

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

**WARNING**  
**Ref. No 01 / 04.06.2026**  
**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  
31.05.2026

## INTRODUCTION

Referring to the latest meeting between Balkanka Association and DG ENV representatives held in Sofia on 15.11.2025, we would like to brief the Commission on the latest developments of two most scandalous projects in Bulgaria the Commission is involved in by financing the same projects in Breach of all relevant EU Directives, regardless of our warnings through the years.

The information in this document is focused on the current state of the environmental procedures concerning the famous in Europe Yadenitsa Dam, the even more famous FAST DANUBE project and a little something is included for the Rozino mining project in Bulgaria having the potential for a devastating transboundary impact both in Bulgaria and in Greece. This is a case that has caused to us long lasting concern due to the fraudulent way all EIA/AA procedures in Bulgaria are being conducted, which we were happy to share with DG ENV of the Commission on numerous occasions with a negligible reaction on behalf of the Commission so far, much to our greatest disappointment.

All these cases represent a clear proof of the extremely low quality of all EIA/AA procedures in Bulgaria carried out by our Ministry of Environment and water, but this time we are sharing an independent expert statement from the Greek Ministry of Environment to prove our point which we have shared with DG ENV on numerous occasions, starting with our first communication from the distant in time 2015, when we have brought to DG ENV's attention our first Complaint on environmental matters - the date was 30 June 2015 and absolutely Nothing has come out of it so far.

We believe that due to the lame reactions of the Commission ever since, as of today we have reached together the *point of no return* where the Commission itself is not only sweeping the infringements committed by our environmental authorities under the Commission's Carpet, but is trying to finance illegal projects in Bulgaria with enormous adverse environmental impact, disregarding the EU principle for the Rule of Law to an unacceptable extent.

That is why this notification is not another Complaint, it is another Warning to the Commission to stop financing the Corruption in Bulgaria before it gets too late and the potential for environmental and human safety damage becomes fact, sustained with the careless financial support of the EU!

### **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](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 YADENITSA DAM CASE - latest development**

Much to the potential surprise or, rather, to the expectations of DG ENV, this famous project has recently become another matter of some sort of new negotiations between the Bulgarian government and the Commission. Here is an official announcement from our new prime minister on the matter /in Bulgarian/:

<https://www.mediapool.bg/pari-za-pavets-chaira-i-rabota-na-darzhavnite-mini-i-tets-do-2038-g-dogovoril-radev-s-bryuksel-news383883.html>

And here is a short quotation /in Bulgarian/:

*Европейската комисия била приела предложените от България реформи в енергийния сектор, които да гарантират работа на държавните Мини "Марица Изток" и ТЕЦ*

"Марица изток 2" до 2038 г. Това заяви премиерът Румен Радев в петък, преди началото на правителственото заседание. Той събщи още, че от Брюксел са обещали да предоставят над 50 на сто, че и повече, европейско финансиране за строежа на яз. "Яденица", който ще увеличи капацитета на ПАВЕЦ "Чаира" и съхранението на енергия в тази водна батерия.

### **In English:**

*The European Commission has accepted Bulgaria's proposed reforms in the energy sector, which would guarantee the operation of the state-owned Maritsa East Mine and Maritsa East 2 TPP until 2038. Prime Minister Rumen Radev said this on Friday, before the start of the government meeting. **He also announced that Brussels has promised to provide over 50 percent, or even more, of European funding for the construction of the Yadenitsa Dam, which will increase the capacity of the Chaira Hydroelectric Power Plant and the storage of energy in this water battery.***

Now, we have to remind that for a very good Reason this fraudulent Yadenitsa project has been withdrawn from the List of EU PCI /Projects of Common Interest/ long time ago. As of today absolutely nothing has changed and the infringements of the relevant EU Directives are still the same. We have even proven to DG ENV of the Commission that this project makes NO economical sense and there will be NO benefits for our Energy System whatsoever - the only idea of our authorities is to split the European money in the usual corruption schemes. In any case this project will not increase anything at all.

As it is obvious that there are a lot of newcomers in the "competent" EU high ranked staff, allow us to remind to the Commission one of the huge infringements - this future dam was NOT assessed for its implications on the Natura 2000 Habitats Directive Site "**Niska Rila**" **BG0000636** and on the Natura 2000 Birds Directive Site "**Rila Bufer**" **BG0002129**.

Another of the Reasons from the human safety point of view was that the 110 meters high dam wall, 310 meters long, will be built on top of the biggest in Bulgaria geological fault - the Yadenitsa fault, which is 30 /Thirty/ meters wide, in a region with high seismicity acc. to the definitions laid down in the EUROCODE structural system of the EU itself! The construction of new dams in such geological and seismic hazard conditions is prohibited by our Seismic Design Code, but who cares about such minor issues?

There are many other infringements of EU law we were happy to share with DG ENV in the past in several consecutive complaints, which have given the Commission enough reasons for this project to be withdrawn from the EU PCI list in the past, of which anyone who's interested may have an idea by simply asking DG ENV for additional specific information. That is why we were so surprised to get to know that there have been new bilateral discussions and new promises on behalf of the Commission regarding this stupid and risky project of which DG ENV was thoroughly informed in the past and as of today Nothing has changed in the project and its devastating impact and Nothing has changed in the relevant EU Directives that were breached. Today they are not breached, or are they?

Now we know that the project has been brought back into the EU PCI list with no explanations whatsoever. This back and forth Wonder of Nature becomes clear from the following EC communication - see table (2) 2.21 in section B.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32026R0764&qid=1780339570856>

Another interesting source of information can be found here:

[https://dams.reki.bg/uploads/Docs/Files/Yadenitsa\\_Analysis\\_SSCOs\\_EN\\_1003%20Hydro-pumped%20storage%20in%20Bulgaria%20-%20Yadenitsa.pdf](https://dams.reki.bg/uploads/Docs/Files/Yadenitsa_Analysis_SSCOs_EN_1003%20Hydro-pumped%20storage%20in%20Bulgaria%20-%20Yadenitsa.pdf)

The Fraud in the second link is written by the same "expert" crooks that wrote the AA report, missing to:

1. Assess the project's implications on the above mentioned two Natura 2000 sites.
2. Point out that the footprint of the dam was deliberately removed from the initially proposed boundaries of the Natura 2000 Habitats Directive Site "**Niska Rila**" **BG0000636**
3. Admit that the footprint of the dam will erase entirely a priority habitat type 91E0 and priority species Stone Crayfish *Austropotamobuis torrentium*/ thriving in river at the moment.

#### **NOTE:**

It is not a matter of discussion whether there will be a negative impact on these priority habitat type and species, listed respectively in Annexes I and II of Council Directive 92/43/EEC of 21 May 1992. They will be erased in the whole area covered by the dam! Therefore we invite DG ENV to come here and see the fact of their existence on the spot!

#### **WARNING:**

As we said above, the geological conditions in the affected area are the worst conditions possible. Apart from the huge geological Yadenitsa fault which may induce an earthquake by itself, the rock formations are cracked, eroded and worn out by the extreme mountainous weather conditions as can be. Those "experts" are stating in their papers that the slopes have been secured against collapse and protected with a concrete cover when the first attempt for the construction started somewhere in the end of the previous century and was abandoned when the government back then realized how stupid the project is. Four years ago we took the following video which shows the collapse of part of the slope regardless of the measures taken in the past:

<https://www.youtube.com/watch?v=EIPNNW0N52I>

Just imagine now that the water in the dam periodically enters the cracks and starts to freeze and thaw when the dam is filled and emptied during every 20-22 hours' working cycle of the Chaira PSHPP in the winter. What will happen then? There are dams that have caused earthquakes, do you know that? The process is called Reservoir-Induced Seismicity (RIS) and here is one source about it out of many:

<https://www.intechopen.com/chapters/47738>

And the geological and seismic hazard conditions in the area concerned are the worst in the world - have you ever thought WHY this dam was not built in the past, during the good old Socialist times, when we were hydropower crazy?

**Anyway, this is not the news for the Commission in this Notification. As of today the News to the Commission is that the EIA Decision of the competent Bulgarian minister of Environment for this poor dam Has Expired on 26.01.2023!** The decision came into force on 26.01.2018 following a decision of the Bulgarian Supreme Administrative Court, and acc. to our Environmental Protection Act EIA decisions expire in five years if no steps for the implementation were taken and the construction of the project has not started. Acc. to article 157 of our Spatial Planning Act -

*The start of construction, in accordance with the issued building permit, is considered the day of drawing up the protocol for opening the construction site and determining the construction line and level.*

There is a Construction Permit from 03 January 2023 all right, but the other requirements are not met so far, hence the construction of the poor dam has NOT officially started insofar and, therefore, the EIA decision has expired!

**Among many other participants, the named Protocol for opening the construction site should be elaborated and signed by the investor, the construction company and the independent supervisor.** So far there is No Money for the project, No Tender, No Construction Company chosen, only one sorry investor - the National Electric Company, which is the most corrupt state owned company in Bulgaria.

Of course, when the EIA Decision did expire, we have sent an invitation to the minister of environment to execute his legal obligations to announce officially that this project's EIA decision has expired, but our invitation was thrown in the minister's Trash as always.

So we believe that the Commission was deceived by our government and has promised to finance the Yadenitsa project, which is illegal as can be, not only acc. to the EU Directives, but acc, to our national law as well.

### **WARNING:**

We are now aware that the EU legal requirements mean the same to the Commission, as they mean to our authorities - one big, round Zero. Still, we invite the Commission to imagine what will happen if and when our warnings based on the huge seismic risk become fact one happy day? We promise - when the damage happens, then everyone involved at National and European level will manage the environment of Mars, most likely from a remote penitentiary facility!

## **2. The FAST DANUBE project - latest development**

For this particular project we have shared several warnings with DG ENV, the latest of which can be found 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)

Currently there are a few things to add to the above information, which, among the other infringements of national and European law, was focused mainly on the potential movement of the border with Romania towards our Bulgarian territory and on the huge risk for activation of the landslides along the Bulgarian high river bank of the Danube River.

**To prevent another blind activity on behalf of the Commission for this project, the News here is that the EIA/AA decision for this project has not yet entered into force so far.** The reason - we have appealed this decision in the Supreme Administrative Court and for the time being the court has not come up with a decision at the first instance. In our previous communication we have even shared our court appeal for DG ENV to see how strong our court case really is.

**We, therefore, believe that it will be a huge Breach of the Rule of Law principle if the Commission starts to support financially this project for which the EIA decision did not enter into force so far.**

And there is a little something about the landslides in Bulgaria to add here - few weeks ago a new landslide was activated in the Pamporovo ski resort without any human interference. One moment the slope was standing still and in the next moment the slope went crazy like this:

[https://www.facebook.com/reel/4100431156934936?locale=bg\\_BG](https://www.facebook.com/reel/4100431156934936?locale=bg_BG)

Nice, A? Think about the people living in Oryahovo and watching the new dredging of the river bottom, moving the fairway to our side of the River close to their premises. And this video shows a micro landslide only 70 meters wide, while the Orsoya and Oryahovo landslides at the Danube River are several kilometers long...

So on page 34 of the EIA/AA decision of the competent authority there are a few measures recommended to conduct some kind of monitoring for the landslides along the risky Bulgarian high river bank, which are absolutely senseless because once the slope

movements start, it will be monitored all over the media and there is Nothing to stop the slopes from going down to block the River forever and then the ships and barges will keep navigating in the rivers on Mars, facilitated and supported on all other environmental matters of that planet by DG ENV of the Commission again...

### **3. The Rozino gold mine project in the Eastern Rhodope Mountain close to the border with Greece.**

**We will use this case here only to prove our point on the extremely low quality of all EIA/AA procedures in Bulgaria** of which we have informed DG ENV thousands of times - only this time it should be taken into consideration that this particular EIA procedure was carried out in the best possible for our environmental authorities way due to the project's transboundary adverse impact. The official reaction of the Greek Ministry of Environment and Energy can be found in the following link:

[https://www.moew.government.bg/static/media/ups/articles/attachments/First%20Review%20of%20EIA%20Rosino%20Mining%20Pr%20\(1\)e6460f37b05375493ea11360f7bf0464.pdf](https://www.moew.government.bg/static/media/ups/articles/attachments/First%20Review%20of%20EIA%20Rosino%20Mining%20Pr%20(1)e6460f37b05375493ea11360f7bf0464.pdf)

It is in Greek, but there is an English translation in the second part of the attached document and we will not add a single word - just read what the Greeks are saying in appreciation of the Fraud proudly called EIA/AA Report by the Bulgarian authorities, which they were so arrogant to share with the Greeks...

So here is an example of the best quality EIA/AA reports ever produced in Bulgaria and think about the other cases, when these reports are not checked by independent foreign authorities, which is the common case in Bulgaria applicable also to the Yadenitsa dam case and to the FAST DANUBE project we have warned the Commission about so many times so far. And these projects will be blindly financed by the Commission nevertheless.

### **4. The Ilovitsa - Shtuka gold - copper mine in North Macedonia**

We are presenting this case here /in which the Commission thankfully was NOT involved, hence the result is a bit different/ just to give DG ENV an example on how some other international institutions react to our signals for breach of the UN Conventions.

This mine was about to be developed in the Strumitsa region - North Macedonia. The devastating impact it would have caused on the surface and ground water bodies in Bulgaria and Greece is exactly the same like in the previous case - the Rozino gold project in Bulgaria. Here is a letter from the Espoo Convention Implementation Committee for you to see the perfect work of other /thankfully non EU/ institutions following the Convention by the book:

<https://dams.reki.bg/uploads/Docs/Files/ESPOO Letter IC65 Balkanka%20Association Strumitsa.pdf>

Unlike our exhausting and senseless communication on environmental matters with DG ENV of the Commission for more than ten years now, as a result from our joint effort with the Implementation Committee of the Espoo Convention, the Macedonian authorities have blocked this project for the moment. Only two letters from us to the Committee and only two years were enough for this outcome to be achieved, while our Bulgarian Ministry of Environment in an EU Member state with all those beautiful EU directives did the usual Nothing in the meantime. The same Nothing which DG ENV is doing upon our numerous signals sent in the last 11 years.

It obviously turns out that a non EU state - North Macedonia - is following the EU environmental directives in much a better way, than the EU member Bulgaria and the Commission itself, when EIA procedures are concerned.

So far there was only one exception where the reaction of DG ENV was worth our efforts and that was the Yadenitsa dam case, which was withdrawn from the PCI list and was denied financial support from the EU funds in the old, much better days of the Commission. Now we find that even in this case the Commission has closed its eyes to the infringements of the EU Directives and is going to finance this stupid and risky project only to give our government the chance to split the money in the normal for Bulgaria corruption schemes.

Therefore, can someone in the Commission draw some sort of schematic or a diagram for us to get a clear idea when the Commission does follow the famous EU principles and when it doesn't, so that we can waste our time and efforts only when it's worth? This will be of great help, you know - especially when we have shared with the media in the past the good News in advance for the only case when DG ENV did a good job - what are we to tell them now and how are we to explain Why the Commission has changed its mind?

And, please, pay special attention to outline the cases when the Commission did the right thing in the first place and then has changed its mind for no reason at all, willing to be deceived by our government.

### **FINAL WARNING:**

This document is focused mainly on the Yadenitsa dam case and on the FAST DANUBE project which are posing unacceptable risks for huge environmental damage, including Threat for human safety, property and lives. Should the Commission finance any part of these projects, it will bear responsibility second to none and the false Bulgarian EIA/AA procedures for these projects will NOT be enough an excuse, since the Commission was warned about the low quality of these procedures and about the risks. Here is just another independent opinion on the matter - the Commission's failures are getting famous around the world, as you can see:

<https://bankwatch.org/blog/pouring-millions-from-empty-into-the-void>

Quote from the minister of finance back then for the good old times of the Commission's sake:

*'The project for the expansion of the Chaira [pumped storage hydropower plant] will proceed. **The reason why the project has not started yet is the huge number of environmental infringement procedures... which are currently blocking the project**'.*

The damn Yadenitsa dam was not even assessed for its implications on two of the Natura 2000 Network sites in the affected area, the EIA/AA decision has expired and the seismic risks have been confirmed even by the Institute of Geophysics at the Bulgarian Academy of Sciences /BAS/... for anyone's sake!

Here is the letter of BAS to confirm our warnings once again, possibly hidden by our authorities from the Commission:

[https://dams.reki.bg/uploads/Docs/Files/STATEMENT\\_BAS\\_GEOPHISICS\\_YADENITSA.pdf](https://dams.reki.bg/uploads/Docs/Files/STATEMENT_BAS_GEOPHISICS_YADENITSA.pdf)

As for the FAST DANUBE project - any project that includes dredging and/or relocation of the fairway and the border close to the landslides in Bulgarian territory should not be financed by the EU. If anyone aims to improve the navigation in the Danube, try to modernize the 70 years "young" fleet, rather than a River millions of years old!

There is a Reason for the growing Euro skepticism in Bulgaria /apart from the Catastrophe with the introduction of the EURO/ and such actions of the Commission

disregarding its own principles, undermining the EU basic rules are not helping anyone in the long run!

**Final note to the attention of DG ENV:**

Following up the topics discussed during our last meeting in November 2025, hereby we inform that the Bulgarian Supreme Administrative Court has denied Balkanka Association the legal interest to appeal the decision of the government for the approval of the new RBMPs 2025-2027 in Bulgaria which, like every other environmental procedure here, are not even worth the paper they are written on.  
EU public access to justice at its best..., my Ass!

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. Dimiter Koumanov/  
Member of the board

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