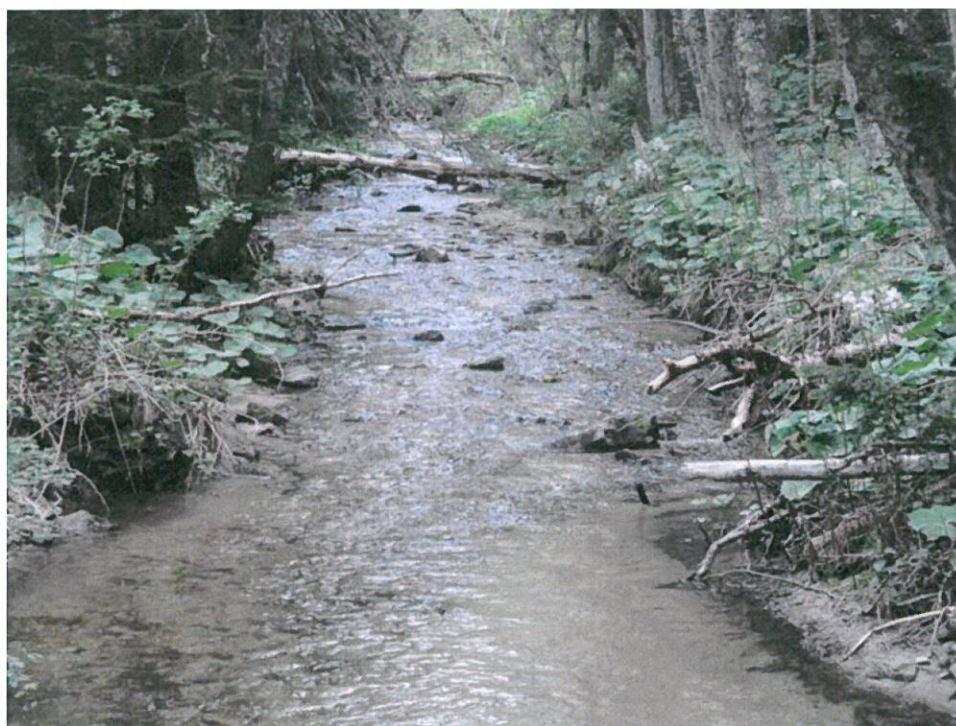


“Balkanka” Association, Sofia, Bulgaria
“Nature has all the time in the world, we do not”.

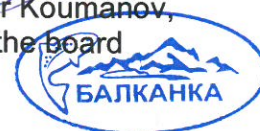
COMPLAINT
TO
THE COMMISSION OF THE EUROPEAN COMMUNITIES
CONCERNING FAILURE TO COMPLY WITH COMMUNITY LAW

APPENDIX 5-A



Representative for this complaint:

dipl.eng. Dimitar Koumanov,
Member of the board



Sofia, Bulgaria
09.05.2018

INTRODUCTION

Regarding the Complaint to the Commission of the European Communities, lodged by Balkanka Association, Sofia, Bulgaria on **30.06.2015**, followed by **7 /seven/** consecutive appendixes - No1 to No7, transferred to **EU Pilot application under reference EUP(2017)9183**, the following document contains new information concerning the legal viability of the **Yadenitsa dam** case directly arising from recent decision of the European Court (Second Chamber) in Case C-97/17 Commission against Bulgaria.

Appendix 5-A is a special edition again - dedicated only to the Yadenitsa dam case in the light of the above decision of the European Court which, we hope, will be taken into consideration in regards to any further development and possible co-financing of the Yadenitsa project by the European Union. The reason is that the dam is located entirely within the boundaries of the Rila Bufer Habitats Directive site and is very close to the Rila Bufer Birds Directive site /some 2.5 kilometers away/ and the dam implications on these sites' conservation objectives has not been assessed at all during the EIA/AA procedure, while the expected adverse impacts on the Rila Bufer Sites are huge.

Anyone who reads this document, please note that you need to have read the **Appendixes №3, 5 and 6** to the original Complaint first - DG Environment case file ID number **CHAP(2015)02363**, to get a clear view on the whole picture concerning the future Yadenitsa dam construction. The documents can be found in the following links:

Appendix 3, see section I.

https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_3_DRAFT4.pdf

Appendix 5

https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_5_DRAFT2.pdf

Appendix 6, see section A. and B.

https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_6_DRAFT3.pdf

However, as far as the EU is about to co-finance the Yadenitsa dam, located close to a Natura 2000 Birds directive site, for the delayed announcement of which DG Environment has filed a law suit against Bulgaria and just won the case, it is apparent that there is a strong possibility for the European Commission that one hand /INEA/ doesn't know what does the other. We, therefore, hope that the EU financial institutions will find out that they are going to co-finance a totally illegal dam, which is in breach of EU environmental legislation and will cancel the EU funding thereupon.

We also hope that this particular appendix will be studied together with Appendix No5 to the original complaint because it holds additional information about the Yadenitsa dam project that was not included in Appendix No5.

Acknowledgements

We dedicate the following document to all the BG scientists, experts and environmental NGO members involved in the proposed Rila Bufer sites for their efforts throughout the last decade or more. We also need to express our deep gratitude to DG Environment for the efforts, standing up to protect endangered habitats and species in Europe and finally we need to thank the European Court of Justice for the right decision, just wondering what took you guys so long?

We would also like to encourage the European Commission to open an infringement procedure and file a law suit against Bulgaria for not announcing the Rila Bufer Habitats directive site as it hosts priority habitat types and priority species entitled to special protection under the EU Habitats directive that are not of lesser importance for the biodiversity in Europe than the endangered bird species.

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ACRONYMS

MOEW	- Ministry Of Environment and Waters of Bulgaria
RIEW	- Regional Inspectorate/s of Environment and Waters
RBD	- River Basin Directorate/s
NEK	- National Electric Company
BDDR	- Basin Directorate Danube Region
EARBD	- East Aegean River Basin Directorate
WARBD	- West Aegean River Basin Directorate
BDBSR	- Basin Directorate Black Sea Region
SAC	- Supreme Administrative Court
WA	- Water Act
FA Act	- Fishing and Aquaculture Act
EIA	- Environmental Impact Assessment
AA	- Appropriate Assessment
RBMP	- River Basin Management Plan
HPP	- Hydropower Plant
WWTS	- Wastewater Treatment Station
IP	- Investment Plan

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:

+359 887 931 241

3.8. E-mail: dkoumanov@abv.bg

4. Correspondence from the Commission can be sent to the complainant

5. Member State or public body alleged by the complainant not to have complied with Community law:

The Bulgarian Ministry of Environment and Waters (MOEW).

II. DESCRIPTION OF THE SUSPECTED INFRINGEMENT OF UNION LAW

A. Judgment of the European Court of Justice in Case C-97/17

It is a case of the European Commission against Bulgaria in which the member state, by not announcing the entire Important Bird Area ('IBA') covering the Rila Mountains (Bulgaria) ('IBA Rila') as a Special Protection Area ('SPA'), has failed to fulfill member state obligations under Article 258 TFEU, namely the classification as SPAs of the most suitable territories in number and size for the conservation of the bird species listed in Annex I to Directive 2009/147.

On 26 April 2018 the European Court of justice ruled the following:

On those grounds, the Court (Second Chamber) hereby:

- 1. Declares that, by failing to include the entire Important Bird Area covering the Rila Mountains as a Special Protection Area, the Republic of Bulgaria did not classify as SPAs the most suitable territories in number and size for the conservation of the species listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on wild birds, so that that Member State failed to fulfil its obligations under Article 4(1) of that directive.**
- 2. Orders the Republic of Bulgaria to pay the costs.**

Here is the link to the Court decision:

<http://curia.europa.eu/juris/document/document.jsf?text=&docid=201489&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=817703>

Now we have to express our deep gratitude to DG Environment for the efforts. As we have already proven in all our previous complaints, in Bulgaria all the EU environmental & water protection directives are thoroughly and deliberately disregarded. We will also express our hope that, based on our complaints concerning the illegal hydropower development in Bulgaria, an infringement procedure on the issues raised in our complaints will start very soon and we will allow ourselves to encourage and kindly invite DG Environment to open an infringement procedure against Bulgaria for not announcing the Rila Bufer Habitats directive site on the grounds that Bulgaria has not achieved sufficient coverage of the Natura 2000 Network - see also the following section B.

B. The Rila Bufer Birds and Habitats directives sites

We should say at first that two parts of the entire Rila Mountain in Bulgaria are announced as protected territories - The Rila National park and the Rilski Manastir Natural park. Both these territories are also announced and designated Natura 2000 Habitats and Birds directive sites under the same names:

Rila [BG0000495](#) Habitats Directive site

Rila [BG0000495](#) Birds Directive site

The Rila habitats and birds directives sites were proposed by the Rila National Park management and Birdlife Bulgaria respectively.

Rilski manastir [BG0000496](#) Habitats Directive site

Rilski manastir [BG0000496](#) Birds Directive site

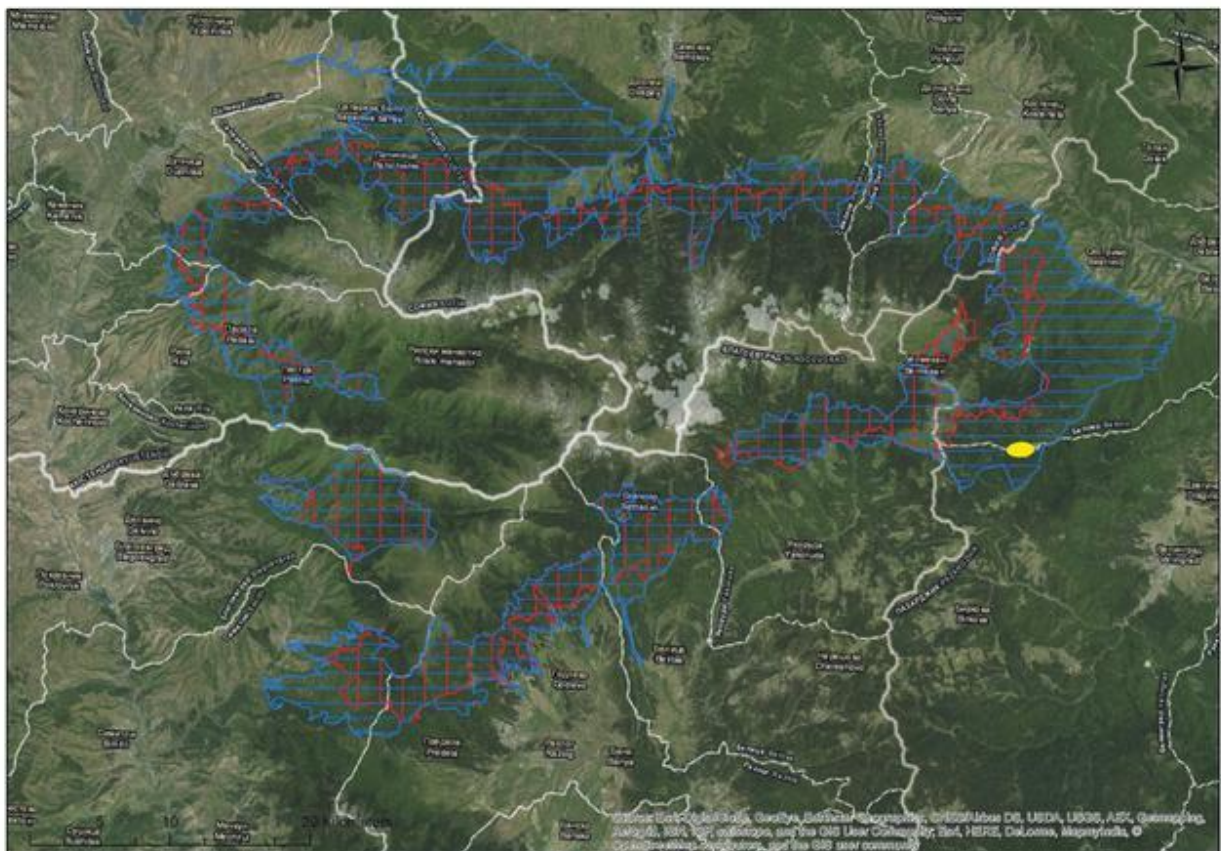
The Rilski manastir sites were proposed by the Natural Park management, together with the Institute of Biodiversity and Ecosystem Research **/IBER/** at the Bulgarian Academy of Sciences **/BAS/**.

The above Natura 2000 sites cover the Rila National park and the Rilsky manastir Natural park boundaries almost exactly. Yet the entire Rila Mountain is far from covered and there are many mountain territories so rich of life, including priority natural habitat types and hosting priority species or endangered birds that still remain without any environmental protection in breach of the relevant EU legal framework.

These remaining territories were proposed to be specified Natura 2000 Habitats and Birds directives sited by IBER - BAS and Birdlife Bulgaria respectively under the same name "**Rila Bufer**" long time ago. The proposal was revised by the National Biodiversity Council, but the announcement of the sites was postponed several times - for the last time in 2016. The reason is that there are too many illegal investment plans that will destroy these sites' conservation values and there is a huge amount of corruption involved. Thus several small hydropower plants were already built or are under construction at the moment, on rivers that host priority habitat types and priority species. The same goes for the future Yadenitsa dam which will flood priority habitat type 91E0 /displayed on the front page/ and will destroy the Stone Crayfish /*Austropotamobius torrentium*/ population in the Yadenitsa River for good, not to mention the devastating impact on the wolves and especially on the bear population in the area.

All this was done deliberately by MOEW, under the reign of several previous ministers, but especially by the special encouragement of the current minister Neno Dimov, with the poor idea that when biodiversity destruction becomes fact, there will be nothing to protect there anymore, hence there will be no need to designate these sites at all. The guy simply disapproves the mere existence of the EU Natura 2000 Network and that's it, thus the existence of critically endangered species is a problem which, according to MOEW, can easily be solved by their extinction.

Here is the map of the Rila Bufer Habitats & Birds directives sites as proposed by IBER-BAS and Birdlife Bulgaria:



The exact location of the Yadenitsa dam is marked with a yellow ellipse on the map. The border lines of the Habitats directive site are in blue and the border lines of the

Birds directive site are in red. To be enlarged and studied in detail the map can be downloaded from the following link:

https://dams.reki.bg/uploads/Docs/Files/RILA_BUFER.jpg

It is obvious that the Rila Bufer sites surround the Rila National Park and the Rilski manastir Natural Park almost completely. The Yadenitsa dam is 2.5 kilometers away from the nearest border of the Birds directive site, but the exit of the tunnel to the Chaira dam is right at the border of the site. And for the construction of the tunnel a huge amount of blast is also expected to be detonated.

C. Directly arising new infringement of Union law

From the decision of the European Court of Justice in Case C-97/17 it becomes clear that the boundaries of the **Rila Bufer** Birds directive site are specified and the bird species listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on wild birds are pretty well known and their presence in the territory concerned is undisputable. Then, this site is now entitled to protection immediately from the date of the court decision. Actually, it should have been set under protection immediately after the proposal of Birdlife Bulgaria - see the rulings of the court in section D.

Yet the implications of the Yadenitsa dam & tunnel project on the Rila Bufer Birds directive site's conservation objectives have never been studied in the AA report for the poor project. Such a study was not even ordered by the "competent" MOEW in the terms of reference for the AA report. One of the major issues pointed out in our objection conveyed to MOEW during the public consultations was based on this particular issue, but it was overruled by minister Neno Dimov again.

Thus, by not studying the dam & tunnel adverse impacts and by not proposing relevant mitigation, protection and/or compensatory measures in the AA report, EU law was breached again. And the impact will be huge not only on the bird population, but especially for the birds it will really be devastating during the construction phase. The reason is that the dam will have a rockfill type of wall, with a volume of **2.5 million cubic meters** and acc. to the EIA and AA reports the rockfill material for the dam wall will be provided by the blasted out of the tunnel rocks (only 0.27 million cubic meters) and the rest **2.23 million** cubic meters will be provided by detonating a huge amount of blast in the surrounding valley and the rocky slopes surrounding the footprint of the dam. Construction will take some 5-6 years at the very least to get complete and not a single living creature will survive to stay around and to enjoy the noise, the vibrations and the dust. And the implications on the Rila Bufer Birds directive site were not even assessed neither were any kind of measures discussed and proposed in the AA report at all.

On the other hand, the impact of the Yadenitsa project on the Rila Bufer Habitats directive site was not studied and assessed either, neither were any kind of measures proposed, never mind that the exact location of the dam falls entirely within the boundaries of the Habitats directive site Rila Bufer, which hosts priority habitat types and priority species. This site was proposed by IBER-BAS, must have been announced long time ago, but now it has to be specified in the nearest future.

Actually by refusing to announce the Rila Bufer Habitats directive site and thus providing insufficient coverage of the Natura 2000 Network thereon, MOEW has breached the EU law again.

Therefore, in the light of the rulings of the European Court of Justice on similar cases /see the next section D./ we find that, by the approval of the Yadenitsa dam & tunnel EIA and AA reports, without taking into consideration the adverse impacts on both Natura 2000 Rila Bufer sites, MOEW has failed to enforce the EU environmental legislation.

And the poor dam & tunnel can possibly be co-financed by the EU INEA?
And the discussed here EIA/AA reports were already co-financed? When that happens /or has already happened/, then it will be obvious that the Agency itself is braking EU law which would be very wrong, but we will dig in this problem in the following section E hereafter.

D. Relevant rulings of the European Court of Justice

1. (C-127/02 – “Waddenvereniging and Vogelbeschermingsvereniging”)

Link:

<http://curia.europa.eu/juris/showPdf.jsf?text=&docid=49452&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=21912>

Citations:

3 Article 4(1) and (2) of the Birds Directive require Member States to classify as SPAs the territories satisfying the ornithological criteria established by those provisions.

4 'In respect of the protection areas referred to in paragraphs 1 and 2 above, Member States shall take appropriate steps to avoid pollution or deterioration of habitats or any disturbances affecting the birds, in so far as these would be significant having regard to the objectives of this article. Outside these protection areas, Member States shall also strive to avoid pollution or deterioration of habitats.'

22 The 10th recital in the preamble to the Habitats Directive states that 'an appropriate assessment must be made of any plan or programme likely to have a significant effect on the conservation objectives of a site which has been designated or is designated in future'. That recital finds expression in Article 6(3) of the Directive, which provides inter alia that a plan or project likely to have a significant effect on the site concerned cannot be authorized without a prior assessment of its effects.

2. (C-355/90, Commission v. Spain - “Santoña Marshes”)

Link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A61990CJ0355>

Citations:

18 That argument cannot be accepted. It is clear from the Court' s judgment in Case C-57/89 Commission v Germany [1991] ECR I-883 that, in implementing the directive, Member States are not authorized to invoke, at their option, grounds of derogation based on taking other interests into account.

19 With respect more specifically to Article 4 of the directive, the Court held in that judgment that, in order to be acceptable, such grounds must correspond to a general interest which is superior to the general interest represented by the ecological objective of the directive. In particular, the interests referred to in Article 2 of the directive, namely economic and recreational requirements, do not enter into consideration. In this connection, the Court held in Case 247/85 Commission v Belgium [1987] ECR 3029 and Case 262/85 Commission v Italy [1987] ECR 3073 that that provision does not constitute an autonomous derogation from the general system of protection established by the directive.

3. (C-96/98, Commission v. France – “Poitevin Marsh”)

Link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A61998CJ0096>

Citations:

3 The first sentence of Article 4(4) of the Directive 79/409 on the conservation of wild birds requires Member States to take appropriate steps to avoid, inter alia, deterioration of habitats, not

only in areas classed as special protection areas in accordance with Article 4(1), but also in areas which are the most suitable for the conservation of wild birds, even if they have not been classified as special protection areas, provided that they merit such classification. It follows, with regard to the latter areas, that any infringement of the first sentence of Article 4(4) of Directive 79/409 presupposes that the areas in question are among the most suitable territories in number and size for the conservation of protected species, within the meaning of the fourth subparagraph of Article 4(1), and that these areas have suffered deterioration.

THE COURT

(Fifth Chamber),

hereby:

1. Declares that, by failing, within the prescribed period, to classify a sufficient area in the Poitevin Marsh as special protection areas, by failing to adopt measures conferring a sufficient legal status on the special protection areas classified in the Poitevin Marsh, and by failing to adopt appropriate measures to avoid deterioration of the sites in the Poitevin Marsh classified as special protection areas and of certain of those which should have been so classified, the French Republic has failed to fulfil its obligations under Article 4 of Council Directive 79/409/EEC of 2 April 1979 on the conservation of wild birds;

E. Conclusions and recommendations

It is so obvious now that by approving the EIA and AA reports for the Yadenitsa dam & tunnel in Bulgaria, without an appropriate assessment of the project's implications on the future Rila Bufer Habitats and Birds directive sites and as a result - by not adopting any recommendations concerning mitigation, protection and/or compensatory measures in the AA report, MOEW has breached Union law once again.

Actually, the ministry turned out to be not capable of following the law in many other cases - for example with the recent approval of the new Pirin National Park management plan without a SEA, where MOEW has recently lost the case in the Supreme Administrative Court in Bulgaria:

http://clubz.bg/67161-sydyt_planyt_za_park_pirin_zadyljitelno_na_ekoocenka

Is this happening because MOEW does not know the law? No, it isn't - it is only due to the widely spread rampant corruption in Bulgaria.

For the Yadenitsa dam case we have warned the European Commission several times already on the basis of many other infringements of EU environmental law concerning devastating impact on the Yadenitsa Habitats Directive site, the lack of any economical viability and even normal sense, the huge seismic risk and many other problematic issues. All these aspects can be found in our previous complaint appendixes, uploaded here in the beginning of the introduction.

Concerning the economical viability we can only add here a statement published in 2015 by Blue Energy Forum in the following link:

<https://bulenergyforum.org/bg/statia/analiz-na-plana-za-razvitie-na-prenosnata-elektricheska-mrezha-na-blgariya-za-perioda-2015>

Experts have written in section **III.5** that the Yadenitsa dam will never return its costs.

And yet another statement on the dam economical performance by an independent expert:

<https://www.publics.bg/files/publications/GStoilov.pdf>

The text in the box on page 16 confirms our warnings on the economical issues, namely that the dam is simply stupid, and finally concludes: *Years ago Stadcraft showed interest in the project and after discovering its inefficiency has given up on it. Now the Yadenitsa project is included in the list of so-called "Project of common interest" that can receive co-financing by the European Commission. How will the Commission react if it learns the truth about the economic inefficiency of the project?*

In addition we are now informing DG Environment and EU INEA about another breach of the EU legal framework - the Yadenitsa dam & tunnel project was not assessed for the project's implications and adverse impacts on both the Habitats and Birds directives Rila Bufer sites' conservation objectives. This particular issue was only briefly mentioned in our previous complaints, but now we have the ruling of the European Court of Justice in case **C-97/17** of the European Commission against Bulgaria, which means that this particular infringement is disputable no more.

In a communication from EU INEA we were also kindly informed that:

INEA, when assessing the proposals received for CEF financing, is checking that all relevant Environmental procedures were carried out in the Member state in relation to the proposals and that all approvals concerning the EIA, Water Framework Directive and Natura 2000, are received. This is the condition for funding. Each project proposed has to be positively assessed by DG Environment before a final decision on EU financing is made.

We also see that the complaint is addressed to DG Environment which has the competence to assess this type of complaints. Therefore, INEA will have to wait for the conclusions from DG Environment and will then act accordingly if needed.

At this point we also find it necessary to remind the following:

COMMUNICATION FROM THE COMMISSION

Guidelines on State aid for environmental protection and energy 2014-2020

2014/C 200/01

(6) It should be recalled that the Resource Efficiency Roadmap ⁽⁵⁾ as well as several Council conclusions call for a phasing out of environmentally harmful subsidies ⁽⁶⁾. These Guidelines should therefore consider negative impacts of environmentally harmful subsidies, while taking into account the need to address trade-offs between different areas and policies as recognized by the flagship initiative. Aid for the extraction of fossil fuels is not included in these Guidelines.

(7) The Roadmap also calls on Member States to address gaps in their performance in delivering the benefits from Union legislation ⁽⁷⁾. To avoid that State aid measures lead to environmental harm, in particular Member States must also ensure compliance with Union environmental legislation and carry out an environmental impact assessment when it is required by Union law and ensure all relevant permits.

Then we think that if these guidelines are applicable to each individual member state, the more they should be applicable to the European Union as a whole and all its Agencies, Committees, Directorates etc. and that the Union itself should not finance environmental harm.

Based on all these grounds, on behalf of Balkanka Association Sofia, Bulgaria, by expressing our congratulations and deep gratitude to the European Commission and especially to DG Environment for the efforts to protect nature, we hereby allow ourselves to invite DG Environment to kindly:

1. Take prompt action for the announcement of the Rila Bufer Habitats directive site, by starting an immediate infringement procedure against Bulgaria for proven breach of the Habitats directive and the TFEU.

2. Advise EU INEA that, in the case of the Yadenitsa dam, the Environmental procedure in Bulgaria is totally corrupt and none of the relevant legal requirements concerning nature preservation and protection are met.

Besides the Yadenitsa dam case, based on several other cases described in our previous complaints, where EU funding was just wasted /the Barzia drinking water treatment station and system, the Dushantsi waste water station and sewerage system/, we also have a very strong message to the European Commission in general:

You guys should quit financing corruption in Bulgaria and it's just about time for you to stop it!

When we manage to become a normal, law abiding EU member state, you will be very welcome to help us afterwards again.

F. Union laws (e.g. Treaties, regulations, directives, decisions) or principles underpinning Union law that we believe to have been breached by the authorities of the country

- **Directive 2001/42/EC** of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment:
- **Directive 2000/60/EC** of the European Parliament and of the Council establishing a framework for Community action in the field of water policy
- **Council Directive 92/43/EEC of 21 May 1992** on the conservation of natural habitats and of wild fauna and flora
- **DIRECTIVE 2009/147/EC** of the European Parliament and of the Council of 30 November 2009 on the conservation of natural habitats and of wild fauna and flora

Some of the principles underpinning Union law and the Directives were cited above in section D.

G. Does the EU country concerned receive EU funding relating to the issue that prompted your complaint, or may it receive such funding in future?

The entire Investment Plan of the Yadenitsa dam will be co-financed by the INEA of the EU and NEK. To our knowledge - the Project and the false EIA/AA reports were already co-financed by the Agency as well.

III. LIST OF DOCUMENTS / EVIDENCE

The relevant rulings of the European Court of Justice supporting our statement for breach of EU law are listed in section D.

The fact that the Yadenitsa dam project was not assessed for the project's implications on the Rila Bufer sites' conservation objectives can be checked in the AA report or in the Terms of reference issued by MOEW, which is a very short document and can be found here:

https://dams.reki.bg/uploads/Docs/Files/MOEW_EIA_AA_TERMS_Yadenitsa_2014.pdf

There is not a word about both the Rila Bufer sites in the MOEW terms of reference and subsequently the impact on these sites was not studied in the AA report at all.

IV. APPEALS/LEGAL ACTIONS/ OTHER ACTIONS

All the actions we have taken insofar are described in the previous complaints.

We have tried to contact EU Institutions to request help on the same issues eight times already - one original complaint and seven consecutive appendices so far.

We were kindly informed that all these documents are transferred to **EU Pilot application under reference EUP(2017)9183** and hope that this new appendix N5-A will be transferred to the application under the same reference too, and will be studied together with Appendix No5.

We do not believe that SOLVIT is better placed to deal with this problem.

V. CONFIDENTIALITY – DATA PROTECTION

We authorize the Commission to disclose the identity of Balkanka Association and/or the identity of our representative in its contacts with the Bulgarian state authorities, against which we are lodging this complaint.

Actually, we have sent copies of the previous complaints to MOEW, so they are pretty well aware of our actions. Having nothing to hide, we will send a copy of this document too.

VI. AIM OF THE COMPLAINT

Ladies and gentlemen,

In the original Complaint and subsequent supplements the aim was thoroughly described. We will not repeat that once again, but instead we will hereby invite DG Environment once again to:

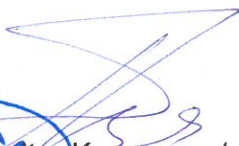

1. Take prompt action for the announcement of the Rila Bufer Habitats directive site, by starting an immediate infringement procedure against Bulgaria for proven breach of the Habitats directive and the TFEU.
2. Advise EU INEA that, in the case of the Yadenitsa dam, the Environmental procedure in Bulgaria is totally corrupt and none of the relevant legal requirements concerning nature preservation and protection are met.
3. Put their best effort to convince the European Commission and all its agencies, committees and so on, to quit financing corruption in Bulgaria, especially when it's inevitably leading to environmental harm.

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 complainant/representative:

Representative for this complaint:



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

Sofia, Bulgaria
09.05.2018