegal sand quarrying, from which soil for construction of the railway embankment was transported. The necessity of extensive technical and environmental assessment of the project is also stressed because of possible danger of some villages located on hill slope flooding. Moreover, there exists a possibility of the Prut water break through the sand bulk dam. The railway embankment construction project doesn't envisage building gateways for diversion of waste rain water, so there is a threat of periodic flooding of Bryndza and Veleny villages. According to local authorities, in connection with threats of flooding, the railway will operate irregularly.

The flood in Moldova in summer 2008 confirms the abovementioned problem, due to the flood many sectors of the embankment were blurred, which led to urgent repairs of the recently opened railway.

## **The situation around the construction of the oil refinery**

The refinery construction is to be completed by 2012. But the final decision on its specialization (petroleum or bio-ethanol) should be taken jointly by the main investor and the Government of the Republic of Moldova in the second half of this year.

**Memo:** bio-ethanol (vegetable oil with sugar cane, corn, wheat or sugar beet) and biodiesel (vegetable oil from rape or from sunflower) are the kinds of bio-fuel, used as admixture to diesel fuel and gasoline. The process of ethanol production, in contrast to the production of biodiesel, has no consequences for the ecology. Production of biodiesel is conducted with methanol - a strong poison that can penetrate the human body by inhalation of air saturated with its vapors, through the skin, with hand washing and wetting of clothing. When used directly the deadly dose of methanol is 5-10 g. Thus, the production of biodiesel is dangerous for the ecology of Reni region in case of such plant construction in the area of Giurgiulesti.

According to data that requires additional review, Moldova intends to build terminal for storage of liquefied gas in the area of the Giurgiulesti Port. The start of specified compressor stations construction in order to meet the needs of the mentioned terminal may prove that information.

## **Passenger Terminal**

The construction and operation of the passenger port envisages conducting of significant scales of sand mining on the Prut River. According to experts, much of it goes downstream to the territory of Ukraine. As a result, artificial islands will appear between the Sulina Arm (Romania) and the Snake Island thus threatening navigation.

## **Grain Terminal**

According to information received, construction of grain terminal is at the final stage. However, its previously announced putting into operation in late May this year was postponed to a later date due to lack of time that takes to build a pier near the grain terminal.

In this regard, the management of companies which invest in construction of the grain terminal, decided to build a temporary pier below the platform (near the confluence of the Prut River in the town) for a future permanent structure.

With this purpose the area below grain warehouses port is being cleared. This envisages dredging on the Prut River, both during the construction and operation of the terminal, to maintain the navigation depth (8 m), which according to experts' estimations have negative impact on the level of the Danube fairway silting in the area of fuel terminal, and may also cause the destruction of spawning areas and forage lands for various kinds of fish and, consequently, the deterioration of their natural recovery.

Given the above, local experts believe that the construction and subsequent operation of the Giurgiulesti Port and other facilities impose potential threats for ecosystem of Ukraine's Danube regions, especially in terms of ecological security:

- usage of industrial and drinking water in the cities of Reni, Izmail, Kiliya, Vilkovovo;
- usage of water for agriculture (including cultivation of rice) and fish farms;
- usage of natural resources (tourism, recreation, fish and water) of the lakes Kahul, Kartal, Kuhurluy, Yalpuh, Saf'yan, Katlabuh and Kytai;
- existence of Nature Protection Fund objects: regional landscape park «Izmail Islands», the Danube Biosphere Reserve, Wetlands of International Importance «Lake Kuhurluy» and «Lake Kartal»;
- ecosystems of the Danube Delta and the north-western part of the Black Sea in general.

In addition, experts conclude that during the design and subsequent construction of listed facilities in the Giurgiulesti area the Moldovan Party breaches provisions of the following international instruments:

Convention «On the environmental impact assessment in a transboundary context» (Espoo Convention);

Belgrade Convention «On the regime of navigation on the Danube» 1948;

Convention on access to information, public participation in decision-making and Access to Justice in matters relating to the environment "(Aarhus Convention).

Agreement between the Governments of Ukraine and Moldova «On joint use and protection of border waters» of 24 November 1994;

Protocol on cooperation in the field of architecture, construction and housing between the State Committee of Architecture and Housing Policy of Ukraine and the Ministry of Development, construction and municipal economy of the Republic of Moldova of 23.09.1999 City;

«Memorandum of Understanding between the GUAM member states to facilitate trade and transport»;

Framework Agreement on the institutional foundations of the creation of interstate transportation of oil and gas» dated 12.01.2000.