

Textual attachment 9

PROPOSAL

**FOR MANAGEMENT OF MINING WASTE FROM THE ROZINO
DEPOSIT, TINTYAVA PLA, SITUATED IN THE LANDS OF THE
ROZINO VILLAGE AND GUGUTKA VILLAGE,
IVAYLOVGRAD MUNICIPALITY, HASKOVO DISTRICT’.**

CUSTOMER: TINTYAVA EXPLORATION AD

November 2025

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INTRODUCTION

According to Article 22r, paragraph 4 of the Mineral Resources Act (MRA), provided that the investment proposal for activities engendering mining waste is subject to a procedure pursuant to Chapter Six of the Environment Protection Act, the investment proposal must include the mining waste management proposal.

This **Mining Waste Management Proposal** was prepared in accordance with these provisions and is consistent, to the relevant level of detail, with the provisions concerning the development of mining waste management plans. Its content follows the structure laid down in the *Mine Waste Management Regulation* (promulgated in the SG, issue 5 of January 19, 2016, amended), and with Directive 2006/21/EC on the management of waste from extractive industries.

The mining waste management plan will be intended to prevent, reduce or limit the harmful impacts of waste onto the environment and will be drawn up after an environmental impact assessment (EIA) decision to approve the investment proposal for ‘Mining and Processing of Polymetal Ores from the Rozino Deposit, Tintyava PLA, situated in the lands of the Rozino village and Gugutka village, Ivaylovgrad Municipality, Haskovo district.’ is made.

This is also the provision of Article 22r, paragraph 7 of the Mineral Resources Act which orders the Operator to present, together with the Mine Waste Management Plan, to the Minister of Energy an enacted EIA Decision issued in accordance with Chapter Six of the Environment Protection Act and containing a reasoned explanation that the mining waste management is not contradictory to the waste management plans and programs required by the Wastes Management Act. Such plans are approved by the Minister of Energy.

1. THE OPERATOR’S IDENTITY. ADDRESS OF THE MINING WASTE FACILITY

By way of Permit No. 467/28.02.2017 issued by the Minister of Energy Gorubso – Kardjali AD from the town of Kardjali is allowed to carry out prospecting and exploration for metalliferous ores and minerals in the Tintyava PLA situated in the lands of the Ivaylovgrad Municipality, Haskovo District, and the Krumovgrad Municipality, Kardjali District.

The rights and obligations set forth in the Agreement dated 02.05.2017 for prospecting and exploration for metalliferous ores and minerals - subsurface resources in the meaning of Article 2, paragraph 1, item 1 of the Mineral Resources Act in the Tintyava PLA, concluded between Gorubso – Kardjali AD and the Minister of Energy pursuant to Permit No. 467/28.02.2017 of the ME were transferred to Tintyava Exploration AD by means of an Additional Agreement No. 1 to the Contract, pursuant to Article 25, paragraph 1 of the MRA and Article 61, paragraph 1, item 12 of the Contract. This Contract became effective on July 17, 2017 and was followed by a Decision No. 09-OC/2017 of the Minister of Environment and Waters concerning the assessment of the negative environmental impact assessment. On 31.08.2020, an Additional Agreement No. 2 extending the period of the Contract by 2 years was signed between Tintyava Exploration AD and the Minister of Energy.

After a 2-year overall report for the performed activities and a reasoned proposal for the first extension of the Contract were submitted, and pursuant to Article 31, paragraph 3 of the 3II, in connection with Article 2, paragraph 2 and paragraph 7 of the Contract dated 02.05.2017

г., on 23.01.2023, Tintyava Exploration AD and the Minister of Energy signed Additional Agreement No 3 extending the Contract for 2 more years. By way of Letter Ref. 017/08.05.2019, the Company has filed an application to register a commercial discovery, which can be granted after a positive EIA decision.

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The Rozino deposit in the Tintyava PLA is situated in the lands of the villages of Rozino, Gugutka, Ivaylovgrad Municipality, Haskovo district, and is approximately 1.2 km. to the south of the Rozino village. The border with Greece is to the east and south, and the municipalities of Lyubimets, Majarovo and Krumovgrad are situated to the north and west. The Rozino Project is located approximately 350km (by road) east-southeast of the city of Sofia.

The Rozino Deposit region is encircled to the south by the steep rocks of the Tashlaka locality and is divided by the Byala River and its tributaries which flow into the regional watershed area of the Arda river. The average altitude in the deposit area is approximately 470 m. (in the north) and 300 m. (in the south).

The coordinates with the location of the individual IP elements are presented in the EIA Report.

The overall intended concession area amounts to **275 ha**, of which **118 ha** will be disturbed. The buffer area covers 157 ha. Some facilities will be developed in areas already processed/disturbed without taking over new areas, with the ‘overlap’ being 261,9 ha. The individual infrastructure is distributed as follows:

No.	Sites	Areas, ha x 10
1	Processing plant	51.4
2	Open pit	261.9
3	External topsoil stockpile 1	14.5
4	External topsoil stockpile 2	37.0
5	External waste rock stockpile (overburden)	247.0
6	Internal overburden stockpile (backfill).	133.2
7	External process tailings storage facility.	438.4
8	Internal (backfill) process tailings storage facility.	128.7
9	Contact water reservoir. Includes: an external processing waste storage facility, a mine, a processing plant and collection ditches. Comprises a supernatant water body and retaining dam).	9.1

10	Clean water reservoir and collection ditches (lake and retaining wall)	62.4
11	Service roads (external to the above infrastructure)	57.3
12	Overlapped areas - backfilling-internal stockpile and internal process tailings storage facility (this area is deducted from the total area!).	-261.9
Total required area:		1179.0

The IP layout plan is presented on the next figure.

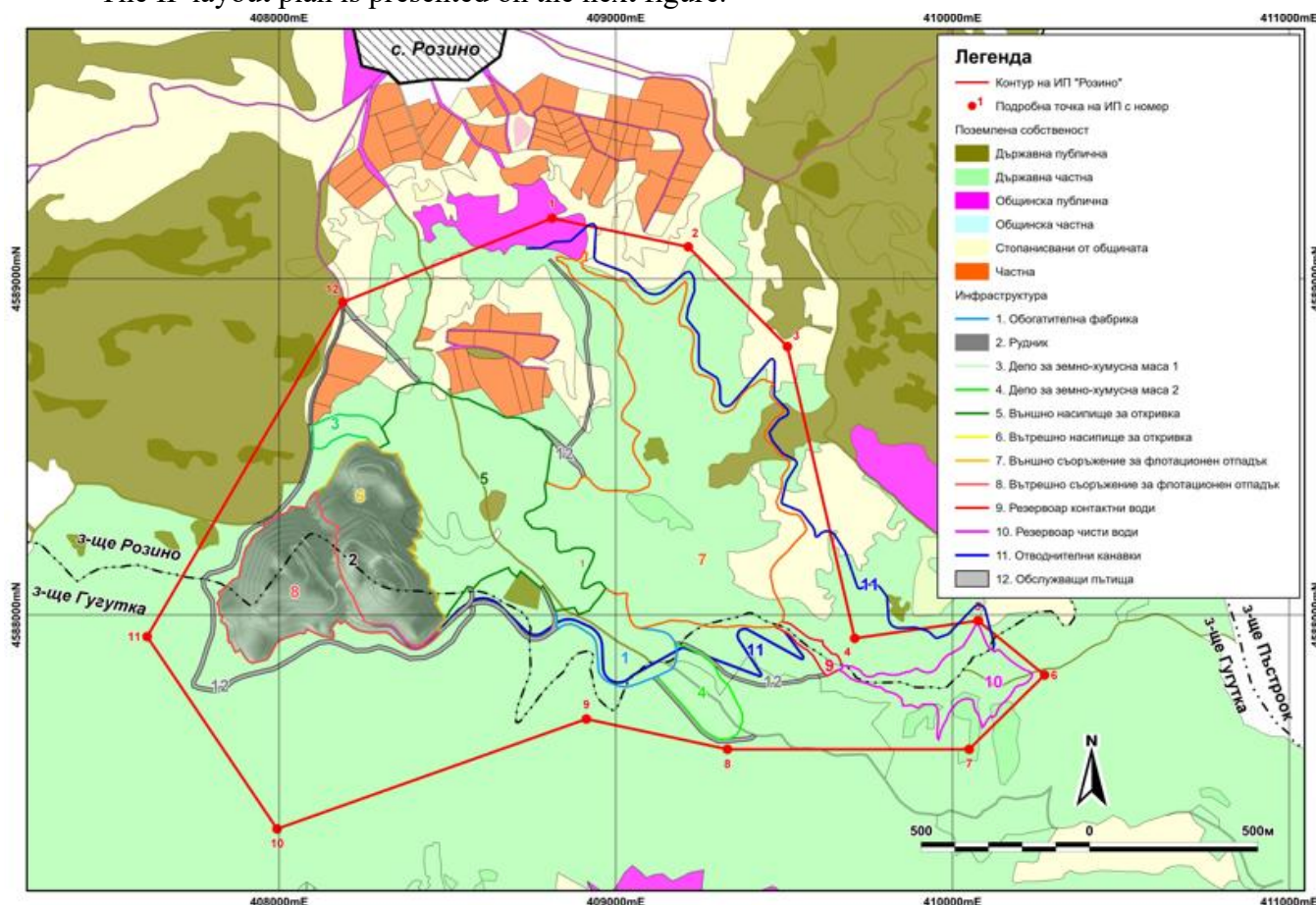


Figure 1-1. IP layout plan

2. ACTIVITIES GENERATING MINING WASTE

Deposit stripping and pit construction are fundamental for the open pit mining. The efficient and safe operation of the Tintyava PLA is contingent on the correct and coherent implementation of these activities.

The open pit mining of polymetal ores from the Tintyava PLA will include drilling and blasting, crushing, hauling and processing of the mined material in the processing plant, hauling of overburden (waste rock) to a stockpile, and transporting of the flotation waste to a MWF.

Topsoil overburden (mass) work

The topsoil (soil) overburden will be collected separately from the rock overburden. Selective topsoil stockpiling is envisaged and the topsoil will be used for disturbed-area rehabilitation after operations end.

The main soil-mass collection activities will be:

- removal from the envisaged areas of tree and brush vegetation (grubbing);
- heaping of the soil mass by bulldozer, although it should be noted that no topsoil is present in some areas or is shallower than 0.25 cm. and, therefore, cannot be collected. The topsoil from all other areas will be collected in heaps and loaded by front end loader or excavator onto trucks for hauling to the two top-soil stockpiles;

These stockpiles will be developed during the mine construction and will be closed after rehabilitation is completed.

Overburden (waste rock) work

The following overburden removal and ore-mining parameters have been set for "Rozino Deposit:

- Working bench height - 5 to 10 m.;
- Non-working bench height - 20 m. (the 5 m. high benches in the final non-mined contour are combined in groups of 4 or two 10 meter high benches joined as 2);
- Working bench angle - 85 to 90°;
- Non-working bench angle - 70°;
- Minimal width between two non-working bench groups - 12 m.;
- Minimal work-area width - 60 m.;
- Overall non-mined face angle 36÷48°.

Because of the hardness of the overburden, it is accepted that both the ore and the waste rock will be detached by drilling with subsequent millisecond delay initiation and blasting using the NONEL system.

As it does not contain any payable components but envelops or is hosted in the ore-bearing rocks, the rock overburden in the Rozino Deposit should be selectively removed and stockpiled.

Most generally, the processes for selective removal of waste rock are: drilling and millisecond delay blasting to detach the waste rock from the massif, loading by back-hoe shovel to trucks and hauling to a waste-rock stockpile.

Overall, 26.6 Mt or around 10.8 Mm³ of waste rock will be removed from the deposit by design. Or the expected maximum annual volume is 3.3 Mt (1.3 Mm³/a)

These volumes of waste rock are intended for stockpiling in the WRF to the east of the mine pit.

Backfilling of mined-out spaces will begin after Year 4 (once the reserves in Section 1 are exhausted).

The overburden removal bench heights will be 5 to 10 m.

The waste rock and the ore will be loaded by a 6 m³ backhoe hydraulic excavator, positioned after the blasting and airing of the pit next to the blast field and beginning the loading of the blasted heap.

Overburden hauling will be by dumper trucks with a total carrying capacity of approximately 55 t (33 m³) and a 10x4 axle configuration, a 7 m. loading length, a 2.6 m. loading width, and a 1.96 m. unloading height. The trucks will be equipped with modern engines meeting the EURO 6 emission standard.

Stockpiling works

Stockpiling will involve selective stacking by bulldozer and trucking.

Selective/separate stockpiling of:

- Earthfill and topsoil;
- Waste rock (overburden);
- Flotation tailings (processing waste)

This selective stockpiling conforms to the best international practices for management and conservation of topsoil which will be used to remediate disturbed areas at the beginning of the rehabilitation phase.

Stockpiling of topsoil

Two earth-fill and topsoil stockpiles will be developed for the deposit, as follows:

- To the north-east with one horizon at RL 495 m;
- To the south-west with two horizons at RL 377 and 382 m.

These stockpiles are expected to evolve during the mine construction and will be closed after rehabilitation is completed. It should be noted that the a staged rehabilitation system can be selected during the drafting of the overall design for operation and closure of disturbed lands.

Stockpiling of waste rock (overburden)

As regards the rock overburden stockpile, it will be bulldozer operated. The waste rock hauled by trucks will be delivered to the stockpile and dumped. Subsequently, a bulldozer will shape the stockpile.

An external stockpile will be developed and in-pit stacking will begin after Year 4.

The boundary between the outer and the in-pit stockpiles is conditional and follows the outline of Section 1 in the pit.

Disposal of flotation tailings

The processing waste will be disposed of in a thickened state of 70 – 75% solids. This method is preferable to the conventional tailings for the following reasons:

- Higher recovery of return water;
- Lower use of 'fresh' water;
- Smaller disposal area;
- Significant increase in the stability coefficient of disposal facilities containing thickened flotation tailings;
- Significantly reduced risk of compromising of supporting facilities;
- Significantly higher potential for staged rehabilitation.

Disposing of flotation tailings (processing waste) with a 25%/75% water to solids ratio will reduce the footprint and, thus, the volume of the facility by approximately 1÷1.5 ha as compared to conventional disposal where the water to solids ratio is 45%/55%, i.e. there is an approximate 20 to 25% reduction of return water.

The water content of the flotation tailings will be reduced and a thickener will be installed in the processing plant to store the water from the dewatered flotation tailings.

Following exhaustion of the reserves in Section 1 and as the mining works in Section 2 advance, backfilling of the mined out spaces will begin and, again, will be consistent with the best open mining practices. Backfilling is expected to begin during Year 4 or 5 of the operations.

Backfilling has the following positive effects:

- Substantial reduction of the area required to (store overburden) and processing tailings (should the quality of such a process be proven);

Substantial reduction of the time during which external stacking will be required, allowing for much faster rehabilitation of the possible external stockpile and the external process tailings storage facility.

Flotation Tailings Management

The following specifics were considered for the choice of the tailings thickening and dewatering process:

- Physical and chemical parameters of the flotation tailings will - the current data show no acid generation potential.
- The yield strength limit or yield stress - the property corresponding to the yield strength limit at which plastic deformation of the material occurs;
- Negative water balance;
- Best practices for dewatering of processed mining waste;
- Best practices for management of mining and processing waste.

The above practices and the basic design for the Rozino Deposit have lead to the selection of a technology for disposal of flotation tailings (processing waste) thickened to 70-75%.

Tailings disposal will be preceded by removal of water (thickening). The thickener operates in the following manner: radial flow of slurry to the centre of the thickener, into a feeding tank. As the solids settle, a rake reaching the outer end of the thickener rotates slowly and moves the settled material to the central outlet. At the same time, as solid particles deposit over the thickener base, the supernatant water or solution clarifies and as its level increases with the introduction of more slurry, it flows over a perimeter launder to return to the process. The particles settling into the centre of the thickener and the matter raked toward it exit through the central exit pipe at the thickener base, containing significantly less water than the slurry in which they had entered the thickener. High-pressure slurry pumps can transfer the thickened processing waste to the storage facility.

The advantage of this method is its efficiency as regards water and the more favourable operating conditions as compared to the conventional method of disposal of processing waste with high content of water. A second advantage over the other options is the minimal potential for liquefaction (slumping or flowing) of the disposed waste or a dam failure. Usually, high-output cone thickeners increase the solids concentration to around 70 -75%.

Cone thickeners ensure the highest yield strength values and guarantee high stability of the stored waste.

The water to solids ratio in the resulting waste is 25/75.

Higher thickening allows for:

- significant increase of the use of return water;
- significant reduction of the use of 'fresh' water.

Being denser, the waste is easier to handle and shape the stockpile it is disposed of in.

Reduced water content shortens significantly the time for evaporation of residual water and improves the stability of the stockpile body, thus allowing for its staged upgrading with

guaranteed stability.

Thickening of waste prior to disposal bears a reflection on the overall consumption of water in the processing plant and provides a substantial improvement of the overall water balance.

Also, thickened waste disposal conforms to the natural geographic, geological, geotechnical and geochemical conditions of the site. As the waste is disposed of from the highest toward the lowest stockpile points, it should be noted this disposal enables staged rehabilitation of completed slopes.

3. MINING WASTE CHARACTERISATION AND CLASSIFICATION. INFERRED QUANTITY

Mine waste generation will begin with the stripping operation. According to Article 15 of the Regulation on the Management of Mine Waste (promulgated in the SG, issue 5/2016), and based on the quality characteristics and composition of the mine waste, and, also, on the risk for the environment and/or human health, the operator has defined a code and name for the mine waste in accordance with Annex 1 to Regulation 2 of 2014 on the Classification of Waste (SG, issue 66 of 2014) and has classified them in accordance with Annex 3 of the Mining Waste Regulation as:

1. unpolluted soils;
2. inert waste;
3. non-hazardous exploration waste;
4. peat extraction and processing waste;
5. non-hazardous non-inert waste;
6. hazardous waste.

Three representative samples were taken to determine the content of harmful substances in the mining waste from the Rozino Deposit – two composite rock samples and one waste rock and flotation tailings from a composite sample.

The tests and analyses were carried out by the Eurotest-Control EAD accredited laboratory in Sofia. The analysis reports are presented in **Attachment 1** – three records (Test Record No. 728/22.07.2020; Test Record No. 730/22.07.2020; Test Record No. 731/22.07.2020;

The results allow the following characterization and classification of the mining waste:

A) Code and name of the mining waste;

- Code 01 01 01 - Waste from removal of overburden and excavation and mining,
- Code 01 03 06 - Tailings other than those mentioned in 01 03 04 and 01 03 05.

B) Type of the mining waste

According to Appendix 3 of the Mine Waste Regulation, the tailings from the Rozino Deposit in the Tintyava PLA should be classified as ***non-inert and non-hazardous waste***, because:

- they do not decompose, dissolve or undergo substantial physical, chemical or biological changes which might impact the environmental media, and the safety and the health of the population;

- they have a maximum content of sulphide sulphur of 1 per cent and the neutralising potential ratio, defined as the ratio between the neutralising potential and the acid potential, and determined on the basis of a static test prEN 15875 greater than is c) 3;

- the waste does not self-ignite and will not burn.

- as the leaching limit value tests show, there are no increased concentrations of substances in concentrations which are hazardous for the environment and for human health as well as substances which are potentially harmful to the environment and to human health (incl. As, Cd, Co, Cr, Cu, Hg, Mo, Ni, Pb, V and Zn);

- The waste is substantially free of products used in extraction or processing that could harm the environment or human health.

The predicted mine waste quantities that will be generated during the operation period are the following:

- 01 01 01 - Waste from removal of overburden and excavation and mining

The waste quality generated during the entire mining phase will be 3.3 M t/year (1.3 M m³/year) or 26.5 M t/10.8 M m³.

- 01 03 06 - Tailings other than those mentioned in 01 03 04 and 01 03 05

Duration of impact – 11.2 Mt over the entire operation period.

4.1 TYPE AND CATEGORY OF THE MINING WASTE FACILITY

4.1 Location of the mining waste facility

The areas required for siting of the mining waste facilities are presented in the following table.

No.	Sites	Areas, ha x 10
1.	External topsoil stockpile 1	14.5
2.	External topsoil stockpile 2	37.0
3.	External waste rock stockpile (overburden)	247.0
4.	Internal overburden stockpile (backfill).	133.2
5.	External process tailings storage facility.	438.4
6.	Internal (backfill) process tailings storage facility.	128.7
7.	Overlapped areas - backfilling-internal stockpile and internal process tailings storage facility (this area is deducted from the total area!).	-261.9*
Total required area:		736.9

* Some facilities will be developed in areas already processed/disturbed without taking over new areas, with the 'overlap' being 27 ha.

Their location is shown on figure 4-1.

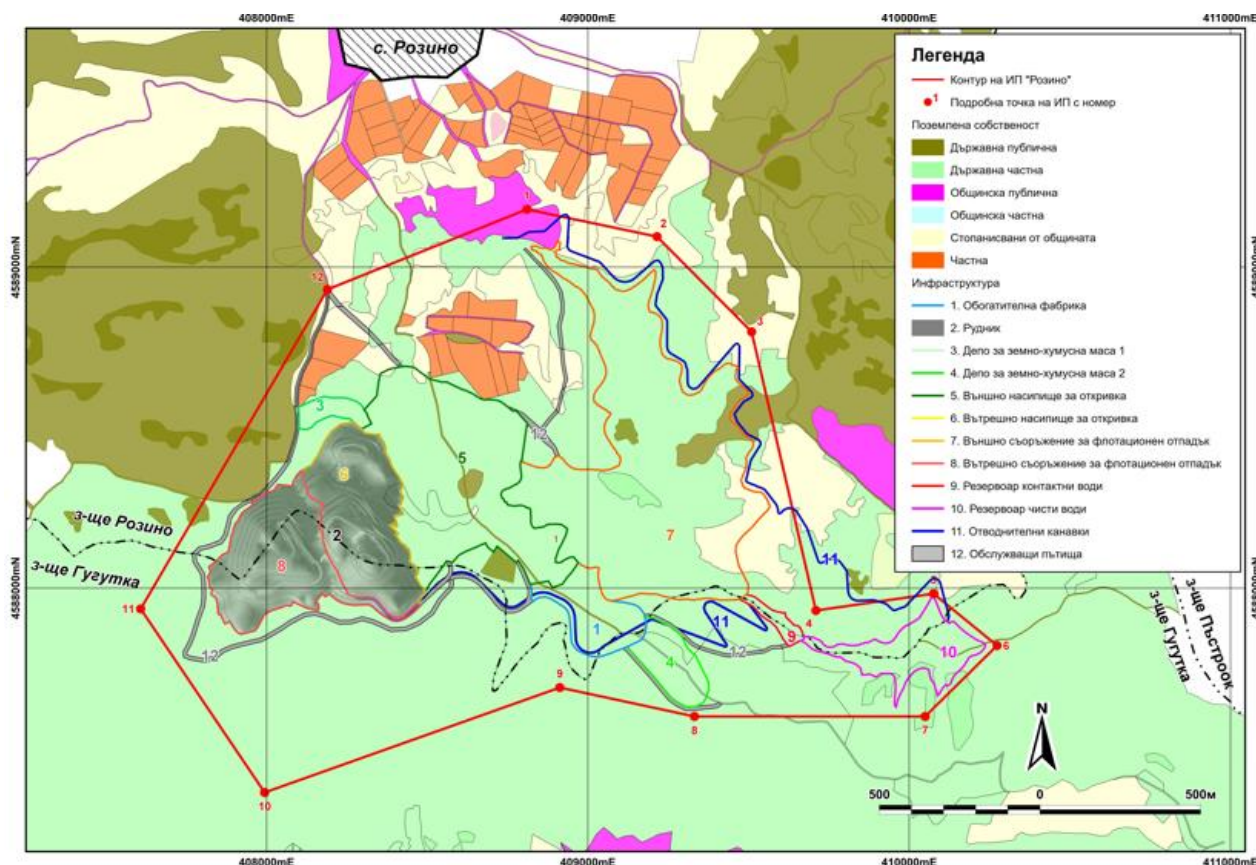


Figure 4-1. IP layout plan

4.2. Condition of the land surface impacted by the mining waste facility

The geology

The Eastern Rhodopes is regarded as part of the so-called Eastern-Rhodopean anticlinorium comprising a series of anticlinal and synclinal folds (Kozuharov, 1971) such as the Kesebair upheaval, the Avren graben-synclinorium, the Tintyava upheaval, and the Rozen synclinorium.

The Tintyava PLA is located in the Eastern Rhodope fall, east of the Belorechki cupola. It is positioned in a Palaeogene graben, typical of the Eastern Rhodopes and filled mainly by coarse clastic material and by less rudaceous sediments. The graben has formed by collision development of the region during the Upper Cretaceous and the Oligocene. This has resulted to the accumulation of thick terigenous and volcanogenic-sediments of diverse composition during the Palaeogene. Hypoabyssal and mainly acidic subvolcanic intrusives have become embedded by the end of the Oligocene in this heavily disintegrated earth crust and have enabled the creation and long existence of hydrothermal systems. The intrusions have acted as thermal motors driving large volumes of hydrothermal solutions. These solutions have leached gold from the hosting rocks and have transported it as chloride complexes across the permeable faulting and thrusting zones. Their mixing with meteoric water has resulted in lower temperature and deposition of the more mineralization. Several highly metamorphous complexes, mesozoic schists and aplitic granites (Rozino type), which are superimposed between one another, are delineated in the western and north-western parts of the Palaeogene sediment basin. Two suites - a breccia-conglomerate and a coal-bearing sandy suite of

Preabonian age have been proven by fauna indicators in the PLA. These suites are 800 - 1,000 m. deep and 100 to 800 m. deep, respectively. Their lithology is highly diverse. The breccia conglomerate suite comprises pieces of the metamorphous foundation, granite blocks, ultrabazites, and diaphorites with sandy and coal-sandy bindings. The coal-sandy suite comprises polymictic sandstones with limestone-clayey binding, gravel conglomerates, aleurolitic sandstones, marls, coal schists and coal.

The main ore deposition is hosted in the sediments of the Byala River graben near the western boundary of the basin. Several highly metamorphous complexes, mesozoic schists and aplitic granites (Rozino type), which are superimposed between one another, are delineated in within the Palaeogene sediment basin.

The sediments outcropping to the surface are part of the Krumograd group (undefined), the breccia-conglomerate suite (Podrumchenska suite), the coal-bearing sandy formation (conglomerate-sandstone suite).

The Alpine ore deposits in the Eastern-Rhodopes Ore Basin are united in five mineralization types:

- pre-Palaeogene: chalcopryrite-pyrite with gold type;
- Palaeogene quartz-pyrolusite, quartz-gold-polymetal, quartz-gold-adular (low-sulphide) types;
- Neogene: quartz-antimony with gold type.

Quartz-gold-polymetal and quartz-gold-adularia mineralizations are predominant in the PLA.

The quartz-gold-polymetal mineralization is closely linked to montsonite hypoabyssal intrusive rocks, post-plutonic dykes and rhyolite-andesite depressions (Kolkovski, 1994). The ore bodies comprise quartz-sulphide veins, vein-like zones or linear stockwerks. Five mineral types are present in the formation:

- quartz-pyrite-chalcopryrite with bismuth sulphosalts - Madjarovo, Popsko;
- quartz-hematite-chlorite with gold - Madjarovo, Spahievo;
- quartz-polymetal with chalcopryrite - Madjarovo, Popsko, Zvezdel-Pcheloyad;
- quartz-barite-sulphosalt with gold - Zvezdel-Pcheloyad, Madjarovo, Popsko.

The quartz-gold-adularia mineralization which is poor in sulphides in the Eastern-Rhodope Ore Region is increasingly important. It is characterised by a genetic connection to sub-volcanic bodies, mainly basalt-latite sills. It is controlled by sub-meridional faults. Four mineral types have been identified:

- quartz-pyrite - Sarnak;
- gold-adularia with haematite - Sarnak, Sedefcje, Chala;
- gold-quartz-pyrite - Rozino;
- gold-quartz-adularia - Madjarovo, Krumovgrad.

The regional geological position of the Rozino Deposit is interpreted as a sequence of small Palaeogene syn-tectonic extensional sediment basins in the Byala Reka metamorphous core basin. The tectonic situation in this complex is extensional and complicated, with a main north-western direction and right-slip fault kinematics of the main structures. One of the main fault disturbances is the so-called Byala Reka shear zone followed along more than 15 km. in the region. Multiple north-eastern fault disturbances limiting the northwestern part of the sediment basin have been

established and drilling data have established the Tashlak fault on which the telethermal alteration zone is found.

The main lithological units containing the gold mineralization in the deposit are breccia-conglomerates/sandstone sediments and, partially, olistostrome blocks, metagranites and ultrabazite rocks of the upper multicolored complex. The breccia-conglomerate suite is the main host of the mineralization and lies transgressively or along a low-angle fault separating it from the up to 200 m. deep foundation. This unit comprises alternating coarse and often non-layered and non-stratified conglomerates of polymictic breccia, sandstone, siltstone and clayey bands. A large 800 m. long, 350 m. long and 170 m. deep olistostrome body that had most likely slipped along the fault surface of a listric fault during sedimentation has been defined in the basin. It consists of black-gray low metamorphous and highly folded schists and phyllites abundant in organic materials.

Hydrological conditions

During construction

The TMF dam construction will be carried out from the beginning of mine construction works and until the end of year two. There will be no production and the water will be classified as construction water during this phase. The surface water will be managed by way of permanent and temporary channels. The watershed areas are presented in Figure 4. 2-1.

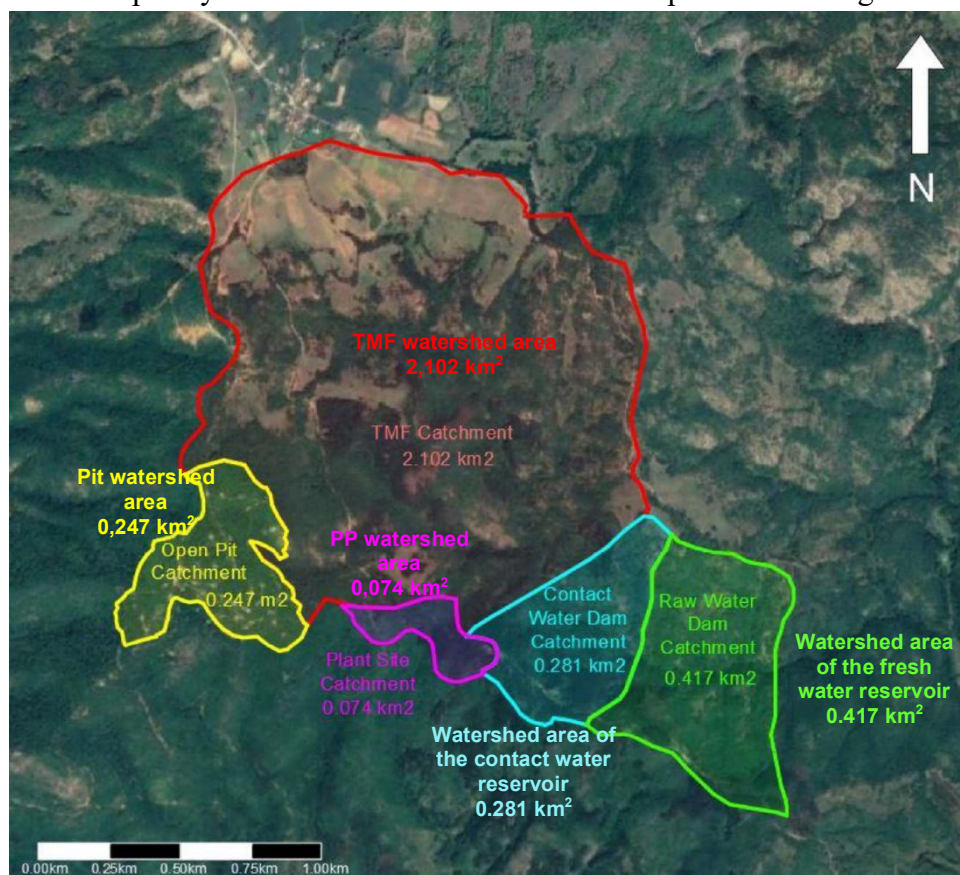


Figure 4.2-1 Catchment areas during the construction
(until Year Two)

Temporary settling ponds will be made during the **construction period** along the water flow in order to catch any sediment run-off and decant clarified water into the Yuren Dere valley.

No negative impacts on surface water is expected during the construction phase since

no objective reasons for such impacts will be present.

During operation

Two channels will manage flows from upstream of the facilities during the operation phase - a northern diversion channel along the north-eastern side, and a southern diversion channel to the south of the site. These channels will discharge into the fresh-water reservoir and, respectively, to the contact-water reservoir. The northern diversion channel will operate along the north-eastern end of the TMF from the beginning of year three, and will reach the fresh-water reservoir area north of the site. This configuration will remain unchanged until the end of mining works, prior to closure.

The watershed areas formed during the mine operation period are presented in Figure 4.2-2, and the watershed area parameters are presented in Table 4.2-1.

Table 4.2-1 Watershed area parameters during mine operation

Catchment area	Surface area (km ²)	Length of flow, (m)	Average terrain gradient, (%)	Arrival time, (min)
MWF	0.858	911	26.69	12.09
Contact Water Reservoir	0.233	374	24.52	7.03
Fresh water reservoir	1.632	3482	22.67	48.27
Process plant	0.118	899	19.75	14.89
Open pit	0.239	not applicable	not applicable	not applicable

The projected pit-bottom elevation is 435 m. No groundwater has been reached during the drilling and no additional pit inflows are expected besides precipitation.

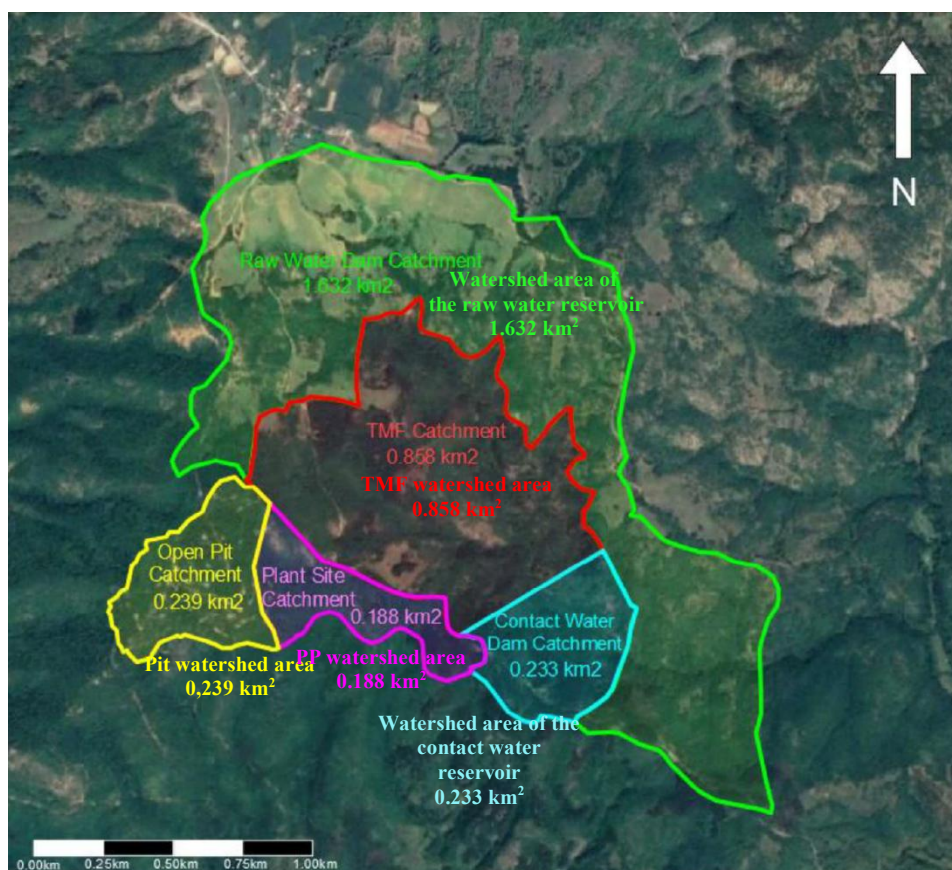


Figure 4.2-2 Catchment areas during the operation

Any rain and snow water entering the pit and the stockpiles will be directed to the lowermost parts of these facilities to be pumped from there into the contact water facility. A sump for collection of surface water will be constructed on every bench in the pit and will be used to spray the mine roads. As necessary, any excess mine water will be pumped and sent to the contact-water facility to be used as return water supplement. All stockpiles will be built and developed with slopes at each level securing gravity flow of surface run-off in a direction opposite to the outer edges. A system diverting surface water to the ore processing plant or to the contact water reservoir will be constructed. The upper pit levels, with an open contour, will aid gravity re-direction of precipitation run off from the pit perimeter, thus reducing the need for drainage during the mining of the pit.

Water will be pumped directly from the Arpa Dere River during the wet months of the year (January through May). Water from Arpa dere will be abstracted near the point of its confluence with the Yuren dere river adjacent to the Rozino village pumping station. This pumping station has been designed to pump water from a spring flowing into river pool. The flow-rate of this spring varies between 6 and 11 l/s during the entire year and is season dependent. It is calculated that a flow-rate of around 0.34 l/s will be required to supply Rozino village. Any excess water from the spring could, with the relevant justification, be drawn year-round for the industrial needs of the site. The plan is to abstract water from a natural pool without damming or other river blocking construction works.

Surface run-off from the open pit will be used as the first source of processing plant water. This water will be pumped from the open pit sumps into the plant water reservoirs. Water

stored in the TMF settling pond will be the second source of processing plant water, and the fresh-water reservoir will be used as a make-up water (third source), if open pit and TMF water is not sufficient or of the quality required by the plant.

No negative impacts on surface water is expected during the operations phase since no objective reasons for such impacts will be present.

During Closure and Rehabilitation

The possibility to introduce accelerated evaporation equipment in order to remove water from the contact-water reservoir and from the system in general during site closure and rehabilitation was studied.

The accelerated evaporation concept involves spraying of approximately 5 l/s of water from the reservoir (by each device) at a height of 18 m into the air with an average drop size of less than 100µm. This will be achieved by mobile mechanical evaporators allowing 'zero discharge' on site during mine closure. These devices will be installed on the ground or on floating platforms. This allows for operational flexibility and changing of locations depending on wind direction. Any non-evaporated water will remain within the reservoir watershed area with such a system.

The accelerated evaporation forecast, even at the lowest efficiency, is 30% or up to 3028 m³ per month per device. The evaporators will be in active use during mine closure (for a 5 year period of active conservation, as provided for in the investment proposal), when the drainage collected into the contact-water reservoir will be evaporated during the summer months to ensure sufficient volume for winter-time drainage, when evaporation is inefficient.

The climate in the region will favour accelerated evaporation. High average temperatures and relatively low humidity between April and September mean that this could be the optimal accelerated-evaporation period.

Furthermore, on site closing the suction end of the pumping station drawing water from the Arpa Dere River during site operation will be dismantled with minimal impact on the river bed.

No negative impacts on surface water is expected during the closure and rehabilitation phase since no objective reasons for such impacts will be present.

Hydrogeological conditions

The use of ground water by the Investment proposal for 'Mining and Processing of Polymetal Ores from the Rozino Deposit, Tintyava PLA' will be limited and only as needed. The hydrogeological study in the deposit area showed insignificant groundwater flow-rates for the process. Therefore, further studies of the hydrogeological conditions and the potential of the groundwater bodies are recommended.

Ground water flowing into the pit sumps will be priority pumped to the plant in order to meet the processing plant requirements. Any excess water will be pumped to the TMF for temporary storage.

Ground water from the open pit will be used as the first source of processing plant water. This water will be pumped from the open pit sumps into the plant water reservoirs.

The contact-water reservoir bottom and sides will be lined in order to reduce contact water seepage. In principle, there should be no seepage from the reservoir, unless the

membrane liner is faulty. Any break-through water will join the seeping water flowing from the TMF. Contact water seeping through liner breaks and, also, any seepage from under the facility will report to the contact-water reservoir, directly through the rock drain, or when intercepted by the grout curtain, will be pumped back to the contact water reservoir.

Any water seeping downstream of the curtain will be intercepted by the grout wall. Apart from intercepting contact seepage, this wall will intercept non-contact water as well. It will not allow both flows to mix and we can affirm that any contact water seepage will be restricted along the contact water reservoir axis and are not expected to cause ground water pollution.

Morphology of the Orebodies

The industrially most important morphogenetic type in the Rozino Deposit is the strip-intergrown type of mineralization evolved in the Palaeogene sediments. The orebody morphology is complex and they may be divided conditionally into steep and sub-horizontal. The steep bodies are evolved near the contact of the sediments with the underlying rocks in the north-northeastern fault sheaf. Frequently the sub-horizontal ore bodies are separate and without clear links to fault structures. The main ore controls in this case are the permeability and the geochemical features of the hosting rocks. Some rare veiny ore bodies are hosted among the rocks of the metamorphous substrate. The bodies are sub-horizontal to slightly inclined, concordant with the foliation and always linked to the mineralizing structure.

Three morpho-genetic types of mineralization can be identified in the Rozino deposit: strip-intergrown type, streaks and veins (gold-silver-polymetal veins);

The steep bodies are evolved near the contact of the sediments with the underlying rocks in the north-northeastern fault sheaf - the Tashlaka fault which confines the sediment palaeogene basin on the north-east. A Bonanza type mineralization is evolved along the fault contact zone where chalcopryrite, sphalerite and galena are deposited alongside gold. The gold mineralization in this shear zone traced for 300 m. is highly irregular both laterally and vertically.

Cross-cutting shape-forming ore bodies are observed both in the steep and inclined ore bodies described above and separately, in the veinlet and veiny morphogenetic mineralization types. They are best represented in the north-northeastern contact-side flank of the sediment basin where they form 130-150° trending and up to 80m wide strip. Veins, veinlets and sheaves of veins are observed on the surface and in boreholes.

Spatial binding with a tectonic direction of 130-150 degrees is observed around the veins (and particularly those with fracture brecciation and silicification). Many veins with voids and open spaces seem to occupy steep sections of extension near the shears, while others are subparallel to the shears. Studies of the veins have shown the following:

- Usually, the quartz-(carbonate)-pyrite-marcazite and quartz-(carbonate)-adularia veins include hollows and substantial open spaces. Crustiform, chalcedonic and mossy textures are present.
- Pyrite, +/- quartz, veinlets are oriented similarly to the quartz veins and mostly dip moderately to WSW and SSW;
- The carbonate veins seem to be paragenetically late and dip moderately to steeply to the SW, subparallel to the NW-SE trending late faults.

Seismic data

According to Bulgaria's current seismic zoning, the deposit is situated in an area with an earthquake potential of I-VII according to the Medvedev-Sponheuer-Karnik intensity scale. The seismic coefficient for the region is $K_s = 0.10$.

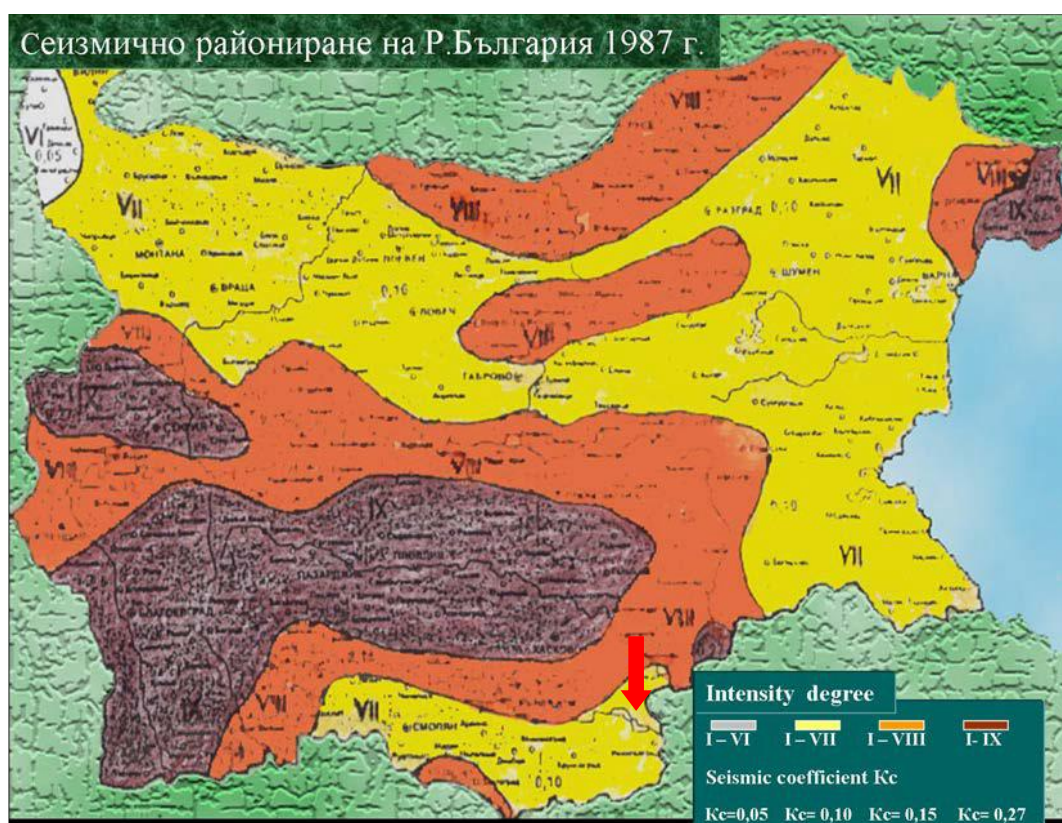


Figure 4.2-3. Seismic zoning of Bulgaria

The following destruction can be expected depending on the degree of earthquake impact:

- up to level VI – slight
- levels VI-IX – severe

There are no infrastructural facilities other than existing forest roads in the sections of the deposit.

4.3. Existing buried and above-ground communications, water bodies, sanitary protection belt areas, buildings etc. in the area of the mining waste facility

No buried or above-ground communications have been identified.

The Investment proposal for 'Mining and Processing of Polymetal Ores from the Rozino Deposit' in the Tintyava PLA falls under the jurisdiction of the East Aegean Region Basin Directorate in Plovdiv, the river basin of the Byala Reka River, a water body (WB) with code BG3MA100R270 - Byala Reka River and its Tributaries.

The IP area **does not encroach on** potable water facilities or the sanitary protection belts established around them.

The closest protected sites are:

- the Rozino Village – distance from the IP boundary and the nearest buildings - 580 m;
- the Byal Gradets Village – distance from the IP boundary and the nearest buildings - 1,430 m;
- the Gugutka Village – distance from the IP boundary and the nearest buildings - 1,770 m;
- the Pastrook Village – distance from the IP boundary and the nearest buildings - 2,580 m;

4.4. Protected territories and protected zones

The IP area is situated in two protected areas (PA) of the National Environmental Network Natura 2000:

- 'Rhodopi - Eastern', code BG0001032, for protection of natural habitats and wild flora and fauna;
- 'Byala reka', code BG0002019, for protection of wild birds.

The IP area does not impact any protected areas in the meaning of the Protected Areas Act. The nearest such area is the Hambar Dere Protected Locality (PL) situated approximately 1.6 km. from the concession area (distance between the nearest concession and PL boundary points).

4.1 Type and category of the mining waste facility

According to the Subsurface Resources Act, the mining waste is disposed of and stored in dedicated pads, mining waste facilities whose location, structure and management prevent or minimise their negative environmental impact and on human health without causing distress by noise or odours and without negative effect on places of special interest.

According to Article 16, paragraph 1 of the Mine Waste Regulation, 'mining waste is any space, tailings facility or other intended for collection or disposal of solid or liquid mining waste, solution or a slurry, for the following period of time::

1. unlimited - in respect of category 'A' facilities characterised as hazardous in the waste management plan;
2. longer than six months - in respect of facilities for unforeseen hazardous mining waste;
3. longer than one year - in respect of facilities for non-hazardous non-inert waste;
4. longer than three years - in respect of non-polluted soil facilities, non-hazardous exploration waste facilities, inert waste and waste facilities generated during peat mining, processing and storage.

According to the above criteria, storage of '...inert waste and waste generated by mining...' for more than three years, the stockpile is a **mining waste storage facility**.

According to Article 22b, paragraph 4 of the Subsurface Resources Act, mining waste facilities are categorized according to their hazard level and risks for the environment and for human health, as:

1. 'Category A' mining waste facilities which may, as a result of unforeseen circumstances or poor management, cause a large-scale accident, or in which hazardous waste are disposed of in excess of the defined limit value, or contain hazardous substances or mixtures in the meaning of the Act on Protection against the Harmful Impact of Chemical Substances and Preparations in excess of the admissible limit values;

2. 'Category B' facilities - all other mining waste facilities.

According to the qualitative characterisation and of the composition of the mining waste and to its changes resulting from potential secondary impacts, and, also, the stability of the facilities, **the Rozino Deposit mine storage facilities should be classified as 'Category B'**, because:

- these facilities do not have the potential for a larger incident resulting from unforeseen circumstances or mismanagement;
- the mining waste to be stored are non-inert and non-hazardous, and do not contain hazardous substances.

This ranking is also reasoned in the item below.

5. MINE WASTE FACILITY CONSTRUCTION, OPERATION AND CLOSURE DESIGN DOCUMENTS

Once the concession for mining of the Rozino Deposit is granted, the facilities will be constructed in accordance with an overall detailed design. The facility will be operated during the respective years according to approved annual work plans which will be consistent with the overall design. The closing of the facilities will be considered in the disturbed land rehabilitation design.

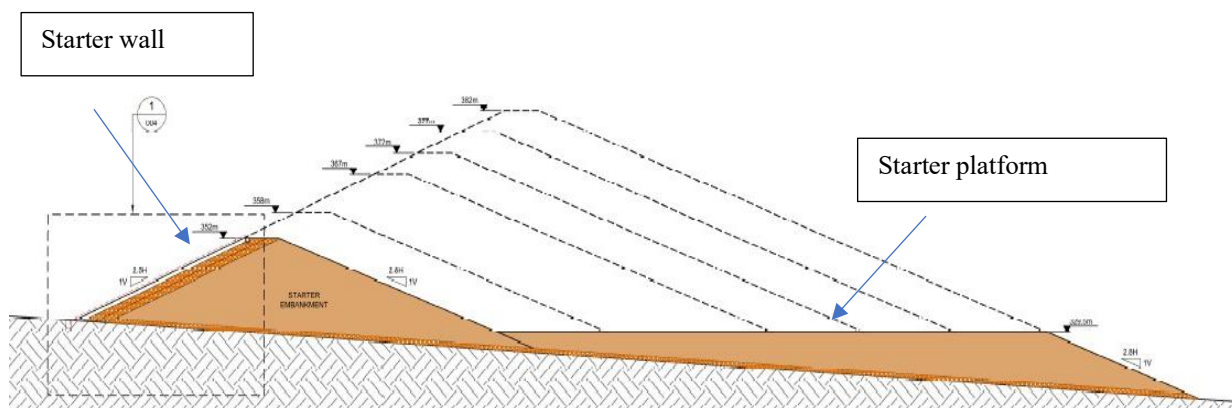
According to currently available technical data, the parameters of the facility for storage of 'Category B' mining waste will be as follows:

Staged TMF development

Construction of the starter wall

The starter wall will be constructed to elevation 352 m.a.s.l. prior to commissioning of the TMF and the process plant, which will be commissioned during the zero year. This facility will allow for disposal of tailings immediately after process plant start-up.

The starter wall will be constructed in a staged fashion as the mine progresses and as the waste rock required for construction of the embankment is made available. The wall will be upgraded on the rockfill from the preceding phase along the downstream face to ensure maximum TMF stability.



Approximately 353,388 m³ or, in the event of density of 2 t/m³, approximately 176,700 t of pre-stripping rockfill will be required for the starter wall and for the starter platform.

Upon completion of the starter wall downstream raises will be carried out as a continuous process during the life of the facility. The filtering areas, the transition areas and the liner will be installed by qualified contractors.

The construction phases are defined in a way that ensures the necessary freeboard at any time in order to accept volumes of water during a probable maximum flooding event.

Flotation Tailings Disposal

The technology provides for tailings disposal in a manner that ensures adequate positioning of the precipitation/atmospheric water drains for easier control of return water.

Drainage during the final years of operation will be carried out in a manner that provides a final profile suitable for closure and rehabilitation.

Slope stability assessment

The embankment slope stability was evaluated by means of a 2D analysis under static and pseudo-static conditions, using the SLOPE/W (GeoStudio) software. The Morgenstern-Price calculation method was used.

The model includes:

- lined upstream slope to reduce seepage;
- a maximum-volume contact water reservoir;
- an area rock drain under the embankment;
- upstream slope inclination 1 V:2.5H;
- downstream slope 1 V:2.8H (following sensitivity analysis).

The minimum allowable factors of safety (FoS) are:

Condition	Lowest FoS
Static – normal level	1.5
Static – quick lowering	1.5
Pseudo-static	1.0

The chosen seismic load is for earthquakes with a statistical return interval of 1 in 10,000 years and 0.3 g acceleration.

Geotechnical parameters

These parameters were taken from laboratory analyses, field tests, published literature and the engineering practice. The materials were modelled as linear materials according to the Mohr-Culomb classification. The exact parameters are to be confirmed during the next design phase.

Stability modelling results

TMF – maximum profile:

Loading	Slope face	Allowable FoS	Estimated FoS
Static	Downstream	1.5	2.14
Pseudo-static	Downstream	1.0	1.03

Lining design

A 2 mm HDPE liner on the upstream slopes of the starter walls and of the subsequent raises will be installed. Its main purpose will be to:

- minimise early-stage seepage;
- lower the pressure on the filtering system;
- extend the operational life of the drainage structures;

A sand and gravel underdrain will be laid below the membrane to collect and filter local seepage.

Internal seepage collection and pumping system

The drainage system comprises:

- filter layers over and below the liner;
- a sump with an immersion pump;
- drainage toward the contact water reservoir.

Its function will be to prevent phreatic surface accumulation below the embankment body.

Toe drain

A filtering system of sand and gravel will be constructed below the upstream face and will be connected to the central drainage ditch leading toward the contact water reservoir.

Surface and filtered flow control measures, comprising:

- diversion ditches;
- curtain drains;
- grout curtains;
- contact and fresh water separation system.

Emergency and post-closure spillways

An emergency spillway will be provided to protect the embankment in the event of extraordinary precipitation. As the raises increase, the spillway will be relocated. Upon closure, a spillway sized for a 24 hour probable maximum flood (PMF) event will be constructed.

Monitoring

The following monitoring and measuring equipment will be used:

- piezoometers;
- survey pins;
- real-time dam settling monitoring system;
- monitoring of the drainage system condition;
- measuring the seepage and contact water flows;

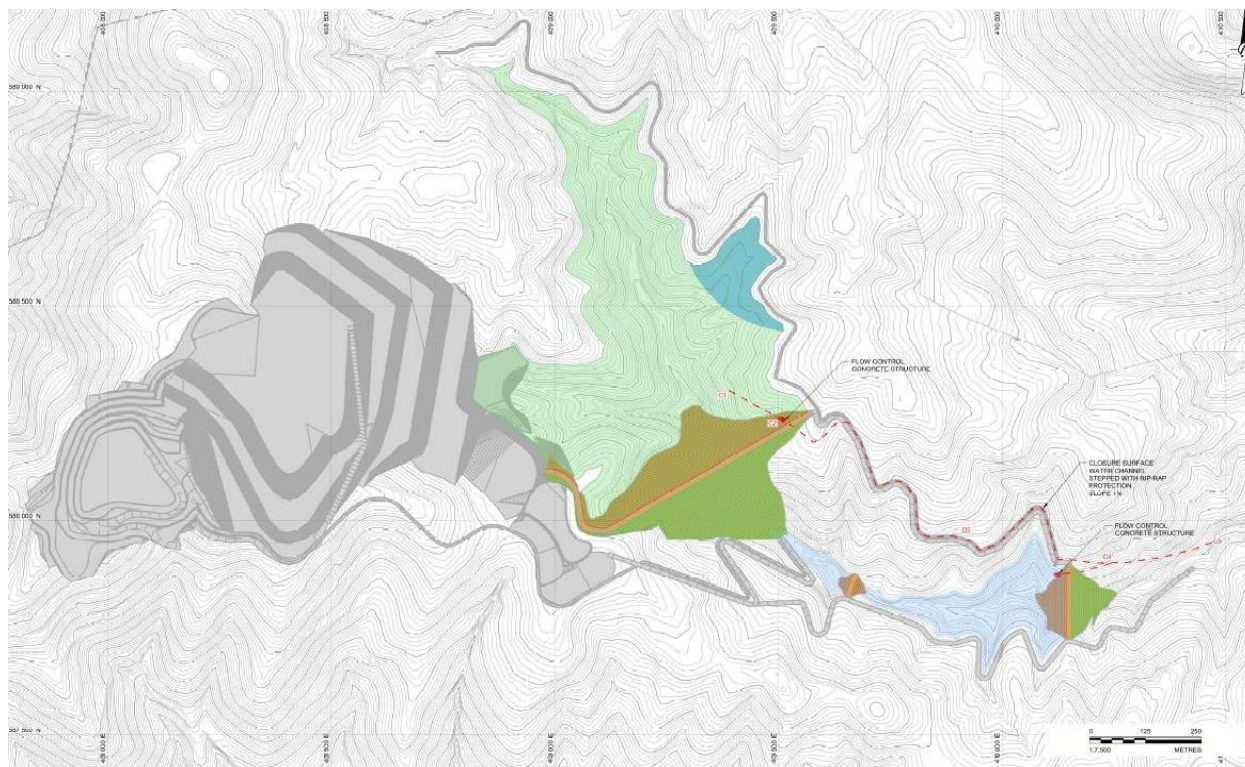
Visual inspections and annual auditing will be carried out.

Closure and rehabilitation

The tailings and the waste rock are evaluated as **acid drainage independent**. The closure will include:

- laying of approximately 0.5 m of waste rock, a layer of topsoil (min. 0.5 m or 2.0 m in the case of reforestation according to Regulation 26),
-
- planting of local species (oak, Austrian pine etc.).

The TMF embankment will not need further profiling for a 20° slope.



6. ENVIRONMENTAL RISKS AND HUMAN SAFETY AND HEALTH RISKS DURING TMF OPERATION AND POST CLOSURE AND MEASURES TO PREVENT SUCH RISKS

6.1 Location of the facilities

The mining waste disposal site was sited following an analysis of the necessary stockpile footprint and in keeping with the legislative requirement that such facilities be located within the concession area, but outside the outline of the mineral resource, and in consideration of the restrictions imposed by the protected area.

6.2. Physical stability of the facilities

As the overall detailed design for the Rozino Deposit is developed, designs for stable mining waste facilities will also be drawn up.

6.3. Influence of geological, hydrogeological, seismic and geotechnical factors

The impacts on the geological and hydrogeological environment caused by the construction of the mining waste facilities may be defined as stockpiling works related to the mining of ores and minerals. The stockpiling works will change only the local depth of the covering material.

The future operation of the deposit involves one main impact on the geological environment: creation of a man-made empty space in the geological environment.

6.4. Short and long-term protection of soil, air and water against pollution, and efficient collection of polluted water and seepage

Air

Short-term events of localised dust emissions in the air are possible during top-soil collection and overburden removal, and are considered in detail in the EIA Report. Subsequently, the stockpiles will be rehabilitated promptly in order to restrict dust emissions. Therefore, the site is not expected to create any long-term impacts on the settlements in the area and the atmospheric air quality will not be affected in a negative way.

Water

The mining waste facilities will not encroach upon:

- the boundaries of settlements with constructed water sources for the needs of the population;
- natural river beds, river banks and floodplains.

Therefore, no prohibitions related to provisions of the Water Act are imposed on the envisaged operations.

Mine drainage

Surface run-off from the open pit will be used as the first source of processing plant water. This water will be pumped from the open pit sumps into the plant water reservoirs. Water stored in the TMF settling pond will be the second source of processing plant water, and the fresh-water reservoir will be used as a make-up water (third source), if open pit and TMF water is not sufficient or of the quality required by the plant.

No discharging of oils and fuels, and any other technical and household pollutants is allowed in the various sections. All activities from which such pollution is likely will be carried out on dedicated locations and pads. Repairs will be carried out in the repair facilities.

The service platform will be equipped with housing containers and a chemical toilet.

Soils

The expected impacts on the earth and soils during the mining waste facility construction phase comprise mechanical disturbance and destruction of the integrity of the soil profile on these particular terrains.

The potential for pollution of adjacent soils during construction and mining are as follows:

- potential emergency spills of oil products such as diesel fuel, motor, hydraulic and compressor oils used in the mining and processing equipment. The risk of such pollution is minimal if the mining and construction equipment is operated in accordance with the operating instructions and is maintained properly;

- dust pollution during earthworks and hauling operations;

The amount of dust generated by earthworks and load-handling activities will depend on the weather conditions. The chemical composition of dust generated during earthworks and handling is consistent with the composition of the soil-forming materials in the region and, therefore, will not change the soil properties and fertility;

- impacts on soils may be expected by fugitive emissions in the air from construction machinery exhaust, and from hauling and storage of waste rock. The automotive exhaust gases contain mainly CO, NO_x, SO₂, hydrocarbons, and dust. These harmful emissions are unlimited in time and quantity, and local in scope.

Collection of polluted water and seepage

The mine drainage is described above. No polluted water and seepage are expected.

6.5. Reduction of wind and water caused erosion insofar as it is technically possible and economically justified.

The soils in the concession area are expected to sustain some limited mechanical impacts from the heavy-duty equipment such as excavators, bulldozers, heavy trucks, and some local erosion. The proposed mining technology involves measures whose implementation will lower significantly the risk of soil erosion.

6.6. Landscape damage

The resource and environment regeneration functions of the landscape will be disturbed during the construction and operation of mine site and mining waste facilities. A typical man-made landscape will be created there, with altered visual appearance. Its impact will be caused by the stockpiles during the concession period and will be limited to a certain possible extent by rehabilitation.

The impacts will be as follows:

- destruction of vegetation in the property occupied by the mining waste facilities;
- change of topography;
- short-term derogation of the quality of environmental media.

The footprint of man-made landscapes will be expanded at the expense of other landscapes during the project operation. The construction of the facilities will change the

geographic forms and the land uses. The changes will be reversible to some degree during the rehabilitation works.

7. ACCIDENT AND RISK PREVENTION MEASURES

7.1. Prior to and during facility operation.

The mining waste storage facilities will be constructed according to detailed designs which will be a part of the overall deposit development design and will be consistent with the Mine Waste Management Plan.

The following measures will be adhered to in order to prevent accidents and incidents during stockpile construction and operation:

- observation of facility boundaries;
- removal of topsoil for its further use during rehabilitation;
- hauling of disposable materials along strictly defined routes;
- observation of the instructions for operation of transport vehicles and construction machinery;
- compliance with the stockpile shaping designs;
- use of personal protection equipment and occupational safety induction of the personnel;
- regular stability inspections of the mining waste storage facilities.

7.2. During rehabilitation of lands disturbed by, and closure of, the mining waste storage facilities

The following measures will be observed during mining waste storage facility rehabilitation:

- drawing up of a detailed design for closure and rehabilitation, post-closure care and a monitoring plan, approved by the competent authorities;
- observation of the design requirements for slope and drainage system structure;
- observation of the technical and biological design requirements;
- observation of occupational safety measures during rehabilitation.

8. CONTROL AND MONITORING PROCEDURES

8.1. Mine waste facility monitoring plans and agreements.

The closure of the mining waste facilities will be followed by monitoring. The self-monitoring plan should include monitoring of the following components:

- ✓ atmospheric air;
- ✓ groundwater;
- ✓ subsurface environment (stability);
- ✓ soils;

✓ biodiversity.

The Overall Detailed Design for Technical and Biological Rehabilitation of the Rozino Deposit will include an environmental media monitoring plan.

8.2. Plans and agreements for inspection of the mine waste facility by competent persons

Plans and agreements for inspection of the mine waste facility by competent persons will be drawn up after stockpiling in the mining waste storage facilities begins. Also, a self-evaluation of the possible immediate threats of environmental damage and of caused environmental damage will be made in accordance with the *Environmental Damages Prevention and Elimination Liability Act*.

8.3. Actions taken if monitoring or inspection results indicate instability of the facility or pollution of soil, air and water.

Specific actions will be provided for an undertaken in response to monitoring results.

The following procedures for control and monitoring of the concession activities and of mine waste generated during such activities can be proposed at this time:

- Internal control of observation of the stripping, mining and stockpiling works provided for in the Overall Detailed Design.
- Regular surveying for adherence to the design solutions embedded in the Overall Detailed Design for operation of the deposit sections.
- Regular observation and control of stockpile conditions for timely prevention of any danger to the individual environmental media and to the health of workers in the pit.

9. MINE WASTE COLLECTION AND STORAGE PADS FOR USE DURING THE TIMELINES SPECIFIED IN ARTICLE 16, PARAGRAPH 4.

According to Article 16, paragraph 4, the following are not mine waste facilities:

1. the pads on which the following are collected or disposed of:
 - a) unexpectedly generated hazardous mining waste, for up to six months;
 - b) non-hazardous non-inert mining waste for up to one year;
 - c) non-polluted soils, non-hazardous exploration waste, inert waste and waste from extraction, processing and storage of peat, for up to three years;
2. Mined-out spaces formed by shaft or pit mining of underground mineral resources and into which mining waste is returned as backfill;
3. ramps, barriers or other facilities connected with the production activity and built using mine waste which meets the conditions referred to in Article 22a, paragraph 5, items 1, 3 and 4 of the Subsurface Resources Act.

Item 2 above include the mined-out spaces in the Rozino Deposit because some of the overburden will be used as backfill in those spaces.

No other waste collection and storage pads for use during the timelines specified in article 16, paragraph 4 are provided for.

10. MINING WASTE INTENDED TO BACKFILL MINED-OUT SPACES FORMED BY SHAFT OR PIT MINING OF ORES AND MINERALS

Stripping in the Rozino Deposit will amount to approximately 26.6 Mt or approximately 10.8 Mm³ of overburden.

Overburden from the mine will be disposed of in two top-soil stockpiles, as follows:

- To the north-east with one horizon at RL 495 m;
- To the south-west with two horizons at RL 377 and 382 m.

These stockpiles are expected to evolve during the mine construction and will be closed after rehabilitation is completed. It should be noted that the a staged rehabilitation system can be selected during the drafting of the overall design for operation and closure of disturbed lands.

The waste rock will be stockpiled in the mining waste facility to the east of the mine pit. An external flotation tailing facility is envisaged as well.

11. CLOSURE AND REHABILITATION OF THE MINING WASTE FACILITIES AND OF THE DISTURBED LANDS

The main tasks set and resolved by the development of the rehabilitation design, in accordance with *Regulation 26/1996 on the Rehabilitation of Damaged Terrains, Improvement of Low-Productivity Areas and Utilization of the Topsoil Layer*, are:

- removal, storage and use of available top-soil layer and geological material fit for rehabilitation;
- selection of suitable rehabilitation method and sequence for the disturbed area;
- restoration or improvement of the disturbed area and lands to a state not despoiling the surrounding landscape and allowing for adequate integration of the rehabilitated area into the surrounding environment;
- development of a design for gradual rehabilitation of the lands disturbed by mining, consistent with calendar schedule for mining of the deposit reserves, provided for in the overall detailed design.

The rehabilitation will include two main groups of activities – technical rehabilitation and biological reclamation.

12. PROGRAMS TO PREVENT DETERIORATION OF THE STATUS OF WATER AND POLLUTION OF AIR AND SOILS

As required by Article 20, paragraph 1, item 1 and item 2, the company must develop water, air and soil deterioration-prevention programs. This is an obligation in accordance with Chapter IV ‘Mine waste facility construction, operation and closure’ of the Regulation on Mine Waste Management.

An overall and annual designs for development of the deposit, a technical reclamation design, a rehabilitation design and a final mine waste management design will be drawn up. Also, real programs to prevent water, air and water deterioration will be developed.

13. DOCUMENTS EVIDENCING THE QUALIFICATION, TECHNICAL SKILLS AND CAPABILITY OF THE OPERATOR TO ACHIEVE THE GOALS OF THE MINE WASTE MANAGEMENT PLAN

Tintyava Exploration AD has adequately qualified and technically skilled personnel that can achieve the goals of the mining waste management plan and possesses the technical and financial resources for implementation of the activities in the plan.

Tintyava Exploration AD develops, implements and upholds the main principles of the environmental management systems and protection of people’s health and safety in accordance with the internationally recognized standards, the voluntary practices of the mining enterprises, consistent with the Bulgarian laws and the relevant European and international guidelines, in strict adherence to the good European and global practices. It is the company’s priority to minimise the risk of environmental damage, to protect the health of the employees and of the visitors and the people in the region.

14. ATTACHMENTS

14.1. Attachment 1 – Record of Testing No. 728/22.07.2020; Record of Testing No. 730/22.07.2020; Record of Testing No. 731/22.07.2020 during the Tests and analyses by the accredited laboratory of Eurotest Control EAD in Sofia.