

## RESPONSES to

**Initial observations on the environmental impact assessment for the project "Extraction and processing of polymetallic ores from the Rozino deposit, Tintyava area", located in the municipality of Ivaylovgrad, Haskovo region, within the framework of the transboundary environmental impact assessment procedure.**

| No.<br>in<br>order | Note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Sources                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 1                  | <p>The Environmental Impact Assessment (EIA) does not contain a comprehensive hydrographic and hydrogeological assessment of the transboundary link from the project area to the Greek territory. The potential transfer of pollutants along the hydrological chain Yuren Dere → Arpa Dere → Byala River → Luda River (Erythropotamos in Greek territory) → Evros River has not been quantitatively documented, nor have the downstream water uses in the Greek territory been assessed. Furthermore, there is no assessment of other mechanisms for the transfer of pollutants, such as through:</p> | <p>With regard to the comment concerning the need for additional hydrographic and hydrogeological assessment of the cross-border connection, it should be noted that within the framework of the EIA procedure, detailed hydrological and hydrogeological studies were carried out, covering the characteristics of surface and groundwater in the area of the investment proposal, including the catchments of the Byala Reka River, the Arpa Dere River and the Yuren Dere River, the runoff regime, the hydraulic connectivity, the filtration characteristics of the geological environments and the potential mechanisms for migration of substances.</p> <p>The "Hydrological Assessment of the Runoff in the Byala Reka River and its Tributary the Arpa Dere River" contains a detailed characteristic of the catchment areas, the climatic and runoff characteristics, the maximum and minimum water quantities, as well as an assessment of the natural hydrological regime in the area of the investment proposal.</p> <p>According to the "Report on the hydrogeological conditions in the area of the investment proposal for the Rozino deposit" (text appendix No. 16), the groundwater in the area is connected to groundwater body BG3G000PtPg049 - "Fractured waters - Eastern Rhodope complex", characterized by very low water abundance, low filtration parameters and limited infiltration.</p> <p>The report concludes that:</p> <ul style="list-style-type: none"> <li>• groundwater circulation occurs predominantly through fractures and tectonic fault zones;</li> <li>• the geological formations exhibit predominantly low permeability and are, to a large extent, practically watertight;</li> <li>• filtration coefficients are extremely low;</li> <li>• groundwater movement follows the local topographic relief and erosion base towards the Byala Reka River and its tributaries;</li> <li>• no conditions have been identified that would allow for significant transboundary migration of groundwater or pollutants.</li> </ul> <p>The chemical analyses of groundwater and contact waters carried out within the framework of the study demonstrate that the waters are fresh, with neutral pH values and without concentrations of heavy metals, sulphates or other indicators exceeding the applicable quality standards under Regulation No. 1/2007. The report explicitly states that the water quality is not affected by anthropogenic activity and that there is no evidence of acid mine drainage formation or any potential adverse impact on water quality.</p> | <ul style="list-style-type: none"> <li>• EIA, Section XII "Transboundary Impacts"</li> <li>• EIA, sections on waters and water management,</li> <li>• Text Appendix 10 "Hydrological Assessment", concluding part</li> <li>• Text Appendix 11 "Water Management",</li> <li>• Text Appendix 16 "Hydrogeological Assessment Report", conclusions</li> <li>• Text appendix 16 "Opinion of the Basin Directorate "Eastern Aegean Region"", conclusions</li> </ul> |

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|   | <p>(a) surface runoff (outside the above sequence),</p> <p>(b) infiltration and groundwater flow. The study needs to be complemented with a combined hydrological and hydrogeological simulation, the model of which should cover the Greek groundwater bodies (GWBs) EL120B100 and EL12BT150, as well as the surface water bodies downstream of the Erythropotamos and Evros rivers in the Thrace watershed (EL12).</p> | <p>The planned engineering measures include:</p> <ul style="list-style-type: none"> <li>• systems for the collection and management of contact waters;</li> <li>• drainage facilities;</li> <li>• sumps and drainage channels;</li> <li>• separation of contact waters from conditionally clean waters;</li> <li>• use of water within a closed-loop circulation system;</li> <li>• absence of wastewater discharge into surface water bodies.</li> </ul> <p>The official opinion issued by the East Aegean River Basin Directorate further concludes that:</p> <ul style="list-style-type: none"> <li>• no data are available indicating a risk of transboundary pollution of surface water or groundwater;</li> <li>• no impacts on groundwater bodies are expected, either quantitatively or qualitatively;</li> <li>• the project does not envisage any discharge of wastewater into water bodies;</li> <li>• the planned mitigation measures are designed to minimize and localize any potential impacts.</li> </ul> <p>With regard to the Greek groundwater bodies EL120B100 and EL12BT150, no data are available demonstrating the existence of a direct and significant hydraulic connection with the area of the investment proposal that could give rise to transboundary impacts under normal operating conditions and with the implementation of the envisaged technical and organizational protection measures. It should also be noted that the investment proposal is located entirely within the territory of the Republic of Bulgaria and has been developed in accordance with the requirements of Bulgarian and European legislation on water protection and pollution prevention.</p> <p>The technical conclusion based on the materials provided is that, during normal operation, no discharge of production, contact, or process waters into rivers, ravines, or sewer systems is envisaged. Production waters are recirculated, while contact waters are collected and managed in a dedicated contact water reservoir. This interrupts the main potential pathway for the transfer of pollutants to transboundary water receptors.</p> <p>Notwithstanding the above, during the subsequent stages of the project, further refinement of the monitoring programme and hydrogeological assessments may be carried out, to the extent deemed necessary by the competent authorities and in accordance with the stage of development of the project.</p> <p>Based on the studies, analyses, and envisaged water management and control measures, no significant adverse transboundary impacts on surface water or groundwater bodies, nor on water uses within the territory of the Republic of Greece, are expected.</p> |                                                        |
| 2 | Documentation is required for the compatibility of the project with the River Basin Management                                                                                                                                                                                                                                                                                                                           | <p>With regard to the request for documentation demonstrating the compatibility of the Project with the River Basin Management Plan (RBMP) for the Greek Thrace River Basin District (EL12, 2nd Revision, Government Gazette A81/12.06.2024), it should be noted that the Project is located entirely within the territory of the Republic of Bulgaria and, in accordance with the applicable national and European legislation, falls within the scope of the East Aegean River Basin Management Plan,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>• EIA, Section XII<br/>“Transboundary Impacts “</p> |

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| <p>Plan (RBMP) of the Greek Thrace River Basin District (EL12, Revision II, Official Gazette A81/12.06.2024). This documentation should include:</p> <p>(a) verification of compliance with all measures of the Greek RBMP programme of measures and</p> <p>(b) verification and confirmation that the principle of non-deterioration of the condition of the EL120B100 and EL12BT150 GVZs will not be violated.</p> | <p>which is the competent planning and management instrument for the assessment of impacts on water resources.</p> <p>The Environmental Impact Assessment Report (EIA Report) has nevertheless considered the transboundary context of the relevant water bodies and notes that, after crossing the national border, the water system enters the Greek River Basin District EL12 "Thrace". Within the Bulgarian section, the assessment has been carried out in relation to the River Basin Management Plan (RBMP) and the Flood Risk Management Plan (FRMP) of the East Aegean River Basin District, taking into account the opinion of the East Aegean River Basin Directorate regarding the admissibility of the Project subject to specified conditions and mitigation measures.</p> <p>The Project's compliance with the applicable objectives and measures for the affected water bodies falls within the competence of the relevant Bulgarian authorities, including the East Aegean River Basin Directorate. Nevertheless, given the transboundary nature of the Maritsa/Evros river basin, a review has been undertaken of the relevant objectives of the Water Framework Directive 2000/60/EC, including the non-deterioration principle, as well as the available information concerning the Greek groundwater bodies EL120B100 and EL12BT150.</p> <p>Within the RBMP for the Greek Thrace River Basin District (EL12, 2nd Revision), the measures are structured in accordance with the requirements of the Water Framework Directive and include:</p> <ul style="list-style-type: none"> <li>• measures to prevent deterioration of groundwater chemical status;</li> <li>• measures to protect groundwater quantitative status;</li> <li>• monitoring and trend assessment measures;</li> <li>• measures preventing the development of new activities that could result in deterioration of water body status;</li> <li>• measures concerning infiltration control, risk management, compliance control and environmental monitoring.</li> </ul> <p>Considering the Project characteristics and design measures described in the EIA Report, namely:</p> <ul style="list-style-type: none"> <li>• no direct or indirect discharge of wastewater into water bodies is envisaged;</li> <li>• a closed-loop water circulation system will be implemented;</li> <li>• contact and non-contact waters will be separated and managed in a controlled manner;</li> <li>• technical measures are incorporated to limit infiltration and prevent contamination of surface water and groundwater;</li> <li>• monitoring of water resources during both construction and operation is foreseen;</li> <li>• geochemical investigations have not identified conditions conducive to acid rock drainage formation or pollutant releases at concentrations that could compromise environmental objectives for water bodies;</li> <li>• no realistic pathways for transboundary contaminant transport have been identified,</li> </ul> <p>it can be reasonably concluded that the Project does not conflict with the principal categories of measures applicable to groundwater bodies EL120B100 and EL12BT150 because:</p> <ul style="list-style-type: none"> <li>• it does not create a new significant pressure on the water bodies;</li> <li>• it does not result in identified chemical or quantitative deterioration;</li> </ul> | <ul style="list-style-type: none"> <li>• Text appendix 10 "Hydrological assessment".</li> <li>• Text Appendix 11 "Water Management "</li> <li>• Text appendix 16 "Opinion of the Basin Directorate "Eastern Aegean Region""</li> </ul> |
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|   |                                                                                                                          | <ul style="list-style-type: none"> <li>it does not hinder the achievement of the objectives established under Article 4 of the Water Framework Directive.</li> </ul> <p>Based on the hydrological, hydrogeological, geochemical and engineering-geological assessments undertaken, no mechanism has been identified through which the construction or operation of the Project could result in significant transboundary impacts or deterioration of the quantitative or chemical status of groundwater bodies EL120B100 and EL12BT150. The assessment demonstrates that the proposed technical and organisational measures are consistent with the main objectives and categories of measures included in the Programme of Measures of the EL12 “Thrace” RBMP relating to groundwater protection, infiltration control, pressure management and the prevention of quantitative or chemical deterioration.</p> <p>With regard to the non-deterioration principle, it should be noted that, based on the assessments undertaken, no deterioration of the quantitative or chemical status of groundwater bodies, including EL120B100 and EL12BT150, is expected. No mechanism has been identified through which implementation of the Project could result in a breach of the non-deterioration principle within the meaning of Article 4 of the Water Framework Directive.</p> <p>With respect to the Erythrotamos River, which constitutes the transboundary continuation of the Byala River, the relevant measures contained in the Programme of Measures of the EL12 “Thrace” RBMP are aimed at preventing deterioration of ecological and chemical status, controlling diffuse and point-source pollution, monitoring, transboundary coordination and the management of hydromorphological risks. The technical and organisational measures incorporated into the Project are consistent with these objectives, and the Project is not expected to generate transboundary pressures that could compromise the achievement of environmental objectives for the respective Greek surface water body.</p> <p>Accordingly, implementation of the Project is not expected to compromise the achievement of the objectives established under Article 4 of the Water Framework Directive with respect to groundwater bodies EL120B100 and EL12BT150 or the Erythrotamos surface water body.</p> <p>In conclusion, based on the available information, the assessments performed and the proposed water management and protection measures, no significant transboundary impact on water bodies within the territory of the Hellenic Republic has been identified. No breach of the non-deterioration principle is expected, and the proposed measures are considered consistent with the principal objectives and categories of measures established under the EL12 “Thrace” River Basin Management Plan.</p> |                                                                                                                  |
| 3 | The ore contains hazardous elements, in particular arsenic (As) and mercury (Hg), which were noted in the operator’s own | With regard to the comment concerning the presence of arsenic (As), mercury (Hg), uranium (U), chromium (Cr), lead (Pb) and other potentially hazardous elements, it should be noted that the geochemical characterization of the ore, waste rock and flotation tailings has been addressed in the submitted documentation, including the Mine Waste Management Plan (MWMP), the attached laboratory protocols for waste characterization, and the referenced Velocity Minerals Preliminary Feasibility Study (PFS).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>EIA, geochemical data, pyrite concentrate and ARD conclusions.</li> </ul> |

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| <p>feasibility study (PFS) (Velocity Minerals, 2021, p. 46) in relation to the telethermal metasomatic activity in the Tashlaka area. The possible presence of uranium (U), which often accompanies other radioactive elements, chromium (Cr) and lead (Pb), is also a cause for concern. The EIA contains insufficient analysis of the issues related to these elements, although As occurs at concentrations of ~125 g/t, which is almost a hundred times higher than that of gold, Hg is a priority substance under Annex X to Directive 2000/60/EC and is regulated by the Minamata Convention, while the risks associated with U, Cr and Pb are well known. Therefore, it is necessary to study the detailed geochemical characterization of all ore types, the overburden (waste rock) and the flotation tailings, and to carry</p> | <p>It should be emphasized that the mere presence of certain chemical elements within the geological environment and ore body does not, in itself, indicate the existence of a significant risk to the environment or human health. Risk assessment must be based on the actual potential for mobilization, migration and exposure under the specific geological, hydrogeological and technological conditions of the project.</p> <p>The MWMP states that representative samples of ore, waste rock and flotation tailings were collected and analyzed by the accredited laboratory “Eurotest-Control” EAD for the purpose of determining the content of hazardous substances in mining waste. Based on the obtained results, the waste generated from the Rozino deposit has been classified as non-inert and non-hazardous. The leaching tests performed did not identify elevated concentrations of substances hazardous to the environment or human health, including As, Cd, Co, Cr, Cu, Hg, Mo, Ni, Pb, V and Zn. The MWMP further indicates that the sulphide sulphur content does not exceed 1.0%, while the neutralization potential to acid generation potential ratio exceeds 3 and, in the present case, is approximately 6. This demonstrates the absence of conditions for acid generation and, consequently, the absence of potential for acid mine drainage formation.</p> <p>In addition, the project documentation specifies that the selected flotation tailings management technology was designed taking into account the physicochemical characteristics of the waste material. According to the available data, no potential for acid-generating reactions has been identified. The selected technology envisages thickening of flotation tailings to approximately 70–75% solids content, thereby reducing water content, increasing storage facility stability, minimizing the risk of liquefaction, and limiting the potential for infiltration.</p> <p>The waste characterization protocols confirm that leachate concentrations do not exceed the applicable regulatory limit values for arsenic, mercury, chromium, lead or other metals. Neutral to slightly alkaline pH values, approximately between 8.73 and 9.57, were recorded, which further confirms the absence of acidic conditions and the lack of potential for mobilization of heavy metals. Mineralogical analyses demonstrate a predominant content of quartz, muscovite, clinocllore, orthoclase, calcite and dolomite, with pyrite content of approximately 1%. The presence of carbonate minerals such as calcite and dolomite provides a natural neutralization capacity and further limits the possibility of acid drainage formation.</p> <p>It should additionally be noted that the elevated arsenic and mercury contents referred to in the cited Preliminary Feasibility Study (PFS) relate to natural geological characteristics of the area and are not directly associated with the ore body of the Rozino deposit. The documentation states that the so-called telethermal metasomatic activity in the Tashlaka area is located more than 500 metres from the planned mine and is of no economic significance, with the elevated concentrations merely indicating ancient pathways of mineralized hydrothermal solutions responsible for the formation of the deposit millions of years ago.</p> <p>The documentation further indicates that the elevated concentrations of arsenic and mercury identified in soils occur outside the mine footprint and represent part of the natural geochemical background existing in the region for tens of millions of years. The average natural arsenic</p> | <ul style="list-style-type: none"> <li>• EIA, classification of mining waste.</li> <li>• EIA, radionuclides and radiological conclusions.</li> <li>• Text Appendix 16 “Hydrogeological Assessment Report”</li> <li>• Text appendix 9.1. Waste characterization protocols</li> <li>• Text appendix 17 “Radionuclide analysis protocols”</li> <li>• Text appendix 9 MWMP</li> </ul> |
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|   | <p>out a quantitative assessment of pollutant fluxes to downstream transboundary receptors.</p>                | <p>concentration in soils in the area is reported to be approximately 460 g/t, reaching up to 1900 g/t in certain samples located more than 500 metres from the future mine site. For comparison, the average arsenic concentration within the ore body is approximately 125 g/t.</p> <p>Appendix 9.1 further demonstrates that, following flotation, the majority of arsenic and associated elements are transferred into the concentrate, which is transported off-site for further processing. Significantly lower concentrations remain within the flotation tailings, with arsenic concentrations of approximately 58 g/t, which remain below the intervention thresholds for industrial sites established under Regulation No. 3/2008.</p> <p>Laboratory analyses for heavy metals and leachability confirm values significantly below the applicable regulatory thresholds, thereby demonstrating the non-hazardous character of the waste and the absence of a realistic risk of hazardous contamination.</p> <p>With regard to mercury, the documentation states that no significant mercury concentrations have been identified within the deposit area, while the chemical analyses of flotation tailings indicate Hg concentrations below 0.005 mg/kg (Appendix 9.1).</p> <p>With regard to uranium (U) and radiological aspects, Annex 17 to the EIA includes specialized radiological analyses for natural radionuclides, which do not identify radiologically significant mineralization or elevated concentrations of uranium and associated radionuclides. No evidence has been identified indicating a risk of radiological contamination or transboundary radiological impact. It should also be emphasized that:</p> <ul style="list-style-type: none"> <li>• no wastewater discharge is envisaged;</li> <li>• the project incorporates a closed-loop water circulation system;</li> <li>• contact waters are collected and managed in a controlled manner;</li> <li>• no conditions for acid mine drainage formation have been identified;</li> <li>• no concentrations of heavy metals or sulphates exceeding the applicable regulatory thresholds have been identified; and</li> <li>• monitoring, control and infiltration limitation systems are envisaged.</li> </ul> <p>Accordingly, the available geochemical, mineralogical, radiological and laboratory data do not support the claims of a risk of contamination by arsenic, mercury, uranium, chromium, lead or other hazardous elements, nor do they indicate any realistic potential for hazardous contamination or transboundary transfer of substances into the territory of the Republic of Greece.</p> <p>Based on the geochemical characterization performed, laboratory analyses, radiological investigations and the envisaged engineering protection measures, no significant adverse impacts on surface water, groundwater, soils, ecosystems or human health are expected, including transboundary impacts within the territory of the Hellenic Republic.</p> |                                                          |
| 4 | <p>The project includes extensive components that may favour the formation of acid rock drainage (ARD), in</p> | <p>With regard to the comment concerning the potential for the formation of acid rock drainage (ARD), it should be noted that the assessment of the geochemical characteristics of the ore, the open pit and the flotation tailings was carried out within the framework of the EIA procedure, including the Mine Waste Management Plan and the associated laboratory analyses. The results obtained did not establish the presence of conditions conducive to acid drainage formation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>• EIA, mineralogy, flotation and ARD conclusions.</p> |

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| <p>particular the open pit slope surfaces (140 m deep in a fault formation), the overburden (waste rock) and the flotation tailings. However, the assessment in the EIA that “no acid drainage formation” is based solely on static measurements using the ABA method (acid-alkaline balance) and has not been confirmed by kinetic or computational methods. In our opinion, it is necessary to jointly assess the results of kinetic geochemical tests (humidity cell tests, column tests) of sufficient duration to exclude the formation of acid drainage. At the same time, it is noted that in similar cases, geochemical modeling (with codes such as PHREEQC and MINTEQA2 of the US Environmental Protection Agency) for expected concentrations of dissolved metals and the assessment of</p> | <p>The static geochemical tests performed using the Acid-Base Accounting (ABA) method indicate that the sulphide sulphur content in the waste rock (overburden) is approximately 0.10%, with a Neutralization Potential Ratio (NPR) of 20.2, while the flotation tailings show sulphide sulphur content of approximately 0.13% and an NPR value of 25.9. Considering that materials with NPR values greater than 1 are generally regarded as possessing sufficient neutralization capacity and are classified as non-acid-generating, the tested materials do not demonstrate conditions favourable for the generation of acid rock drainage.</p> <p>In addition, mineralogical analyses demonstrate the presence of carbonate minerals such as calcite and dolomite, which provide natural buffering and neutralization potential. It is also important to note that the pyrite content in the ore is low, approximately 1%, while other sulphide minerals occur only rarely and sporadically, primarily during microscopic observations. These characteristics further reduce the likelihood of sustained acid-generating reactions.</p> <p>Laboratory analyses of leachates and eluates demonstrate neutral to slightly alkaline pH values, approximately in the range of 8.73–9.57, and do not indicate elevated concentrations of heavy metals or sulphates. The obtained results confirm the absence of active acid-generating processes and the lack of significant metal mobilization potential.</p> <p>It should further be emphasized that:</p> <ul style="list-style-type: none"> <li>• flotation tailings will be thickened to approximately 70–75% solids content;</li> <li>• the project includes measures for limiting infiltration;</li> <li>• contact waters will be collected and managed in a controlled manner;</li> <li>• no wastewater discharge is envisaged;</li> <li>• a closed-loop water circulation system is planned;</li> <li>• drainage and protective engineering systems are incorporated; and</li> <li>• monitoring of waters and facilities will be implemented throughout operation.</li> </ul> <p>With regard to the request for additional kinetic testing and geochemical modelling, it should be noted that such methods may be applied as supplementary tools during subsequent stages of technical design or operation, where deemed necessary by the competent authorities. However, the absence of kinetic modelling at the present stage does not render the assessment insufficient, as the available static geochemical tests, mineralogical analyses and leaching studies consistently indicate the absence of acid-generating potential.</p> <p>It should also be emphasized that environmental risk assessment must be based on the actual geological, mineralogical and geochemical characteristics of the specific site, rather than on hypothetical analogies with other deposits or mining projects developed under different geological conditions and mineral compositions.</p> <p>Kinetic analyses were not carried out because such testing is generally not considered necessary where static tests clearly demonstrate non-acid-generating characteristics.</p> <p>Based on the performed geochemical, mineralogical and laboratory investigations, no evidence has been identified indicating significant potential for acid rock drainage formation, substantial metal</p> | <ul style="list-style-type: none"> <li>• EIA, classification and management of mining waste.</li> <li>• EIA, water balance and zero discharge.</li> <li>• Text appendix 9.1 "Waste characterization protocols".</li> <li>• Text Appendix 11 "Water Management"</li> </ul> |
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|   | long-term loads with acidic pollutants contributes significantly to the assessment of environmental impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | mobilization or significant adverse impacts on surface water or groundwater, including transboundary impacts within the territory of the Republic of Greece.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                 |
| 5 | <p>The TMF and the waste rock disposal area are designed to completely cover the natural bed of the Yuren Dere stream. The proposed diversion solution (northern and southern diversion channels) concerns exclusively unpolluted upstream flows to the Fresh Water Dam (RWD) and Contact Water Reservoir (CWR) respectively, until a hydraulic simulation of the natural flow line of Yuren Dere is presented, which is eliminated from the proposed design. This location, in addition to the compatibility issues with the Bulgarian RDP for the East Aegean region, which is a matter of Bulgarian domestic legislation, creates an increased transboundary risk for Greece. Therefore, alternative locations</p> | <p>With regard to the comment concerning the location of the Tailings Management Facility (TMF), the waste rock disposal area and their relationship to the Yuren Dere stream bed, it should be noted that the site selection and engineering solutions were developed on the basis of detailed geological, hydrological, hydrogeological, engineering-geological and technical studies carried out within the framework of the project and presented in the EIA documentation and accompanying reports. The project includes analyses of the topographic characteristics, catchment areas, surface runoff regime, terrain stability, geological conditions and the possibilities for engineering protection and water management. Specialized engineering solutions for diversion and controlled management of surface waters are envisaged, including northern and southern diversion channels, drainage systems, collection facilities and controlled water management systems.</p> <p>The design and construction methodology for the tailings storage facility are aligned with the principles of the Global Industry Standard on Tailings Management (GISTM). The facility is designed using the downstream construction method, whereby the embankment is progressively raised in the downstream direction using rockfill placed over previously constructed sections. This method is internationally recognized as one of the safest approaches for tailings dam construction and is specifically recommended by GISTM in preference to upstream construction methods.</p> <p>It should be emphasized that the project does not envisage uncontrolled discharge or free flow of contact waters or process waters into the natural flow line of the Yuren Dere stream. Surface water and contact water will be collected, controlled and managed within dedicated project facilities, including the Fresh Water Dam (FWD), Contact Water Reservoir (CWR), drainage systems and the closed-loop water circulation system. No wastewater discharge into natural water bodies is envisaged.</p> <p>The hydrological assessment prepared for the project evaluates the characteristics of the catchment areas, surface runoff and water quantities within the Byala Reka River basin, Arpa Dere and adjacent catchments, including under extreme hydrological conditions. The engineering design has been developed taking into account the maximum design flood conditions and applicable facility safety requirements.</p> <p>In addition, the Integrated and Sustainable Water Management Report includes water balance modelling for dry, average and wet years, as well as assessment of extreme precipitation scenarios. The modelling results indicate that the maximum water levels within the facilities remain below the design crest elevations and that overflow is not expected under the adopted design conditions. The facilities have been dimensioned with consideration of extreme hydrological scenarios, including Probable Maximum Precipitation (PMP) and Probable Maximum Flood (PMF) conditions.</p> | <ul style="list-style-type: none"> <li>• EIA, thickened flotation tailings and advantages.</li> <li>• EIA, risks in accidents and breakdowns.</li> <li>• EIA, measures in case of extreme rainfall and flooding.</li> <li>• Text Appendix 11 "Water Management",</li> <li>• Text Annex 16 "Opinion of the Basin Directorate "Eastern Aegean Region""</li> </ul> |

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|     | <p>outside the river bed need to be explored, with a focus on the dry stack tailings method. A more complete justification of the proposed location is also needed, as well as a more extensive assessment of the possible adverse transboundary effects on Greece. In particular, the following points are noted on this issue:</p> | <p>With regard to the allegations of increased transboundary risk, the hydrological and hydrogeological assessments carried out do not identify any mechanism capable of generating significant transboundary impacts within the territory of the Republic of Greece. The geological environment is characterized by low permeability and limited groundwater migration potential, while the envisaged engineering measures are designed to prevent uncontrolled transport of substances through surface runoff or infiltration.</p> <p>The chemical, geochemical and mineralogical analyses of the ore, waste rock, flotation tailings and contact waters do not indicate concentrations of heavy metals, sulphates or other indicators exceeding the applicable regulatory thresholds, nor do they establish conditions for acid rock drainage formation or generation of toxic infiltration waters.</p> <p>The Mine Waste Management Plan and the associated laboratory investigations further demonstrate that:</p> <ul style="list-style-type: none"> <li>• the waste materials are classified as non-hazardous;</li> <li>• no potential for acid rock drainage generation has been identified;</li> <li>• leachate pH values remain neutral to slightly alkaline;</li> <li>• sulphide sulphur content is low;</li> <li>• the neutralization potential ratio (NPR) is favourable; and</li> <li>• no significant concentrations of mercury or other hazardous elements have been identified in the flotation tailings.</li> </ul> <p>With regard to the proposal for alternative technologies and locations, including dry stack tailings, it should be noted that different technical options and configurations were considered during the development of the project. The selected solution was chosen on the basis of geological, topographical, technical, environmental and economic criteria and has been assessed as technically feasible and environmentally compatible with the proposed mitigation and management measures. It should also be noted that the assessment of compliance with the River Basin Management Plan and the Flood Risk Management Plan for the East Aegean Region falls within the competence of the relevant Bulgarian authorities, including the East Aegean River Basin Directorate, which has not identified unacceptable impacts on water bodies or risks of transboundary pollution. Nevertheless, during subsequent stages of project development, individual technical solutions, monitoring measures and hydraulic assessments may be further refined to the extent considered necessary by the competent authorities and in accordance with the stage of project implementation. Based on the available studies, analyses and the envisaged engineering measures, no significant adverse impacts on surface water, groundwater or water uses are expected, including significant transboundary impacts within the territory of the Republic of Greece.</p> <p>...</p> |                                               |
| 5.1 | <p>The EIA states that “there will be no overflow even in a 1000-year flood”, but</p>                                                                                                                                                                                                                                                | <p>With regard to the comment concerning the risk of overflow of the mine waste management facilities during extreme hydrological events, it should be noted that detailed hydrological and hydraulic assessments have been carried out within the framework of the project documentation, including</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>• Text Appendix 11 “Water Management”,</p> |

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| <p>no detailed hydraulic simulation of the probable maximum flood (PMF) is presented. In case of overflow, the contaminated waters flow into the natural watercourse Yuren Dere → Arpa Dere → Byala Reka → Luda Reka/Erythrotamos → Evros (Greek territory).</p> | <p>analyses of extreme precipitation and runoff scenarios, water balance calculations and facility sizing under conservative design conditions.</p> <p>The project is not based solely on a standard 1,000-year flood event assessment, but also includes evaluation of Probable Maximum Precipitation (PMP) and Probable Maximum Flood (PMF) scenarios, which represent the most conservative criteria commonly applied in international engineering practice for the design of mining and hydraulic facilities.</p> <p>The documentation states that:</p> <ul style="list-style-type: none"> <li>• hydrological process modelling was performed using the specialized HEC-HMS model;</li> <li>• scenarios involving extreme precipitation events and maximum surface runoff were analysed;</li> <li>• the facilities were dimensioned under PMP/PMF design conditions;</li> <li>• freeboard, emergency spillways and reserve storage capacity are incorporated into the design;</li> <li>• the maximum predicted water level remains below the crest elevation of the facilities; and</li> <li>• no overtopping is expected under the adopted extreme design scenarios.</li> </ul> <p>In addition, the project documentation explicitly states that:</p> <p>“The entire contact water storage system is provided with the necessary retention volume for a precipitation event with a probability of 1 in 1,000 to 1 in 10,000 years (elevation 312).”</p> <p>This confirms that the design solutions were developed taking into account extreme hydrological conditions and very low probability precipitation events, ensuring sufficient reserve storage capacity for safe water retention and prevention of uncontrolled overflow.</p> <p>The project incorporates an integrated water management system, including:</p> <ul style="list-style-type: none"> <li>• northern and southern diversion channels;</li> <li>• a Fresh Water Dam (FWD);</li> <li>• a Contact Water Reservoir (CWR);</li> <li>• drainage and infiltration control systems;</li> <li>• systems for collection and recirculation of infiltration waters;</li> <li>• a closed-loop water circulation system; and</li> <li>• absence of wastewater discharge into natural water bodies.</li> </ul> <p>It should also be emphasized that the contact waters do not exhibit concentrations of heavy metals, sulphates or other indicators exceeding the applicable regulatory limits, and no conditions for acid rock drainage formation or generation of toxic infiltration waters have been identified. This further limits the potential for significant impacts even under hypothetical emergency conditions.</p> <p>With regard to the allegations concerning possible transboundary transport of contaminants, the hydrological, hydrogeological and engineering assessments carried out do not establish the existence of a realistic mechanism capable of causing significant transboundary impacts within the territory of the Republic of Greece under normal operating conditions or under the envisaged design scenarios.</p> | <ul style="list-style-type: none"> <li>• EIA, climate risks and adaptation measures.</li> <li>• Text Appendix 10 “Hydrological Assessment”</li> </ul> |
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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The geological environment is characterized by low permeability and limited groundwater migration potential, while the engineering solutions were specifically developed to prevent uncontrolled discharge of waters into natural watercourses.</p> <p>It should also be noted that the project facilities have been designed in accordance with internationally recognized engineering practices and the applicable safety requirements for mining waste management, including consideration of extreme climatic and hydrological events.</p> <p>Nevertheless, during subsequent stages of project development, individual hydraulic models, monitoring systems and emergency response procedures may be further refined where deemed necessary by the competent authorities and in accordance with the stage of project implementation.</p> <p>Based on the studies, modelling and the envisaged engineering protection measures, no significant adverse impacts on surface water or groundwater are expected, including significant transboundary impacts on the environment and water uses within the territory of the Hellenic Republic.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                         |
| 5.2 | <p>The possibility of underground infiltration through the fractured aquifer is a concern. It is questionable whether the cement curtain can guarantee long-term impermeability in the fractured aquifer, which will moreover be disturbed by weekly blasting during a 7-year operational period. If infiltration occurs, it will reach the transboundary groundwater body (TGB) BG3G000PtPg049, which is hydraulically connected to the Greek AWBs EL120B100 (Drossiniou) and EL12BT150 (Soufliou-Didymotiou).</p> | <p>With regard to the comment concerning the potential for subsurface migration through the fractured aquifer, it should be noted that, within the framework of the Environmental Impact Assessment (EIA), hydrogeological investigations and project documentation have included detailed assessments of the geological, hydrogeological and engineering-geological characteristics of the area, including fractured rock formations, filtration properties, hydraulic gradients, potential pathways and possible mechanisms for groundwater migration.</p> <p>The hydrogeological model developed for the Project indicates that the fractured aquifer system in the area is characterized by limited hydraulic conductivity, low groundwater yield and predominantly local groundwater circulation. The available data do not demonstrate conditions for the development of a sustained and significant regional hydraulic connection that could facilitate transboundary transport of water or contaminants to the Greek groundwater bodies EL120B100 (Drosiniou) and EL12BT150 (Soufliou–Didymoteicho). Groundwater body BG3G000PtPg049 is characterized by limited filtration capacity, and no evidence has been identified of a direct and significant hydraulic connection with the aforementioned Greek groundwater bodies.</p> <p>It should be emphasized that the mere presence of fracturing within the rock mass does not, in itself, constitute sufficient evidence of significant transboundary transport. Such a mechanism would require the simultaneous presence of:</p> <ul style="list-style-type: none"> <li>• sufficient and sustained hydraulic conductivity;</li> <li>• continuous connectivity between fracture systems;</li> <li>• favourable hydraulic gradients;</li> <li>• the presence of a contamination source; and</li> <li>• a realistic migration pathway for water or contaminants over significant distances.</li> </ul> <p>No such mechanism has been identified in the assessments undertaken.</p> <p>The Project incorporates an integrated system of engineering and hydrogeological measures designed to limit infiltration and control groundwater, including:</p> <ul style="list-style-type: none"> <li>• a grout curtain;</li> <li>• drainage systems;</li> </ul> | <ul style="list-style-type: none"> <li>• Text appendix 9 MWMP as an intention for mining waste management.</li> <li>• Text Appendix 11 "Water Management",</li> <li>• EIA, emergency and climate measures.</li> <li>• Text Annex 16 "Hydrogeological Assessment Report",</li> <li>• Text appendix 12 "Test explosion report"</li> </ul> |

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|     |                                                                                           | <ul style="list-style-type: none"> <li>• collection and management systems for infiltration water;</li> <li>• groundwater monitoring;</li> <li>• controlled management of contact water;</li> <li>• a closed-loop water circulation system; and</li> <li>• measures to minimise seepage into the surrounding geological environment.</li> </ul> <p>It should be stressed that the grout curtain does not represent a standalone protective measure but forms part of a multilayered system of engineering protection and water management. The effectiveness of this system is based on the combined performance of the technical design solutions, environmental monitoring and operational controls throughout the life of the Project.</p> <p>With regard to blasting activities, a dedicated report on blast-induced impacts has been prepared based on experimental blasting, instrumental measurements and analysis of vibration effects. The assessment concludes that, provided the design parameters and maximum explosive charge limits per delay interval are respected, no significant alteration of the hydrogeological characteristics of the rock mass, water sources, groundwater flow conditions or formation of new migration pathways is expected, nor is any impairment of the proposed engineering protection measures anticipated.</p> <p>The following additional findings should also be taken into account:</p> <ul style="list-style-type: none"> <li>• no conditions conducive to the formation of Acid Rock Drainage (ARD) have been identified;</li> <li>• no concentrations of heavy metals or sulphates exceeding applicable regulatory thresholds have been detected;</li> <li>• mine waste materials have been classified as non-hazardous;</li> <li>• contact water quality does not indicate contamination above applicable reference values; and</li> <li>• the Project does not envisage any discharge of wastewater into surface water bodies.</li> </ul> <p>The assessment has been undertaken both for normal operating conditions and for conservative seepage scenarios. The analyses performed have not identified any realistic mechanism for significant transboundary transport of water or contaminants to the Greek groundwater bodies EL120B100 and EL12BT150.</p> <p>No transboundary pathways have been identified that could lead to significant deterioration of the quantitative or chemical status of the relevant groundwater bodies or compromise the environmental objectives established under Article 4 of the Water Framework Directive 2000/60/EC.</p> <p>Nevertheless, the Project includes a groundwater and surface water monitoring programme, and, where considered necessary by the competent authorities, the monitoring programme may be further refined during subsequent stages of project development.</p> <p>Based on the hydrogeological, engineering-geological and geochemical assessments undertaken, no significant adverse impacts on groundwater resources are expected, nor are any significant transboundary impacts on the territory of the Hellenic Republic anticipated.</p> |                                                                                                         |
| 5.3 | There is also concern about potential dam failure. In such a case, about 10 million cubic | With regard to the comment concerning the hypothetical failure of the flotation Tailings Management Facility (TMF) wall, it should be noted that the facility has been designed with the primary objective of preventing such scenarios through the application of conservative engineering criteria, controlled                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• EIA, thickened flotation tailings and reduced risk.</li> </ul> |

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| <p>meters of tailings from the tailings pond would flow along the natural flow path towards Greek territory. The EIA should include a detailed analysis of the distribution of the waste, with flood maps covering the territory of Greece, as well as an assessment of the affected population and agricultural lands in the Evros region.</p> | <p>water management, emergency spillways, freeboard provisions, drainage systems and continuous monitoring measures.</p> <p>The assertion that, in the event of a possible failure, “approximately 10 million m<sup>3</sup> of waste” would be transported toward Greek territory represents a hypothetical and unspecified scenario that does not take into account the actual design configuration, the physical and rheological characteristics of the thickened flotation tailings, the phased construction methodology of the facility, the local topography, the available retention volumes, the water balance assessments or the envisaged emergency protection measures.</p> <p>The submitted documentation clearly indicates that the facility is designed for the deposition of thickened and compacted flotation tailings rather than for storage of a water-saturated free-flowing slurry. The selected tailings management technology provides for thickening of the flotation tailings to approximately 70–75% solids content, resulting in rapid primary consolidation within approximately one to two months. Under these conditions, the material does not exhibit the characteristics of a freely flowing liquid mass, which substantially limits the plausibility of the described catastrophic scenario.</p> <p>The selected technological solution was assessed as appropriate for the specific topographical, technical and operational conditions of the site and was selected following comparative evaluation of alternative options, including paste and dry cake technologies.</p> <p>The project also incorporates an integrated water management system based on the principle of zero discharge of contact waters, including separation of contact and non-contact waters, collection and recirculation of infiltration waters, controlled drainage systems and closed-loop water circulation. Water balance modelling was carried out for dry, average and wet years, with the results demonstrating that the maximum predicted water levels remain below the crest elevations of the facilities and that overflow is not expected under the adopted design conditions.</p> <p>Furthermore, the emergency spillways and surface water management systems have been dimensioned for extreme hydrological conditions, including PMP/PMF scenarios, with the 24-hour Probable Maximum Precipitation (PMP) estimated at approximately 506.2 mm.</p> <p>It should also be emphasized that the EIA assessment should be based on realistic and technically substantiated accident scenarios consistent with the design parameters, engineering standards, applicable regulatory requirements and probability of occurrence, rather than on arbitrary or speculative catastrophic assumptions.</p> <p>Where considered necessary by the competent authorities, additional assessments of accident scenarios, emergency response planning and propagation modelling under extreme adverse conditions may be further refined during subsequent stages of technical design and operation.</p> <p>At the present stage, based on the engineering design solutions, water balance assessments, facility sizing, planned drainage and emergency protection systems, and the absence of wastewater discharge, no realistic mechanism has been identified for significant adverse transboundary impacts on the territory of the Republic of Greece, including impacts on population, agricultural lands or water uses within the Evros region.</p> | <ul style="list-style-type: none"> <li>• EIA, emergency situations.</li> <li>• EIA, measures in case of extreme precipitation.</li> <li>• Text Appendix 11 “Water Management”</li> </ul> |
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| <p>5.4</p> | <p>Finally, the ecological impact on the ecosystem of the Yuren Dere River — a river included in the Bulgarian Natura 2000 sites Byala Reka (BG0002019) and Rhodopes – Eastern (BG0001032), and which is mainly an internal matter of Bulgaria — may affect the downstream biocommunity and in particular the priority species <i>Unio crassus</i> (freshwater mussel), <i>Cobitis strumicae</i> (Thracian spiny stickleback) and <i>Sabanejewia balcanica</i> (Balkan golden stickleback), which are associated with populations in the Greek Natura 2000 sites GR1130011 and GR1110010.</p> | <p>With regard to the comment concerning the potential impact on the ecosystem of the Yuren Dere River and the associated Natura 2000 protected areas, it should be noted that the EIA and the Appropriate Assessment considered the characteristics of the affected habitats and species, as well as the potential impacts on the protected areas BG0002019 “Byala Reka” and BG0001032 “Rhodopes – Eastern”.</p> <p>The assessments carried out conclude that, with implementation of the envisaged prevention, mitigation and control measures, no significant adverse impact is expected on the conservation objectives, integrity or protected features of the affected Natura 2000 sites, including aquatic ecosystems and associated species.</p> <p>It should further be emphasized that the Appropriate Assessment considered not only direct spatial overlap with protected areas, but also the potential for indirect impacts related to water quality, noise, dust emissions, vibrations and habitat alteration.</p> <p>With regard to the species <i>Unio crassus</i>, <i>Cobitis strumicae</i> and <i>Sabanejewia balcanica</i>, it should be noted that these species depend on specific local hydromorphological and ecological conditions, including water quality, substrate characteristics, oxygen regime and habitat integrity. The assessments carried out do not identify impacts of such scale or intensity that would result in significant alteration of these conditions on a transboundary scale.</p> <p>The hydrological, hydrogeological and hydrochemical analyses performed do not indicate a likelihood of significant deterioration of water quality or the formation of a pollutant pathway capable of affecting protected habitats or ecosystems within the territory of the Republic of Greece. The contact waters do not exhibit concentrations of heavy metals, sulphates or other indicators exceeding the applicable regulatory thresholds, while the project incorporates a closed-loop water circulation system, contact water collection and management facilities, drainage systems and monitoring of surface water and groundwater.</p> <p>It should also be noted that the investment proposal does not include activities within Greek Natura 2000 sites and does not directly affect habitats or populations located within the territory of the Republic of Greece. The assertions concerning possible impacts on populations associated with Natura 2000 sites GR1130011 and GR1110010 are based on assumptions regarding hypothetical ecological connectivity, without presentation of specific scientific evidence demonstrating a realistic impact mechanism.</p> <p>The Appropriate Assessment was carried out in accordance with the requirements of Directive 92/43/EEC, the Bulgarian Biological Diversity Act and the applicable Bulgarian and European legislation concerning nature conservation. The assessment considered the characteristics of the affected protected areas, the conservation objectives and qualifying features, as well as the potential direct, indirect, cumulative and long-term impacts.</p> <p>The envisaged prevention and mitigation measures include:</p> <ul style="list-style-type: none"> <li>• control and management of surface water and contact waters;</li> <li>• infiltration limitation measures;</li> <li>• measures to prevent erosion and transport of materials;</li> </ul> | <ul style="list-style-type: none"> <li>• EIA, Emergency plan.</li> <li>• EIA, emergency response to flooding.</li> <li>• EIA, Own monitoring plan.</li> <li>• EIA, conditions of the BDIBR.</li> <li>• DOSV Description and analysis of the impact...</li> <li>• DOSV, final parts and measures</li> </ul> |
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|     |                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• limitation of dust emissions;</li> <li>• reclamation and restoration of disturbed areas; and</li> <li>• environmental monitoring during operation and post-closure phases.</li> </ul> <p>It should additionally be taken into account that the Yuren Dere River and the associated Bulgarian Natura 2000 sites are primarily subject to the national nature conservation system and regulatory competence of the Republic of Bulgaria, and the assessment of impacts on these protected areas has been carried out by the competent Bulgarian authorities in accordance with the applicable legislation.</p> <p>Within the framework of the assessments performed, no data have been identified indicating a likelihood of significant deterioration of the ecological status of aquatic ecosystems at a scale capable of causing adverse impacts on associated populations within the territory of the Republic of Greece.</p> <p>Based on the assessments carried out, the available scientific data and the envisaged engineering and environmental protection measures, no significant adverse impacts on protected areas, habitats, aquatic ecosystems or protected species are expected, including significant transboundary impacts within the territory of the Hellenic Republic.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                     |
| 5.5 | In any case, the design of waste management facilities must meet the requirements of the “Reference Document on Best Available Techniques for the Management of Waste from the Extractive Industries” (JRC, 2018), and the design must be verified to comply with international guidelines, guidelines and requirements for the management of waste from the extractive industries. | <p>With regard to the comment concerning compliance with the “Reference Document on Best Available Techniques for the Management of Waste from the Extractive Industries” (JRC, 2018), it should be noted that the design of the mining waste management facilities has been developed taking into account the applicable European and national regulatory requirements, as well as internationally recognized good engineering practices for the management of extractive waste.</p> <p>The proposed engineering solutions incorporate key principles consistent with Best Available Techniques (BAT), including minimization of water contact with mining materials, separation of contact and non-contact waters, closed-loop water circulation, infiltration control, drainage and seepage interception systems, emergency spillways, and monitoring and management of the facilities during operation and post-closure.</p> <p>The submitted Integrated and Sustainable Water Management Report explicitly applies a “zero discharge” approach for contact waters, maximization of water reuse within the production process, and prevention of mixing between contact and non-contact waters.</p> <p>It should also be emphasized that the tailings management facility is designed for deposition of thickened and compacted flotation tailings rather than water-saturated free-flowing tailings. This approach significantly reduces the volume of free water, limits infiltration potential and reduces the risk of accidental dispersion of contaminants.</p> <p>The project incorporates key techniques and principles described in the “Best Available Techniques Reference Document for the Management of Waste from the Extractive Industries” (MWEI BREF, 2018), including:</p> <ol style="list-style-type: none"> <li>1. Waste volume minimization</li> </ol> <p>The investment proposal envisages the use of waste rock material for backfilling of excavated</p> | <ul style="list-style-type: none"> <li>• EIA, backfilling and reclamation effects.</li> <li>• EIA, future Plan for own monitoring.</li> <li>• EIA, MWMP as an intention.</li> </ul> |

sections of the open pit, as well as deposition of thickened flotation tailings with solids content of approximately 70–75%.

2. Tailings management

The selected approach utilizes thickened and compacted tailings deposition, consistent with the trend toward filtered or low-water-content tailings management technologies intended to reduce the risks typically associated with conventional liquid tailings impoundments, including risks related to stability and uncontrolled release.

3. Pollution prevention

The project incorporates engineering and operational measures for prevention of acid rock drainage (ARD), control of heavy metal mobilization and protection of surface water and groundwater. These measures are described in detail within the EIA documentation and associated technical studies.

At the present stage, the following BAT-related measures and assessments have been completed:

- BAT 1: Establishment of an organizational and environmental management framework at an early stage of project development.
- BAT 2, 3 and 4: Laboratory analyses of the behaviour and characteristics of flotation tailings and waste materials have been performed. No conditions for acid rock drainage formation, toxic leachate generation or significant mobilization of hazardous substances have been identified. The obtained results have been incorporated into the design solutions for the mine waste management facility.
- BAT 7: The project envisages segregation of waste rock from flotation tailings and utilization of suitable waste rock for backfilling purposes.
- BAT 11 and 13: Stability analyses and engineering calculations have been performed for the mine waste management facility using highly conservative design criteria, including extreme hydrological events with a probability of occurrence of approximately 0.01% (1 in 10,000 years).
- BAT 12: Environmental monitoring is envisaged throughout the entire life cycle of the project in accordance with the applicable legislation, covering all relevant environmental components and factors.

Final verification of compliance with the MWEI BREF (2018) and other applicable international guidance documents may be further refined and supplemented during subsequent stages of detailed technical design, permitting and implementation procedures.

At the current stage, no evidence has been identified indicating that the proposed engineering solutions are inconsistent with the principles of Best Available Techniques for extractive waste management.

Based on the submitted documentation, the performed analyses and the envisaged engineering and environmental protection measures, no significant adverse impacts are expected, including significant transboundary impacts within the territory of the Hellenic Republic.

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| 6 | <p>The cumulative impact assessment needs to be supplemented and expanded. The cumulative impacts of the planned or upcoming mining projects in the Eastern Rhodopes region (Kesebir, Iran Tepe, Kondovo, Blagun, Tintyava, Elhovo, Chirita, Khan Krum, Krumovitsa, Chukata, etc.), which are located in the same transboundary PTA BG3G000PtPg049, need to be studied in more detail and, as far as possible, quantitatively, especially with regard to the cumulative effect on water use and agricultural activities in the Greek regional units of Evros and Rhodopes.</p> | <p>With regard to the comment concerning the need to supplement the cumulative impact assessment, it should be noted that, within the framework of the EIA, an analysis was carried out of other investment proposals, plans, programmes and projects in the area that could potentially give rise to cumulative effects in combination with the present investment proposal.</p> <p>This analysis is presented in detail in Section V.6.5 of the EIA and Annex 14 to the EIA, where numerous projects and procedures are considered, including those in the areas of Kesebir, Iran Tepe, Kondovo, Blagun, Tintyava, Elhovo, Chiirite, Khan Krum, Krumovitsa, Chukata and others. Table VI.6.5-1 presents the distances between the boundaries of the investment proposal and the lands where exploration, extraction and/or processing of mineral resources are planned. It is evident from this table that only two potential sites could give rise to cumulative effects — in the lands of the villages of Zhelezino, Pastrok and Sokolentsi — and these have been subject to detailed analysis using relevant mathematical models.</p> <p>Table VI.6.5-2 provides a description of other investment proposals in the vicinity of the Rozino deposit concession area and assesses the probability of cumulative effects. Figure VI.6.5-1 illustrates the location of the investment proposal in relation to neighboring lands. The conclusions on cumulative effects, presented from page 272 of the EIA onwards, clearly indicate the absence of such impacts within the territory of the Republic of Bulgaria, and even less grounds exist to expect such impacts within the territory of the Republic of Greece.</p> <p>It should be taken into account that a significant number of the projects mentioned are at early stages of prospecting and exploration, without approved investment designs, final exploitation parameters or actual extraction activities. For some of them, sufficiently specific technical and hydrogeological data are not available to allow reliable quantitative assessment of potential cumulative effects.</p> <p>The cumulative impact assessment carried out takes into account the spatial scope, nature and stage of development of the known projects, as well as the specific characteristics of the affected protected areas, surface water and groundwater. The analysis does not identify any realistic mechanism for the formation of significant cumulative transboundary impacts on water bodies, water uses, agricultural activities or the ecological status of the territory of the Republic of Greece.</p> <p>With regard to groundwater body BG3G000PtPg049, it should be noted that the project provides for water management measures, infiltration limitation, contact water control and monitoring. Accordingly, no significant impact on the quantitative or chemical status of groundwater is expected. No evidence has been identified indicating that the implementation of the project, either independently or in combination with other known investment proposals, could lead to non-compliance with the environmental objectives for water bodies, significant deterioration of their status or significant transboundary impacts on water use and agricultural activities in the Greek regional units of Evros and Rhodopes.</p> <p>It should also be noted that the cumulative impact assessment has been carried out on the basis of currently available public information regarding existing and reasonably foreseeable projects, and in accordance with their degree of project readiness. In the event of new data becoming available, and</p> | <ul style="list-style-type: none"> <li>• EIA, cumulative impacts and reference to Textual Annex 14.</li> <li>• Text appendix 14 “Rosino cumulative effect table”.</li> <li>• Text Appendix 10 “Hydrological Assessment”,</li> <li>• Text Appendix 11 “Water Management”, • Text Appendix 16 “Hydrogeological Assessment Report</li> </ul> |
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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>depending on the development of other investment proposals, the assessment may be further updated and refined during subsequent stages of the project, where deemed necessary by the competent authorities.</p> <p>Based on the assessments carried out and the envisaged engineering and environmental protection measures, no significant adverse cumulative transboundary environmental impacts are expected within the territory of the Hellenic Republic.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                          |
| 7 | <p>In connection with the concerns expressed to us regarding the radiation risks arising from the proximity of the project to the former Planinets uranium mine (distance ~5 km), we consider that the possibility of re-extraction of radioactive elements as a result of changes in the local hydrological regime and repeated blasting operations, as well as the release of radon (Rn- 222) from the open pit mine area, should be assessed. A comprehensive radiation assessment and dosimetric assessment, in accordance with the dose limits and principles set out in Council Directive 2013/59/Euratom (Basic Safety Standards), should be made available to the</p> | <p>With regard to the comment concerning potential radiological risks associated with the proximity of the former Planinets uranium mine, it should be noted that this aspect has been considered within the framework of the geological, hydrogeological, radiological and blast-seismic assessments carried out for the project.</p> <p>Radiological aspects are addressed in Sections IV.10.2, V.10.4 and VI.6.3 of the EIA documentation. The laboratory data clearly demonstrate that the area where the investment proposal will be implemented does not constitute a source of harmful radiation to the environment. The presented gamma-spectrometric analyses, evaluated against the applicable regulatory standards, indicate that the excavated materials do not pose a risk to the environment and would not result in alteration of the natural radiation background in the area.</p> <p>The measured radioactivity levels in the investigated geological layers are sufficiently low and do not indicate conditions for contamination or dispersion of radioactive isotopes into other environmental components within the territory of the Republic of Bulgaria, much less within the territory of the Republic of Greece. Based on the laboratory analyses performed on rock material extracted from various depths, no geological formations exhibiting elevated radioactivity have been identified. Nevertheless, Section IX of the EIA establishes specific conditions and recommendations concerning non-ionizing radiation and radiological monitoring measures for the different stages of project implementation.</p> <p>Directive 2013/59/Euratom is not directly applicable to the investment proposal, as the project does not involve the extraction, processing, storage or use of uranium ores, radioactive substances, nuclear materials or sources of ionizing radiation. The project does not constitute a radiological activity and does not generate radioactive waste.</p> <p>Appendix 17 to the EIA contains specialized laboratory analyses concerning the specific activity of natural gamma radionuclides, performed by the Central Research Laboratory at Dial Ltd. The obtained results indicate values characteristic of the natural geological background, without evidence of radiological contamination or anomalous concentrations of uranium and associated radionuclides. The measured values for U-238, U-235, Ra-226 and Th-232 do not indicate the presence of radiologically significant mineralization. In most analysed samples, U-235 concentrations remain below the analytical detection limits, while the values of the remaining natural radionuclides are low and correspond to natural background levels.</p> <p>With regard to the possibility of remobilization of radioactive elements due to changes in the hydrological regime, the hydrogeological investigations establish low groundwater abundance, low filtration coefficients, limited permeability and restricted hydraulic conductivity within groundwater</p> | <ul style="list-style-type: none"> <li>• DOVOS, gamma-spectrometric analyses.</li> <li>• EIA, health and hygiene assessment regarding radiation.</li> <li>• EIA, responses to comments on the radiological factor and "Planinets".</li> <li>• Text appendix 12 "Test explosion report"</li> <li>• Text appendix 17 "Dial analysis protocols".</li> </ul> |

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|   | public on both sides of the border.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>body BG3G000PtPg049. These conditions do not indicate significant migration potential for substances through groundwater pathways.</p> <p>With regard to blasting operations, a specialized assessment of the lateral impacts of blasting was prepared on the basis of experimental blasting activities and instrumental monitoring using specialized equipment. The conclusions indicate that, subject to compliance with the recommended maximum explosive charge per delay interval, no significant seismic impacts on groundwater or water sources are expected.</p> <p>Concerning radon (Rn-222), it should be noted that radon is a naturally occurring gas characteristic of many geological environments. At present, no data have been identified indicating a risk of significant radon emissions associated with the investment proposal. Where considered necessary, radon monitoring may be incorporated into the environmental monitoring programmes as an additional precautionary and control measure.</p> <p>Based on the radiological, hydrogeological and blast-seismic assessments carried out, no significant radiological impacts are expected on the population, workers, environmental components or water bodies, including significant transboundary impacts within the territory of the Republic of Greece.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                |
| 8 | <p>A significant addition is needed to the assessment of the significance of the impact under Article 6(3) of Directive 92/43/EEC in order to determine whether an appropriate assessment is required in the neighbouring Greek Natura 2000 sites, and in particular in the Special Protection Areas (SPAs) GR1130011 "Koylada Filiouri" (Rhodopi Regional Unit) and GR1110010 "Oreinos Evros - Koylada Dereyou" (Evros Regional Unit). A specific analysis is needed of the priority</p> | <p>With regard to the request for an additional assessment under Article 6(3) of Directive 92/43/EEC, it should be noted that, within the framework of the EIA procedure, an appropriate assessment was prepared concerning the compatibility of the investment proposal with the conservation objectives and protected features of the affected Natura 2000 sites BG0001032 "Rhodopes – Eastern" and BG0002019 "Byala Reka". The assessment was carried out pursuant to Article 31 of the Bulgarian Biological Diversity Act and in accordance with the applicable Regulation on Compatibility Assessment.</p> <p>The assessment considers both direct and indirect impacts on natural habitats, species and their habitats, including potential impacts through water, noise, dust, vibration, fragmentation, barrier effects, disturbance and cumulative impacts.</p> <p>With regard to species associated with the aquatic environment, it should be noted that Unio crassus, Sabanejewia aurata and Cobitis taenia are explicitly included within the scope of the assessment for the protected area BG0001032 "Rhodopes – Eastern". Their potential habitats and the degree of impact have been assessed, and the summary conclusions define the expected impacts as absent or insignificant, subject to implementation of the envisaged mitigation measures. It should be emphasized that the Bulgarian Compatibility Assessment considered the species that are subject to conservation within the affected Bulgarian Natura 2000 sites. No evidence has been identified of a realistic mechanism by which the project could cause significant transboundary impacts on populations within the Greek Natura 2000 sites GR1130011 "Koylada Filiouri" and GR1110010 "Oreinos Evros – Koylada Dereiou".</p> <p>The investment proposal does not envisage any activities within the territory of the Republic of Greece or within the boundaries of the above-mentioned Greek Natura 2000 sites. The potential impacts assessed are local in nature and limited to the project area and the directly affected Bulgarian protected areas.</p> | <ul style="list-style-type: none"> <li>• DOSV, final parts and measures,</li> <li>• EIA, Section XII "Transboundary Impacts",</li> <li>• Text Appendix 10 "Hydrological Assessment"</li> <li>• Text Appendix 11 "Water Management",</li> <li>• Text Appendix 16 "Hydrogeological Assessment Report"</li> </ul> |

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|   | species in Annex II to the Directive that are linked to transboundary water resources (in particular the above-mentioned <i>Unio crassus</i> , <i>Cobitis strumicae</i> and <i>Sabanejewia balcanica</i> ).                                                                                                                                               | <p>The hydrological, hydrogeological and hydrochemical assessments carried out do not identify any likelihood of significant deterioration of water quality or transport of substances at a scale capable of affecting Greek protected areas or associated aquatic habitats. The project provides for a closed-loop water circulation system, no wastewater discharge, controlled management of contact waters, infiltration limitation measures and monitoring.</p> <p>Accordingly, there is no basis for requiring a separate Appropriate Assessment of the compatibility of the investment proposal with Greek Natura 2000 sites GR1130011 and GR1110010, as no likelihood of significant effects on these sites within the meaning of Article 6(3) of Directive 92/43/EEC has been established.</p> <p>Based on the Appropriate Assessment carried out, the available data and the envisaged mitigation and control measures, no significant adverse impacts on protected areas, habitats, aquatic ecosystems or species are expected, including significant transboundary impacts within the territory of the Hellenic Republic.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                       |
| 9 | <p>The proposed environmental monitoring, in our opinion, is insufficient in terms of its transboundary aspect. We believe that an adequate transboundary monitoring system should be developed and implemented, for which the responsibility, care and costs are borne by the project operator, and which should have the following characteristics:</p> | <p>With regard to the comment concerning the need for additional transboundary environmental monitoring, it should be noted that the project provides for monitoring programmes covering the principal environmental components and factors, including surface water, groundwater, dust emissions, noise, vibrations, facility stability and the technical condition of water management and waste management systems.</p> <p>Under the applicable Bulgarian legislation, the detailed Own Monitoring Plan is developed after the entry into force of the EIA decision approving the investment proposal and after the granting of a concession under the Underground Resources Act, since at the present stage the Contracting Authority does not possess operational rights over the relevant territories. The monitoring plan is subsequently coordinated with the competent environmental authorities.</p> <p>Given the extended period between the current procedural stage and the commencement of operational activities, it is not currently possible to define comprehensively all environmental parameters or establish the complete baseline and operational monitoring framework that will apply during the future implementation phase. Any recommendations and requirements concerning the future Own Monitoring Plan may be incorporated into the EIA decision and would thereby become mandatory for implementation irrespective of the timing of project realization.</p> <p>Nevertheless, the envisaged monitoring measures have been developed in accordance with the nature, scale and location of the investment proposal, the applicable regulatory requirements and the conclusions of the environmental assessments carried out.</p> <p>It should also be emphasized that, within the framework of the EIA and the accompanying specialized assessments, no evidence has been identified indicating a likelihood of significant adverse transboundary impacts on water resources, ecosystems, population or land use within the territory of the Republic of Greece. Accordingly, no necessity has been identified for establishment of a separate specialized transboundary monitoring system beyond the control and monitoring measures already envisaged by the project and required under Bulgarian legislation.</p> <p>The project nevertheless envisages monitoring of:</p> | <ul style="list-style-type: none"> <li>• EIA, future Plan for own monitoring.</li> <li>• EIA, conditions of the BDIBR.</li> <li>• EIA, Section XII "Transboundary Impacts",</li> <li>• Text Appendix 11 "Water Management"</li> <li>• Text Appendix 16 "Hydrogeological Assessment Report"</li> </ul> |

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|     |                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• surface waters;</li> <li>• groundwater;</li> <li>• contact waters;</li> <li>• seepage and infiltration flows;</li> <li>• ambient air quality;</li> <li>• noise and vibrations;</li> <li>• geotechnical stability of the facilities; and</li> <li>• operational integrity of dams and water management systems.</li> </ul> <p>Monitoring activities will be carried out in accordance with the requirements of the competent Bulgarian authorities and the conditions of the issued permits, including the applicable reporting, control and follow-up obligations.</p> <p>It should further be noted that the specific monitoring parameters, monitoring frequency, location of monitoring points and technical specifications of the monitoring programmes are subject to further refinement during the subsequent stages of design, permitting and project operation, in accordance with the requirements of the competent authorities and the actual site-specific conditions.</p> <p>With regard to the request that all responsibilities, obligations and costs associated with any potential transboundary monitoring should be assigned entirely to the project operator, it should be noted that the scope and conditions of monitoring are determined by the competent authorities within the applicable administrative and permitting procedures and in accordance with the relevant national and European legislation.</p> <p>Based on the assessments carried out, the available scientific and technical data and the envisaged monitoring and control measures, no significant adverse transboundary impacts are expected that would require the establishment of an additional specialized transboundary monitoring system beyond the measures already envisaged in the project and under the applicable regulatory framework.</p> <p>The analysis of the potential impacts presented in detail in the EIA for the individual environmental components and factors does not identify objective evidence indicating a likelihood of transboundary pollution requiring monitoring within the territory of the Republic of Greece. The expected impacts are local and spatially limited in nature.</p> |                                                                                                                                                                                         |
| 9.1 | A monitoring network with clearly defined observation points on both Bulgarian and Greek territory (at a minimum: the mouth of Yuren Dere, the mouth of Arpa Dere, the Byala River before its confluence with the | <p>With regard to the proposal for the establishment of a transboundary monitoring network with specifically designated observation points on the territory of the Republic of Bulgaria and the Republic of Greece, it should be noted that the necessity, scope and parameters of monitoring programmes are determined on the basis of the conclusions of the environmental impact assessments, the characteristics of the investment proposal and the likelihood of significant impacts.</p> <p>Within the framework of the hydrological, hydrogeological and ecological assessments carried out, no data have been identified indicating a likelihood of significant transboundary impacts on water bodies or ecosystems within the territory of the Republic of Greece that would necessitate the establishment of a specialized transboundary monitoring network extending onto Greek territory.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• EIA, Section XII “Transboundary Impacts”</li> <li>• EIA, Own monitoring plan.</li> <li>• Text Appendix 10 “Hydrological Assessment”</li> </ul> |

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|     | <p>Luda River, the Luda/Erythropotamos River on the Greek-Bulgarian border, the Erythropotamos River at Metaxades, the Evros River at Didymoteicho).</p>                                          | <p>Nevertheless, the project provides for monitoring of surface water, groundwater, contact waters, seepage and infiltration flows, as well as the technical condition and stability of the facilities. The specific monitoring points, monitoring frequency and analytical parameters will be determined and updated in accordance with the requirements of the competent Bulgarian authorities and the conditions of the issued permits.</p> <p>It should also be emphasized that the designation and operation of monitoring points within the territory of another Member State cannot be established unilaterally by the investment proposal or project operator, but would require coordination and decisions by the competent national authorities within the framework of the applicable interstate, administrative and environmental procedures.</p> <p>The observation points proposed in the comment within the territory of the Republic of Greece, including locations near Metaxades and Didymoteicho, are situated at considerable distances from the investment proposal area. No specific scientific data, hydrological modelling or hydrogeological analyses have been presented demonstrating the existence of a realistic mechanism for impacts at such spatial scales.</p> <p>The assessments carried out demonstrate that:</p> <ul style="list-style-type: none"> <li>• no wastewater discharge into natural water bodies is envisaged;</li> <li>• contact waters will be managed within a closed-loop circulation system;</li> <li>• no concentrations of heavy metals or sulphates exceeding the applicable regulatory limits have been identified;</li> <li>• no conditions for acid rock drainage formation have been identified; and</li> <li>• no mechanism has been established for significant transboundary migration of pollutants.</li> </ul> <p>Accordingly, no data are currently available that would justify the establishment of a specialized transboundary monitoring system extending to the Evros River within the territory of the Republic of Greece.</p> <p>Nevertheless, where considered necessary and upon decision of the competent authorities, individual monitoring measures and observation points may be further refined or expanded during subsequent stages of project development, operational monitoring and environmental control procedures, in accordance with the applicable regulatory requirements and the results of ongoing environmental monitoring.</p> | <p>• Text Appendix 11 "Water Management"</p>                                                                                                   |
| 9.2 | <p>Monitoring of surface and groundwater (from existing boreholes or new ones, if necessary) with sampling at least every six months during the operational phase and annually after closure,</p> | <p>With regard to the proposal for monitoring of surface water and groundwater with specified sampling frequency and long-term post-closure duration, it should be noted that the project already provides for monitoring programmes concerning water resources and the technical condition of the facilities during both the operational phase and the post-closure period.</p> <p>The specific scope, frequency, duration and location of monitoring points are subject to determination and periodic updating by the competent authorities within the framework of the permitting procedures and the subsequent stages of project design and operation, taking into account:</p> <ul style="list-style-type: none"> <li>• the results of the environmental assessments carried out;</li> <li>• the actual characteristics and operational conditions of the site;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>• EIA, future Plan for own monitoring.</p> <p>• Text Appendix 16 "Hydrogeological Assessment Report"</p> <p>• EIA, conditions of BDIBR.</p> |

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|     | <p>for a period of at least 30 years after closure.</p> <ul style="list-style-type: none"> <li>• the applicable regulatory requirements;</li> <li>• the results of ongoing environmental monitoring;</li> <li>• the risk assessments performed; and</li> <li>• the necessity for follow-up control measures.</li> </ul> <p>At the present stage, no evidence has been identified indicating a likelihood of significant adverse impacts on surface water or groundwater, including transboundary impacts, that would justify the prior establishment of a fixed 30-year transboundary monitoring regime.</p> <p>Nevertheless, the project envisages:</p> <ul style="list-style-type: none"> <li>• monitoring of surface waters;</li> <li>• monitoring of groundwater;</li> <li>• monitoring of contact waters and seepage/infiltration flows;</li> <li>• monitoring of the technical condition and stability of the facilities; and</li> <li>• post-closure environmental control and monitoring.</li> </ul> <p>The duration and scope of post-closure monitoring will be determined by the competent authorities on the basis of the actual condition of the site, the results of monitoring activities and the applicable regulatory requirements in force at the time of closure.</p> <p>It should also be emphasized that the geochemical, hydrogeological and engineering assessments carried out indicate that:</p> <ul style="list-style-type: none"> <li>• acid rock drainage formation is not expected;</li> <li>• no concentrations of heavy metals or sulphates exceeding the applicable regulatory limits have been identified;</li> <li>• the project incorporates a closed-loop water circulation system;</li> <li>• no wastewater discharge into natural water bodies is envisaged; and</li> <li>• no mechanism has been identified for significant transboundary migration of pollutants.</li> </ul> <p>Accordingly, no data are currently available that would justify the establishment of a predefined exceptionally long-term transboundary monitoring regime extending beyond the standard requirements of the applicable legislation and the conditions to be determined by the competent authorities.</p> <p>Notwithstanding the above, where considered necessary and at the discretion of the competent authorities, monitoring programmes may be expanded, updated and adapted during subsequent stages of project implementation and after closure of the site.</p> | <p>• Text Appendix 11 “Water Management”</p>                                                                        |
| 9.3 | <p>Ambient air monitoring (PM<sub>10</sub>, PM<sub>2.5</sub>, heavy metals in airborne particulate matter, radon).</p> <p>Section IX and Table IX-1 of the EIA include a number of measures related to atmospheric air protection and control. It should be noted that the detailed Own Monitoring Plan can only be developed after the entry into force of the EIA decision approving the investment proposal and after the granting of a mining concession under the Underground Resources Act, since at the present stage the Contracting Authority does not possess operational rights over the relevant territories. The monitoring plan will subsequently be coordinated with the competent environmental authorities.</p> <p>Given the extended period until the occurrence of these circumstances, it is not currently possible to comprehensively define all environmental parameters or establish a complete operational</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>• EIA, emissions and modelling.</p> <p>• EIA, health and hygiene aspects and dust.</p> <p>• EIA, conclusions</p> |

baseline for future monitoring activities, which will be implemented only after the Contracting Authority acquires the legal rights to carry out the activity and the associated monitoring. Any recommendations and requirements concerning the future Own Monitoring Plan may be incorporated into the EIA decision and would thereby become mandatory for implementation regardless of the timing of project realization.

In general, it should be emphasized that the project provides for air quality control and monitoring measures proportionate to the nature and scale of the investment proposal and consistent with the applicable regulatory requirements.

Measures envisaged for limitation of dust emissions include:

- watering of access roads;
- management and control of transport activities;
- limitation of dust generation during loading and unloading operations;
- land reclamation and stabilization measures; and
- operational process control measures.

Within the framework of the EIA, assessments of emissions and dispersion of particulate matter were carried out, and no data have been identified indicating a likelihood of significant adverse impacts on ambient air quality outside the project area, including significant transboundary impacts within the territory of the Hellenic Republic.

With regard to monitoring of PM<sub>10</sub> and PM<sub>2.5</sub>, it should be noted that the specific monitoring parameters, measurement frequency and monitoring locations are subject to determination by the competent authorities within the framework of the permitting procedures and operational conditions, in accordance with the applicable legislation and the results of the environmental assessments.

The geochemical and chemical analyses performed do not identify conditions for significant emissions of heavy metals into ambient air. No evidence has been identified indicating concentrations of heavy metals exceeding the applicable regulatory limits in contact waters, waste materials or the assessed environmental media.

With regard to radon (Rn-222), Appendix 17 to the EIA presents specialized radiological analyses which do not identify radiologically significant mineralization or conditions indicating significant radiological impacts. Radon is a naturally occurring gas characteristic of many geological environments, and at present no evidence has been identified indicating a realistic risk of significant radon emissions associated with the investment proposal.

Nevertheless, where considered necessary and at the discretion of the competent authorities, parameters such as PM<sub>10</sub>, PM<sub>2.5</sub>, heavy metals and radon may be included or further refined within the monitoring programmes during subsequent stages of project development and operation.

Based on the assessments carried out, the available scientific and technical data and the envisaged control measures, the expected impacts are local and limited in nature, and no significant adverse impacts on ambient air quality are expected, including significant transboundary impacts within the territory of the Republic of Greece.

regarding PM10/PM2.5.

- EIA, radiological analyses.
- Text Appendix 12 "Test Blasting Report".
- Text appendix 17 "Radionuclide analysis protocols"

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| 9.4 | <p>A pre-defined and clearly stated procedure for informing the Greek authorities (Ministry of Environment and Energy, the Directorate of Waters of Eastern Macedonia-Thrace of the Decentralized Administration of Macedonia-Thrace and the Department of Environment and Water Management of the Evros Regional Unit of the Eastern Macedonia-Thrace region) on a regular basis under normal conditions and in real time in case of exceeding the pre-defined limits.</p> | <p>With regard to the proposal for a predefined procedure for informing the competent Greek authorities, it should be noted that the conditions and mechanisms for notification, reporting and exchange of information during normal operation and in emergency situations are determined by the competent national authorities within the framework of the applicable administrative, permitting and transboundary procedures.</p> <p>In principle, such requirements may be incorporated into the EIA decision approving the investment proposal and would thereby become mandatory for implementation, irrespective of the timing of project realization.</p> <p>In addition, the project provides for monitoring, control and emergency preparedness systems, including:</p> <ul style="list-style-type: none"> <li>• monitoring of surface water and groundwater;</li> <li>• monitoring of the technical condition and stability of the facilities;</li> <li>• emergency response procedures;</li> <li>• internal control and reporting systems; and</li> <li>• notification of the competent Bulgarian authorities in the event of incidents or exceedance of regulatory thresholds.</li> </ul> <p>It should be emphasized that, at the present stage, no evidence has been identified indicating a likelihood of significant adverse transboundary impacts within the territory of the Republic of Greece that would justify the establishment of a special bilateral real-time notification regime beyond the mechanisms already provided for under the applicable legislation.</p> <p>Nevertheless, where considered necessary and in accordance with the decisions of the competent authorities, the following aspects may be further specified during subsequent stages of the project:</p> <ul style="list-style-type: none"> <li>• procedures for exchange of information;</li> <li>• notification mechanisms in emergency situations;</li> <li>• reporting parameters and thresholds; and</li> <li>• coordination mechanisms between the competent authorities of the Republic of Bulgaria and the Republic of Greece.</li> </ul> <p>It should also be noted that the international exchange of information between state institutions, including between the competent authorities of the Republic of Bulgaria and the Republic of Greece, is carried out in accordance with the applicable European legislation, interstate mechanisms and national competences, and cannot be unilaterally determined within the framework of the investment proposal itself.</p> <p>Based on the assessments carried out, the available scientific and technical data and the envisaged control and monitoring measures, no significant adverse transboundary impacts are expected that would require the establishment of a specialized extraordinary notification system beyond the applicable regulatory mechanisms and procedures determined by the competent authorities.</p> | <ul style="list-style-type: none"> <li>• EIA, Emergency plan.</li> <li>• EIA, emergency response to extreme precipitation.</li> <li>• EIA, Own monitoring plan.</li> <li>• EIA, Section XII "Transboundary Impacts"</li> </ul> |
| 9.5 | <p>Public access to all monitoring data.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>With regard to the proposal for public access to monitoring data, it should be noted that the provision of information concerning environmental components, monitoring results and compliance with permit</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• EIA, future Self-Monitoring Plan.</li> </ul>                                                                                                                                          |

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|    |                                                                                                                                                                                                                                                                                                                                                                             | <p>conditions is carried out in accordance with the applicable Bulgarian and European legislation governing access to environmental information.</p> <p>The project operator will fulfil the obligations concerning environmental monitoring, reporting and provision of information to the competent authorities in accordance with the conditions of the issued permits, the EIA decision, where applicable, and the relevant regulatory requirements.</p> <p>It should also be noted that monitoring results subject to public disclosure under the applicable legislation are made available through the established administrative procedures and mechanisms, including through the competent authorities and public registers where such requirements apply.</p> <p>The specific scope, format, frequency and method of publication of monitoring data are determined in accordance with:</p> <ul style="list-style-type: none"> <li>• the applicable regulatory requirements;</li> <li>• the conditions of the permits;</li> <li>• the requirements of the competent authorities; and</li> <li>• the protection of information constituting commercial, technical or legally protected information.</li> </ul> <p>Nevertheless, the project envisages implementation of environmental monitoring programmes and provision of information to the competent authorities in accordance with the established procedures. Where a legal basis and applicable requirements exist, the relevant information may also be made available to the public.</p> <p>Based on the assessments carried out and the envisaged control and monitoring measures, no significant adverse transboundary impacts on the environment or population within the territory of the Republic of Greece are expected.</p> | <ul style="list-style-type: none"> <li>• EIA, conditions of the competent authorities.</li> </ul>                                                                                                                                                                                                                  |
| 10 | <p>The EIA foresees that water for irrigation and dust suppression (up to 10,510 m<sup>3</sup>/month in August) will be drawn from the waste facility. This practice leads to widespread spread of contaminated water, formation of toxic aerosols during evaporation and a constant risk of surface transport of pollutants after rainfall to downstream transboundary</p> | <p>With regard to the comment concerning the use of water from the mine waste management facility for sprinkling and dust suppression, it should be noted that the project envisages the controlled use of contact water within a closed-loop water circulation system, which represents a widely applied practice in the mining industry aimed at minimizing freshwater consumption and reducing discharges to the environment. This approach is also consistent with the conclusions on Best Available Techniques (BAT) for extractive waste management, including point 4.3.3.1.2 of the relevant reference document.</p> <p>According to the MWEI BREF (EC-JRC, 2009), reuse of water originating from mine waste management facilities, including extractive waste facilities (EWF), is recognized as good environmental practice and contributes to sustainable water resource management.</p> <p>Laboratory analyses carried out within the framework of the EIA and the associated technical studies demonstrate that the waters managed within the waste management system do not contain hazardous or priority hazardous substances at concentrations exceeding the applicable regulatory thresholds.</p> <p>It should be emphasized that the waters used for dust suppression do not constitute “contaminated wastewater” within the meaning suggested in the comment. The performed chemical analyses of contact waters did not identify concentrations of heavy metals, sulphates or other indicators</p>                                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>• EIA, consumption, recycled water and zero discharge.</li> <li>• EIA, thickened flotation tailings 70–75% solids.</li> <li>• EIA, spraying as a measure against dust.</li> <li>• EIA, local precipitation of PM.</li> <li>• Text Appendix 11 “Water Management”</li> </ul> |

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|    | <p>receptors. We believe that this project should be revised, using clean (uncontaminated) water for irrigation and dust suppression.</p> | <p>exceeding the applicable regulatory or reference values. No conditions for acid rock drainage (ARD) formation, toxic seepage generation or significant mobilization potential for hazardous substances have been identified (Textual Appendix 9.1). Contact waters are collected, controlled and managed within dedicated project facilities, including through:</p> <ul style="list-style-type: none"> <li>• the Contact Water Reservoir (CWR);</li> <li>• a closed-loop water circulation system;</li> <li>• seepage collection and recirculation systems;</li> <li>• drainage facilities; and</li> <li>• water quality monitoring systems.</li> </ul> <p>The use of recycled water for dust suppression is specifically intended to limit dust emissions and prevent the uncontrolled dispersion of particulate matter into the environment. No evidence has been identified indicating that this practice would result in the formation of “toxic aerosols” or significant off-site transport of pollutants under the envisaged operational conditions.</p> <p>It should also be noted that:</p> <ul style="list-style-type: none"> <li>• no uncontrolled discharge of contact waters into natural water bodies is envisaged;</li> <li>• the project incorporates measures for limitation of surface runoff and erosion;</li> <li>• drainage and protective engineering systems are provided;</li> <li>• monitoring of surface water and groundwater is envisaged; and</li> <li>• no concentrations of hazardous substances exceeding the applicable regulatory limits have been identified.</li> </ul> <p>The assertion concerning a “constant risk of transboundary transport of pollutants” is not supported by the hydrological, hydrogeological and hydrochemical assessments carried out. The analyses performed do not identify a realistic mechanism capable of causing significant transboundary impacts within the territory of the Hellenic Republic under normal operating conditions and with implementation of the envisaged engineering and environmental protection measures.</p> <p>The use of recycled water is also consistent with the principles of sustainable water resource management and reduction of freshwater consumption, in line with internationally recognized good practices and the applicable reference documents concerning extractive waste management. Nevertheless, during subsequent stages of project development and operation, individual operational and monitoring measures may be further refined where deemed necessary by the competent authorities.</p> <p>Based on the analyses performed and the envisaged engineering and operational measures, no significant adverse impacts on surface water, groundwater, ecosystems or transboundary receptors within the territory of the Republic of Greece are expected.</p> | <p>• Text appendix 9.1 "Waste characterization protocols".</p> |
| 11 | <p>It should be checked whether the reference river basin is correctly indicated: the status of</p>                                       | <p>A technical error was indeed identified in the EIA documentation, as page 72 refers to the West Aegean River Basin District instead of the East Aegean River Basin District. However, the correct basin district is explicitly identified elsewhere in the documentation and the assessments themselves have been prepared on the basis of the correct geographical and hydrological context.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>EIA – pages 2 - 60</p>                                      |

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|    | <p>the RBG is assessed based on the Annual Bulletin for the Western Aegean River Basin, while the project falls within the Eastern Aegean River Basin. This appears to be a clerical error which may affect the validity of the assessment of the status of the RBG referred to in points 1, 2 and 5.2 above.</p> | <p>In particular, item IV.2 on page 60 of the EIA explicitly states that:<br/>         “The investment proposal for ‘Extraction and processing of polymetallic ores from the Rozino deposit, Tintyava area’ falls within the territorial competence of the East Aegean River Basin Directorate – Plovdiv, within the catchment area of the Byala Reka River, water body BG3MA100R270 ‘Byala Reka River and tributaries’.”</p> <p>The same section further specifies that:</p> <ul style="list-style-type: none"> <li>• the River Basin Management Plan (RBMP) 2022–2027 for the East Aegean Region; and</li> <li>• the Flood Risk Management Plan (FRMP) 2022–2027 for the East Aegean Region</li> </ul> <p>were used as the principal reference documents for integrated water management and environmental assessment.</p> <p>The actual data concerning the status of the relevant water bodies were derived from the competent RBMP applicable to the East Aegean Region. If the assessments had in fact relied on incorrect basin management data, the competent Bulgarian environmental authorities, including the Ministry of Environment and Water (MoEW) and the East Aegean River Basin Directorate (BDIBR), would not have issued positive opinions within the EIA procedure.</p> <p>It should also be emphasized that:</p> <ul style="list-style-type: none"> <li>• the geographical location of the project;</li> <li>• its location within the East Aegean River Basin District;</li> <li>• the characteristics of the relevant water bodies;</li> <li>• the hydrological and hydrogeological connections; and</li> <li>• the water impact assessments</li> </ul> <p>have all been correctly addressed within the substantive content of the documentation and are not affected by the isolated editorial inaccuracy concerning the name of a reference basin district. The identified technical inaccuracy may therefore be corrected editorially in the final version of the documentation without altering the conclusions of the assessments carried out and without affecting the validity of the assessment concerning impacts on water bodies.</p> <p>Based on the assessments performed and the available scientific and technical data, no significant adverse impacts on surface water or groundwater are expected, including significant transboundary impacts within the territory of the Hellenic Republic.</p> |  |
| 12 | <p>We did not find any provisions in the EIA for a financial guarantee of an appropriate amount and duration in accordance with Article 14 of Directive 2006/21/EC on the management of waste</p>                                                                                                                 | <p>With regard to the comment concerning the absence of provisions for financial guarantees and environmental liability, it should be noted that matters related to financial guarantees, closure guarantees and post-closure care are not regulated directly within the EIA documentation itself, but are subject to subsequent permitting, administrative and contractual procedures under the applicable Bulgarian and European legislation.</p> <p>The requirements of Article 14 of Directive 2006/21/EC on the management of waste from extractive industries have been transposed into Bulgarian legislation, including through the Underground Resources Act, the Environmental Protection Act and the subordinate legislation governing the management of extractive waste and reclamation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |

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| <p>from extractive industries, nor for liability insurance for transboundary environmental damage in accordance with Directive 2004/35/EC (the Environmental Liability Directive). We consider that the above elements are essential and should cover both the period from the start to the completion of the project and the aftercare of the site in the period after its completion for at least 30 years.</p> | <p>Under the applicable regulatory framework, financial guarantees and securities for closure and post-operational control are determined and approved by the competent authorities within the procedures for:</p> <ul style="list-style-type: none"> <li>• granting of a concession;</li> <li>• approval of the Mine Waste Management Plan (MWMP);</li> <li>• issuance of permits and operational approvals; and</li> <li>• approval of closure and reclamation plans.</li> </ul> <p>The amount, form and duration of such guarantees are determined on the basis of the specific technical parameters of the project, the MWMP, the closure plan, the risk assessment and the applicable regulatory requirements at the relevant stage of project development.</p> <p>It should also be noted that Directive 2004/35/EC on environmental liability has been transposed into Bulgarian legislation through the provisions of the Act on Liability for Prevention and Remediation of Environmental Damage and the Environmental Protection Act. The application of these mechanisms does not depend on their explicit reproduction in the EIA text, but follows directly from the applicable regulatory framework. National practice allows an explicit condition to be included in the EIA decision, where the investment proposal is approved, requiring compliance with the obligations arising from Directive 2004/35/EC.</p> <p>It should again be emphasized that, at this stage, the Contracting Authority does not yet hold rights over the assessed territories that would allow it to fulfil the extended obligations related to financial guarantees, operational control and post-closure measures. Such obligations would arise only after the granting of a mining concession and the issuance of the relevant permits and approvals.</p> <p>With regard to the request for specific “insurance for transboundary environmental damage”, it should be noted that the applicable legislation provides mechanisms for environmental liability, control and enforcement, which are implemented by the competent national authorities in accordance with the applicable regulatory requirements and the specific characteristics of the project.</p> <p>It should also be taken into account that the project is currently at the environmental impact assessment stage and has not yet reached the concession phase, the operational permitting stage or the approval stage for final closure and post-operational control plans, within which the specific financial guarantees, monitoring obligations and post-operational measures are determined.</p> <p>Nevertheless, the project provides for:</p> <ul style="list-style-type: none"> <li>• phased reclamation;</li> <li>• environmental monitoring;</li> <li>• mine waste management;</li> <li>• water management and control;</li> <li>• measures for prevention and limitation of impacts; and</li> <li>• post-closure care and monitoring in accordance with the applicable regulatory requirements.</li> </ul> |  |
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|  |  | Based on the applicable regulatory framework and the envisaged subsequent procedures, there are no grounds to conclude that mechanisms for financial security, environmental liability or control over the activity are lacking, including with regard to potential impacts after closure of the site. |  |
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