

“Balkanka” Association, Sofia, Bulgaria

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

**WARNING**  
**Ref. No 11 / 30.11.2025**  
**TO**  
**THE EUROPEAN COMMISSION CONCERNING FAILURE**  
**TO COMPLY WITH COMMUNITY LAW**



The Orsoya landslide in Bulgaria Photo credit: MPPB

Representative for this complaint:



dipl.eng. Dimitar Koumanov,  
Member of the board

Sofia, Bulgaria  
30.11.2025

## INTRODUCTION

Referring to the latest technical meeting between representatives of DG ENV of the Commission and some Bulgarian environmental NGOs, including our representatives from Balkanka association, held on 15 October 2025 in Sofia, Bulgaria, this particular Notification is aiming to add new information to some of the topics we have discussed with DG ENV during the meeting.

Two projects that are currently developed in Bulgaria are in the main focus of this Notification, aiming to discourage the Commission's intentions to keep financing illegal projects in Bulgaria.

**These symbolic projects are:**

- 1. The FAST DANUBE project**
- 2. The Yadenitsa dam project.**

**1. The new developments concerning the FAST DANUBE project are as follows:**

**1.1.** Technical meeting between the Bulgarian *Exploration and Maintenance of the Danube River* Executive Agency, the Romanian Ministry of transport and the administration of the "*Rhine - Danube*" and the "*Baltic - Black - Aegean Sea*" transport corridors took place.

<https://www.dunavmost.com/novini/es-tarsi-reshenie-za-12-te-kritichni-uchastaka-v-reka-dunav>

This meeting was held in the town of Ruse, Bulgaria, on 04 November 2025, obviously under severe pressure on behalf of DG MOVE of the Commission. It was held in such a manner as if this project's development is facing no obstacles at all and its implementation is therefore inevitable...

**1.2.** The Bulgarian Parliament has unreasonably and untimely ratified an Agreement with Romania for the FAST DANUBE project's implementation:

<https://www.bta.bg/en/news/bulgaria/1011274-parliament-ratifies-agreement-with-romania-on-danube-navigation-project#Danube>

**2. The new developments concerning the Yadenitsa dam project are as follows:**

**2.1.** *The project is in the ENTSO-E ten-year plan and is candidate for European project of common interest with the project "Construction of the Yadenitsa Dam and a reversible pressure tunnel for connection with the Chaira Dam".* This is a quote from page 17 of the following official publication

[https://www.dker.bg/uploads/reshenia/2025/res\\_dprm\\_2\\_25.pdf](https://www.dker.bg/uploads/reshenia/2025/res_dprm_2_25.pdf)

The above information is confirmed by ENTSO-E itself under Ref. No 1003 on page 44 of the following document:

[https://eepublicdownloads.blob.core.windows.net/public-cdn-container/tyndp-documents/TYNDP2024/forapproval/entso-e\\_RIPs\\_2024\\_CSE\\_250612.pdf](https://eepublicdownloads.blob.core.windows.net/public-cdn-container/tyndp-documents/TYNDP2024/forapproval/entso-e_RIPs_2024_CSE_250612.pdf)

Finally there are some 38.3 million Euro envisaged for some sort of state guaranties in the new Bulgarian Budget 2026 for the Yadenitsa dam project, meaning that the project's implementation is not terminated, but on the contrary.

Now, both these scandalous projects have been thoroughly discussed in our long lasting communication with DG ENV of the Commission but there is some News that we will share hereafter.

But first of all - the mandatory information about Balkanka Association:

## **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. Dimitar 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](mailto: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) and the European Commission itself.

## **II. DESCRIPTION OF THE INFRINGEMENT OF UNION LAW**

### **1. The new developments concerning the FAST DANUBE project**

To any of the newcomers in our communication with the EC, we find it possible that some of them may not be aware of this project's risks for the environment and human safety. Therefore the basic information on the matter can be found in our previous Notification here:

[https://dams.reki.bg/uploads/Docs/Files/EU\\_FAST\\_DANUBE\\_NOTIFICATION\\_2024\\_1%20DRAFT1.pdf](https://dams.reki.bg/uploads/Docs/Files/EU_FAST_DANUBE_NOTIFICATION_2024_1%20DRAFT1.pdf)

At our meeting with DG ENV representatives held in Sofia on 15 October 2025 we announced that we've had the pleasure to appeal this project's EIA/AA decision of the competent Minister of Environment in the Supreme Administrative Court in Bulgaria and that the first instance court has issued Decision denying us the legal interest to appeal EIA/AA decisions of the minister, thus depriving our environmental organization from access to justice on environmental matters.

However, when we found ourselves in such a situation for the first time in our practice, this decision of the court was immediately brought to the higher court level and, thankfully, the higher court ruled that the legal hearings must proceed, otherwise we would have lost the last remains of any faith in our judicial system.

The legal grounds for our court appeal are 100% reasonable and DG ENV of the Commission is pretty well informed about them in our previous communication concerning the FAST DANUBE project's Breach of all possible environmental requirements and restrictions, provided for in the relevant EU Directives, including the risks for human safety and the transboundary issues arising from the relocation of the borderline in favor of Romania, together with the relocation of the fairway

**The News here** is that our statements that the human safety of the population along our high river bank due to the risks from the potential awakening of the landslides in the Bulgarian section of the River was not proven through the EIA procedure. These statements of ours were confirmed by a statement of the managing director of the Bulgarian *Exploration and Maintenance of the Danube River* Executive Agency during the last hearing in the Supreme Administrative Court /SAC/, the official protocol of which can be found on the SAC web page here:

[https://info-adc.justice.bg/courts/portal/edis.nsf/e\\_protocol.xsp?id=2472915&code=vas&guid=1328400582&fbclid=IwY2xjawOWoiNleHRuA2FIbQlxMQBzcnRjBmFwcF9pZBAyMjlwMzcxNzq4MjAwODkyAAEejJSWMDpX7Xrd\\_H9jTJqZUhWb9w0HEKODr\\_CCHW24RSXuIibh8bzU7L4laL4\\_aem\\_331LSrd\\_BQYoiTu1VJk5hQ](https://info-adc.justice.bg/courts/portal/edis.nsf/e_protocol.xsp?id=2472915&code=vas&guid=1328400582&fbclid=IwY2xjawOWoiNleHRuA2FIbQlxMQBzcnRjBmFwcF9pZBAyMjlwMzcxNzq4MjAwODkyAAEejJSWMDpX7Xrd_H9jTJqZUhWb9w0HEKODr_CCHW24RSXuIibh8bzU7L4laL4_aem_331LSrd_BQYoiTu1VJk5hQ)

The statement of the managing director of the Bulgarian *Exploration and Maintenance of the Danube River* Executive Agency /EMDREA/ was declared in an answer to our warnings that the necessary geological studies and analyses, required by the Expert Group of the Ministry of Regional Development were not carried out, hence the human safety is far from proven

His statement can be found at the very end of the above protocol and it sounds like this:

#### **In Bulgarian:**

**И. ЗАНЕБ:** *Всички тези страхове, с които те се заиграват, са съвсем ясно описани в решението по ОВОС. Всички тези изисквания, които са от експертната група, доклада по ОВОС и в решението по ОВОС, са записани там и няма да бъдат предприети абсолютно никакви мерки преди да се направят описаните проучвания.*

### **In English:**

I. ZANEV: *All these fears they are playing with are very clearly described in the EIA decision. All these requirements, which are from the expert group, the EIA report and in the EIA decision, are written down there **and absolutely no measures will be taken before the described studies are carried out.***

In this way the managing director of the project's Developer from the Bulgarian side officially confirmed that Safety Was Not Proven at the moment when the EIA Decision was taken and it is not proven yet, but studies will be carried out at some other point in the unknown future...

**Here it is important to underline the fact that the EIA/AA decision of the "competent" minister was issued and published on 03.10.2024. More than one year later, there is not a sign of any geological study or survey, let alone modeling, analyses, risk assessments etc. Nothing in one year?** Is the director of EMDREA lying and is the EC willing to believe only to proceed with this illegal project's implementation, or what?

Of course, the director also failed to share with the court his view on what will happen if the studies fail to prove the safety guarantees but on the contrary, OR if the costs of the necessary reinforcing measures exceed by far the whole budget of the project, which is more than likely?

**So, the point here is that the FAST DANUBE project's EIA decision was proven to be the usual for our territories Fraud, because in breach of article 3 of the EU EIA Directive the human safety is not guaranteed at all.**

This is happening in the same EU that has already financed the same EIA Report, /i.e. the Fraud/ and still in the same EU that keeps pushing for this project to be implemented without the necessary guarantees, required by its own EU Law! We therefore find that the very meaning of the EIA Directive to protect the human health, laid down in para.14 of the preamble, has been thrown in the trash by the EC itself!

**Don't you ever try to talk to us about the Rule of Law principle anymore,** while you are financing the greatest possible Breach of your own basic rules, when the precautionary principle is eaten, chewed and swallowed, or there are no measures for rectification of environmental damage whatsoever - not only at the source, but anywhere, because the potential for landslide damage is not even studied, AND there are no money in this project for the polluter to pay for the Damage when it happens!:

And have you ever thought about this project's "sustainability" if and when our landslides start to move and block the River? Do you really think that the affected Bulgarian people will tolerate you and that we will suffer the consequences silently, or will we pay for the compensations? You are living in another world, not ours!

**And have you ever thought of what will happen when we win the case in court? Why are you still pushing up this project and what exactly are you going to finance when the EIA decision gets overruled by our court of justice?**

### **Important:**

According to the Bulgarian Spatial Planning Act the construction permits for the various hydro technical facilities within the project cannot be issued before the EIA/AA decision is set into force, which can only happen if the court decides it's legal. Regardless of the fact that the same EIA/AA decision was released with the so called "preliminary execution", it is NOT enough for a construction permit to be released!

The decision of the court will take some time, together with a little bit of pressure on the judges to close their eyes, of course, otherwise we will 100% win this case under the circumstances in the light of the infringements of the law. So don't you hurry too much with this project, please!

## 2. The new developments concerning the Yadenitsa dam project.

This particular project is one of our greatest concerns because it is as illegal and risky as can be in terms of seismic safety. Still, in the introduction we have shared the official News that there are 38.3 million Euro for this project in the Bulgarian budget 2026, the project is included in the ENTSO-E ten-year plan and it is said to be a candidate for European project of common interest again. We are not quite sure that this will happen, but following our own precautionary principle we are bringing the case to the attention of the EC one more time, only to share the following news about it:

**The fresh News about the Yadenitsa dam project is that the EIA/AA decision of the "competent" minister of environment and water has expired and has lost its legal validity.**

The project still holds valid Water and Construction permits, but the construction has not started at all, while the EIA/AA decision was enforced on **22.01.2018** by a decision of the Supreme Administrative Court, which overruled our legal complaint based on the unusual even for our territories Fraud conducted in the EIA/AA reports.

We have shared with the Commission a lot of information about this project through the years, some summary of which can be found here:

[https://dams.reki.bg/uploads/Docs/Files/EU\\_COMPLAINT\\_ANNEX\\_6\\_DRAFT3.pdf](https://dams.reki.bg/uploads/Docs/Files/EU_COMPLAINT_ANNEX_6_DRAFT3.pdf)

In addition to information in this document, DG ENV of the Commission is aware that this project's implications on the Natura 2000 Habitats Directive site "Niska Rila" and on the Birds Directive site "Rila Bufer" have not been assessed at all. DG ENV is also aware that the footprint of the dam was deliberately extracted and erased from the "Niska Rila" proposed area and the borderline of the Natura 2000 site coincides with the borders of the footprint of the dam.

Now, according to the Bulgarian national Environmental Protection Act and to the Biodiversity Act, EIA/AA decisions expire and lose legal grounds if the implementation of the project has not started five years from the enforcement of the same decisions. And again according to article 157 of the Spatial Planning Act - *the start of construction in accordance with the issued building permit is considered to be the day of issuance of the protocol for opening the construction site and determining the construction line and level.*

There are no such protocols, lines and levels for the Yadenitsa dam site, meaning that the implementation of the project has not started officially and the EIA/AA decisions have expired, but the "competent" minister of environment rejected our invitation to announce this fact.

Of course, the affected Yadenitsa riverbed hosts priority habitats types and priority species and of course DG ENV is doing less than nothing to stop this project on the grounds of the infringements of the EU Directives, but we are already used to DG ENV's lame reactions.

**What we still are not used to will become clear if one happy day we find that the Yadenitsa project has been brought back into the EU PCI list**, not that it will be too much of a surprise to is, of course. In the light of the infringements the FAST DANUBE project will commit with the substantial help and the complicity of the Commission itself, no other action of the Commission can surprise us anymore.

### Conclusion and recommendations:

**This Notification is not a complaint!** We got tired of complaining to the Commission and see no sense in that, because nothing comes out of it, no matter of the scale of the infringements!

Therefore, consider it a Warning which holds additional evidence concerning two of the most illegal and risky large scale projects in Bulgaria, developed with the substantial contribution of the Commission in breach of Union law. In the light of the Yadenitsa dam seismic risks and the FAST DANUBE landslide risks, apart from the environmental damage and apart from the infringements of EU law, these two projects pose significant risks for human safety too, and there are absolutely no guarantees that future catastrophes are avoided. The lack of safety guarantees for the FAST DANUBE project was declared fair and square by the developer himself during the hearings in a court of justice!

We therefore strongly urge the Commission's top executives to think of what will happen when our warnings become real life facts? Do you really believe that the EIA procedures in Bulgaria are trustworthy enough when splitting lots of European money is at stake?

Rest assured that if something happens, our warnings will be all over the national and European media, together with the necessary information conveyed to the EU Prosecutors office.

**And stop financing the Corruption in Bulgaria and in the EU at last, of course!**

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  
30.11.2025