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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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File open

**Wind farms in Balchik and Kaliakra
–Via Pontica (Bulgaria)**

- REPORT BY THE GOVERNMENT -

*Document prepared by
the Ministry of Environment and Water, Bulgaria*

- OCTOBER 2017 -



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

27 October 2017

**RECOMMENDATION No. 130 (2007)
ON THE WINDFARMS PLANNED NEAR BALCHIK AND KALIAKRA, AND OTHER
WIND FARM DEVELOPMENTS ON THE VIA PONTICA ROUTE (BULGARIA)**

1. INTRODUCTION

The Windfarms near Balchik and Kaliakra Special Protected Area (SPA) has been monitored by the Bureau and Standing Committee of the Bern Convention for years and as part of this process the Recommendation No. 130 (2007) has been issued. Following a complaint from Bulgarian NGOs, the progress on the case has been last reported at the 36th Meeting of the Standing Committee in November 2016. Further to that, following its Meeting held on 18 September 2017 the Bureau instructed the Secretariat to request new reports from both the national authorities and the complainant to be presented at the upcoming meeting of the Standing Committee scheduled for 5-8 December 2017. The request received by the Ministry of Environment and Water (MoEW) on 27 September 2017 seeks additional information on:

- the status of the Integrated Management Plan's development (hereinafter referred to as the IMP);
- how the IMP will specifically address the operational points of Recommendation No. 130 (2007) on the windfarms planned near Balchik and Kaliakra, and other wind farm developments on the Via Pontica route (Bulgaria);
- the conclusions drawn from the public consultations which were expected to be held in early July 2017;
- the expected timescale for final adoption of the IMP.

2. INTEGRATED MANAGEMENT PLAN

The IMP of SPA BG0002051 „Kaliakra” and BG0002097 „Belite Skali“, and SCI BG0000573 „Kaliakra Complex“ could not be finalised in near future for various reasons explained below. Consequently detailed and objective answers to the posed questions could not be provided. However we present information on the alternative actions and measures undertaken or planned to be undertaken by the Bulgarian authorities in order to protect the habitats and the species, incl. the bird species in the Kaliakra area.

2.1 Public hearings on the draft IMP

The Public hearings were organized by the author of the IMP the Institute of Biodiversity and Ecosystem Research at the Bulgarian Academy of Sciences (IBEI-BAS) and took place on

04.08.2017. It started with a morning session hosted by Kavarna Municipality and afternoon sessions hosted by the municipalities of Balchik and Shabla.

On the same day of the scheduled hearings, public protests were organized in front of the administrative buildings of the municipalities of Kavarna, Balchik and Shabla with the participation of local officials and residents. The protests in Kavarna and Balchik escalated to the level of clashes between protesters and law enforcement officers, which made impossible a real public hearing to be held. As a result the hearings were suspended. Although less intense protests in Shabla, the hearings were still not successful and gained little public support.

Both local residents and representatives of the local municipalities as well as NGOs expressed strong opposition to the prohibitions and limitations proposed in the IMP. The protesters argued that the Plan does not provide balance between nature protection and livelihood of people, and that compensatory mechanisms for affected fishermen, landowners and tenants are missing. The issues raised during the protests provoked intensive public debates and social tension not only among local communities, but also among citizens from other areas of the country whose properties fall within Natura 2000 network.

The scale of public discontent and the intention to find a consensual solution led to two additional meetings with the participation of the Bulgarian Prime Minister, the Minister of Environment and Water, mayors of the involved municipalities, business, landowners, fishermen and NGOs representatives, and media.

In order to reach consensus on the regimes and restrictions to be included in the IMP, the Minister of Environment and Water designated four working sub-groups within the existing interdepartmental working group which coordinates the enforcement of the Judgment of the Court of Justice of the European Union from 14 January 2016 in Case C-141/14. These subgroups will work on individual topics of concern - Agriculture, National Aquatory, Energy and Construction. Despite the efforts of the expert groups their work was discontinued by the local stakeholders which have firmly requested their demands to be met beforehand any further work on the IMP and its adoption.

2.2 Alternative actions and measures

At the end of July 2017, pursuant to Art. 19 of the Biodiversity Act the Minister of Environment and Water issued a temporary Order to preserve and prevent from damaging and/or deterioration of the territory of BG0000573 'Kaliakra Complex' and in particular the part covered by natural habitat 62C0 * Ponto-Sarmatic steppes. The same Order introduces two categories of prohibitions - a ban on construction and a ban on plowing, afforestation and the creation of crops fields. These prohibitions will be in effect until a final Order for designation on BG0000573 "Complex Kaliakra" protected zone is issued by the Minister of Environment and Water, but for no more than two years time. The Order aims also to provide time for discussions with all stakeholders about the possible measures that will be introduced by the SAC designation order.

Following the protests in August 2017 it was announced that the Order has been appealed but it remains in force, until the final Court Judgment is delivered.

Taking into account that the continuation of the public hearing and the adoption of IMP is objectively not possible at present, the Bulgarian authorities remain in constant constructive dialogue with the European Commission in order to discuss the possibility to introduce further measures for protection of the habitats and species, incl. birds in the area of Kaliakra. It will be achieved through amendments to the existing Orders for designation of Kaliakra SPA and Belite Skali SPA and issuing of Order for designation of Kaliakra SAC. Currently, all these orders are in the process of being drafted by MoEW.

Separately, an agreement has been reached and signed with the three major wind turbine operators in the area - "AES", "Kaliakra wind power" and "EVN". A commitment was made by them to create a joint venture to manage the Early warning system (EWS).

The following measures are under discussion and implementation:

- Introduction of EWS – The System should be in operation by 15/02/2018 – prior the start of the next migration period (spring and autumn). For all the operators which do not participate in the

system will be ordered their turbines to be stopped during the migration periods in daylight hours unless they joined the EWS. Such measure will be introduced by amendment to the Orders for designation of Kaliakra SPA and Belite Skali SPA.

- Adoption of the National Action plan for the red-breasted geese – the draft has been further modified to accommodate the comments made by the National Biodiversity Committee and now is under review in the MoEW. Its adoption is envisaged to take place by the end of 2017 – beginning of 2018 at the latest, after the consultations with all stakeholders have been carried out.
- Launching a Communication campaign – public procurement procedure will be started this autumn to select a contractor to organise the campaign.

3. CONCLUSIONS

Despite existing circumstances the Bulgarian authorities declare their readiness to undertake all possible and necessary actions to protect the habitats and the species, incl. bird species in the Kaliakra region, in the context of the Court Judgment and the Recommendation No. 130 (2007) of the Bern Convention. The progress will be reported on a regular basis.

- JULY 2017 -



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

PROGRESS REPORT

**on the implementation on Recommendation No. 130(2007)
on the Windfarms planned near Balchik and Kaliakra, and other wind
farm developments on the Via Pontica route
(Bulgaria)**

1. INTRODUCTION

The Windfarms planned near Balchik and Kaliakra Special Protected Area (SPA) has been monitored by the Bureau and Standing Committee of the Bern Convention for years and as part of this process Recommendation No. 130 (2007) has been issued. Following a complaint from Bulgarian NGOs, the progress of the project has been last reported at the 35th Meeting of the Standing Committee in December 2015. Further to that, at the Meeting of the Bureau on 22 March 2016 the project has been discussed and a request for information has been sent to the authorities (letter dated 9 May 2016). Additional information about the progress made since May 2016 was provided to the Secretariat on 3 August 2016.

Further discussion on the open Dossier № 2004/2 related to the construction of wind generators in the area of Kaliakra and Balchik took place at 36th Meeting of the Standing Committee of the Berne Convention.

Taking into account the Judgment issued on 14th January 2016 by the Court of Justice of the European Union (CJEU) on Case C-141/14 ('Court of Justice's Decision / ECJ Decision'), the Committee decided to leave the Dossier open, urging the Bulgarian authorities to ensure that all procedures carried out at national level to implement the ECJ Decision are transparent and involve all stakeholders.

The present report provides the information requested on the progress made in the implementation of the ECJ Decision and how it relates to the operational part of Recommendation 130 (2007) of the Standing Committee of the Bern Convention.

2. OPERATIVE PART OF THE ECJ DECISION

2.1 Obligations under Art. 4 (1) and (2) of Directive 2009/147/EC

'By failing to include all the territories of the important bird areas in the Kaliakra special protection area, the Republic of Bulgaria has failed to classify as SPAs the most suitable territories in number and size for the conservation, first, of the biological species listed in Annex I to the Birds

Directive¹ and, secondly, of the regularly occurring migratory species, not listed in that annex, in the geographical sea and land area where that directive applies, and accordingly has failed to fulfil its obligations under Article 4(1) and (2) of that directive;’

2.2 Obligations under Art. 4 (4) of Directive 2009/147/EC

‘By approving the implementation of the projects ‘AES Geo Energy’, ‘Windtech’, ‘Brestiom’, ‘Disib’, ‘Eco Energy’ and ‘Longman Investment’ in the territory of the Kaliakra IBA which was not classified as an SPA, although it should have been, the Republic of Bulgaria has failed to fulfil its obligations under Article 4(4) of the Birds Directive;’

2.3 Obligations under Art. 6 (2) of Directive 92/43/EEC

‘By approving the implementation of the projects ‘Kaliakra Wind Power’, ‘EVN Enertrag Kavarna’ and ‘Vertikal — Petkov & Cie’, and of the ‘Thracian Cliffs Golf & Spa Resort’ in the territory of the Kaliakra and Belite Skali SPAs respectively, the Republic of Bulgaria has failed to fulfil its obligations under Article 6(2) of the Habitats Directive².

2.4 Obligations under Art. 2 (1), Art. 4 (2) and (3) of Directive 2011/92/EU and point 1(b) of Annex III to that Directive

‘By failing, first, to assess properly the cumulative effect of the projects ‘Windtech’, ‘Brestiom’, ‘Eco Energy’ and ‘Longman Investment’ in the territory of the Kaliakra IBA which was not classified as an SPA, although it should have been, and, secondly, by none the less authorising the implementation of the ‘Longman Investment’ project, the Republic of Bulgaria has failed to fulfil its obligations under Article 4(2) and (3) of Directive 2011/92³ and point 1(b) of Annex III thereto, and under Article 2(1) of that directive, respectively’.

3. TYPES OF INFRINGEMENTS

- All the territories of the important bird areas (IBAs) has not been included in special protection area (SPA) (first indent)
- The implementation of projects in the territories that have been classified or should have been classified as SPA or SCI has been approved (second and third indent);
- The cumulative effect of four projects (only one has been implemented) in a territory which should have been classified as an SPA has not been assessed properly (fourth indent).

3.1 Discontinued infringements:

The infringements under first indent of the operative part of the Decision are deemed to have been discontinued (EC Letter 15 from 17th February 2016);

3.2 Priority follow-up measures:

- Terminating infringements under second, third and fourth indents of the operative part of the Decision;
- Long-term protection and sustainable management of Natura 2000 sites.

4. PROJECTS COVERED BY THE ECJ DECISION – TEN PROJECTS IN TOTAL, OF WHICH NINE FOR WIND GENERATORS AND ONE FOR A GOLF COMPLEX:

4.1 Project ‘Thracian Cliffs Golf & Spa Resort’

The project is located in the lands of Topola village and Bozhurets village, Kavarna municipality, and falls in SPA BG0002097 ‘Belite Skali’ and SCI BG0000573 ‘Kompleks Kaliakra’.

¹ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ 2010 L 20, p. 7)

² Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ 1992 L 206, p. 7)

³ Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ 2012 L 26, p. 1)

4.2 Wind farm project ‘Kaliakra Wind Power’

The project consists of 35 wind generators and is located in the lands of Bulgarevo village, Kavarna municipality, and falls in SPA ‘BG0002051 ‘Kaliakra’ and SCI BG0000573 ‘Kompleks Kaliakra’.

4.3 Wind farm project ‘EVN Enertrag Kavarna’

The project has 20 wind generators approved, but only eight of them are built and operational. It is located in the lands of Kavarna and Bulgarevo village, Kavarna municipality, and falls in SPA ‘BG0002051 ‘Kaliakra’ and SCI BG0000573 ‘Kompleks Kaliakra’.

4.4 Wind farm project ‘Disib’

The project consists of 3 wind generators located in the lands of Rakovski village, Kavarna municipality, and falls in SPA ‘BG0002051 ‘Kaliakra’ after its enlargements.

4.5 Wind farm project ‘Longman Investment’

The project consists of one wind generator located in the lands of Bulgarevo village, Kavarna municipality, and falls in SPA ‘BG0002051 ‘Kaliakra’.

4.6 Wind farm project ‘Vertikal — Petkov & Cie’

The project consists of two wind generators situated in the lands of Bulgarevo village, Kavarna municipality, and falls in SPA ‘BG0002051 ‘Kaliakra’.

4.7 Wind farm project ‘AES Geo Energy’

The project consists of 52 wind generators located in the lands of Bulgarevo, Sveti Nikola, Hadji Dimityr, Rakovski and Poruchik Chunchevo villages, Kavarna municipality. 37 out of 52 generators have fallen in SPA ‘BG0002051 ‘Kaliakra’ after its enlargements.

4.8 Wind farm project ‘Windtech’

The project was planned to build 4 wind generators situated in the land of Kavarna, Kavarna municipality, and falls in SPA BG0002051 ‘Kaliakra’ after its extension.

4.9 Wind farm project ‘Brestiom’

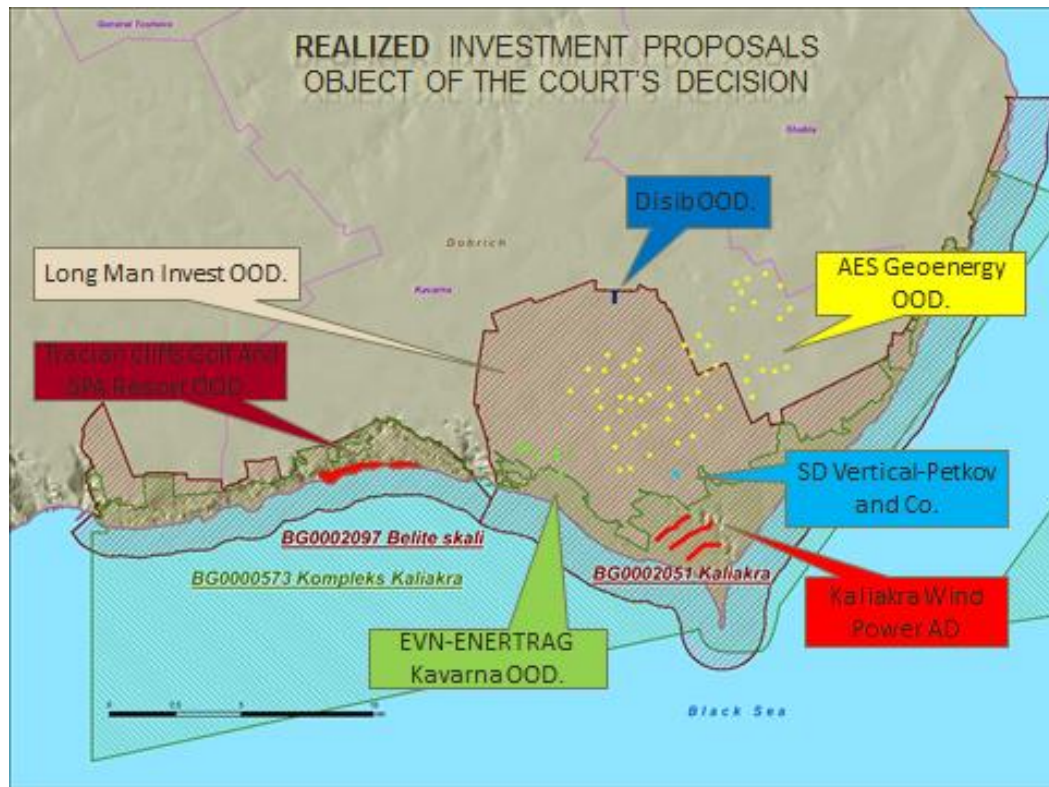
The project was planned to build 6 wind generators situated in the land of Rakovski village, Kavarna municipality, and falls in SPA BG0002051 ‘Kaliakra’ after its extension.

4.10 Wind farm project ‘Eco Energy’

The project was planned to build one wind generator situated in the land of Kavarna, Kavarna municipality, and falls in SPA BG0002051 ‘Kaliakra’ after its extension.

From the ten projects covered by the ECJ Decision the first seven are operational at present. This implies that they have been legally constructed and exist in accordance with the national legislation. **No construction permits have been issued** for the last three projects and as result **they have not been implemented** because the approvals issued under the environmental protection legislation have lost their legal effect.

At present, the total number of operational wind generators covered by the ECJ Decision is 101, of which 86 fall in SPA BG0002051 ‘Kaliakra’ (see the map below).



Location of all implemented projects covered by the ECJ Decision

5. MEASURES TAKEN

In the course of the pre-trial phase of the infringement procedure, Republic of Bulgaria has taken a number of measures that ultimately aim the sustainable management of the area. Those measures are related to:

- **Legislative changes**

The validity of project approval decisions under the Environmental Protection Act and the Biological Diversity Act has restricted to a period of 5 years. If the implementation of the project has not started within that period, the approval decision loses its legal effect. The implementation of a project is considered as started if construction permit is obtained within the mentioned timeframe.

The Environment Impact Assessment (EIA)/Appropriate Assessment (AA) decisions and construction permits are individual administrative acts that create rights or obligations or directly affect the rights, freedoms, or legitimate interests of individuals or organisations.

As a rule, the enacted EIA/AA decisions and construction permits are legally secured administrative acts. This implies that they have not been legally challenged or that their validity has been confirmed by a judicial authority. The compliance of the administrative act with the substantive law should be assessed in the time of issuance.

- **Strategic planning and assessment**

Already in 2012, a strategic assessment was carried out covering the entire country in order to identify the possible locations for the construction of renewable energy sources, as well as to designate the areas where such activities would be completely prohibited.

The Minister of Environment and Waters issued positive AA opinion № 1-2/2012 on the National Action Plan for Renewable Energy Sources (NAPRES 2011-2020). This strategic document supports regional and municipal planning and development of renewable energy projects and assists the operators in selecting the suitable locations and implementing the requirements to minimize the possible negative impact on the Natura 2000 protected areas.

Pursuant to the AA opinion through NAPRES a number of additional measures and conditions were introduced, incl. restrictions on the implementation of new renewable energy projects inside and outside the Natura 2000 network.

- **Designation of new protected areas and extension of the Natura 2000 network**

In the course of the infringement procedure, measures were taken to protect additional areas which represent suitable habitats for the bird species (*Burhinus oedicnemus*, *Melanocorypha calandria*, *Calandrella brachydactyla*, *Anthus campestris*) inhabiting SPA BG0002051 'Kaliakra' which are possibly affected by various activities such as renewable energy projects, changes in land use, etc. Other implemented measures aimed to increase the suitable feeding habitats of wintering geese, mainly the Red-breasted Goose (*Branta ruficollis*) and their subsequent effective management. Furthermore 4800 decares representing the priority habitat 62C0* 'Ponto-Sarmatian steppes' have been added to the Natura 2000 network.

- **Studies of the risk factors for the birds, development of recommendations, mapping the bird's sensitivity to wind generators and establishment of early warning systems, and reduction of the risk of collisions with bird**

In recent years, Bulgaria gained significant experience in assessment of the risks of birds colliding with operating wind generators and in development of preventive measures for reduction of the significant negative impacts on bird populations. In 2011, the Bulgarian government funded a study on how 'Early Warning Systems (EWS) regulating the operation of wind farms' can be deployed in order to reduce the specific impacts associated with this type of collisions.

Following obligatory instructions issued by the Regional Inspectorate of Environment and Waters in Varna several wind farms located in North-Eastern Bulgaria have introduced such EWS. They allow the wind generators to be stopped when there is a risk for collision with birds. Monitoring reports for collisions, as well as available annual monitoring reports on the mortality rates of birds at these wind farms in Bulgaria, have not revealed cases of systemic mortality of the common bird species nor significant mortality of rare and endangered bird species. Those reports demonstrate the effectiveness of EWS used in Bulgaria and their real positive impact on reduction of collisions. According to the reports, the few observed collisions of birds are sporadic and casual.

Since 2012 a specialized radar type ROBIN (<http://www.robinradar.com>) with effective coverage of more than 25 km in diameter has been operating in Kaliakra area. Another specialized Swiss radar type BIRD SCAN 1 is working nearby to detect and prevent collisions between birds and wind turbines. Those radar systems when used together with experienced ornithologists have proven to be effective during the migration and wintering periods when the risks for bird are higher.

It is of particular importance to highlight that those measures have already proven their effectiveness.

6. PROGRESS TOWARDS IMPLEMENTATION OF ECJ DECISION

The Ministry of Environment and Water prepared and sent to the EC in April 2016 a package of specific measures and a timetable for their implementation. At the end of September 2016, the EC has returned written questions on those measures;

At the end of October 2016, a technical meeting with the EC took place and as a result. Joint Conclusions of the Directorate-General Environment and Republic of Bulgaria regarding the meeting decisions were prepared in November 2016.

In December 2016, Bulgaria submitted written opinion on the EC questions and the Joint Conclusions and at the end of March 2017 - a draft of the Integrated Management Plan (IMP) of SPA 'Kaliakra', SCI 'Kompleks Kaliakra' and SPA 'Belite Skali' and Project Impact Analysis prepared by the Ministry of Environment and Water. No emergency measures have been notified to the European Commission.

6.1 Development and implementation of Integrated Management Plan (IMP)

The projects in the Kaliakra area, which are covered by the ECJ Decision have been analyzed to determine the potential impacts on bird species and their habitats in SPA BG0002051 'Kaliakra' and SPA BG0002097 'Belite Skali' that overlap with SCI BG0000573 'Kompleks Kaliakra'. The analysis were conducted with a view of Bulgaria taking additional appropriate measures, which together with the already implemented once will ensure that national obligations, resulting from the judgment, will be met in its entirety.

Those impacts on birds were identified and analyzed as part of the 'Integrated Management Plan (IMP)' project' for the territory of SCI BG0000573 'Kompleks Kaliakra', SPA BG0002051 'Kaliakra' and SPA BG0002097 'Belite Skali' that was developed by a group of experts from the Institute of Biodiversity and Ecosystem Studies of Bulgarian Academy of Sciences. The development of the IMP is one of the measures that Bulgaria will be implementing pursuant of the ECJ Decision.

On the basis of the studies conducted and the available information on abiotic factors and biological components, the IMP assesses the current status of the three protected areas. The changes that have occurred since their designation to date are subject to further update, incl. on the basis of the information that will be provided during the public consultation.

By development and adoption of the IMP Republic of Bulgaria aims to define all the necessary measures for species and natural habitats protection for the next 10 years period as well as to maintain their conservation status and the state of security for birds. The objective is to achieve a comprehensive management and control of the territory covered by the IMP in order to ensure the effective implementation of the planed conservation measures.

In order to coordinate the implementation of the IMP the Ministry of Environment and Water foresees the establishment of a management authority for those protected sites. This will ensure public engagement and active involvement of the stakeholders and will facilitate the coordination of the activities of different institutions and organisations to implement the plan.

- **Legal status of IMP:**

- IMP is a general administrative act with one-off legal action towards an indeterminate number of persons;
- IMP creates rights and obligations and directly affects the rights or legitimate interests of an unlimited number of addressees.

- **Effect of IMP:**

- After the adoption of the IMP, all projects must comply with it. If they are in conflict with the IMP provisions, they will be deemed ineligible and the EIA/AA procedures will be terminated.
- **New obligations and restrictions on the operation of already approved projects might be imposed through the measures in the IMP, incl. on the projects covered by the ECJ Decision.**

- **Measures in IMP:**

The IMP will create zoning of the territory and the following measures will be implemented within the 10-years period of validity of the plan:

- prohibition or restriction of specific activities, incl. enforcement and sanctions for violation;
- preventive actions to avoid predictable adverse events;
- supporting, guiding and regulatory activities;
- restoration of habitats and species;
- conducting research, educational and monitoring activities.

The draft of IMP is expected to be presented for public consultation in early July 2017 and to be approved by the Minister of Environment and Water by the end of the year.

6.2 Establishment of an Interdepartmental Working Group;

By the Ordinance № RD-714/08.12.2016 of the Minister of Environment and Water an **Interdepartmental** Working Group was established to coordinate the implementation of the measures and all other activities necessary to address the ECJ Decision. In addition this group has to identify the urgent actions needed to prevent damage or destruction of conservation objects in the protected sites in the Kaliakra region. The group consists representatives of the Ministry of Environment and Water, the Ministry of Regional Development, the Ministry of Agriculture, Food and Forestry, the Ministry of Energy, the Bulgarian Academy of Sciences and the Regional Inspectorate of Environment and Waters - Varna.

6.3 Instructions to the Regional Inspectorate of Environment and Waters - Varna;

The Minister of Environment and Water issued instructions to the Director of RIEW-Varna to:

- pay special attention to the proper conduct of the procedures under the Environmental Protection Act and the Biological Diversity Act;
- develop effective coordination mechanism with the territorial state and municipal authorities that issue permits for construction control and other activities with have direct or indirect impact on the conservation of respective objects in the protected sites;
- notify the Ministry about any identified irregularities that could be a threat to habitats and species.

6.4 Development of concept (methodology) for an Early Warning System

The Ministry of Environment and Water is developing and conducting consultations on elaboration on a concept (methodology) for an effective EWS that will prevent the negative impact on the target species of birds within its scope to the maximal possible extend.

The Ministry actively cooperates with all operators of existing renewable energy projects covered by the ECJ Decision, using their experience in implementing 'Bird Monitoring Systems' and measures to reduce the risk of collision between birds and wind turbine rotors.

The concept has also been presented for discussion in the Interdepartmental Working Group.

6.5 Development of a new Master Plan of Kavarna Municipality;

The new Master Plan of Kavarna Municipality is under ongoing Environmental Assessment (EA) and AA according to the Environmental Protection Act and the Biological Diversity Act.

As part of those procedures a request was made for preparation of an EA report and a report assessing the impact of the Master Plan projected developments on the conservation objects and objectives of the protected areas.

Those reports are expected to include the most up-to-date information on the proposed, approved and implemented investment proposals, as well as on all proposals that will not be implemented as a result of the changes in national legislation related to the protected areas.

7. CONCLUSIONS

When presenting the implementation of the measures, our country is guided by the understanding that the most adequate and effective measures should be implemented on the basis of a clear and accurate picture of the current situation in the three protected areas. At present, it is essential to develop and adopt an IMP. A prerequisite for its effectiveness is to perform a comprehensive analysis of the overall state of the three protected areas. Such analysis requires longer time and the attainment of such a level of rationalization that will allow not only the identification of certain prohibitions and restrictions, but also will ensure implementation on active conservation measures, prevention and recovery of the species and the habitats.

Republic of Bulgaria is ready to implement all measures necessary to terminate the infringements identified in the ECJ Decision. It is our understanding that the proposed measures clearly and unambiguously demonstrate our readiness to comply with the European Wildlife legislation and in particular to the habitats and species protection in the Kaliakra region.

July 2017