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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

36th meeting
Strasbourg, 15-18 November 2016

Possible file

**Follow-up of Recommendation No. 98 (2002)
on the project to build a motorway
through the Kresna Gorge
(Bulgaria)**

- REPORT BY OTHER STAKEHOLDERS -

*Document prepared by
the Bulgarian Construction Chamber*

Official translation from Bulgarian

**CONSTRUCTION A LOT 3 “BLAGOEVGRAD – SANDANSKI” OF THE STRUMA
MOTORWAY IN THE AREA OF THE KRESNA GORGE**

Letter sent to:

STANDING COMMITTEE

THE BERN CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND
NATURAL HABITAT

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Follow-up/Appendix to Recommendation No. 98 (2002) on the project to build a motorway through the Kresna Gorge (Bulgaria)

Observations to a Signal by NGOs published on the web site of the Bern Convention /T-PVS/Files (2016) 10 / with a request for consideration at the 36th meeting of the Standing Committee of the Bern Convention (15-18 December 2016)

Document prepared by

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Association "Bulgarian Forum for Transport Infrastructure"
Bulgarian Association for Rural and Ecological Tourism
Bulgarian Hunting and Fishing Union
Ecological Association "Maritza 2004"
"Cluster Green Freight Transport" Association
Federation of Consumers in Bulgaria
"Cluster Wellness Bg" Association
Environmental Association "Protect Proekt"*

Dear Ladies and Gentlemen,

With regard to the Report by some non-governmental organisations (NGOs) published on the web site of the Bern Convention /T-PVS/Files (2016) 10/ and the information contained therein, we feel obliged to address you and express our competent, responsible and categorical stance on the construction of the most challenging section of the Struma Motorway in decades, namely Lot 3.2 between Krupnik and Kresna.

The Struma Motorway is not only one of the largest, but also one of the most complex from engineering and technical perspective infrastructure projects in Bulgaria; at the same time it is also the most eco-friendly highway that has been built in our country. The decision on how to successfully complete the Struma Motorway in the programming period of the Operational Programme Transport and Transport Infrastructure 2014 – 2020 (OPTTI) is very important for the Bulgarian society and the discussion on this issue is extremely active.

In this regard, the Bulgarian Construction Chamber (BCC) organised yet another discussion forum on "*Progress of the Struma Project, Lot 3.2 in the section of Krupnik to Kresna*". The event was held on September 27, 2016 and it stated desire and referred to the tremendous efforts by the construction industry and the scientific community in Bulgaria to timely solve the issue with the implementation of the Struma Motorway in the area of the Kresna Gorge.

Led by the need of relevance and admissibility of the project, there have been discussed the studies, research and analysis made in order to take into account the influence of all factors on the decision on the routing alternative. There has been established that the protected zones and affected areas in places of intersection with the route of the road have been investigated seeking the most appropriate technical solutions and that there have been taken all possible measures to protect biodiversity and habitats.

The developed design for a new route suggests one carriageway be moved to the east of the Kresna gorge, which aims to reduce the traffic in the gorge by half. The separation of the traffic flows and the implementation of two separate, distant from one another carriageways would allow trouble-

free and conflict-free trip. The new design solution plans rehabilitation and reinforcement of the existing road, and provides for technical measures to protect the species and improve the ecological environment in this sensitive area. Action has been taken in the preparation of the EIA/AA report, which clearly defines the problems and opportunities for the implementation of different alternatives.

At the forum it has been noted that the construction of the new route will be accompanied by significant technical problems. We should also not ignore the fact that the project cost would rise compared to the already proposed and discussed alternatives, but there is still no clarity on the additional funding under OPTTI. However, participants in the forum agreed and unanimously accepted that the new design solution would be a compromise that meets the highest environmental requirements.

The participants in the forum expressed their disapproval of the behavior of some environmental NGOs that once again have extended manipulative conclusions and statements in their correspondence with the European institutions and the Bern Convention. It is outrageous that in their reports and signals the representatives of these NGOs comment on technical, geological, seismo-tectonic, hydrogeological, pricing and other issues concerning project alternatives, rather than environmental aspects in which area they are supposed to be competent in. In their statements those NGOs have cited titled persons who interpret facts and draw conclusions using unscientific methods. Thus they have deliberately misled the responsible European institutions presenting false information, statements and conclusions. These specialists are employees of institutions that have made radically different official statements and reports, backed up by research and analysis. In its report to the Bern Convention, the NGOs have considered project drafts that have long been discussed, revised and new ones have been adopted with very different parameters.

The presentation of false and misleading information to the European institutions has hampered the decision-making process and has created preconditions for blocking the project and has put at risk the implementation of OPTTI.

All participants in the forum have come up with the same firm opinion that the allegations of the environmental organisations sent in a letter to the Bern Convention contain misleading information and conclusions that do not meet reality. The request to reopen a file on a monitoring procedure for the project only leads to blocking the work on it. Any delay means new casualties and killed animals in the region of the Kresna Gorge. There has been created commotion and anxiety among the locals and the entire traffic passing through the region. This is in contradiction with the efforts of all institutions that are being developing a design that complies with the requirements for eligibility and feasibility within the programming period. Any delay is in conflict with the results achieved by the constant dialogue that is being held with NGO representatives who have signed the letter to the Bern Convention.

In conclusion, the forum categorically states that the work on the project is being carried out responsibly and in compliance with the Bulgarian and EU legislation and international norms and requirements on the implementation of large and complex infrastructure projects such as the Struma Motorway. With our work, and in accordance with our competence, we all are looking for an opportunity to support the activity of the institutions responsible for the construction of a modern road infrastructure corresponding to the strategic objectives of the European Union.

We hereby object and see that it would be completely inappropriate for the Standing Committee of the Bern Convention to pay attention to yet another piece of slanderous and completely misleading information submitted by some NGOs; information that only attracts attention on issues long solved rather than making an effort to find the most effective methods and solutions for the realisation of the section, thereby ending the hindrances preventing the safe traffic and protection of the environment in the gorge.

Given the above, we would like our representatives be allowed to participate in the 36th meeting of the Standing Committee of the Convention on the Conservation of European Wildlife and Natural Habitats.

Respectfully,

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Prof. Radoslav Nakov, PhD, Director of the Geological Institute, Bulgarian Academy of Sciences

Prof. Aleksey Benderev, Head of the Hydrogeology Department, Geological Institute of the Bulgarian Academy of Sciences

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Vladimir Todorov, Chairman of the Bulgarian Association of Victims in Car Accidents

Arch. Petar Dikov, Deputy Chairman of the Association "Bulgarian Forum for Transport Infrastructure"

Miroslav Manolov, Bulgarian Forum for Transport Infrastructure

Assoc. Prof. P. Petrov, Bulgarian Association for Rural and Ecological Tourism

Assen Piperkov, Chairman of the Bulgarian Hunters and Fishermen Union

Liliana Shumanska, Chairman of the Environmental Association "Maritza 2004"

Assoc. Prof. Dr. Simeon Ananiev, Chairman of the "Cluster Green Freight Transport" Association

Emil Georgiev, Chairman of the Federation of Consumers in Bulgaria

Radoslava Neycheva, Chairman of the Association "Cluster Wellness BG"

Lyubomir Ivanov, Chairman of the Environmental Association "Protect Proekt"

*I, the undersigned **Malina Stefanova Arnaudova** certify the fidelity of the translation, rendered by me from Bulgarian into English of the attached document. This translation consists of 7 pages.*

*Translator: **Malina Stefanova Arnaudova***

Official translation from Bulgarian

DECLARATION

by

Bulgarian Academy of Sciences
"St. Ivan Rilski" Mining and Geology University
University of Architecture, Civil Engineering and Geodesy
Bulgarian Construction Chamber
Bulgarian Branch Association "Road Safety"
Bulgarian Branch Chamber "Roads"
Federation of Highway Engineers
Bulgarian Forum for Transport Infrastructure
Bulgarian Association of Victims in Car Accidents
Association "Bulgarian Forum for Transport Infrastructure"

and

Bulgarian non-governmental organisations:
Bulgarian Association for Rural and Ecological Tourism
Bulgarian Hunting and Fishing Union
Ecological Association "Maritza 2004"
"Cluster Green Freight Transport" Association
Federation of Consumers in Bulgaria
"Cluster Wellness Bg" Association
Environmental Association "Protect Proekt"

The realisation of the largest road infrastructure project in Bulgaria is still under the imminent threat of failure. For more than two years now the decision to complete the final stage of the Struma Motorway has been impeded by the so-called environmental organisations.

In March 2014, at the initiative of the Bulgarian Construction Chamber, the Association "Bulgarian Branch Association Road Safety", the Bulgarian Branch Chamber "Roads", the Roads Department at the Faculty of Transportation Engineering at the University of Architecture, Civil Engineering and Geodesy, the Federation of Highway Engineers, the Association "Bulgarian Intelligent Transport Systems", there was held a discussion forum to discuss the conceptual design of the Struma Motorway Lot 3. At this forum almost all participants stated that the decision to pass through the Kresna Gorge through the 15-kilometer tunnel is impractical, unrealistic, environmentally and economically unjustified and insisted an alternative passage through that section of the gorge be sought.

The Bulgarian Construction Chamber, in order to better the expert awareness of state institutions, has held various events and initiatives at which it has invited prominent international experts and scientists for a thorough and detailed study of all aspects of the proposed alternatives through the Kresna Gorge. Several international scientific conferences have been held with the participation of representatives of the Bulgarian Academy of Sciences, the University of Architecture, Civil Engineering and Geodesy, the Mining and Geology University, the Association "Bulgarian Branch Association Road Safety", the Bulgarian Branch Chamber "Roads", Federation of Highway Engineers, many experts and scientists from Bulgaria and abroad, a number of NGOs, the Bulgarian Association for Rural and Ecological Tourism, the Bulgarian Hunting and Fishing Union, the environmental Association "Maritza 2004", the "Cluster Green Freight Transport" Association, the Federation of Consumers in Bulgaria and the Association "Cluster Wellness BG", the Environmental Association "Protect Proekt". The discussion forums held have clearly outlined the poorly studied aspects of

engineering and geological, tectonic, seismic, financial and environmental conditions in the construction of the long tunnel alternative.

In summary, the additional research and studies carried out for the construction of a long tunnel have led to the following main conclusions:

The region of the Kresna Gorge is located in one of the most seismically active areas in this part of the Balkan Peninsula. It is connected with the manifestation of one of the strongest seismic events in Europe and the Balkans. On April 4, 1904 two strong earthquakes were recorded within 23 minutes with magnitudes of 7.1 and 7.8, where the most significant surface deformation and destruction were established and described in the Simitli graben and the Kresna Gorge. The quake caused ground ruptures with amplitude of more than three meters. The projected construction tunnel crosses the main active structures that have generated these earthquakes;

The geological structure is complex and extremely diverse, with very low values under the RMR (rock mass rating) classification indicator, which means that in its most part the tunnel would be routed under extremely difficult construction conditions. The tunnel will cross many fault zones, some of which are active. This indicates a high degree of expected sudden falls of unstable rock formations during construction or operation of the facility. Under these conditions the time for construction of a long tunnel can not be accurately determined. Normally, construction under such conditions is time consuming, and in this case it could last more than ten years;

The radioactive radiation is high, established under the specific activity of natural radionuclides, which are two to three times higher than the background ones. Excavations in these rocks must be performed under strict precautions for work in areas with increased radioactive backgrounds, which will put at risk the health and lives of the construction workers;

The excavated rock mass, which in swelling state has a volume of about 8 million m³, will occupy huge space for its storage. Such landfills have not been allocated. At the same time, the increased radioactivity requires the materials be stored and kept under special conditions – the territory has to be drained and the effluent be specially purified, and the rock materials should be covered with additional clean earth;

The construction of the tunnel will drain the rock formations, which will drain large areas that will create environmental problems of deforestation of vast territories. The drained water will be highly radioactive and special treatment facilities would have to be provided for the runoff;

The long tunnel poses a great risk with regard to security. Such a facility poses a high risk of terrorist attacks. At the same time, in long tunnels grease particles from the exhaust of vehicles aggregate and create a thin film on the asphalt, which in combination with dust sharply deteriorates the tire grip. This results in slips and difficult braking and handling of vehicles (a particularly telling example of this is a recent accident in the Vitinya Tunnel);

It takes extremely high operating costs for its maintenance and ensuring safe passage of large numbers of cars. The Bulgarian car fleet consists mainly of older cars, many of which are not in very good condition, and any failures in such a tunnel would lead to a large number of casualties and injuries.

Analyses show that the construction of long tunnel is technically risky, impractical and unacceptable for realisation due to geological, seismic, economic and environmental uncertainties and lack of necessary financial resources.

In order to search for the most effective solution, a number of specialists and designers have developed various alternatives for crossing the gorge. There have been carried out additional geological, radiological, environmental and other studies, and alternatives have been proposed tailored to the results and recommendations.

All these analyses and tremendous efforts are opposed by a circle of people calling themselves conservationists, using all possible means to stop the project. These same organisations exchange correspondence with European institutions and ask Bulgaria be punished for its refusal to build a long tunnel, demanding the funding be stopped and sanctions be imposed. In their statements they have cited titled people who, however, make false analyses and conclusions using absolutely unscientific

methods. Furthermore, they have made statements and qualifications on recognised authorities and experts and on issues that do not fall within their competence. The institutions in which they work officially present reports and statements which are categorically different from their private conclusions. In their letters, including the one from 19.08.2016 to the Bern Convention, the aforementioned NGOs are manipulating the international institutions with false assertions and conclusions, arguing that the Bulgarian party is working with false information and does not comply with construction requirements under these conditions. All this is to block the project, which in turn increases the risk of losing EU funding and imposing prohibitive financial penalties for our country. At the same time the number of fatalities on the road will continue to grow.

At the meetings held of the Struma Motorway Monitoring Committee, the representatives of these so-called environmental organisations have made impossible demands for the development of an alternative by insisting both carriageways be moved to the east and the road into the gorge be completely closed. It is impossible for the following reasons:

The road through the gorge will be needed, regardless of the choice of an alternative because in case of an accident under bad weather conditions and other unforeseen circumstances the existing road should be able to take the entire traffic.

The terrain and conditions east of the Struma River are extremely difficult and construction there requires prohibitively difficult and expensive solutions.

Bypassing the gorge from the east with two carriageways will impose adverse impact on the environment and there is a real possibility that the project would prove to be unacceptable from an environmental perspective.

The cost of this project is extremely high and additional European funds are not foreseen.

The operation will require significant costs because the large gradients and the difference in weather conditions will require expensive maintenance. This will require numerous tunnels and large viaducts.

Based on the foregoing, we hereby make a categorical declaration in support of the efforts of the Road Infrastructure Agency for implementation of the proposed alternative of the design solution with a bypass from the east with only one carriageway outside the gorge. We believe that it is vital to unite our efforts to ensure that all approval procedures and the actual commencement of work on site be accelerated. We do not accept the never-ending search and discussion of alternatives, most of which are completely unworkable under the current conditions as this definitely blocks the work on the project in the region of the Kresna Gorge. The risk of failure to complete Lot 3 of Struma Motorway in the area of the Kresna Gorge is very big. This is undoubtedly a real threat to the stability of the entire Struma Motorway construction project, including the already built sections funded under OP Transport 2007 – 2013 and for those which are currently under construction in the current programming period under Operational Programme Transport and Transport Infrastructure 2014 - 2020.

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