Subject: Important Emergency Report of Balkanka association  
From: Dimiter Koumanov <dkoumanov@abv.bg>  
Date: 02.05.2019, 11:08  
To: r.dilova@government.bg, ms.priemna@goverment.bg, cabinet.minister@moew.government.bg, anikolova@moew.government.bg, kzhivkov@moew.government.bg, press@moew.government.bg, ivelina.vasileva@parliament.bg, S.Ivanov@parliament.bg, itodorova@moew.government.bg, dunavbg@bddr.bg, bd.plovdiv@abv.bg, bdvarna@bsbd.org, bdblg@wabd.bg, m.kalugerov@moew.government.bg, kbramcheva@moew.government.bg, rosip@moew.government.bg, mbabukchieva@moew.government.bg, KOSV@parliament.bg, edno_gishe@moew.government.bg

WITH OFFICIAL PURPOSE

Dear Sir/Madam,

As the person in charge of the ecological matters in the Balkanka association, I would like to inform you about the following:

When implementing the Association program for saving the Bulgarian rivers and the people from the deadly impact of the HPPs, the mines and the other disasters and agencies in our country, in relation to the commitment to help the structures of the Ministry of Environment and Water and the Water Basin Directorate and with the mission of the association to improve the awareness of all state authorities and to perfect the administrative capacity of the Ministry of Environment and Water for dealing with the problems of the environment and water and avoiding new penal procedures from the EC, as well as to prevent the penal procedure from the Executive Committee of the Convention of ESPOO,

I hereby urgently present to your attention the news that the Grot mine (previous Blagodat) in the brotherly Serbia wants to expand its production of lead, zinc and other precious metals. I want to remind you that this mine is situated in the Besna Kobila mountain above Bosilegrad and its sewage water firstly flows into the Ljubatska river that actually forms the Dragovištica river together with the Božička river. In Gorna Ljubata the poison flows into the Lisinsko lake, but if the waters are high, they go to the Dragovištica river too.
And so – the Serbian Ministry of Environment and Water will approve the Environmental Impact Assessment so that the Grot mine can be expanded. You can find the Environmental Impact Assessment on the following link:


I hereby present a part of the message for the public discussions:

An overview of updated environmental impact assessment training can be done at the offices of the ministry in New Belgrade, 1 Omladinski Brigadi Str., room No. 428, every work day from 11 AM to 2 PM within 20 days of the announcement of this message; in the offices of the city administration of Vranja, 1 King Milan Str. and in the offices of the municipality administration of Bosilegrad, 82 Georgi Dimitrov Str.

An overview of the updated environmental impact assessment training can also be found on the official site of the ministry.

Remarks and opinions on the environmental impact assessment training can be made in writing and submitted to the Department of Environmental Protection, 1 Omladinski Brigadi Str., Novi Belgrad.

On 15.05.2019 from 1 PM a public discussion and presentation of the training will be held in the offices of the City Administration in Vranja, 1 King Milan Str.

The above means that the report is available in the Serbian Ministry of Environment and Water and a public discussion will be held on 15.05.2019 in Vranja.

After we reviewed the Environmental Impact Assessment Report, we did not find any mentions of the cross-border impact, etc.

This is why, if we have in mind our warmer relationship with the Serbian Ministry of Environment and Water, maybe it will be a good idea to send a short notification within the work group for tackling the cross-border environmental problems, but it has to be amicable.

We also hope that a representative of our Ministry of Environment and Water will participate in the public discussion in Vranja. We will also be there as a potential members of the bilateral working group for future partnership with our Serbian brothers.
By the way, I want to highlight that this is not a case of pilot expansion and there is no gratis period of two years for anything, so do not think of anything similar.

Maybe it is time to set constructive condition to our Serbian brothers within the negotiation process for entering the EU?

And maybe a suspension of the pre-accession funds of the brotherly Serbia will have a positive impact on strengthening our cooperative relationship?

And, by the way, the authorities in Serbia are working hard for the two golden mines of Medgold in Bosilegrad, if our Serbian brothers haven’t inform you yet, because they do not want to disturb you…

We hope that you will take the correct measures on time, unless you find that it is better to wait a little more…

Kind regards,

Dimiter Koumanov
Chief adviser of Environment
Balkanka association, city of Sofia