



KRESNA GORGE CASE UPDATE: 15 YEARS LATER

For the 37th Standing Committee
6th December 2017, Strasbourg

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on behalf of “Save Kresna Coalition”

Kresna gorge case – the value

- Natural north-south bio-corridor for plants, invertebrates, snakes, tortoises, bats and other species
- ▶ Two NATURA 2000 sites
- ▶ The richest biodiversity region in Bulgaria! > 4500 species of animals!
- Part of local traditions
- ▶ Ecotourism and entertainment
 - ▶ >20,000 rafting / kayaking tourists per year
- ▶ Road connection for local people to the northern big towns and the capital



IMPACTS OF THE EXISTING ROAD IN THE GORGE

In 2003

- ▶ 4000-4500 vehicles per day (NGO monitoring) + on-spot appraisal from the Bern Convention already adverse impact

- ▶ In 2013 – close to 7,000 (both directions)
- ▶ In 2030-40 – 6-7,000 vehicles per day (in one direction if G10,5 Eastern applied) (National Company "Strategic Infrastructure Projects" (2014))

- ▶ Snakes: *Elaphe situla* – 58%, *E. quatorlineata* – 100% decrease of population
- ▶ Tortoises: (*Testudo graeca* and *T. hermanni*) -70% decrease
- ▶ Bats - 92% decrease
- ▶ All vertebrates - 84% decrease



ARTICLE 9

- ▶ Each Contracting Party may make exceptions from the provisions of Articles 4, 5, 6, 7 and from the prohibition of the use of the means mentioned in Article 8 **provided that there is no other satisfactory solution** and that the exception **will not be detrimental to the survival of the population concerned: [...]**.



REMINDERS AND UPDATES

- ▶ **Recommendation No 98 (2002) of the 23th Standing Committee:**
 - ✓ To abandon enlarging the current road
 - ✓ To study alternative routes outside the gorge
 - ✓ The choice of alternative should be based also on social and ecological criteria
 - ✓ To restore its initial status of a local road used by the farming community and tourists
- ▶ **2004 – a case file is open, and closed in 2010 because of 2008 EIA decision:**
 - ✓ Long tunnel alternative to be implemented, which is outside the Gorge
 - ✓ No mitigation/compensation is possible inside the gorge
 - ✓ Any alternatives inside the gorge are unacceptable, including rehabilitation of the existing road



NEW 2017 EIA DECISION OCTOBER 2017:

G10.5 eastern alternative approved,
where:

- ▶ Half of the highway passes inside the gorge on the existing road
- ▶ Half of the road passes on the slopes East from the Gorge
- ▶ No assessment of "rehabilitation of the existing road under option G10.5" BUT road is enlarged from 10.5m to 12m
- ▶ Not all alternatives have been included
- ▶ No road for local communities



WHAT IS WRONG WITH 2017 EIA

- ▶ G10.5 - Pre-determined option (based on technical and financial criteria)
- ▶ Misleading data for reaching certain conclusions of overrated impacts from "tunnel" and "G20-Eastern" options :
 - States that **G20-Estern** has adverse impacts based on wrong calculations of direct habitat loss with presumption that the track is 100 m wide

Direct loss of habitats	EIA statement	Facts
Forest to be cut down	129.4 ha	16,5 ha
% of direct loss of forests	2,9%	0,37%
% loss g1AA* Eastern Oak forests	1,27%	0,23%
% loss g1Eo* Alluvial forests	3,26%	0,53%

- States that **long tunnel** is not acceptable based on misleading data on radioactivity
- ▶ Poor public hearings and protocol – local people want motorway outside of the Gorge and a local road



GOOD ALTERNATIVES ARE POSSIBLE OUTSIDE KRESNA GORGE

▶ G20 Eastern

- Largely supported by local people in Kresna town
- Some significant impacts on habitats that could be mitigated

▶ Long tunnel

- Initially proposed by local people from Kresna
- No impacts on habitats and species

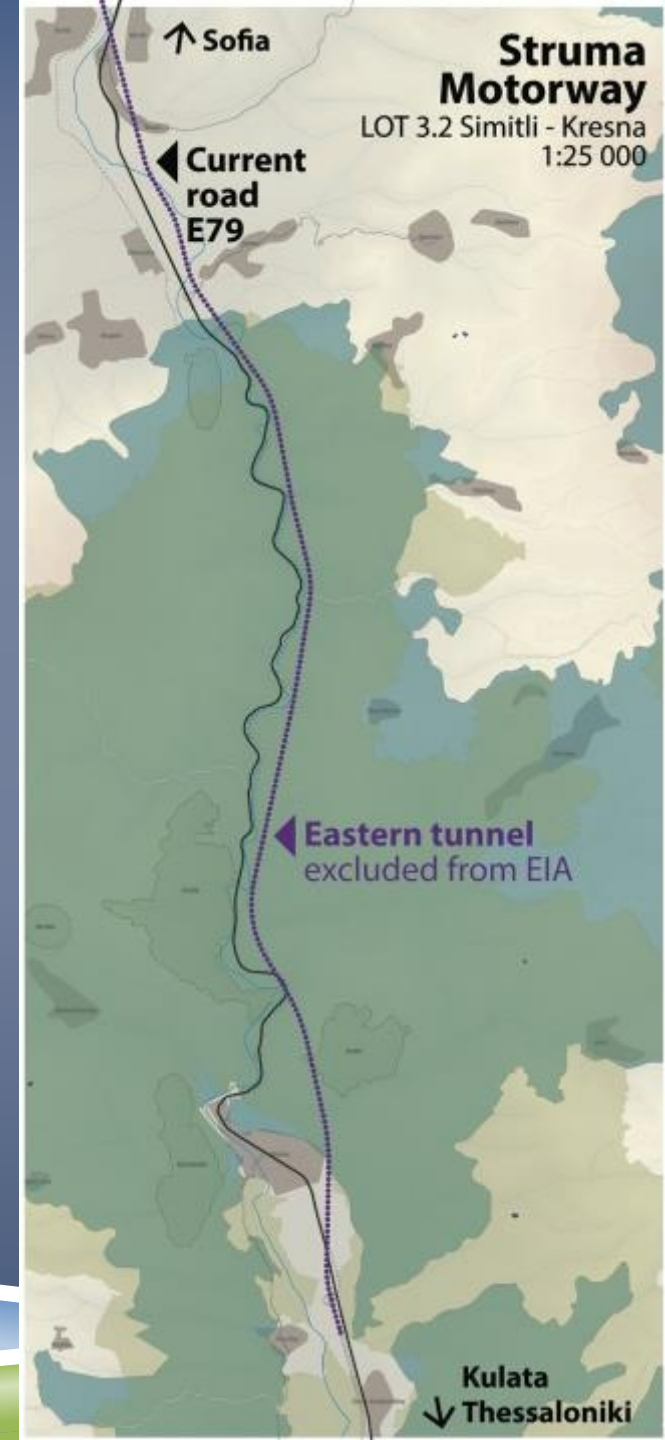
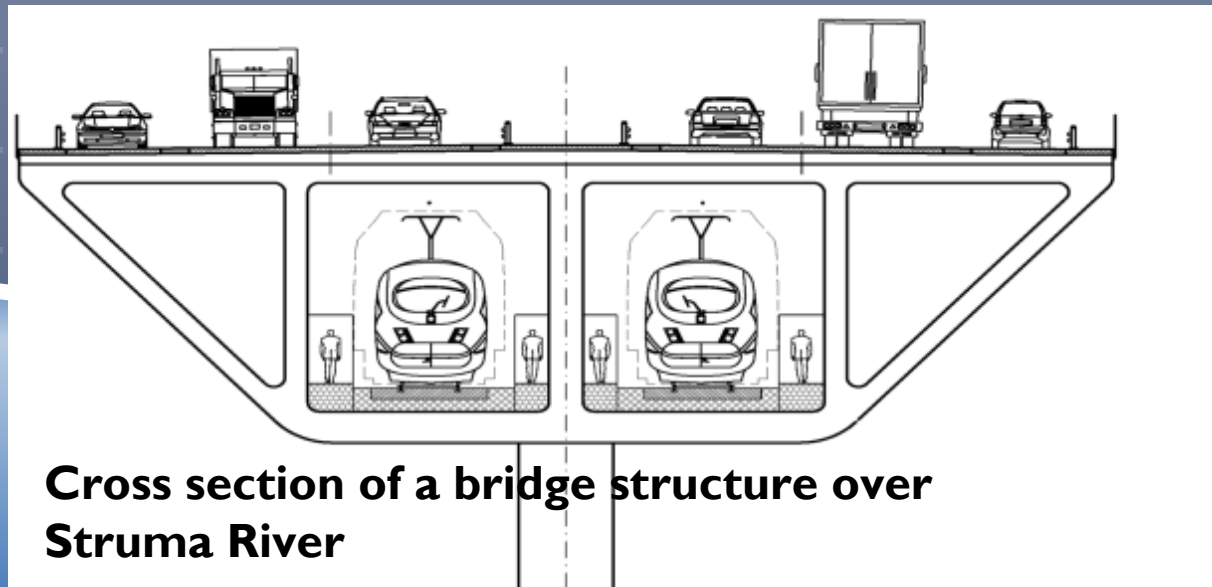
▶ Both supported by scientists:

- ▶ 2016: Position of 99 scientists from the Bulgarian Academy of Science + 4 Universities
- ▶ 2017: Position of the Scientific Council of the National History Museum of BAS



NEW “EASTERN MULTI-TUNNEL” ALTERNATIVE

- ▶ Combined motorway with railway
 - ▶ 12 tunnels and bridges
- ▶ Expected to have little impact on habitats and species
- ▶ Not assessed in the 2017 EIA



AS A RESULT:

- ▶ Bern convention Recommendation 98 (2002) has been neglected
- ▶ Existing depletion & projected catastrophic impacts for unique protected habitats & wildlife;
- ▶ EU public money is funding the irreversible destruction of European natural heritage;
- ▶ A complaint to the EC submitted in July 2017 for significant violations of EU law.

WE ASK FOR 37TH STANDING COMMITTEE TO:

- ▶ **Ask the Government to revise the EIA as soon as possible and to equally assess all alternatives;**
- ▶ **Ensure that the Bern Convention is consistently applied, especially Art. 4 and Art. 9;**
- ▶ **Ensure that the whole Struma motorway is routed OUTSIDE of the Kresna Gorge;**
- ▶ **Open a case file until the project is finalised.**

THANK YOU!



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