

“Balkanka” Association, Sofia, Bulgaria

“Nature has all the time in the world, we do not”.

NOTIFICATION

Ref. No 02 / 21.09.2026

to

**THE EUROPEAN COMMISSION and to THE IMPLEMENTATION
COMMITTEE OF THE ESPOO CONVENTION
CONCERNING FAILURE TO COMPLY WITH EU and UN LAW**



WWII Ship wreck in Serbia Photo credit: Bulgaria ON AIR



Mammoth bones emerging from bottom of the Danube Photo credit: Mediapool

Representative for this Notification:



dipl.eng. Dimitar Koumanov,
Member of the board

Sofia, Bulgaria
21.09.2026

INTRODUCTION

Referring to the long and exhausting communication with the Commission on environmental matters in general and on the Danube River collapse in particular, first and foremost we would like to express our deepest gratitude and highest appreciation for the efforts of the Commission aiming at better implementation of the EU legal framework concerning biodiversity and water protection.

We were so glad to hear the annual speech of commissioner Ursula von der Leyen, especially the part dedicated to draught this year and to the problems emerging from the bottom of dried European rivers, including the Danube River.

What we didn't hear anything about are the reasons why it happened and what exactly should be done to avoid such future disasters step by step.

We also didn't hear anything about the arrogant demeanor of some of the EU member states along the River disregarding both the relevant EU directives and the Espoo Convention on EIA in transboundary context, together with SEA Protocol to the Convention in the same context, which is unacceptable to say the least.

As you may know, **Romania** has blasted some rocks to divert more water to the Cherna voda NPP in a Natura 2000 site, and together with **Hungary** the same Romania has sunken several barges to lift the water level for the same purpose in Natura 2000 again, blocking the downriver sediment transport as an additional "benefit".

At the same time in the Bulgarian section of the River the water level has dropped down to its historical all time record, which has led to drying of the irrigation wells and to huge problems with our drinking groundwater sources located in the terraces of the River, while we were watching videos of the hydro units in **Austria** and **Serbia** full of water to the top...

The pictures on the front page show just one of many World War II ship wrecks emerging on the surface in Serbia, and in Bulgaria even mammoth remains emerged too. This is a clear sign the River has never reached such low levels since the prehistoric times, otherwise the mammoth bones would have been discovered much earlier, somewhere in the previous centuries.

And in this critical period nearly all the EU member states have forgotten what is written down in the EU EIA and SEA Directives, not to speak about the Habitats Directive and the WFD, let alone the Espoo Convention and its SEA protocol. It was a Test for the applicability of these documents that failed to a total collapse, and they are meant to be followed exactly under such critical circumstances, aren't they? Because nobody will even notice and make fuss if someone is stealing water from the River when it's full of water to the top, but if the same thing happens in an almost dried river, the affected parties like Bulgaria suffer and it hurts a lot! And at the same time **Romania and Serbia** have signed a new agreement to build yet another hydro unit on the Danube - Djerdap III...

Now, this Notification is addressed to the highest levels of the EU and of the Espoo Convention to take the necessary steps for the perpetrators to be punished in such a way that they will never think of doing the same thing ever again!

The idea for this action of ours came when a journalist from Politico got in contact, asking us to comment the Danube River Catastrophe in August 2026. The article can be found here:

<https://www.politico.eu/article/the-danube-is-drying-up-europe-still-has-no-plan/>

And the answers we have given - being politically incorrect - were Not published with a very few exceptions. This media practice may be normal in the EU /surprise, surprise/, but it is not acceptable to us, therefore in the following document we will share the full text of the questions asked and the answers given, because we believe it is the easiest way to prove our point for the reasons of the Danube River Catastrophe this year.

I. IDENTITY AND CONTACT DETAILS

1. Name:

“Balkanka” Association, Sofia, Bulgaria

2. Sector / field of activity and location(s) where active:

"Balkanka" Association is a non-profit, non-governmental organization, registered in Bulgaria for action in public benefit, on 07 August 2013, company file 203/2013 of the Sofia City Court, UIC 176566443. The main objectives of “Balkanka” are protection and conservation of river biodiversity, with a focus on conservation and restoration of indigenous Balkan brown trout /*Salmo trutta*/ populations in Bulgarian rivers.

3. ADDRESS OR REGISTERED OFFICE

3.1. Surname and forename of complainant:

Ivan Pandukov, Chairman of the board

3.2. Where appropriate, represented by:

Dipl.eng. Dimiter Koumanov, member of the board

3.3. Nationality:

Bulgarian

3.4. Address:

Petko Todorov blvd, bl.8, en.D, app.87

3.5. Town: Sofia

3.6. Post code: 1408

3.7. Country: Bulgaria

3.8. Mobile telephone:

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3.8. E-mail: dkoumanov@abv.bg

4. Correspondence from the Commission can be sent to the representing person.

5. Member State or public bodies alleged not to have complied with Community law:

The Bulgarian Ministry of Environment and Waters (MOEW) which remains silent as usual, the EU member states Austria, Hungary, Romania and the non EU member Serbia, together with the European Commission itself, each and every one of them being a party to the Espoo Convention.

II. DESCRIPTION OF THE INFRINGEMENT OF UNION LAW and the of the Espoo Convention

As we said in the introduction, for your convenience the information in this document will be presented in the form of questions asked by POLITICO and the answers given by us. The questions are in **italic red** and the answers are in black. We hope that the information will be useful to the EU executives to understand WHY the good old Europe is mostly affected by the climate change effects and that it is not only due to climate change, but to many other human actions taken in Europe in the past.

Have a nice time reading:

1. How serious are the current low water levels on the Danube from an environmental perspective, and what impacts are you seeing or expecting in Bulgaria?

These days the lower Danube River has reached its historical, all time low level record in the Bulgarian section of the River. I was raised by the River in the town of Lom and for the last 60 years I have never seen the River so low.

Many World War II ship wrecks emerged on the surface in Serbia, and in Bulgaria even mammoth remains emerged too. This is a clear sign that the River has never reached such low levels since the prehistoric times, otherwise the mammoth bones would have been discovered much earlier, somewhere in the previous centuries.

In the Bulgarian section **the wells of the local people used for irrigation have dried down to the bottom**. This is a serious problem, because people irrigate their gardens from these wells. So far problems with the groundwater drinking water sources have been registered for the town of Svishtov and the levels in the drinking water sources for the town of Ruse have dropped down, but the best is yet to come.

The low water level in the Danube River is having an immense negative impact on the biodiversity connected to the water and the river. A lot of species - like invertebrates, benthos etc have died on the dried riverbanks and this way the food base for the other species has dropped down as well. When the water returns back to its normal level, the already dead organisms will start to rotten causing additional problems and pollution.

Dead fish has not been found yet, but the fish population in the River has reached the verge of extinction in the previous decades anyway. **The reasons are** the pollution in the *Cloaca Maxima* of Europe, the constant dredging of the bottom substrate to secure the navigation, the Hydro Units - Djerdap 1 & Djerdap 2 in the Romanian - Serbian section, the straightening of the tributaries, which are blocked with numerous barrages, and so on, and so on.

At the moment fishing is dead everywhere in the Bulgarian section of the river. The river has a lot of algae, it has become like a swamp with little oxygen if any. The situation is critical.

Another problem is that the wetlands and spill lands along the Danube dried up very early this year, and they play an extremely important role as reservoirs for the reproduction of a number of species of amphibians, fish and other organisms for which these Danube wetlands are important habitat.

Furthermore, due to the constant dredging, the natural bottom substrate, which serves as a natural filter hindering the polluted waters in the River from reaching the groundwater

sources has been removed. Imagine that during low water periods like the one we suffer today, when the concentration of pollution is the highest and that filter is gone?

And there is this crazy EU Project called FAST DANUBE for further deepening of the fairway, which will cause irreparable damage to the bottom substrate and to the water quality of the drinking water sources in Bulgaria! With this project the EU is trying to "modernize" the River, instead of modernizing the fleet, while the youngest barge in the River is 70 years old, rusty and heavy as hell, waiting to sink by itself!

And there were several cases in the past when some mines in **Hungary, Romania and Serbia** have dumped their poisonous mining waste from the tailings ponds directly into the River or its tributaries, falsely imitating accidents. Can you imagine what will happen to the Bulgarian groundwater sources if the same thing happens now and the natural bottom filter on the riverbed has been removed?

And even at the moment Serbia is dumping all its mining waste from the huge mining area close to the town of Bor into the tributaries of the completely poisoned transboundary Timok River which flows into the Danube without any purification whatsoever...

2. Do the current conditions expose weaknesses in Bulgaria's approach to river-basin management and drought preparedness?

Currently Bulgaria is just a victim, rather than an actor in the TOTAL COLLAPSE of all the EU beautiful directives and of the Espoo Convention as well!

In Breach of the EU legal framework and the Convention Romania has blasted some big rocks and has sunken four barges in their section to redirect more water from the River to the Cherna Voda NPP, Hungary has sunken several barges to lift the level and to hold more water for their Paks NPP, blocking the sediment downriver transportation, Romania and Serbia have signed an agreement for yet another Hydro unit Djerdap III - to block more water and more sediments...

And this all is happening in a River full of Natura 2000 sites, announced both under the Habitats and Bird Directives, WITHOUT any SEA, EIA, AA etc under the relevant EU directives, and without any coordination under the Protocol for SEA in transboundary context under the Espoo Convention whatsoever and without an EIA for each individual project in the same context!

Furthermore - during such low water periods, water abstraction from the River and ALL its tributaries should have been stopped for any purposes, other than the drinking water supply!

Not only to provide the falsely called in the EU "ecological" flow, which has nothing to do with ecology, but reduce the concentration of pollutants and to provide fresh water for drinking purposes. In the meantime Germany is diverting water from the Danube to the Rhine River, the hydro technical lakes in Austria, Serbia etc. are staying full of water to the top, and we in Bulgaria are suffering severe water problems, including drinking water shortage.

All the other Danube countries are doing everything they wish, and we in Bulgaria are paying the Price, because our drinking water problems will only grow in the next weeks!

By the way, we would have also taken water for irrigation BUT our systems were destroyed and the pipes and pumps were stolen in the usual corruption scheme of the first cabinet with prime minister at the time Boiko Borisov - somewhere around 2010.

And the stupid things they did in Romania allowed their Nuke to work only 10 additional days with only one reactor? What happened to the connected EU power grid, with the power exchange, the shared capacities etc.?

TOTAL Collapse of all EU policies down to the bottom of the Danube.

But most importantly:

Together with the dramatic use and transfer of the Danube River's waters and with the immense logging in its catchment area, the Big Cause for the current Catastrophe lies in the straightening of the tributaries, which is why in the spring the water from the Danube's catchment area flows like crazy into the Black sea! When you have a river with its natural meanders, it is several times longer than a straight river.

The longer river collects and holds MUCH more water, which flows MUCH slower through the meanders, feeds groundwater and wetlands, reduces the risk of flooding, and this way the tributaries supply the big River with water for much longer time!

When all the tributaries are straightened, the water flows like crazy through the riverbeds at higher speed, the Danube rises for a short time, and then flows into the Black Sea in No Time!

Apart from the above, when there are no meanders and wetlands, there is nowhere for the water to evaporate from during the summer heat and to fall back somewhere closer, cooling the surrounding area,

AND

it evaporates almost ONLY over the sea, from where we get the long Droughts and the short-term torrential Cataclysms and Floods!

And now we blame the Climate Change for the Crises...

Is it the climate or is it our fault?

The Climate is the Consequence of the Stupidity and Greed of the Hydro Mafia in the EU! Period.

But this is not a weakness, born only in Bulgaria...

3. What concrete measures should Bulgaria prioritize to make the Danube and surrounding wetlands and ecosystems more resilient to prolonged drought and low-water levels?

We in Bulgaria can do nothing at the moment, but to declare war to the other Danube countries /joking or not - it's up to you to tell/.

Long term measures may include reduced pollution, returning the tributaries to their original watersheds and many other measures, for which there is no room here to be described.

These measures are applicable not only for Bulgaria, but for all the other countries in Europe and for all their other rivers, of course.

Otherwise the Problem in Europe will only grow in the future.

I would wish to say that the main measure is to follow the EU legal framework by the book and make it more stringent aiming at better protection of the natural water resources, but I also know that this is Utopia for the moment.

Some day the wooden heads in the EU will learn the Lesson and I hope that then it will not be too late.

One thing we in Bulgaria can do is to abandon the FAST DANUBE project right away, but the good old EU will punish us for the rebellion, cutting all the EU funds for us.

4. Do you believe the Water Framework Directive and the EU Water Resilience Strategy provide a sufficiently strong framework for addressing these pressures, or is stronger implementation and coordination between Danube countries needed?

The EU Water Framework Directive and the other relevant EU Directives are a good instrument all right, but they are not followed anywhere in Europe and even by DG ENV of the Commission. The Danube River collapse is a clear proof for that.

In the meantime the Danube Commission and ICPDR also ceased to exist.

It is a complete Catastrophe and you are asking me about stronger implementation and coordination? Please ask Ursula von der Leyen, not me. By the way, she is German, you know...

5. Would reopening or weakening the Water Framework Directive risk undermining efforts to improve drought resilience at a time when rivers such as the Danube are under increasing stress?

As I said - not only the WFD, but the entire EU legal framework dealing with Nature and Water protection should become much more stringent and should be followed by the book by all EU Member states, otherwise Europe will pay an unimaginable Price.

The Danube River is teaching us a Lesson today!

.....
end of Q&A

CONCLUSION:

From what has happened in the entire Danube River catchment area this year it becomes clear that none of the Danube states, including Bulgaria, is following the relevant EU directives and UN conventions, including the Danube River Protection Convention. Each country is breaching every rule possible only to its national interest, not taking into account the devastating impact on the River and on all the other Danube states in every possible meaning of the word. It is a Catastrophe of which Bulgaria is suffering the most. Measures should be taken immediately and in such a way, that no one will ever think of doing the same to the River in the future!

REQUEST to commissioner von der Leyen:

Dear Ursula,

Hereby we strongly urge you to force the Commission to directly take Germany, Austria, Hungary and Romania to the European Court for irreparable Breach of the EU Directives we mentioned above. Hungary and Romania must be forced to remove all artificial facilities they have installed or sunken in the River right away and until they do that they should pay large penalties proportional to the damage caused! There still is the Polluter Should Pay principle in the EU, in case you have forgotten!

Not after several years of legal proceedings, but right away! And of course, all negotiations for the accession of Serbia in the EU should be cancelled immediately. Otherwise you may throw the useless EU Rule of Law principle directly in the Trash!

REQUEST to the Implementation Committee of the Espoo Convention:

Dear friends,

Hereby we strongly urge you to take all necessary steps against the perpetrators of the Convention - Hungary, Serbia and Romania. These countries have clearly proven that the Convention means less than nothing to them therefore they should be thrown out and directly erased from the list of parties to the Convention. Otherwise you may also throw the useless Thing you call UN Convention in the Trash.

Thank you all for your kind understanding and cooperation.

"Nature has all the time in the world, we do not".

Place, date and signature of representative:

Representative for this notification:



/dipl.eng. Dimitar Koumanov/
Member of the board

Sofia, Bulgaria
21.09.2026