

**APPENDICES
TO THE STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT
OF OPERATIONAL PROGRAMME ENVIRONMENT 2014 -2020**

APPENDIX 1

Information on the conducted consultations and copies of the opinions received as a result of the carried out consultations on the on the Terms of Reference on the Scope and Content of the Strategic Environmental Assessment Report and on the Strategic Environmental Assessment Report

Table XIII.1-1 Received opinions as a result of the consultations on the Terms of Reference for the Scope and Content of the SEA Report1

Table XIII.1-2: Received opinions on the Strategic Environmental Assessment Report of Operational Programme Environment 2014 – 202049

Table XIII.1-1 Received opinions as a result of the consultations on the Terms of Reference for the Scope and Content of the SEA Report (only those questions from the Questionnaires to the Scoping ToR of the SEA Report, to which answers have been provided, are referred to)

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
1	Ministry of Environment and Water	<p><u>Instructions on the scope of the SEA Report pursuant to Decision No. EO-14/2013</u></p> <p>1. The SEA must at least contain the information under Article 86 Paragraph (3) of the Environmental Protection Act in accordance with the degree of detail of the forecasts of the programme.</p> <p>2. It is necessary to examine the potential development of the environment without the application of OPE, i.e. the so-called “zero alternative” must be examined as well;</p> <p>3. It is necessary to analyse the likely significant impacts on the environment, including secondary, cumulative, simultaneous, short-term, medium-term and long-term, permanent and temporary, favourable and adverse consequences from the activities envisaged under the priority axes.</p> <p>4. It is necessary to make a detailed analysis and assessment of the likely effect and risk to human health, including:</p> <ul style="list-style-type: none"> • Compliance assessment and coordination of the OPE 2014-2020 strategy with the objectives of the relevant national strategic documents, as well as with other Operational Programmes for the period 2014 – 2020, which are related to the main priorities of the OPE and especially with OP “Regions in Growth” and Rural Development Programme (to the possible extent depending on the stage that their implementation process is at) in respect of the measures related to improving the quality of the drinking water envisaged in all the three programmes; • Assessment of the current status of the environment and the possible risks to human health; • Main conclusions regarding the achievement of the objectives and the attained results for improving the status of the environment and elimination or mitigation of the risks to human health as a result of the implementation of the activities envisaged in the OPE for the previous programming period; • Expected positive effect on the environmental status as a result of the implementation of the activities envisaged under the various priority axes in OPE 2014-2020 and the positive effect expected in connection with their implementation on the living environment and reduction of the risk factors posing potential risks to human health; • Regarding Priority Axis “Water Management” in particular, an assessment shall be made as to what extent the envisaged activities have been prioritized correctly in accordance with the <i>National Strategy for Management and Development of the Water Sector</i>, where it is stated that 	<p>Implemented</p> <p>Implemented in Section II of the SEA Report</p> <p>Implemented in Section VI of the SEA Report</p> <p>Implemented in Section V of the SEA Report, where it has been specified the intended measures within the relevant programmes in reference of the respective stage of elaboration of the present SEA Report. Implemented in Sections II and VI of the SEA Report</p> <p>Implemented in Section V of the SEA Report</p> <p>Implemented in Section VI of the SEA Report. The activities under Priority Axis I of the Draft OPE</p>

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		<p>the investment projects resulting from the requirements of the European legislation for ensuring the quality of drinking water should be the first priority in accordance with the European requirements. In this respect it is important to analyse also whether the necessary conditions have been set in the OPE for the period 2014-2020 to prevent emphasis on the wastewater treatment (construction of sewerage systems and WWTP) when prioritizing the needs and measures in the water sector, as was the case with the implementation of the OPE for the previous programming period. As a consequence of this approach, even in the case of the so-called “integrated water projects”, the main activities and financial resources were aimed at resolving the problems with the wastewater, whereas the activities and financial resources related to the household drinking water supply were limited primarily to replacement of the water supply network in limited segments accompanying the construction or reconstruction of the sewerage network within the urban areas. Such limited measures do not in any way resolve the problems with the drinking water quality in the urban areas and the water supply zones as a whole, especially in the cases of some types of pollution of the drinking water (for example, with nitrates, manganese, microbiological pollutants, etc.), which require entirely different types of measures (construction of new water sources, facilities for treatment and disinfection of drinking water, construction of water supply main pipeline to the urban areas and water supply connections to other water supply zones, establishment of sanitary safeguard zones (SSZ) around the water sources, adherence to the modes of operation in these water sources given a created opportunity for compensation of the possible losses of the land owners or of the people performing specific activities on the territories of the SSZ, caused by complying with the prohibitions and restrictions in these zones, etc.);</p> <ul style="list-style-type: none"> As a Member-state of the European Union, Republic of Bulgaria is obliged to ensure compliance with the European legislation in the drinking water sector . The Ministry of Health as the competent authority for the application of the European and national legislation in this sector, in fulfilment of its obligations under Article 13 Paragraph (3) of Directive 98/83/EC on Quality of Water Intended for Human Consumption, has provided to the European Commission two national reports (for 2007 and for the 2008-2010 period) regarding the application of the Directive. In these reports, data on the results from the conducted monitoring of the drinking water quality in 	<p>2014-2020 takes into account also the National Strategy for Development and Management of Water Supply and Sanitation of Republic of Bulgaria. Currently the Draft Strategy is subject to public consultations. The activities and funds will be focused not only on the wastewater issue but also on the drinking water supply. Considering the resource efficiency requirements, the restrictions of the current period regarding the construction of water supply mains pipeline only on the routes of the sewerage network will be lifted. The investments will be concentrated only on the regions with identified drought or water deficit. Implemented in Section V of the SEA Report</p> <p>Given the limited financial resources, the implementation of the indicated other type of measures, including the</p>

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		<p>the country and on established non-conformities with the legal requirements has been provided by indicators and water supply zones during each of the years mentioned above. Certain commitments in respect to the measures which must be undertaken and deadlines within which they must be implemented have also been assumed in the reported information, for the purpose of fulfilment of the legislative requirements in the water supply zones, in which deviations in the quality of the drinking water have been registered. The non-compliance with the European legislation with regards to the drinking water quality creates actual prerequisite for launching an infringement procedure by the European Commission against Bulgaria.</p>	<p>sanitary safeguard zones (SSZ) around water sources is not included in the OPE interventions. The proposal for funding such activities has been redirected to the cross-border cooperation programmes and Ministry of Economy and Energy (MEE) within the initiative for joint projects applying for PPP funds.</p> <p>These commitments of Bulgaria have been taken into account in the OPE preparation (see activities under Priority Axis 1). The expectations are that Ministry of Health as responsible authority for the application of the legislation in this area works in cooperation with MoEW (incl. the respective regional structures) for reconciliation of the water abstract zones under the Drinking Water Directive and the water bodies under WFD . Upon the identification of the reasons of the registered deviations, proposals for joint</p>

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			interventions shall be formulated and included in the second RBMP. The reports were not available for SEA authors and the consulted data were those of the internet site of the Ministry of Health, which is specified in section II.1.3.3.2. of SEA
		5. It is necessary to analyze the potential transboundary impact of the programme provisions on the environment and on human health on the territory of other countries.	Implemented in Section VI.13 of the SEA Report
		6. It is necessary to propose measures for prevention, reduction and fullest possible offsetting of the adverse consequences from the application of OPE 2014-2020 on the environment and for prevention or reduction of the suspected adverse health impacts. The measures must be defended by solid arguments, including in regard to the expected positive results from their application. The measures must be presented as follows: <ul style="list-style-type: none"> • Measures to be included in the final version of the programme; • Measures to be applied during the implementation of the programme. 	Addressed
		7. It is necessary to propose specific measures and indicators for monitoring and control of the impact on the environment from the application of the programme, including the sources of information for reporting on and measuring these impacts. The measures must be envisaged as part of the overall system for monitoring and control of the programme.	Addressed
		8. It is necessary to use the instructions and methodologies of the European Commission for SEA published on the Commission Website (http://ec.europa.eu/environment/eia/home.htm), including the “Manual for Preliminary Assessment” Document. (http://ec.europa.eu/regional_policy/sources/docoffic/2014/working/ex_ante_en.pdf), as well as on the MoEW Website (http://www.moew.government.bg).	Addressed
		9. It is necessary to take into consideration <i>the Guidelines on Mainstreaming of the Environmental Policy in the Programming for 2014-2020 period</i> , Phase “Programming of the Common Strategic Framework Funds” (approved by minutes resolution under Section 7 from Minutes No.8 from the session of the Council of Ministers of 1 March 2013).	Addressed

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		<u>Opinion of the MoEW No. EO-44/14.08.2013.</u>	
		<p><i>I. In regard to the Scheme for conducting public consultation, the authorities concerned and third parties, which are likely to be impacted by the implementation of OPE 2014-2020:</i></p> <p>The proposed scheme has been prepared according to the requirements of Article 19 (3) of the <i>Ordinance on the Terms and Procedure for Performing Environmental Assessment of Plans and Programmes</i> (The SEA Ordinance) and includes detailed information on:</p> <ul style="list-style-type: none"> • The method of coordination of the process of programming of OPE 2014-2020 with the main stages of the environmental assessment; • The method of identification of the general public, stakeholders and third parties which may be impacted by OPE 2014-2020 and with which consultations are to be held; • Specific stages of conducting the consultations, method of conducting them and method of recording the results thereof in the documentation from the environmental assessment. 	Given that the scheme has been coordinated and agreed by MoEW, the statement does not contain any remarks.
		<p><i>II. In regard to the Terms of Reference for the scope of the SEA Report:</i></p> <p>The Terms of Reference have been prepared by taking into consideration the requirements imposed in Resolution No.EO-14/2013 of the Minister of Environment and Water by virtue of which it was decided that an SEA of the draft of OPE 2014-2020 should be made. The requirements of Article 86 (3) of the <i>Environmental Protection Act (EPA)</i> regarding the minimum required contents of the SEA Report have been taken into consideration. We have the following remarks and recommendations regarding the information and scope envisaged for the SEA Report in the terms of reference:</p> <p>1. In regard to Section I “<i>Content and Main Objectives of OPE 2014-2020 and Relation to Other Plans and Programmes</i>”:</p> <p>1.1. According to the information under Priority Axis 3 “Natura 2000 and Biodiversity”, it is stated for some groups of measures that specific eligible activities are yet to be determined. In this regard, we would like to draw attention to the fact that, when preparing the SEA Report itself, the eligible activities should be specified in maximum detail and should be included in the assessment.</p> <p>1.2. to Section I.3 “<i>Correlation of OPE 2014 – 2020 with other Plans and Programmes</i>”, the following documents must be considered and analyzed in the SEA Report:</p> <ul style="list-style-type: none"> • The National Information and Communication Strategy for NATURA 2000 Network, adopted by Council of Ministers Decree of 19.06.2013 http://www.moew.government.bg/files/file/Nature/Natura%202000/PROEKTI/Strategia/natura_final_27062013_CD_final.pdf; 	Implemented – the activities are specified in option III of OPE

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		<ul style="list-style-type: none"> • EU Strategy on Adaptation to Climate Change, http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:DKEY=725522:EN:NOT; • Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Green Infrastructure (GI) — Enhancing Europe’s Natural Capital , http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52013DC0249:EN:NOT. <p>2. It is necessary to make note of the remarks and correction of the Water Management Directorate at the MoEW made on the electronic version of the Terms of Reference in “Track Changes”(CD enclosed).</p> <p>3. When preparing the SEA Report, it must be taken into consideration that the Unified Methodology for Inventory Taking of the Emissions of Harmful Substances into the Air, quoted in Section II.1.2. “Ambient Air”, is applied when calculating the emissions for the indicated groups of sources, including the total national emissions, but should not be used for assessment of the quality of the ambient air as is written in the Terms of Reference.</p> <p>4. In regard to Section VIII “Reasons for selecting the alternatives (options) dealt with”, we would like to draw attention to the fact that in this Section of the SEA Report, it is necessary to consider not only the “zero alternative” but also to analyze and assess other realistic alternative for OPE 2014-2020 as well and to justify by appropriate arguments the chosen alternative for OPE 2014-2020 from the standpoint of the expected impact on the environment and on human health.</p>	<p>They are considered in Section I.3 and the relevance of OPE to the environmental protection objective towards the documents is assessed in Section V.</p> <p>Addressed.</p> <p>The standpoint has been addressed</p> <p>In section VIII are set forth the reasons for selection of alternatives based on the impact assessment of the three options (alternatives) of the Programme, performed in Section VIII and in Section II.2 are summarized the anticipated impact of the “zero alternative”</p>
		<p>III. Instructions for follow-up actions which you must undertake for conducting the EIA procedure:</p> <p>1. Submission in the MoEW (Preventive Activity Directorate) of a SEA Report of the draft OPE 2014-2020 for conducting consultations as per Article 20 (3) of the <i>SEA Ordinance</i>. The report must</p>	Addressed

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		<p>address in a well-grounded manner all the opinions obtained as a result of the conducted consultations on the ToR for the Scope of the SEA of OPE 2014-2020.</p> <p>2. Simultaneously with the submission of the SEA Report in the MoEW, you must organize and conduct consultations according to the procedure of Article 20 (1) of the <i>SEA Ordinance</i> as well, in accordance with the provisions of the presented Scheme for conducting consultations.</p> <p>Appendix: as per the text (remarks of the Water Management Directorate in the MoEW in electronic format).</p>	Addressed
		<p><u>Waste Management and Soil Protection Directorate – 31.07.2013</u></p> <p>In connection with the presented Terms of Reference for the Scope of the SEA of OPE 2014-2020, “Waste Management and Soil Protection” Directorate has proposed that on Page 14 <i>Specific Objectives under Priority Axis 2</i>, Bullet 6 “<i>Construction of other installations for recovery and/or disposal of municipal waste</i>” should be edited to read as follows: “Construction of Other Installations/Facilities/Systems for Recovery and/or Disposal of Municipal Waste”.</p>	The remark concerns the Option I of the OPE and was addressed by the Proponent.
		<p><u>Water Management Directorate to MoEW– 31.07.2013:</u></p> <p>After acquainting itself with the proposed ToR for determining the Scope of the SEA of Operational Programme Environment 2014-2020, Water Management” Directorate to MoEW agree with the ToR proposal with the revisions and corrections made in “Track Changes” in the attached document.</p>	The revisions are addressed in the SEA Report
		<p><u>Environment Policies Directorate – 31.07.2013:</u></p> <p>In connection with Section I.3 “<i>Correlation of OPE 2014 – 2020 with other Plans and Programmes</i>”, the following documents must also be considered and analyzed in the SEA Report:</p> <ul style="list-style-type: none"> • The National Information and Communication Strategy for NATURA 2000 Network, adopted by Council of Ministers Decree of 19.06.2013 , http://www.moew.government.bg/files/file/Nature/Natura%202000/PROEKT/Strategia/natura_final_27062013_CD_final.pdf; • EU Strategy on Adaptation to Climate Change, http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:DKEY=725522:EN:NOT; • Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Green Infrastructure (GI) — Enhancing Europe’s Natural Capital, http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52013DC0249:EN:NOT 	They are considered in Section I.3 and the relevance of OPE to the environmental protection objective towards the documents is assessed in Section V.

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	Work Group on OPE	<p><u>1. Confederation of the Independent Trade Unions in Bulgaria – Ms. Reneta Vassileva 06.08.2013.</u></p> <p>Questionnaire:</p> <p><i>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to analyze under Section I.3 “Correlation of OPE 2014 – 2020 with other Plans and Programmes” of the SEA Report? Please, state the sources, in which they are published and the method of accessing them.</i></p> <p>We propose that the following strategies be analyzed::</p> <ul style="list-style-type: none"> - EU Strategy on Adaptation to Climate Change - Strategic Plan for Implementation of the European Partnership on Innovations in the Water Sector; <p><i>2. Which aspects of the current status of the environment, as envisaged to be examined under Section II.1 of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>We think that the aspects which must be paid greater attention to (from the current status of the environment under Section II.1 of the SEA Report) are the following:</p> <p>Climate factors and climate change;</p> <p>Greenhouse gas emissions – implementation of the priority for sustainable growth of Strategy Europe 2020 – a more competitive low-carbon economy;</p> <p>Ecological and chemical water status;</p> <p>Biological diversity – flora, fauna, protected areas and protected territories;</p> <p><i>3. Do you have any concerns that the implementations of the plans of OPE 2014-2020 will significantly impact certain territories and areas? Please, state these territories and areas and</i></p>	<p>They are considered in Section I.3 and the relevance of OPE to the environmental protection objective towards the documents is assessed in Section V.</p> <p>Addressed in Section II.1.1. Climate factors and climate change</p> <p>Addressed in Section.II.1.3</p> <p>Addressed in Section II.1.7. The reason is that the number of plant and animal species and habitats with conservation status is classified as “unfavourable – unsatisfactory” is increased ».</p>

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		<p><i>expound on your reasons for your concerns, so that they can be addressed in Section III of the SEA Report.</i></p> <p>The draft Operational Programme Environment 2014-2020, envisages the implementation of activities for conservation of the biodiversity, protected territories and areas, which are incorporated in Priority Axis 3. Over the next programming period emphasis will be put on activities related to the prevention of the generation of waste and related to the recycling of the generated waste.</p> <p><i>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>The environmental problems which deserve special attention are the purity of the ambient air (violation of the national ceilings for SO₂, NO_x and dust under the Accession Treaty of Bulgaria to the EU), as well as the quality of water.</p> <p><i>5. Which national and international documents, setting environmental protection objectives (other than those specified for examination in Section V from the proposal for the scope and content of the SEA Report), do you propose to be examined while assessing also the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications for this choice, as well as the source and method of accessing these documents.</i></p> <p>The specified strategies, plans and programmes for achieving the objectives of environmental protection on a national and on an EU level are sufficient. All the necessary documents related to the environmental protection have been taken into consideration in the content of the SEA Report on OPE 2014-2020 thus presented.</p> <p><i>6. Which forecasts of likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to?</i></p> <p>All the forecasts of the likely impacts in the following sub-sections must be examined in detail – ambient air, ground and surface water, soils, waste, biodiversity.</p> <p><i>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</i></p> <p>We propose monitoring of the quality of drinking water and ambient air, since they are vital for the good public health status. The indicators which are specified in the sections regarding the ambient air, as well as the chemical and biological status of the water, must be monitored.</p>	<p>The comment is addressed.</p> <p>Addressed in Sections II.1.2. and IV.1 on ambient air and in Sections II.1.3 and IV.3 on the water</p> <p>Requirements are not set out.</p> <p>Addressed in Section VI of the SEA Report</p> <p>Addressed in Sections VII and X of the SEA Report.</p>

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		<p>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think should be included in the envisaged Section X of the SEA Report?</p> <p>An assessment of the current status of the environment and the possible risks to human health must be carried out. An important measure is also the improvement of the quality of drinking water.</p>	<p>Addressed in Sections. VII and X of the SEA Report.</p>
		<p><u>2. Associate Professor Lachezar Pehlivanov Ph.D. (received on 25.07.2013):</u></p> <p>At this stage I have no specific remarks and comments on the presented Terms of Reference on the scope and content of the SEA on OPE and on the Public consultations scheme.</p> <p>I have however remarks regarding the OPE 2014-2020 itself; to the extent that it is presented in the Terms of Reference (so far we haven't been acquainted with the full text of the draft of OPE).</p> <ul style="list-style-type: none"> • <u>In Priority Axis I: Water, Specific Objective 1, Item 2.2. Monitoring of the Water Quality</u>, the biological monitoring of the surface water is entirely neglected, although that according to the requirements of the Water Framework Directive the biological components of the quality (macrozoobentos, fish, phytobentos, macrophytes and phytoplankton) have primary importance for the assessment of the environmental status of the surface water bodies. • In the draft of OPE (<u>II.1.3.1. Surface water</u>) it has been mentioned that the "Main components of the monitoring and management of the surface water are built on the basis of determining their status by conducting monitoring and determining the "pressure" (pollution or exhaustion) on the water, wastewater treatment, etc.", but nowhere in the text is any attention paid to the <u>environmental status of the surface water</u>, which is one of the main priorities of the Water Framework Directive. (It is quite possible that these issues are addressed in the draft of OPE but, as I mentioned above, we are not acquainted with the full text) • In the presentation of the Terms of Reference on the Scope and Content of the SEA on the draft of OPE, in Priority Axis 3, Specific Objective 1, Section 2, Section 2.2. has been omitted. <p>What draws my attention is the fact that again, just like in the previous programming period, the research institutes of the Bulgarian Academy of Science (with the exception of the National Institute of Meteorology and Hydrology) have been neglected as beneficiaries. By the way, these institutes are almost entirely neglected as a target group as well, despite the fact that during the last few years the Institute of Biodiversity and Ecosystem Research (IBDESR – BAS) has been involved as a leading</p>	<p>The OPE intends to support the water monitoring related to investments for construction of the necessary installation and delivery of monitoring equipment. The execution of the monitoring activity itself is not eligible activity for funding. For this reason funding is not envisaged for this.</p> <p>The remark is addressed</p> <p>NIMH is nominated as beneficiary for strongly specific activities in</p>

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		<p>contractor in practically all activities related to the application of the Water Framework Directive and other programmes related to the water policy s, as well as in the development of the National Environmental Network Natura 2000 (a list of the past and current contracts can be submitted upon request).</p> <p>In connection with the issues stated so far, as a member of the Working Group, appointed by the Institute of Biodiversity and Ecosystem Research at the BAS, I think it is appropriate and imperative that:</p> <ol style="list-style-type: none"> 1. the necessary attention should be paid in the OPE to the issues related to the environmental status and biological monitoring of the surface water ; 2. the Institute of Biodiversity and Ecosystem Research should be recognized as a beneficiary and as a target group in: <ul style="list-style-type: none"> • <u>Priority Axis 1: WATER. Specific Objective 1: Protection and Improvement of the Status of the Water Resources.</u> in Section 2.2. Monitoring of the Water Quality and 2.3. Monitoring of the Marine Waters and Marine Environment; • <u>Priority Axis 3: NATURA 2000 AND BIODIVERSITY. Specific Objective 1: Reducing the Loss of Biodiversity.</u> Section 1.1, 1.2. 1.3., 2.1. and 2.4. • <u>Priority Axis 4.</u> 	<p>reference of its strongly defined functions and the abovementioned conditions - investments in monitoring facilities. The research institutes are specified as beneficiaries under Priority Axis 3 of OPE Option III for elaboration/update/harmonisation of plans and strategic documents.</p>
		<p><u>3. Mining Geology University “Sv. Ivan Rilski”, Associate Professor Borislav Velikov, Ph.D., 27.07.2013:</u> <u>Questionnaire:</u> 2. <i>Which aspects of the current status of the environment, which are envisaged to the examined in Section II.1 of the SEA Report, do you think deserve special attention? Please state your arguments and justifications for this choice.</i></p> <p><u>II.1.2 Ambient air</u></p> <ul style="list-style-type: none"> • The extent to which the lack of data on the levels of dioxins and furans in the ambient air affects the indicators for the quality of the ambient air must be examined – Section II 1.2.1. <p>Justification – to determine the contribution of these compounds to the air quality. Doesn't the lack of information on their content compromise the use of the specified indicators as a characteristic of the quality of the ambient air?</p>	<p>The index used for assessment of the ambient air quality is the representative indicator of the national emissions of harmful substances into air combining 11 groups of sources. The index incorporating dioxins and</p>

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		<p><u>II.1.3 Surface and ground water</u></p> <ul style="list-style-type: none"> • It is necessary to determine whether the lack of information on some of the priority substances and specific pollutants, as well as on some hydrobiological indicators, incorporated in the monitoring programmes of the River basin Directorates, distorts the picture of the quality of water. • Justification: to assess the significance of this information for the quality of the water and the need for planning of actions for the next programming period • Current status of the marine waters – is there sufficient data on the quality of marine waters of Bulgaria, since it is clear that the Institute of Oceanology does not have the capacity to accommodate fully the monitoring programmes. • If such data is available– what are the trends observed? <p>Justification – the marine waters have a great impact on the human beings, both in terms of health and in terms of economy.</p> <p><i>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>The identified environmental problems, which will be presented for discussion under Section IV, are not specified.</p> <p><i>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect these impacts to be examined and assessed to?</i></p> <p>Section VI.3 – Surface water – marine waters. It is necessary to define the specific results which are expected as a result of the effect of OPE 2014-2020.</p> <ul style="list-style-type: none"> • Assessment of the current status of the programmes for monitoring of the quality of marine 	<p>furans (DIOX) is not referred in OPE because these emissions for the period 2010-2012 have been insignificant – under 100 g/year but this does not imply that data of these emissions are missing. Addressed in Section II.1.3</p> <p>Addressed in Section II.1.3</p> <p>Addressed in Section II.1.3.2</p>

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		<p>waters – in the bathing zones and in the territorial waters (1 mile, 12 miles)</p> <ul style="list-style-type: none"> • Expected favourable effect on the content and volume of the information on the quality of the marine waters • Expected favourable effect on the quality of the marine waters as a result of the construction of WWTPs <p><u>Section VI.12 – Tangible assets</u></p> <ul style="list-style-type: none"> • Appraisal of the available tangible assets related to the SEA and assessment of the effectiveness of their application. • Analysis of the need for renovation and supplementation of the tangible assets used for determining the quality of the environmental components. • Expected favourable effect on the quality of the data obtained on the status of the environment as a result of the modernization and upgrading of the tangible assets. • Expected favourable effect on the population and on human health as a result of the modernization and upgrading of the tangible assets used for analysis and control of the environment <p><i>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think should be included in the envisaged Section X of the SEA Report?</i></p> <ul style="list-style-type: none"> • In connection with Thematic Objective 1: Strengthening research, technological development and innovation – it is necessary to use the scientific research capacity in the country and to create a national analytic organization, which must participate, together with the similar organizations from the other member-states of the EU, in the research and identification of the new factors impacting the environment. At present, Bulgaria does not have such an organization and because of this we cannot participate in the research and in the discussions, such as for example on the introduction of priority substances and pharmaceutical products, when it comes to water. The existence of such an institution would extricate us from situation in which we cannot provide data on specific indicators because of inadequacy of the existing tangible assets or human resources. • Monitoring of the marine water and the marine environment – it is necessary to use the available human resources and, by application of the opportunities under OPE 	<p>The considered information is the available one</p> <p>The considered information is the available one</p> <p>Addressed</p> <p>Addressed in Section VI</p> <p>Addressed in Section VI</p> <p>Addressed</p> <p>The proposals of such measures as for organisation and centres have been addressed</p>

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		<p>2014-2020, to create a modern centre for quality assessment, monitoring and control of the marine waters – on land and as part of expeditions, which should generate a sufficient volume of information of adequate quality. This centre should be a level, which would allow it to service the needs for information of all the national and international statutory documents.</p> <ul style="list-style-type: none"> • Monitoring of the quality of the drinking water, which exert a significant impact on human health and is affected to a significant extent by the status of the environment • Completion and/or optimization of the networks for monitoring of the chemical status of the drinking water: construction of points, equipment of existing and newly-built points with devices for measurement, automatic storage and/or transmission of data; • Restructuring, renovation and modernization of the laboratories from the WSS sector with devices for sampling, measurement and analysis: ion chromatography systems, analysers for determining the total organic carbon/total nitrogen (TOC/TN); devices for electrochemical measurements (pH-meters, conductometers, oxygen meters), spectrophotometers; chromatographic systems for analysis in gaseous and liquid state, equipment for elemental analysis (including mercury analysers), equipment for sampling, sample preparation, storage and transportation of the samples, auxiliary equipment and laboratory equipment and furniture, etc. 	
		<p><u>4. Regional Governor of Vidin Region – No. 2803/5038/06.08.2013</u></p> <p>In connection to the conducted consultations on the scope and the content of the SEA Report on the Operational Programme, I hereby express the following opinion:</p> <p>I am of the opinion that when it comes to the implementation of the measures incorporated in the program, an adverse impact on the environment can be exerted by the wastewater treatment plants. In case of inadequate implementation of the treatment process, there is a true and present threat of pollution of the water bodies which are recipients of the treated water.</p> <p>In this connection and in view of the fact that, pursuant to Directive 91/271/EEC, most of the water recipient bodies in the country are classified as “sensitive zones”, I propose that specific measures for prevention and reduction of the adverse impact of the urban wastewater treatment plants on the water recipient bodies be included in Section VII of the SEA Report.</p> <p>I have to inform you that in accordance with the provisions of Article 8 Section 4 of the Rules on the Organization and Activity of the Work Group on Preparing Operational Programme Environment 2014-2020, this opinion has been coordinated with the Chairman of the Regional Council for</p>	Considered for information only

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		Development of the North-West Planning Region (NUTS-2).	
		<p>5. Chuprene Municipality</p> <p>Questionnaire:</p> <p>2. Which aspects of the current status of the environment, which are envisaged to be examined under Section II.1 of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <p>1. Climate change. A very dynamically changing system. The problem of “climate change” and the measures for surmounting this problem ever so rapidly are becoming senseless and emergency measures for surmounting the consequences of the changes that have already occurred are now necessary.</p> <p>2. Biodiversity – an issue ranking lower on the priority list of the environmental problems</p> <p>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <p>Biodiversity, climate change, waste management. The waste management system that is in the process of being introduced catches the small municipality by surprise and without preparedness for the extensive investments which are necessary so that they can start operating in the new manner.</p>	<p>The available data are addressed in Section II.1.1. Climate factors and climate change.</p> <p>Addressed in Section II.1.7. The reason is that the number of plant and animal species and habitats with conservation status is classified as “unfavourable – unsatisfactory” is increased ».</p> <p>Addressed in Section II.1.7. The reason is that the number of plant and animal species and habitats with conservation status is classified as “unfavourable – unsatisfactory” is increased ».</p> <p>Climate change is addressed in detail in Section II.1.1.2. Climate change The waste related issues are</p>

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		<p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to?</p> <p>It is difficult for me to differentiate as “significant” the possible impacts on the environment and on human health from the implementation of the program</p> <p>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think should be included in the envisaged Section X of the SEA Report?</p> <p>The existing state and municipal institutions and the competent NGOs are entirely sufficient</p>	<p>addressed in Section IV.3 The waste management systems require much more strengthening of the administrative capacity of the small municipalities for preparing them to attend to and be awarded of projects supporting the municipalities in attraction of investments. The regional waste management systems are under the responsibility of the region as a whole.</p> <p>Remarks are not formulated</p> <p>Remarks are not formulated</p>

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		<p><u>6. Lovech Regional Administration</u> Questionnaire: <i>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section 1.3 “Correlation of OPE 2014 – 2020 with other Plans and Programmes” of the SEA Report? Please, state the source, in which they are published and the method of accessing them.</i></p> <p>1) Green Paper on Forest Protection and Information in the EU: Preparing forests for climate change (2010) 2) Thematic Strategy on air pollution</p> <p>3) Green Infrastructure (GI) (COM(2013) 249 final) 4) Proposal for a COUNCIL DIRECTIVE laying down requirements for the protection of the health of the general public with regard to radioactive substances in water intended for human consumption</p> <p><i>2. Which aspects from the current status of the environment, which are envisaged to be examined in Section II.1 of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i> In Section II.1.5.2.1. Processes of soil impairment: We propose that the impact of the incorrect forests stewardship be examined as a factor for soil impairment.</p>	<p>Analysed in Section I.3.</p> <p>The forest stewardship is not relevant to OPE 2014 – 2020. The Priority Axes of the Programme do not provide specific objectives and measures related to forests stewardship and for this reason this is not subject of the SEA.</p>

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		<p>In Section II.1.5.3. Biological agriculture: We propose that the impact of the biological agriculture on the biodiversity as a whole and on the bee populations in particular, as well as on the quality of the water (surface and ground), be examined as well.</p> <p>In Section II.1.10. Harmful physical factors – it is necessary to include the ionizing radiation and the radioactive pollution (of water and air) as physical factors.</p> <p><i>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>Sustainable management of the water resources with a view to adapting to climate change;</p> <p>Incorrect storage of the plant protection products with an expired shelf life as a potential pollution threat;</p> <p>Low resource efficiency, disposal of a great share of the waste going to landfill without introduction of separation, recycling and composting systems, etc.</p>	<p>The impact of the organic agriculture on the biodiversity and the water quality is not relevant for the specific objectives and specific measures of OPE and is out of the scope of OPE Report. Specific measures for application of the organic agriculture are set in the Rural Development Programme 2007 – 2013</p> <p>Addressed in Section II.1.10</p> <p>Addressed in Section IV.3</p> <p>Addressed in Sections II.1.9.11 and IV.8</p>

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		<p>Reduction of the biodiversity;</p> <p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to?</p> <p>We propose that special attention be paid to the consequences from the implementation of the programme on the following environmental components: VI.2. Ambient air VI.3. Surface water VI.4. Groundwater VI.6. Soils</p>	<p>The progressing process of biodiversity losses are analysed in detail in Section IV of the SEA Report separately for the vegetal and animal species and habitats as part of the environmental problems.</p> <p>Addressed in Section VI</p>
3	RIEW Sofia	NO OPINION HAS BEEN RECEIVED	
4	RIEW Stara Zagora	NO OPINION HAS BEEN RECEIVED	
5	RIEW Russe/ Ref. No. 2570/ 08.08.2013.	<p>I. In regard to the Terms of Reference for determining the scope of the assessment: The Terms of Reference have been prepared in accordance to the requirements of the legislative framework. The structure and content of the SEA Report is in accordance with the requirements of Article 86 (3) of the <i>Environmental Protection Act</i>. The recommendations of RIEW-Russe regarding aspects of the development of the assessments are given in the completed Questionnaire (Appendix 1 to the presented terms of reference).</p>	

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		<p>II. In regard to the scheme for conducting consultations: According to Article 19 (3) of the <i>SEA Ordinance</i>, the scheme prepared by the Proponent of the plan is coordinated with the competent authority, namely the Ministry of Environment and Water. RIEW-Russe has no objections or remarks regarding the scheme presented and/or regarding the forms and scope proposed for the consultations pursuant to Article 19 Paragraph (3), Article 19a and Article 19 Paragraphs 1-3 of the <i>Ordinance on the Terms and Procedure for Performance of Environmental Assessments of Plans and Programmes</i>.</p> <p>Questionnaire: 1. <i>Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section 1.3. "Correlation of OPE 2014 – 2020 with other Plans and Programmes" of the SEA Report? Please, state the source, in which they are published, and the method of accessing them.</i></p> <ul style="list-style-type: none"> ○ Operational Programme Rural Regions Development for the next programming period, the forecasts in the field of modernization and development of the economies, the use of the natural resources, including ground and surface water , requirements to the projects for efficiency of the amelioration activities related to the use of the water bodies (surface and groundwater bodies) – identification of conflict and/or divergence when planning and implementing the operational programme and OPE ○ Regional Plans for Development of North-Central, North-West, North-East, South-East, South-Central and South-West Planning Regions. It is necessary to assess the consistency of the provisions within the priorities for the development of the regions with the priorities of OPE for the period. <p>2. <i>Which aspects of the current status of the environment, which are envisaged to be examined in Section II.1. of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i> Given the priority axes outlined, the status of the respective components and factors of the environment must be examined on a priority basis. As far as the “water” component is concerned, the current status and quality of the drinking water, as well as of the water in agricultural water management activities, must be assessed.</p> <p>4. <i>Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and</i></p>	<p>The correlation with the activities intended within OPE, particularly Option III of OPE is present as part of the OPE- Section II of the Draft Programme.</p> <p>Implemented in Section II.1.3. of the SEA Report</p>

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		<p><i>justifications for this choice.</i></p> <p>Environmental problems arising out of the destruction/disruption/fragmentation of natural habitats and populations of species, as a consequence of the construction of industrial and manufacturing facilities falling within the boundaries of the protected areas, to the extent that the latter are related to the implementation of the objectives and priority axes of OPE.</p> <p><i>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to?</i></p> <p>Both the favourable and the possible adverse impacts and effects must be considered on a footing of equality. When forecasting the likely impacts in regard to the waste management and the forecasts of Priority Axis 2, it is necessary to report on and analyze the omissions and weaknesses in the hierarchical management of the waste pending its disposal. In this sense – what extent will the objectives of the priority axis be accomplished to in the longer term, given the not so efficient functioning of the systems for separate collection and recovery of the various types of household waste (including, hazardous waste, as well as compostable green waste)</p> <p><i>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</i></p> <p>The measures must be outlined after identification of the risk factors and the possible adverse impacts and effects.</p>	<p>Addressed in Section IV.7 of the SEA Report</p> <p>The current state of the waste management is considered in Section II.1.9, and the anticipated risks and problems – respectively in Section IV.3. The way of achievement of the objectives under the Priority Axis is not within the environmental experts competence, the implementation of the specific interventions is much more under the responsibility of the society, the administration, the institutions including the auditing and law enforcement authorities.</p> <p>Implemented in Section VII of the SEA Report</p>

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6	RIEW Shumen/ Ref. No. 4424/26.07.2013	RIEW Shumen does not have any remarks and proposals on the draft of the Terms of Reference on the scope of the SEA Report and on the Scheme for conducting consultations on SEA of OPE 2014-2020.	The opinion does not contain remarks, requirements and recommendations requiring addressing.
7	RIEW Pernik/ Ref. No. 04-01-231-(1)/ 05.08.2013	<p>In connection with Article 19a (3) of the <i>Ordinance on the Terms and Procedure for Performance of SEA of Plans and Programmes</i> (SEA Ordinance, amended and supplemented SG No.94/30.11.2012) we hereby express the following opinion on the presented:</p> <p>I. Terms of Reference for determining the scope of the SEA Report of Operational Programme Environment 2014-2020</p> <p>The Terms of Reference for determining the scope of SEA have been prepared in fulfilment of the provisions of Article 19a Section 1 of the SEA Ordinance. The proposed structure of the SEA Report is consistent with Article 86 (3) of the Environmental Protection Act.</p> <p>A small technical error has been made on Page 32 in Section II.1.7.3. "Protected Areas".</p> <p>II. Scheme for conducting consultations on the SEA of Operational Programme Environment 2014-2020 – we have no proposals for amendment of the Scheme under Article 19 (3) of the SEA Ordinance thus proposed.</p>	The opinion does not contain remarks, requirements and recommendations requiring addressing.
8	RIEW Burgas	NO OPINION HAS BEEN RECEIVED	
9	RIEW Blagoevgrad/ Ref. No. EII-229-1/ 29.07.2013	<p>We agree with the Terms of Reference presented with the Proposal for the scope of the SEA made therein.</p> <p>We think there is no need to fill out the questionnaires attached to the terms of reference, since we have no proposals for additional information to be presented by the SEA Report.</p>	The opinion does not contain remarks, requirements and recommendations requiring addressing.
10	RIEW Haskovo/ Ref. No. IIJ-539/ 05.08.2013.	<p>Pursuant to Article 19a (3) of the Ordinance on the Terms and Procedure for Performance of SEA of Plans and Programmes, we approve the information presented by you on conducting preliminary consultations on the Terms of Reference for determining the scope and content of the SEA with RIEW Haskovo, while expressing the following opinion:</p> <ul style="list-style-type: none"> • In the presented Terms of Reference for determining the scope and content of the SEA of Operational Programme Environment 2014-2020 , all the attributes for preparation of an SEA have been covered, including the components and factors of the environment specified in Article 86 (3) of the Environmental Protection Act. • The methods for description of the characteristics of the environment for territories which will 	The opinion does not contain remarks, requirements and recommendations requiring addressing.

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		<p>likely be significantly impacted from the implementation of the programme have been properly planned.</p> <p>In connection of the foregoing, RIEW Haskovo has no remarks and recommendation to the Terms of Reference for determining the scope and content of the SEA of Operational Programme Environment 2014-2020 thus presented to us.</p>	
11	<p>RIEW Smolyan/ Ref. No. КИД-01-154-(2)/ 05.08.2013</p>	<p>I. In regard to the Terms of Reference for determining the scope and content of the SEA of Operational Programme Environment 2014-2020</p> <p>The scope and content of the SEA of OPE 2014-2020 thus presented to us comply with the requirements of Article 86 (3) of the Environmental Protection Act and Article 17 of the SEA Ordinance and in this connection we have no remarks and supplementations to add to it. We have no remarks and supplementations to the positions thus presented to us in Appendix 1 to the Terms of Reference of the Environmental Assessment.</p> <p>II. In regard to conducting consultations: the Scheme for conducting consultations on the SEA of Operational Programme Environment 2014-2020</p> <p>The scheme thus presented to us for conducting consultations with the public, the stakeholders and the third parties within the framework of the performance of the SEA of Operational Programme Environment 2014-2020 complied with the requirements of Article 19 (3) of the SEA Ordinance. According to the information presented to us and according to the requirements of Chapter Four of the SEA Ordinance, consultations are planned on: the Terms of Reference for determining the scope of the SEA under Article 19a (1) of the SEA Ordinance and consultations on the SEA and Operational Programme Environment 2014-2020 according to the procedure stipulated by virtue of Article 20 Paragraphs (1) and (3). The development of Operational Programme Environment 2014-2020 has been made consistent with the main stages of the procedure for Environmental Assessment.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing.</p>
12	<p>RIEW Veliko Tarnovo/ Ref. No. 2660/06.08.2013</p>	<p><u>I. In regard to the terms of reference</u></p> <p>Four priority axes are covered by the Terms of Reference – Water Management, Waste Management, Protection of Biodiversity and Technical Assistance with their specific objectives, beneficiaries and target groups.</p> <p>In connection with the outlining of the “green system” in the Republic of Bulgaria in its entirety and the possibility of affecting the interests of third parties we hereby propose:</p> <ul style="list-style-type: none"> • “Agricultural lands of high natural value” to be considered in new Sections II.1.5.3.1. and Section II.1.7.5; • Section III to be supplemented by a land layer – “lands of high natural value” • Section IV to be supplemented by a land layer – “lands of high natural value” 	<p>The achievement of the Specific Objectives of the Priority Axis of OPE OIIOC 2014 - 2020 doesn't provide application of agro-ecological measures, applicable for rural lands of high natural value and for this reason 2014 - 2020 will</p>

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		<ul style="list-style-type: none"> • In Section XII.3. <i>On a National Level</i>, Bullet “Others”, the following topics to be elaborated on in more detail: <ul style="list-style-type: none"> - National and municipal programmes for waste management - Annual reports on the implementation of other operational programmes We attach the completed questionnaire to the remarks on the terms of reference. <p>II. In regard to the Scheme for conducting consultations We have no remarks</p> <p><i>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section 1.3. “Correlation of OPE 2014 – 2020 with other Plans and Programmes” of the SEA Report? Please, state the source, in which they are published and the method of accessing them.</i></p> <ul style="list-style-type: none"> • National strategic plan for development of the rural regions 2007-2013 (<i>website source</i>) • Rural Development Programme (<i>website source</i>) • Operational Programme Regions in Growth 2014-2020 (<i>website source</i>– May 2013) • Regional plan for development of the North-Central Region 2014-2020 (<i>website source</i>) <p><i>2. Which aspects of the current status of the environment, which are envisaged to be examined in Section II.1. of the SEA Report, do you think deserve greater attention? Please, state your arguments and justifications for this choice.</i></p> <p>Status of the areas under Natura 2000. Justification: to assess “the Restoration” in natural conditions of the communities of organisms, ecosystems and complexes thereof according to a model of the naturally existing ones or creation of conditions for re-occurrence or increase of the number of the natural populations after implementation of wastewater treatment plants and regional landfills in the previous programming period.</p> <p><i>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>Lands of high natural value. It is necessary to present information on this part of the “green system”.</p>	<p>not affect third site interests in this aspect. Currently the solution of the raised environmental problems in this kind of lands is Specific Objective under the Rural Development Programme.</p> <p>Addressed.</p> <p>The documents in reference of expired periods towards OPE 2014 - 2020 have not been considered in Section I.3 of the SEA Report.</p> <p>Such monitoring and research studies on the processes related to “Restoration” in natural conditions were not provided under the previous programming period and such assessment can not be done.</p> <p>The achievement of the Specific Objectives of the Priority Axis of OPE OIIOC 2014 - 2020 doesn’t provide</p>

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		<p>5. Which national and international documents, setting environmental protection objectives (other than those examined in Section V of the proposal for the scope and content of the SEA Report), do you propose to be examined, while assessing the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications for this choice, as well as the source and method of accessing these documents.</p> <ul style="list-style-type: none"> • Regional Development Plans 2014-2020 • Operational Programme Regions in Growth 2014-2020 • Rural Development Programme (for the new programming period) 	<p>application of agro-ecological measures, applicable for rural lands of high natural value and for this reason 2014 - 2020 will not affect third site interests in this aspect. Currently the solution of the raised environmental problems in this kind of lands is Specific Objective under the Rural Development Programme. The current ecological problems related to the agricultural (rural) lands are considered in Section IV of the SEA as part of the general environmental problems in Bulgaria.</p> <p>The indicated plans and programmes do not represent plans and programmes specifying environmental protection objectives and thus do not comply with the subject of Section V of the SEA Report.</p>

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		<p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to? Surface and groundwater (in the area of the investment proposals). Soils – lands of high natural value (in the area of the investment proposals) Biodiversity (in the area of the investment proposals)</p> <p>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)? Those derived based on the expected impacts from the implementation of the investment proposals</p> <p>8. What other (than those enumerated in Section IX and XII of the present proposal for scope and content of the SEA Report) methods and sources of information do you recommend to be used when preparing the SEA Report? Other operational programmes and plans for development – specified above The national and municipal waste management programmes. Annual reports from other operational programmes.</p> <p>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think must be included in the envisaged Section X of the SEA Report? Those derived based on the anticipated impacts resulting of the investment proposals implementation.</p>	<p>It was taken into account</p> <p>Implemented in Section VII of SEA Report</p> <p>The used effective sources of information have been listed.</p> <p>Implemented in Section X of SEA</p>
13	<p>RIEW Pazardjik Ref. No. P/D-04-3237/ 05.08.2013</p>	<p>In connection with the presented Terms of Reference on the Scope and Content of the SEA Report on the programme quoted above, which we assume to be a consultation with the competent environmental authority as per Article 19a Section 3 of the Ordinance on the Terms and Procedure for Performance of SEA (SEA Ordinance), we hereby express the following opinion: We have no remarks and recommendations to the proposed structure and content in regard to the presented Terms of Reference for determining the scope and content of the SEA Report. Questionnaire: 4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p>	

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		<p>The lack of regional landfills for municipal waste and in particular the lack of a regional landfill for municipal waste for the Pazardjik Municipality and for 8 more municipalities from the Pazardjik Region. As a result of this, at this point in time the Pazardjik Municipality has a huge pile of constantly smouldering waste which does not meet any requirements and which is situated in a protected area from the NATURA 2000 Network. The justification for addressing this issue is that the present state of affairs has a considerable adverse impact on human health and on the biodiversity.</p> <p><i>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think must be included in the envisaged Section X of the SEA Report?</i></p> <p>Monitoring of the status of the species and of the protected areas, the protection of which will be financed by the OPE, in order to assess the degree of effectiveness of the financed protection measures.</p>	<p>The current state of the waste management is studied in Section II.1.9.1 and the assessment of the anticipated risks and problems – respectively in Section IV.3.</p> <p>The delay in the implementation of the regional waste management systems, as it is the case in Pazardzhik, is not in the scope and the objectives of the SEA Report.</p> <p>Addressed in Section X of SEA.</p>
14	RIEW Montana/ 05.08.2013	<p>1. The Terms of Reference on the scope and content of the Environmental Assessment are consistent with the requirements of Article 86 (3) of the Environmental Protection Act and Article 17 of the Ordinance on the Terms and Procedure for Performance of Strategic Environmental Assessment of Plans and Programmes.</p> <p>2. The Scheme for conducting consultations contains detailed information for co-ordinating the OP programming process with the main stages of the SEA; the public, the stakeholders and the third parties, which could be affected and with which the consultations are to be held, have been properly identified. The specific stages of conducting the consultations, the method of conducting them and the reporting of the results thereof in the documentation on the SEA have been properly described.</p> <p>3. We enclose the completed questionnaire – Appendix No.1 to the Terms of Reference on the scope and content of the SEA Report on the Operational Programme:</p> <p><u>Questionnaire:</u></p> <p><i>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section I.3 “Correlation of OPE 2014 –</i></p>	

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		<p>2020 with other Plans and Programmes” of the SEA Report? Please, state the source, in which they are published and the method of accessing them.</p> <ul style="list-style-type: none"> - Operational Programme Regions in Growth 2014-2020 and the Regional Plans for Development 2014-2020 of the six regions from the administrative-territorial partitioning of the country (NUTS-2). They are accessible on the Website of the Ministry of Regional Development and Public Works - Cartagena Protocol on Biosafety to the Convention on Biological Diversity and Nagoya – Kuala Lumpur Supplementary Protocol on Liability and Redress to the Cartagena Protocol to the Cartagena Minutes – accessible on the page of the Ministry of Environment and Water. <p>2. Which aspects of the current status of the environment, which are envisaged to be examined in Section II.1 of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <ul style="list-style-type: none"> - the climate change and in particular the increase of the average annual temperature in the North-West Region of the country. - the quality of the ambient air in the bigger settlements, the presence of PM pollution exceeding the allowable limits. - the pollution of soils – the fertilization, the storage of plant protection products and the ultimate disposal of plant protection products which are no longer fit for use. - the disposal and recovery of biodegradable waste intended for disposal – the stage-by-stage disposal of biodegradable waste should be terminated. - Raising the awareness of the local population and of the local communities and improving the perspectives for breeding an environmentally-friendly crops through acquainting the population with the biodiversity and the Natura 2000 Protected Areas. 	<p>Addressed in Section I.3 of the SEA Report</p> <p>Addressed in Section II.1.1.2. Climate change Addressed in Section II.1.2.5. Quality of the ambient air and in Section IV.1</p> <p>Addressed in Section II.1.5.2.4.</p> <p>Addressed in Section IV.3.</p> <p>Implemented in II.1.5. The awareness and environmental culture are not element of the environmental status studied in Section II.1. Their significance is considered in reference of the specific activities of the respective</p>

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		<p>3. Do you have concerns as to significant impacts of certain territories and areas from the implementation of the envisaged OPE 2014-2020? Please, state these concerns and outline your arguments and justifications for them, so that they can be addressed in Section III of the SEA Report.</p> <ul style="list-style-type: none"> - In Priority Axis 2 “Waste”: please, specify in more detail the “other” installation for recovery and/or disposal of municipal waste and construction of installations for recovery of the biogas at regional landfills for municipal waste and at old municipal landfills for non-hazardous waste through the electric power generation and through capturing and flaring. - more complete and clear examination of the cumulative effect resulting from the implementation of the investment proposals, plans and programmes on the biodiversity and Protected Areas when making managerial decisions. <p>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <ul style="list-style-type: none"> - The water depletion in the rivers and the problems of shortage of good-quality drinking water in the summer and autumn. - The quality of the ambient air in the bigger populated settlements. - The inefficiency of the separate waste collection system. - The lack of reliable and trustworthy information on the actual status of the species and habitats in the Natura 2000 Protected Areas, as well as the lack of methodologies for research and monitoring of the priority species and habitats. <p>5. Which national and international documents, setting environmental protection objectives (other</p>	<p>priority axis.</p> <p>Addressed in Section II.1.9.</p> <p>Addressed in Option III of OPE</p> <p>The status of the species and habitats in Natura 2000 sites is analysed in Section 7 based on up-to-date information using the data source of the Project “Mapping and identification of conservation status of natural habitats and species – Phase D”</p>

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		<p><i>than those specified for examination in Section V of the proposal for the scope and content of the SEA Report), do you propose to be examined, while assessing the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications, as well as the source and method of accessing these documents.</i></p> <ul style="list-style-type: none"> - It is necessary to assess the compliance with the documents specified in Section 1 of the Questionnaire. <p><i>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect the impacts to be examined and assessed to?</i></p> <ul style="list-style-type: none"> - The impact on the surface and groundwater. - The cumulative effect from the implementation of the investment proposals plans and programmes on the biodiversity and on the object and objectives of environmental protection in the protected areas. <p><i>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</i></p> <ul style="list-style-type: none"> - Measures, guaranteeing conservation and improvement of the status of the ambient air, surface water and groundwater, soils, biodiversity and protected areas and territories, as well as human health. - Stricter control and monitoring. <p><i>8. What other (that those enumerated in Section IX and XII of the present proposal for scope and content of the SEA Report) methodologies and sources of information do you recommend to be used when preparing the SEA Report?</i></p> <ul style="list-style-type: none"> - Preparation of methods and methodologies for monitoring of the species and habitats (where such methods and methodologies are lacking) and building of managerial and expertise-related capacity. 	<p>Implemented in Section VI.7 of SEA Report</p> <p>Addressed in Section II.1.3 Addressed in Section IV.3.</p> <p>Addressed in Section VII.</p> <p>The methods and methodologies for monitoring of the species subject of conservation in Natura 2000 sites have been elaborated in the framework of the project “Mapping and identification of conservation status of natural habitats and</p>

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		<p>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think must be included in the envisaged Section X of the SEA Report?</p> <p>- Setting clear criteria for assessment of the risk to human health.</p>	<p>species – Phase D”</p> <p>Addressed in X</p>
15	<p>RIEW Vratza Ref. No. B-1700/26.07.2013</p>	<p>I. In regard to the Terms of Reference for determining the content and scope of the SEA of Operational Programme Environment 2014-2020</p> <p>Given the fact that the scope and content of the SEA of OPE 2014-2020 comply with the requirements of Article 86 (3) of the Environmental Protection Act and Article 17 of the SEA Ordinance, we have no remarks on them.</p> <p>We have no proposals considering the identified positions under Annex 1.</p> <p>II. In regard to conducting consultations: Scheme for conducting consultations on SEA of Operational Programme Environment 2014-2020</p> <p>The conducting of consultations on the SEA and the reporting of the results thereof is in accordance with Article 19 of the SEA Ordinance.</p> <p>The Scheme for conducting consultation with the public, the authorities concerned and third parties within the framework of performance of the SEA of Operational Programme Environment 2014-2020 has been prepared in compliance with the requirements of Article 19 (3) of the SEA Ordinance.</p> <p>In accordance with the requirements of Chapter Four of the SEA Ordinance, consultations are envisaged on: the Terms of Reference for determining the scope of the SEA under Article 19a Section 1 of the SEA Ordinance and consultations on the SEA and Operational Programme Environment 2014-2020 according to the procedure stipulated by virtue of Article 20 Paragraph (1) and (3) of that same Ordinance.</p> <p>The process of development of Operational Programme Environment 2014-2020 has been made consistent with the main procedural stages of the SEA.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing.</p>
16	<p>RIEW Pleven/ Ref. No. 4498/26.07.2013</p>	<p>The Regional Inspectorate of Environment and Water-Pleven <u>has no objections</u> to the drafts of the Terms of Reference on the scope and content of the SEA Report on Operational Programme Environment 2014-2020 and on the Scheme for conducting consultation with the public, the authorities concerned and third parties thus presented.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring</p>

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			addressing
17	Danube Region Basin Directorate	<p>The following must be included in Section II.1.3. “Water” from the draft of the Terms of Reference on the scope of the SEA Report on OPE 2014-2020:</p> <ul style="list-style-type: none"> ➤ The period of effectiveness of OPE 2014-2020 coincides with the period of application of the River Basins Management Plans for the 2010-2015 period, the updating/preparation and application of the River Basins Management Plans for the 2016-2021 period, as well as the updating/preparation of the River Basins Management Plans for the 2021-2027 period. The principle for protection of the surface and groundwater from exhaustion, pollution and impairment has been laid down in the River Basins Management Plans for the purpose of maintaining the necessary amount and quality of the water and a healthy environment, conservation of the ecosystems, preservation of the landscape and prevention of economic damages; ➤ When assessing the current status of the water in the SEA Report on OPE 2014-2020, a supplementation must be made in the sense that the information which pertains to the characteristics of the river basin management regions, the review of the impact of the human activities on the status of the surface and groundwater and the economic analysis of the water use will be updated by the River basin Directorate. The updating will be performed on the grounds of and in accordance with Article 156z Sections 1-3 of the Water Act and Article 5 of the Water Framework Directive by the end of 2013; ➤ In the SEA Report information must be presented both on the chemical status and on the quantitative status of the groundwater bodies. It is necessary to take into account the fact that the free disposable resources for the groundwater bodies are determined according to an annual Order for Approved Disposable Resources of the Groundwater Bodies issued by the Directors of the River basin Directorate, as well as pursuant to Article 116 (2) of the Water Act the total water intake from the groundwater bodies and the free water volumes are determined on a monthly basis; ➤ Upon River Basins Management Plans entered into force in 2010, there were some changes in the legislative framework on water protection. According to the Water Act, the Directors of River basin Management Directorates shall issue opinions on the permissibility of investment proposals and projects which envisage use of water intake from surface and groundwater as to the compliance of these investment proposals and projects with the River Basins Management Plans (Article 155 Paragraph (1) Section 23 of the Water Act). Identical requirements have also been introduced into the Ordinance on the Terms and Procedure for Performance of Environmental Impact Assessment, the Ordinance on the Terms and Procedure for Performance of Compatibility 	The available information on surface and groundwater has been referred.

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		<p>Assessment of Plans, Programmes, Projects and Investment Proposals with the Object and Objectives of the Protection of the Protected Areas (AA Assessment) and the Ordinance on the Terms and Procedure for Performance of SEA of Plans and Programmes. The implementation of investment projects and proposals which envisage use or water intake from surface and groundwater and which stem from OPE 2014-2020 will be coordinated as to their permissibility with respect to the environment objectives and the planned measures for achieving better status of the water in the River Basins Management Plans, as well as with respect to the objectives of the management of risk of floods and the envisaged measures in the Flood Risk Management Plans for the respective period of effectiveness.</p> <ul style="list-style-type: none"> ➤ The Flood Risk Management Plan shall be prepared by the DRBD in accordance with the requirements of Directive 2007/60/EC, transposed into the Bulgarian legislation by virtue of the amendment of the Water Act of 06.08.2010 (Chapter Nine “Protection from the Harmful Impact of Water”). The main stages of this process are as follows: Preliminary Flood Risk Assessment (PFRA) and determining the Regions of Considerable Flood Potential; Preparation of maps of the threat and risk of floods; Preparation of a Programme of Measures for Management of the Risk of Floods. The deadline for preparation of the Flood Risk Management Plan shall be December 2015. As of the present point in time, the Danube Region Basin Directorate has completed the preparation of the Preliminary Flood Risk Assessment. The objective of this preliminary assessment is, on the basis of the available information on past floods, to make an assessment of the potential future risk of floods in regard to human health, the economic activity, the environment and the cultural and historical heritage. Within the Preliminary Flood Risk Assessment, segments in which future occurrence of floods can be expected, have been analysed, where for some of these segments simplified modelling of the flooding boundaries with a probability of occurrence of 1% has been performed and the potential risk according to adopted national criteria has been assessed. Significant Potential Flood Risk Regions are yet to be determined pursuant to Article 146e of the Water Act, for the delineation of which detailed mapping and assessment of the risk of floods will be performed. Within the framework of the assessment of the Danube Region, preliminary indicative Significant Potential Flood Risk Regions have been determined. ➤ Pursuant to Article 116 Paragraph (2) Section 3 of the Water Act, all the water and all the water bodies are being protected from exhaustions, pollution and impairment for the purpose of maintaining the necessary amount and quality of the water and a healthy environment, conservation of the ecosystems, preservation of the landscape and prevention of economic 	

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		<p>damages, where for the accomplishment of these objectives water protection zones are being determined. Information on the water protection zones, which are regulated in Article 119a of the Water Act, must be included in the SEA Report: drinking water protection zones; bathing water zones; zones the water in which is sensitive to biogenic elements, including: vulnerable zones and sensitive zones; zones for protection of economically valuable species of fish and other water organisms; protected territories and areas proclaimed to be protected in terms of habitats and biological species, in which the maintenance or improvement of the status of the water is an important factor for their preservation (protected areas from the NATURA 2000 Environmental Network). The protection of the water intended for drinking water supply, on the grounds of Article 119 Paragraph (4) Sections 1 and 2 of the Water Act, shall be implemented through delineation of water bodies and sanitary safeguard zones around the water intake facilities for drinking water supply, in accordance with the requirements of Ordinance No.3 of 16 October 2000 on the Terms and Procedure for Prospecting, Design, Approval and Operation of Sanitary safeguard zones Around the Water Sources and the Facilities for Drinking Water Supply and Around the Water Sources of Mineral Water Used for Therapeutic, Prophylactic, Drinking and Hygienic Needs;</p> <ul style="list-style-type: none"> ➤ In regard to the surface and groundwater bodies and the zones for their protection, it is necessary to assess the secondary, cumulative, simultaneous, short-term, medium-term, long-term, permanent and temporary, favourable and adverse consequences which are expected from the implementation of the programme and its plans. ➤ In the process of examination of the existing environmental problems associated with the “Water” components, it is necessary to take into account also the reported impact on the surface and groundwater bodies in the first River Basins Management Plans 2010-2015 as follows: the reported significant problems in the management of water in each basin management region and the examination of the significant types of pressures and impact as a result of the human activity on the status of the surface and groundwater <p>Regarding the Scheme for conducting consultations on the SEA of OPE 2014-2020 The Danube Region Basin Directorate deems it appropriate to include more target groups when it comes to the determining the representatives of the public, the stakeholders and the third parties, which can be impacted by OPE 2014-2020. The identified main target groups in OPE 2014-2020 could also participate in the process of environmental assessment of the programme.</p>	

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		<p>Questionnaire:</p> <p>3. Do you have concerns as to significant impacting of certain territories or areas from the implementation of the plans of OPE 2014-2020? Please, state these concerns and expound on your arguments for them, so that they can be addressed in Section III of the SEA Report.</p> <p>The Danube Region Basin Directorate is of the opinion that a considerable and long-term impacting of territories and areas is not expected from the implementation of the plans of OPE 2014-2020.</p> <p>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <p>The Danube Region Basin Directorate is of the opinion that it is necessary to pay special attention to the short-term and the long-term consequences from climate change on the environmental components. A serious challenge for the updating of the River Basins Management Plan 2016-2021 and for the preparation of the Flood Risk Management Plan for that same period of effectiveness is to keep track of the impact of climate change on the water resources as a significant pressure factor and to determine the direct and indirect impacts from climate change. The detailed assessment in the SEA Report of the status and trends in the effect of climate change on the environment, when analyzing the registered values of the proposed indicators, will make sure that OPE 2014-2020 will contribute to the solution of this environmental problem.</p> <p>5. Which national and international documents, setting environmental protection objectives (other than those specified for examination in Section V of the proposal for the scope and content of the SEA Report), do you propose to be examined, while assessing the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications, as well as the source and method of accessing these documents.</p> <p>The Danube Region Basin Directorate is of the opinion that the national and international documents, which set objectives for conservation of the water resources and of the zones for their protection, are correctly identified in the Terms of Reference for the SEA Report.</p> <p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect these impacts to be examined and assessed to?</p> <p>The Danube Region Basin Directorate is of the opinion that all the factors and environmental components envisaged in the SEA Report must be examined in a scope and degree of detail comparable to those of the impact assessment. We believe that the consequences from the impact on the surface and groundwater bodies and on the water protection zones will be most pronounced</p>	<p>Such assessment is performed in Section II.1.2 and II.2 of the SEA Report .</p> <p>Addressed</p>

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		<p>during the period of implementation of the investment projects and proposals stemming from OPE 2014-2020.</p> <p>7. <i>What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</i></p> <p>The Danube Region Basin Directorate hereby proposes that measures for prevention, reduction and fullest possible offsetting of the adverse consequences from the implementation of the programme on the surface and groundwater bodies, as well as on the water protection zones, be identified:</p> <ul style="list-style-type: none"> - In the process of implementation of investment projects and proposals stemming from the implementation of OPE 2014-2020; - For overcoming the difficulties encountered by specialists and experts when it comes to the updating of the River Basins Management Plan for the 2016-2021 period, stemming from the lack of national manuals, methodologies, methodological instructions and surveys for determining the significant pressure and impact on the water bodies and on the water protection zones, approaches to processing the data for assessment of the status of the water bodies, on the basis of which adequate objectives and measures for achieving better status of the water are to be identified. <p>8. <i>What other (that those enumerated in Section IX and XII of the present proposal for the scope and content of the SEA Report) methods and sources of information do you recommend to be used when preparing the SEA Report?</i></p> <p>The Danube Region Basin Directorate hereby proposes that the Report by the Commission to the European Parliament and the Council on the Implementation of the Water Framework Directive (2000/60/EC) in the River Basins Management Plan for Bulgaria (dated 14.11.2012) be used as a source of information when preparing the SEA Report.</p> <p>9. <i>Do you have proposals for alternatives in regard to the forecasts of OPE 2014-2020, which are to be examined and assessed in the SEA Report? Please, state them.</i></p> <p>To Specific Objective 3 of Priority Axis 1: "WATER", in "Other Activities Aimed at Strengthening the Capacity for Water Management for "Development of new and/or updating of the existing strategic/programming documents and of the respective supplementary documents (manuals, methodological instructions, surveys, etc.)"", we propose that the following be added: Second River Basins Management Plan for the 2016-2021 period (it continues the development of the River Basins Management Plan for the 2014-2015 period relative to the period of effectiveness of OPE 2014-</p>	<p>Addressed</p> <p>Implemented.</p> <p>Funding of activities related to development and implementation of RBMP is provided under Option III of OPE</p>

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		<p>2015)</p> <p><i>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think must be included in the envisaged Section X of the SEA Report?</i></p> <p>The Danube Region Basin Directorate hereby proposes the following tentative measures and indicators for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 and related to the achievement of a good status of the water bodies and the water protection zones:</p> <p><u>1. Measure 1: Construction of WSS infrastructure in agglomerations of more than 2 000 PE:</u></p> <p>1. Construction of new sewerage network given the existence of an operational WWTP which meets the requirements of the Urban Wastewater Treatment Directive and the Discharge Permit (or in case that the construction of a new one is envisaged simultaneously) – km and environmental effect resulting of the application of the measure in regard to the status of the water recipient body and the groundwater body;</p> <p>2. Construction of new sewerage network in case that the construction of a new WWTP is envisaged simultaneously – km and environmental effect resulting of the application of the measure in regard to the status of the water recipient body and the groundwater body;</p> <p>3. Replacement of sewerage network which compromises the WWTP operation or pollutes the groundwater – km and environmental effect from the application of the measure in regard to the status of the water recipient body and the groundwater body;</p> <p>4. Replacement of sewerage collectors with new ones with a bigger diameter stopping the overflow of wastewater from the spill-over in dry weather or in case of significantly increased amount of wastewater entering this branch – number and environmental effect from the application of the measure in regard to the status of the water recipient body;</p> <p>5. Further construction to completion treatment plants in agglomerations of more than 2000 PE in accordance with the requirements of the Urban Wastewater Treatment Directive and the terms and conditions in the Discharge Permit – number and environmental effect from the application of the measure in regard to the status of the water recipient body.</p> <p>6. Construction/ reconstruction of treatment plants in agglomeration of more than 2 000 PE in accordance with the requirements of the Urban Wastewater Treatment Directive and the terms and conditions in the Discharge Permit - number and environmental effect from the application of the measure in regard to the status of the water recipient body.</p>	<p>Addressed through the measures formulated in SEA, Section X.</p>

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		<p>7. Construction of new treatment plants in agglomeration of more than 2 000 PE in accordance with the requirements of the Urban Wastewater Treatment Directive and the terms and conditions in the Discharge Permit - number and environmental effect from the application of the measure in regard to the status of the water recipient body.</p> <p>8. Construction of water supply networks – number and km;</p> <p>9. Rehabilitation of water supply networks – number, km and extent of reduction of the losses of drinking water;</p> <p>10. Construction of Drinking Water Treatment Plants – number and extent of reduction of the pollution of the drinking water in terms of specific indicators;</p> <p>11. Rehabilitation of Drinking Water Treatment Plants - number and extent of reduction of the pollution of the drinking water in terms of specific indicators;</p> <p><u>Measure 2</u> <u>Completion of the Water Monitoring Systems</u> <u>2.1. Monitoring of the quantitative water status</u></p> <p>1. Research and assessment of the necessity to build to completion and/or to optimize the networks for monitoring of the amount of the surface and groundwater – number of research surveys and assessments performed;</p> <p>2. Completed networks for monitoring of the amount of the surface water – number of points and stations built;</p> <p>3. Completed networks for monitoring of the groundwater amount – number of points and stations built;</p> <p>4. Optimized networks for monitoring of the surface water amount – number of points and stations optimized;</p> <p>5. Optimized networks for monitoring of the groundwater amount – number of points and stations optimized;</p> <p><u>2.1. Monitoring the water quality</u></p> <p>1. Research and assessment of the necessity to built to completion and/or to optimize the networks for monitoring of the quality of the surface and groundwater – number of research surveys and assessments performed;</p> <p>2. Completed networks for monitoring the quality of the surface water – number of points and stations built, number of quality indicators monitored;</p> <p>3. Completed networks for monitoring the quality of the groundwater – number of points and stations</p>	

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		<p>built, number of quality indicators monitored; 4. Optimized networks for monitoring the quality of the surface water – number of points and stations optimized, number of quality indicators monitored; 5. Optimized networks for monitoring the quality of the groundwater – number of points and stations optimized, number of quality indicators monitored;</p> <p><u>Priority Axis 1: WATER</u> <u>Specific Objective 2: Improving the conditions for reduction of the flood and drought risk</u> <u>Measure 1</u> <u>Establishment of an Operational Centre for water management and flood and drought warning</u> 1. Planning, designing and constructing of an Operational Centre for water management and flood and drought warning – degree of completion and operability of the centre; 2. Information provided in real time on the amount of the water resources – type, format and volume of the provided information; number of users (target groups) of the information flow; 3. Provided short-term, medium-term and long-term hydrologic forecasts on the river outflow – number, type, format and volume of the forecasts made; number of users (target groups) of the forecasts; 3. Implemented activities in connection with the development of the Flood Risk Management Plans – number, scope and applicability of the activities (target group); 4. Implemented activities in connection with the application of the Flood Risk Management Plans – number scope and applicability of the activities (target group); 5. Implemented activities in connection with the updating of the River Basins Management Plans – number, scope and applicability of the activities (target group).</p> <p><u>Priority Axis 2: WASTE</u> <u>Specific objective 1: Sustainable waste management for resource-efficient and green economy</u> <u>Measure 1</u> <u>Phased closure and reclamation of municipal landfills for non-hazardous waste which do not meet the legal requirements</u> 1. Closed municipal landfills for non-hazardous waste which do not meet the legal requirements – number and environmental effect on the environmental components; 2. Reclaimed municipal landfills for non-hazardous waste which do not meet the legal requirements – number and environmental effect on the environmental components.</p>	

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18	Black Sea Basin Directorate/ Ref. No. 04-01-198 (2)/ 06.08.2013	<p>In connection with the presented drafts of Terms of Reference on the scope and content of the SEA Report of Operational Programme Environment 2014-2020 and the Scheme for conducting public consultations, the authorities concerned and third parties, who are likely to be affected by Operational Programme Environment 2014-2020, I hereby inform you of the following:</p> <p>In the presented draft Operational Programme Environment 2014-2020, in Priority Axis 1 “Water” the following beneficiaries are specified: MoEW and the various directorates respectively, including the Water Management Directorate and the following target groups are specified: river basin directorates, etc. Given the fact that the envisaged eligible activities are legislatively assigned to the Directors of the River basin Directorates and that they have responsibility for their implementation, I deem it necessary the target groups to be more precisely determined. They must not only be users, but also active participants in the process of implementation. Failing that, it is impossible to guarantee the necessary provision of sustainable benefits to these groups and to produce the desired effect – the objectives should be consistent with the local needs and there should be a lasting result consistent with the objectives set.</p> <p>Questionnaire:</p> <p><i>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section 1.3 “Correlation of OPE 2014 – 2020 with other Plans and Programmes” of the SEA Report? Please, state the source, in which there are published and the method of accessing them.</i></p> <p>Updated National Implementation Plan on POPs Management in Bulgaria 2012-2020 – source: http://www.strategy.bu/StrategicDocumentsA^icw.aspx?lang=bu-BG&Id=783</p> <p>Strategic Plan for Action on Protection of the Environment and Recovery of the Black Sea– source: http://www.strategy.bg/StiateaicDocuments/View.aspx?lang=bu-BG&Id=561</p> <p><i>2. Which aspects of the current status of the environment, which are envisaged to be examined as part of Section II.1 of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>It is necessary to clearly identify in the report the aspects exerting direct and indirect impacts on the environment. Attention should be paid to the aspects which have a direct impact on the environment, the significant aspects for all processes and activities which can be managed and which can be favourable influenced.</p> <ul style="list-style-type: none"> • Waste management /generation, treatment/ • Emissions into the ambient air 	<p>Addressed in Section I.3 of SEA Report</p> <p>Addressed in Section II.1</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<ul style="list-style-type: none"> • Wastewater discharged and treated water • Water use, etc. <p>3. Do you have concerns as to significant impacting of specific territories and areas from the implementation of the plans of OPE 2014-2020? Please, state these concerns and expound on your arguments and justifications for them, so that they can be addressed in Section III of the SEA Report. An analysis must be performed and information must be given in the report on the special status zones falling within the scope of the program, including the sanitary safeguard zones. Given the general direction and the intent of the program, these zones must be favourably impacted as a whole.</p> <p>4. Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</p> <ul style="list-style-type: none"> • Treatment of municipal wastewater (reduction of the pollution of the water bodies by untreated municipal wastewater); • Allocation of the water resources and protection and recovery of the quality and amount of the water; • Development and implementation of strategic documents on the marine environment; <p>Justification: accomplishment of the objectives set for environmental protection.</p> <p>5. Which national and international documents, setting environmental protection objectives (other than those specified for examination in Section V of the proposal for the scope and content of the SEA Report), do you propose to be examined while assessing the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications, as well as the source and method of accessing these documents.</p> <p>Updated National Implementation Plan for POPs Management in Bulgaria 2012-2020 – source: http://www.strategv.bg/StrategicDocuments/View.aspx?laniz=bti-BG&Id=783</p> <p>Justification: Implementation of the Stockholm Convention, application of Regulation (EC) 850/2004 on the Stable Organic Pollutants.</p>	<p>Addressed but because the programme do not reach the detail of formulating specific projects (excluding the major projects - 3 projects), an analysis of the impact on specific sanitary safeguard zones is not possible. The anticipated impacts are assessed in Section VI.3 of SEA.</p> <p>Addressed.</p> <p>Section V provides information on the consistence of OPE with the environmental impact assessment objectives relevant to the Programme. The info on the Updated National Implementation</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect these impacts to be examined and assessed to?</p> <p>The forecasts of the likely impacts on the environment and on human health must be assessed in accordance with their priority status according to the strategic objectives set by the MoEW. The description must have a full scope, including the direct and the main impacts and whether the impacts on the environmental aspects have been quantitatively identified. It must be sufficiently detailed, so as to allow the performance of a detailed assessment of the significance of the impacts. A forecasts for incidental (accidental) and indirect impacts must be envisaged; The secondary impacts must be described, for example the impacts on water users inflicted by changes in the hydrology or in the quality of water, the impacts on the flora, fauna or habitats inflicted by the pollution of soils, air or water or by the noise, etc.; A forecast of the impacts on human health and on the sustainable development.</p> <p>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</p> <p>The investment proposals/plans, programmes or projects, for which EIA/SEA (according to the procedure of the Environmental Protection Act) and a compliance assessment with the object and objectives of conservation in the protected area (according to Biodiversity Act) is required, must be approved according to the procedure of the respective special act only after an issuance of an act of agreement by the competent environmental authorities and given that the recommendations from the performed assessments and the terms and conditions of the respective act are taken into consideration. In the process of performing research, granting approval and granting permission for the investment proposals in relation to water, the following must also be taken into consideration: the respective River Basins Management Plans, the regimes of the protected territories as specified by the Protected Territories Act, the orders for designating these protected territories and the approved management plans; the regimes of the protected areas as designated by the orders under Article 12 (6) of the Biodiversity Act; 2.3. The regimes of the water protection zones as specified under Article 119a of</p>	<p>Plan for POPs Management is subject to comments in Sec. I.3, II.1.9.11 and Sec. IV.3 of SEA Report</p> <p>Addressed.</p> <p>Addressed in Section VII - formulation of measures.</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p>the Water Act; 2.4. the requirements for health protection of the environment of the residential areas. It is necessary to implement on a priority basis the activities for reducing the water losses from the water supply network and for improving the quality of the drinking water; Introduction of green technologies, including safe, clean and energy-saving technologies; Raising the awareness and involvement of the public in the environmental protection.</p> <p>8. <i>What other (than those enumerated in Section IX and XII of the proposal for the scope and content of the SEA Report) methods and sources of information do you recommend to be used when preparing the SEA Report?</i> Methods for analysis and inclusion of the stakeholders in the assessment of the programme.</p> <p>9. <i>Do you have proposals for alternatives in regard to the forecasts and plans of OPE 2014-2020 which must be examined and assessed in the SEA Report? Please, state them.</i> It is necessary to consider the possibilities for financing /co-financing/ between OPE and the other operational programmes, including the possibility for integration part of the specific objectives. It is desirable that the possibility for inclusion of beneficiaries other than the current ones be further developed and expanded. It is necessary to envisage alternative mechanisms for financing of measures under projects, included in the plans prepared at a local level and related to the management of the flood risk.</p> <p>10. <i>What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think deserve to be included in the envisaged Section X of the SEA Report?</i> Regular periodic reporting on the monitoring and control when implementing the programme. Specifying indicators for measuring the progress of the program, for measuring the results and for assessing the environmental effectiveness, part of which are to be included in the criteria for selection of projects. The implementation of remedial measures in the cases of adverse consequences for the environment must be envisaged.</p>	<p>It is implemented. The inclusion of stakeholders is indicated in the information about the public consultations.</p> <p>Special Priority Axis 4 is devoted to the flood risk management.</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
			Addressed in Section X of SEA
19	West Aegean Region Basin Directorate/ Ref. No. II-01-111/ 01.08.2013	<p>...we hereby submit the completed Questionnaire – Appendix 1 to the Terms of Reference on the scope and the content of the SEA Report on OPE 2014-2020. In regard to the presented Scheme for conducting public consultation, the authorities concerned and third parties who are likely to be impacted by Operational Programme Environment 2014-2020, the West Aegean Region Basin Directorate – Town of Blagoevgrad has nothing to add.</p> <p>Questionnaire:</p> <p>2. <i>Which aspects of the current status of the environment, which are envisaged to be examined as part of Section II.1. of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice?</i></p> <p>In regard to the “Water” component, it is necessary to examine the impact of the climate factors and climate change on the ground and surface water for the purpose of identifying drought areas.</p> <p>3. <i>Do you have concerns as to significant impacting of specific territories and areas from the implementation of the plans of OPE 2014-2020? Please, state these concerns and expound on your arguments and justifications for them, so that they can be addressed in Section III of the SEA Report.</i></p> <p>No. The implementation of OPE 2014-2020 will contribute favourably to the protection of the water protection zones in the sense of Article 119a of the Water Act.</p> <p>4. <i>Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <p>1. The agglomerations of more than 2 000 people equivalent will again be the subject matter of OPE 2014-2020 in regard to the wastewater. The problem with the pollution of the water of agglomerations of less than 2 000 people equivalent remains; what are the options with regard to the distribution of the population in the smaller populated settlements where there is no sewerage yet and where the wastewater is discharged in pits or in surface water bodies without treatment.</p> <p>2. The lack of supplementary tanks for providing drinking water for household needs and irrigation in the drought areas, as a consequence of the impact of climate change. In this connection, it is worth</p>	<p>Considered for information</p> <p>The funding of the WSS in agglomerations less than 2 000 PE is subject to the Rural Development Programme 2014-2020 – this is mentioned in Section VIII of OPE.</p> <p>It was taken into account, at the current stage the priority</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p>noting that there are as yet populated settlements without water supply network constructed, as well as on water rationing regime.</p> <p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect these impacts to be examined and assessed to? We expect that special attention be paid to Sections VI.1, VI.3, VI.4 and VI.8.</p> <p>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse impacts from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)? - In our opinion, no adverse consequences from the implementation of OPE 2014-2020 are possible.</p> <p>10. What measures for monitoring and control of the impacts on the environment and on human health as a result of the implementation of OPE 2014-2020 do you think must be included in the envisaged Section X of the SEA Report? - Measures analogous to those set in OPE 2007-2013.</p>	<p>is the reduction of drinking water losses.</p> <p>Addressed.</p> <p>Addressed in Section X of the SEA Report</p>
20	<p>East Aegean Region River Directorate/ Ref. No. PM-179/06.08.2013</p>	<p>In connection with your request for opinion on the Terms of Reference for determining the scope and content of the SEA and on the Scheme for conducting consultations on the SEA, we are hereby sending to you as an attachment the completed Questionnaire (Appendix No.1).</p> <p>Questionnaire:</p> <p>1. Which other (than the enumerated) strategies, plans and programmes at the national, EU and international level do you propose to be analyzed as part of Section 1.3 “Correlation of OPE 2014 – 2020 with other Plans and Programmes” of the SEA Report? Please, state the source, in which they are published and the method of accessing them.</p> <p>National Plan for Protection of the Most Important Wet Lands in Bulgaria (2013-2022) – it is yet to be prepared but there is a work-in-progress version: http://AvuAv.bbrhiodix'orsity.bg/nics/doc/Wctlands-plan-final.pdf Flood Risk Management Plans for the four basin directorates – they are yet to be prepared; information is available on the Internet pages of the basin directorates.</p> <p>2. Which aspects of the current status of the environment, which are envisaged to be examined as part of Section II.1 of the SEA Report, do you think deserve special attention? Please, state your</p>	<p>Addressed in Section I.3 of SEA</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p><i>arguments and justifications for this choice.</i></p> <p>Section II.1.1.2 Climate change – it is necessary to introduce also supplementary indicators for assessment of the climate change for the purpose of assessing also the trends towards droughts, as well as to make an assessment, if possible, of the regions under threat of droughts.</p> <p>Section II. 1.3 Surface and groundwater – it is necessary to present the current status of the water bodies. The information is available in the Basin Directorates.</p> <p>Justifications: the current status of the water bodies differs from the status in the River Basins Management Plans (2009-2015), where the data is from year 2009. It is necessary more measures for protection of the water and their status to be examined in this Section. The main differences in the surface water have to do also with the different types of water, as well as with the different nature of the pollution – in terms of sources and types of substances. The hydromorphological changes – such as barrier facilities in the rivers, construction of small HPPs, embankments, dykes, etc. – also have relation to the surface water status .</p> <p><i>4. . Which existing environmental problems, the examination of which is envisaged for Section IV of the SEA Report, do you think deserve special attention? Please, state your arguments and justifications for this choice.</i></p> <ol style="list-style-type: none"> 1. Surface water pollution as a result of the discharge of untreated wastewater from the urban areas and the industry. 2. Regulation of the river outflow and the water in-take of as an environmental problem exacerbated by climate change. At the present point in time, many rivers dry up during the low water period and the main reason for this is the in-take of water amounts and the regulation of the river outflow by the constructed dams. 3. Problems related to the hydromorphological status of the water such as: disrupted continuity of the rivers and the impact on the water fauna from the construction of barrier facilities and small HPPs; reduction of the erosion basis of the rivers as a consequence of the disruption of the outflow of sediments and the mining of ballast materials, the construction of river corrections and the destruction of the river vegetation. <p><i>5. Which national and international documents, setting environmental protection objectives (other than those specified for examination in Section V of the proposal for the scope and content of the SEA Report), do you propose to be examined, while assessing also the compliance of OPE 2014-2020 with them? Please, state your arguments and justifications, as well as the source and method of accessing</i></p>	<p>Addressed in Section II.1.1.2. Climate change</p> <p>Addressed in SectionII.1.3.</p> <p>Considered for information</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p><i>these documents.</i></p> <p>National Plan for Protection of the Most Important Wet Lands in Bulgaria (2013-2022) – it is yet to be prepared but there is a work-in-progress version available: http://www.bbf.biodiver.sity.Bu/files/doc/Wetlands-plan-final.pdf</p> <p>Certain EU Directives must be added. Despite the fact that they have been transposed into the Bulgarian legislation:</p> <ul style="list-style-type: none"> • Directive 2000/60/EC of the European Parliament and of the Council dated 23 October 2002 on establishing a framework for the actions of the Community in the field of the water Policy. • Directive 98/83/EU of the Council dated 3 November 1998 on the quality of water intended for human consumption. • Council Directive 91/676/EEC concerning the protection of water against pollution caused by nitrates from agricultural sources. • Council Directive 91/271/EEC concerning urban waste-water treatment • Directive 80/68/EEC on the protection of groundwater against pollution caused by certain dangerous substances • Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration. <p>6. Which forecasts of the likely impacts of OPE 2014-2020 in your opinion deserve special attention in the envisaged Section VI of the SEA Report? What degree of detail do you expect these impacts to be examined and assessed to?</p> <p>Our proposal is to examine the “Water” component structured into: surface water, groundwater and water protection zones. It is necessary to assess the impact on the quality and amount of water, the impact on the water-related ecosystems and the impact on the water protection zones. It is necessary to assess the measures laid down in the Plan for Management of the River Basin(s) by virtue of which commitments have been assumed for implementation in the sense of Directive 2000/60/EU, as well as to assess the opportunities for their financing. The implementation of the measures shall be reported to the European Commission and it will bring about an improvement in the status of the water and in the living environment by extension. The reports on the implementation of the measures are available in the Basin Directorate. Part of measures has not been started yet due to lack of financing mechanism.</p>	<p>Addressed in Section V of the SEA Report.</p> <p>The information is provided in Section II.1.3.</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on ToR	Modes of addressing the statements and respective arguments
		<p>7. What measures for prevention, reduction and fullest possible offsetting (if necessary) of the adverse consequences from the implementation of the programme on the environment and on human health do you think must be envisaged (in the proposed Section VII of the SEA Report)?</p> <p>A requirements for early-stage coordination of the projects presented for financing under OPE with the institutions responsible for application of the respective legislative instruments.</p>	Such measure is formulated in Section VII of the SEA Report
21	RIEW Plovdiv Ref. No. EII-664/ 14.08.2013	Regional Inspectorate of Environment and Water – Plovdiv has no remarks and recommendation on the submitted draft ToR on the scope and content of the SEA of Operational Programme Environment and the Scheme for conducting consultations with the public, the authorities concerned and third parties	The opinion does not contain remarks, requirements and recommendations requiring addressing
22	RIEW Varna Ref. No. OIIOC-H-1/1/ 25.09.2013	Regional Inspectorate of Environment and Water – Varna has no remarks and recommendation on the submitted draft ToR on the scope and content of the SEA of Operational Programme Environment and the Scheme for conducting public consultations, the authorities concerned and third parties	The opinion does not contain remarks, requirements and recommendations requiring addressing
23	Ministry of Health	NO OPINION HAS BEEN RECEIVED	--

Table XIII.1-2: Received opinions on the Strategic Environmental Assessment Report of Operational Programme Environment 2014 – 2020

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments
1	Regional Inspectorate of Environment and Water (RIEW) Haskovo Ref. 05-08-2971/ 23.05.2014	<p>RIEW hereby express the following opinion:</p> <ul style="list-style-type: none"> • The SEA report is established as an integral document pursuant to the provisions of Article 86 (3) of the Environmental Protection Act (EPA) and is developed by a team of experts meeting the requirements set in Article 16 (1) of the SEA Ordinance. The SEA Report is composed of main report body, reference list and scheme for conducting consultations. • The SEA of OPE considers the baseline environmental conditions (current environmental status) by components and factors. The flora and fauna of the region have been studied as a whole with mentioning of the species and habitat of conservation priority. The protected territories and protected areas with the associated type of natural habitats have been specified. • The trends in the environmental development without OPE implementation have been studied. The current environmental problems established at various levels and related to the programme, including those related to regions of special environmental importance, such as the Natura 2000 areas. • The likely significant impacts on the environment and human health, including the biodiversity, flora and fauna have been considered. <p>Measures for preventing, reducing and offsetting to the highest possible extent the unfavourable consequences of the implementation of OPE on the environment are envisaged.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing</p>
2	Danube Region Basin Directorate – Pleven centre Ref. 05-08-2971/ 28.05.2014	<p>All recommendations and proposals formulated by us in reference to the Scope of the Terms of Reference (ToR) for the elaboration of the SEA Report have been correctly addressed, but with some technical mistakes, which shall be removed:</p> <p>1. Section II. 1.3.2.1 Groundwater:</p> <ul style="list-style-type: none"> - „Heavily modified water bodies" is not a surface water category. In the Danube Region (District), some of the water bodies within the surface water categories (rivers and lakes) were defined as heavily modified or artificial water bodies (section 1.2.4 and 1.2.5 of the River Basin Management Plans (RBMP) 2010 – 2015 in the Danube Region.); - The term „chemical potential" doesn't exist in the assessment of the status of the heavily modified water bodies and of the artificial water bodies. Their common status is defined by their ecological potential and chemical status; 	<p>Addressed in Section II.1.3.1.</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments
		<ul style="list-style-type: none"> - In Section 2 of the RBMP 2010 – 2015 of the Danube Region are studied and assessed also other impact on the status of the surface bodies as a result of human activity, consisting of point source or diffuse source pressure; - The international project “Stakeholder oriented flood risk assessment for the Danube floodplains (DANUBE FLOODRISK), funded and performed in the framework of the Operational Programme South-East Europe 2007-2013 is completed. 	
		<p>2. Sections VII.2 Measures to be applied during the implementation of the programme and X Measures for environmental impact monitoring and control during the implementation of the programme:</p> <ul style="list-style-type: none"> - Measures to be applied during the implementation and the measures for monitoring and control of the Operational Programme Environment 2014-2020 related to the implementation of the green infrastructure, on the restoration activities of floodplains and for improving water retention shall be conformed only to the FRMP 2016-2021. (Preliminary Flood Risk Assessments (PFRAs) are integral part of FRMP). - For all potential investment proposals arising from Operational Programme Environment 2014-2020 measures to prevent, reduce and offset to the highest possible extent the unfavourable consequences on the water and their safeguard zones shall be undertaken. The regulatory requirements as per Article 156f of the Water Act (WA) shall be addressed and included as measures. For that purpose, for each of the investment proposals in the programme implementation period, intending use and/or water abstraction from surface or groundwater body shall apply the provisions of Article 156f (1) and (2) of the WA. <p>This requirement is valid for all potential investment proposals covered by Operational Programme Environment 2014-2020, which could lead to the following (Article 156f. (1) of WA):</p> <ul style="list-style-type: none"> - failure to achieve good ecological status of surface water or good ecological potential of heavily modified water bodies, or failure to prevent deterioration in their status is the result of a new modification to the physical characteristics of the surface water body and new sustainable human development activities with socio-economic effect; - failure to achieve good groundwater status , or failure to prevent deterioration in the status of such groundwater as a result of alterations to the levels of the said water; - failure to prevent deterioration from high status to good status of a surface water body as a result of new sustainable human development activities 	<p>Accepted</p> <p>The measure has been supplemented as follows: The investigation, approval and authorisation procedure of water-related investment projects shall address the provisions of the Water Act, Article 156f (1) and (2).</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments
		<p>For the abovementioned investment proposals, measures to be envisaged and included in the final version of the Programme Environment 2014-2020 with the following justifications and requirements in accordance with Article 156f. (2) of WA, namely:</p> <ul style="list-style-type: none"> - justification that the reasons for these modifications or deviations must be of public interest or the benefits therefrom to human health and human safety or to sustainable development must outweigh the benefits to the environment and to society of achieving the objectives under Article 156a (1) herein; - justification that for reasons of technical feasibility or disproportionate cost, the beneficial objectives served by these modifications or deviations in the status of the water body cannot be achieved by other means, which are a better environmental option - justification that all practicable steps have been taken to mitigate the adverse impact on the status of the water body 	
3	RIEW Russe Ref.1508/ 30.05.2014	<p>In consideration of the submitted SEA of OP Environment 2014-2020, RIEW Russe express the following opinion on the submitted documentation:</p> <ul style="list-style-type: none"> - the structure and the content of the report meet the requirements of Article 86 (3) of the Environmental Protection Act (EPA) (SG issue 91/2002, amended SG issue 22/2014); - the report provides in the form of appendix the information for the consultations conducted up to the current stage of the procedure; - the alternatives of the implementation of OP Environment 2014-2020 are studied The plans, programmes, projects and investment proposals arising from the selected alternative – Option III of the Programme have an integrated positive effect on the environment and human health. Taking into account the above-mentioned, RIEW Russe has no remarks and additional requirements regarding the SEA documentation. 	The opinion does not contain remarks, requirements and recommendations requiring addressing
4	RIEW Smolian Ref.05-08- 2971/ 03.06.2014	<p>The submitted SEA Report, the associated appendices and Non-technical Summary on the Operational Programme Environment 2014-2020 have covered all requirements on elaboration of SEA including all environmental components and factors designated in Article 86 (3) of the Environmental Protection Act. All alternatives including the „zero alternative" are adequately described. Measures envisaged to prevent, reduce and offset to the highest possible extent the unfavourable consequences of the Programme implementation on the environment are formulated.</p> <p>We have no remarks and supplements to the submitted SEA with the appendices and the Non-technical</p>	The opinion does not contain remarks, requirements and recommendations requiring addressing

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments
		Summary of the Operational Programme Environment 2014-2020.	
5	RIEW Vratsa Ref.05-08-2971/ 31.05.2014	<p>I. Concerning the structure, scope and content and format of the Strategic Environmental Assessment:</p> <p>The objectives and priorities of the significant national and EU documents for integrated development for the respective period are addressed and conformed at all stages of the programme development.</p> <p>Statements pursuant to Article 83 of the Environmental Protection Act and Article 16 of the SEA Ordinance have been submitted by the experts performing the assessment, with specification of the relevant programme as well as a common list of the team leader and experts involved in the elaboration of the SEA is submitted where each one has certified by signature the sections developed by him.</p> <p>Non-technical Summary of the Strategic Environmental Assessment is presented containing textual part accompanied with the necessary graphic information /maps, pictures/.</p> <p>Information on the conducted consultations with the expressed opinions and proposals and the way of addressing them, the mailing referred to consultations is given in appendix to the SEA.</p> <p>Equipotent description, analysis and comparison of the considered alternatives for reaching the main objectives of the Programme are made: Zero Alternative and Options I, II and III of the OPE.</p> <p>The measures proposed in SEA are specified in maximum details aimed to ensure and facilitate their practical application with regards to the environmental protection requirements.</p> <p>III. Concerning the organisation of the SEA elaboration and the addressing of the consultations outcome:</p> <p>The steps undertaken in relation to the main procedural SEA stages are conformed with the Scheme as per Article 16 (2) item 2 of the SEA Ordinance.</p> <p>The documentation summarising the outcome of the consultations as per Article 19a of the SEA Ordinance in reference of the SEA and the assessed programme is given in appendix to the assessment itself.</p> <p>The information on the conducted consultations and the standpoints and proposals of the consultations, the accepted and unaccepted remarks, recommendations and proposals and the documents arising from the consultation process (statements, letters etc.) are studied and described</p>	The opinion does not contain remarks, requirements and recommendations requiring addressing
6	RIEW Pazardzhik Ref. 05-08-	<p>- In regard to the submitted: Strategic Environmental Assessment Report on OPE 2014 -2020, the respective appendices and the non-technical summary of the report we have no remarks and proposals.</p> <p>- In regard to the submitted Draft Operational Programme Environment 2014 - 2020 we have no remarks</p>	The opinion does not contain remarks, requirements and

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	2971/ 05.06.2014	and proposals.	recommendations requiring addressing
7	RIEW Montana Ref. 05-08- 2971/ 05.06.2014	<ol style="list-style-type: none"> 1. The structure and the scope of the SEA Report meet the requirements of Article 86 (3) of EPA and of Article 17 of the SEA Ordinance 2. Three options of the OPE 2014 – 2020 are developed and the SEA Report presents in detail the analyses and assessment of the impact of the provisions of all three options on the environment and on human health. The priority axes, specific objectives and eligible actions are specified for each of the options. 3. The report contains description of the strategies, plans and programmes directly related to OPE 2014 - 2020 (studied also in the programme strategy) at EU and national level as well as other strategies, plans and programmes setting environmental objectives. 4. The aspects of the current state of the environment and the possible development without the application of the programme are outlined. The used information is up-to-date and statistical data is studied, an integral assessment of the anticipated impact of the priority axes and the respective specific activities as a result of OPE 2014 — 2020 implementation on the environmental components and factors, population and human health from ,. <p>In Section II. 1.9.2 Construction and Demolition Waste, D. CDW landfilling and F. Asbestos containing CDW(pages 205 and 206 of the SEA Report – BG version) is mentioned Ordinance 8 dated 24.08.2004 on the terms and conditions for construction and operation of landfills and other facilities and installations for waste recovery and disposal. The latter is repealed with the entry into force of Ordinance 6 dated 27.08.2013.</p> <ol style="list-style-type: none"> 5. Characteristics of the environment for territories which will potentially be significantly impacted is made. 6. Existing environmental problems established at various levels and with regards to the programme, including those related to regions of special environmental importance, such as the Protected Areas under the Biodiversity Act are studied. 7. Analysis of the environmental protection objectives at the national and international level and the way of addressing them in the process of elaboration of OPE 2014 – 2020 is made. 	Addressed in Section II. 1.9.2

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		<p>8. Based on the result of the performed analyses and assessment of the likely significant impacts on the environment measures have been proposed to prevent, reduce and offset to the highest possible extent the unfavourable consequences of the Programme implementation.</p> <p>9. Reasons for selecting the alternatives (options) dealt with and the methods for conducting SEA as well as difficulties in collecting information are included in the report.</p>	
		<p>10. Measures for environmental impact monitoring and control during the implementation of the programme are specified in respect of each priority axis together with the relevant indicators (measurement unit, target value (2023), data source, and frequency of reporting).</p> <p>11. The conclusion of the team of independent experts elaborating the SEA of OPE 2014 - 2020 is that Option III of the Programme will achieve a comprehensive positive impact on the environment and human health at national level, provided that the measures proposed under item 7 of the SEA Report are respected.</p>	
8	RIEW Pernik Ref. 05-08-2971/05.06.2014	<p>1. The SEA Report is prepared in compliance with Article 86 (1) and (2) of EPA with observation of the provisions regarding the content of Article 86 (3) of EPA and Article 17 of the Ordinance on the terms and procedures for performing strategic environmental assessment of plans and programmes (the SEA Ordinance, amended SG issue 94/30.11.2012).</p> <p>2. The Report is conformed to the requirements set out in Decision EO-14/2013 of the Minister of Environment and Water.</p> <p>3. In consideration of the submitted SEA Report and the Draft Operational Programme Environment, RIEW Pernik has no remarks and proposals.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing</p>
9	RIEW Stara Zagora Ref. 05-08-2971/09.06.2014	<p>The SEA Report is elaborated as integral document in compliance with the provisions of Article 86 (3) of EPA, prepared by a team of experts meeting the requirements of Article 16 (1) of the SEA Ordinance. The SEA Report, based also on the conducted consultations and performed analyses propose measures to prevent, mitigate and at highest extent eliminate the unfavourable consequences as a result of the Programme implementation. We consider that the interventions and objectives set out in the proposed Option III of the Draft Operational Programme Environment 2014-2020 will exert positive effect on people and environment and will satisfy our needs in the areas of water, waste, Natura 2000 network.</p>	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing</p>

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10	RIEW Pleven Ref. 05-08-2971/ 05.06.2014	<p>We consider that the information provided in the report is complete and reliable except the following identified discrepancies:</p> <p>Regarding the components Ambient air and Harmful physical factors “Noise” :</p> <ol style="list-style-type: none"> Concerning the analysis of the specific ambient air pollutants, for ammonia indicator (page 110 - <i>BG version</i>) it is not specified that the pollution of Nikopol is originating from a sources located outside the Bulgarian territory (Source of data – ExEA, Bulletin on the state of the ambient air in the towns of Lower Danube Bulgarian- Romanian cross-border zone). Concerning the update of the municipal programmes pursuant to Article 27 of the Clean Ambient Air Act (page 242 - <i>BG version</i>), there is an omission of Nikopol Municipality which has adopted updated programme by Resolution of Nikopol Municipality Council No.1279/28.04.2011. The indicated as updated programme of Lovech Municipality is a new one (initial) – adopted by Lovech Municipality Council Resolution No. 777/30.06.2011. (Source of information – websites of the respective municipalities). Concerning the analysis of noise factor, the information specified on page 220 (<i>BG version</i>) “Strategic Noise Maps with Action Plans for the Cities of Pleven and Stara Zagora are to be developed” is not up-to-date. Pleven Municipality has already developed Strategic Noise Map, approved with Resolution of Pleven Municipality Council Resolution 344/29.11.2012 as well as the associated Action Plan, approved with Resolution of Pleven Municipality Council Resolution 831 /28.11.2013. (Source of information – websites of Pleven Municipalities). <p>We agree with the formulated conclusion on the impact of the Operational Programme Environment 2014 - 2020 on the ambient air and the acoustic environment including the effect expected from Priority Axis 5 - Improvement of the Ambient Air Quality, Investment Priority: Taking action to improve the urban environment, to revitalise cities, regenerate and decontaminate brown field sites (including conservation areas), reduce air pollution and promote noise-reduction measures.</p>	<p>Addressed in Section II.1.2.5</p> <p>Addressed in Section III.1</p> <p>Addressed in Section II.1.10.1 Noise</p>

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		<p>Regarding the component Water:</p> <ol style="list-style-type: none"> 1. On page 118(<i>BG version</i>) in Table II.1.3.1.-3 the data about Osam River is imprecise – the point sources of pollution by the urban WWTP (UWWTP) are 2, and not 1. 2. On page 163 (<i>BG version</i>) in Table II 1.3.4.-3 similarly the data about Osam River is imprecise – the UWWTP intended for construction are not two but one. 3. The above-mentioned incompleteness and/or mistakes are not of substantial importance for decision making about the programme affirmative statement. <p>We agree with the formulated conclusions regarding the effect of the Operational Programme Environment 2014 - 2020 on the protection and improvement of the water resources state and the priority axis for objectives achievement. The enumerated laps are insignificant regarding the decision making. We consider that the information is sufficient for positive statement on the Strategic Environmental Assessment of the Operational Programme Environment 2014 - 2020 r."</p>	<p>Summarised data (as of 31/12/2012) about the status of the WSS systems are present in Section II.1.3.3.2 as an abstract of the <i>Report on the implementation of Council Directive 91/271/EEC concerning urban wastewater treatment</i> prepared pursuant to Article 16 of <i>Directive 91/271/EEC concerning urban wastewater treatment</i></p>
11	RIEW Veliko Tarnovo	<p>In regard to the submitted SEA of the above-mentioned Programme, RIEW Veliko Tarnovo has the following considerations:</p> <ol style="list-style-type: none"> I. All main waste streams and their treatment up to date are described in detail in the Strategic Environmental Assessment Report on the Operational Programme Environment 2014 – 2020. The submitted Report has omitted to describe the treatment of the biodegradable waste. A new <i>Ordinance on treatment and separate collection of biowaste</i> is in force and has not been included in the report. II. In regard to the section of the report studying flora, fauna, protected areas and protected territories and the respective impacts, the following considerations related to the impact assessment and the proposed relevant measures referred to the eligible activities under Priority Axis 4 "Flood risk prevention and management" of Option III of OPE 2014-2020 can be formulated: 	<p>The biodegradable waste is included in the report, in the section studying municipal waste and sludge.</p> <p>The assessment is made in</p>

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		<ul style="list-style-type: none"> – On page 33 of the Report (<i>BG Version</i>) one of the specified groups of activities is „2. Measures related to flood risk prevention and management solutions, aimed at fortifying the banks in the urban areas in the Danube River region, including ecosystem-based approach”. – On page 96 (<i>BG Version</i>) of the appendix “<i>Model for operational programmes under the Investment for growth and jobs goal</i>” the specified group of activities is 2. Measures related to flood risk prevention and management solutions, aimed at fortifying the banks in the urban areas, including ecosystem-based approach” <p>The difference being identified doesn’t provide clear idea whether the SEA Report has studied only the activities related to Danube region or to all rivers on the country territory and whether such activities are eligible for the whole country.</p> <p>On page 306 (<i>BG Version</i>) of the report the text “Concerning the activities grouped in item 2 of PA 4 it shall be mentioned that in case of inadequate planning the latter can be assessed as contradictory – on one hand the restoration of floodplains and water retention is foreseen and on other hand the improvement of the flood risk management is intended” it doesn’t become clear why the restoration of the floodplains and water retention is in contradiction with the improvement of the flood risk management, given that the first is aimed to achieve the second, which is grounded on the modern European practices.</p>	<p>reference of the degree of detail of the provisions and covers the whole territory of the country. The eligibility of the specific activity (intervention) shall be assessed in line with the preparation of the project for a precisely defined territory.</p> <p>The impact assessment aims to indicate all potential risks and in this connection, regarding the activities for restoration of floodplains and water retention, there is likelihood of flood risk occurrence in case of inadequate planning.</p>
		<p>3. On page 326 (<i>BG Version</i>) regarding the impact assessment at eligible activity level:</p> <p>3.1. The impact of <i>Activities related to water retention improvement</i> is assessed as „<i>Unknown; significantly negative impact is possible</i>”. It is not clear on the basis of what specific activities (is the artificial infrastructure included) included in this group are made these forecasts and assessment, given the fact that the water retention can be achieved by natural means and non-structural measures can be implemented for this purpose – water retention effect of vegetation, soils, ground and wetlands has an important mitigating effect particularly in minor or medium-scale floods. Each of these storage media is capable of retaining certain quantities of water for a certain length of time. A large natural storage capacity provides slow rises in water levels and comparatively minor floods. Retaining water on the natural media should have priority over swift water run-off. In this connection some best practices consist</p>	<p>The proposed activities are very specific and can be studied in the framework of the specific project itself. At the present stage the degree of detail doesn’t allow to precisely define the constitutive elements included, thus detailed impact assessment is not possible to be made.</p>

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		<p>in:</p> <ul style="list-style-type: none"> • Reclaim (restore) former floodplains and lakes, where possible, by relocating dykes, by creating inlets at the deepest terrain sections, in order to reincorporate these areas as natural retention areas; • Discharge excess water into natural and artificial flood retention areas (which will, in principle, only be used temporarily) in a controlled manner; <p>The maintenance of the vegetation edging a waterway is however necessary in a way that is both respectful of the wealth, biodiversity of these environments, and effective against the risk of flood damage</p>	<p>Namely the lack of more specific data on the respective activities doesn't allow more precise assessment. If the activities on the improvement of water retention are related solely to the improvement/maintenance of the natural retention or to the use of the so called "green infrastructure" adverse impact is not expected or will be minor but in case when structural measures are applied and they affect natural habitats and/or species habitats, then significant adverse impact is likely.</p> <p>The proposed measure for compliance of the intended activities to the Flood Risk Management Plans incorporates and addresses the suggestion of V.Tarnovo RIEW.</p>

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		<p>3.2. Considering the activities on „<i>Design and construction/strengthening/rehabilitation of protection infrastructure (including biological fortification of the banks, dikes, etc.)</i>”, for which the likely impact is direct destruction of habitats of conservation importance and habitats of species of conservation importance (if there are such on construction/strengthening/rehabilitation sites), the assessment is <i>“Insignificantly negative (if there are habitats of conservation importance and habitats of species of conservation importance on construction sites)”</i>. The ground of this assessment is not clear, given that it does not correspond with the conclusion formulated at page 311 of the report: <i>“Possibility of long-term adverse effects in the event that the activities related to strengthening river banks affect priority habitats and habitats of species subject to protection in PAs under Natura 2000. Similar impacts could also occur as a result of river correction works and vegetation clearance in riverbeds”</i> Such a generalised statement is made on page 259 of the Report (BG Version): <i>„Hydrological measures and facilities - construction of dams, correction of rivers, drainage, abstraction, etc. affect habitats of all groups associated with surface and/or groundwater”</i>.</p> <p>In vicinity to the water courses and floodplains numerous natural habitats of conservation priority are widely distributed, as for example 1530*, 91E0* etc, which are likely to be affected by construction of dams and bank strengthening in non biological method.</p> <p>In line with the modern vision of flood risk reduction using natural means limiting the drainage of the landscape shall be reduced and water-courses bank reinforcement on an artificial way shall be cancelled. Better flood conveyance capacity of the flood bed shall be ensured by dikes relocation or fragmentation. All work related to draining swamp lands and other wetland territories shall be considered as contrary to the objective of flood prevention. In this regards good practices have been identified:</p> <ul style="list-style-type: none"> – Increase the flood conveyance capacity of the flood bed in the middle and lower river sections where natural slope of the river is too little by dismantling manmade obstacles of flow. For this purpose encouraging appropriate land uses, rehabilitation of pastures and mosaic type floodplain forests in the floodway, by creation of bypassing channels in the flood bed, by increasing the flow capacity of bridge sections is necessary. – Measure the effectiveness of actions on flood wave run-off, particularly dyke relocation and the development of flood polders <p>The impacts of the abovementioned eligible activities shall be precisely specified and consequently relevant measures for their mitigation shall be set out. As mitigation measures can be studied the avoidance of activities leading to:</p>	<p>The assessment is made with the presumption that the greatest part of these activities relates to rehabilitation of already existing facilities, and consequently the chance of significant impact (at least at national scale) is minor. Of course we need to take into account that in documents of such type specific data, allowing more precise and objective assessment of the impact, are not available. In any case, every project, related to these activities, should be assessed before its implementation and in consideration of its impact on the biodiversity at smaller scale, e.g. at the level of the specific protected area where its impact can really be significant.</p>

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		<ul style="list-style-type: none"> – Area loss and fragmentation of riparian forest habitats of conservation importance; – Land use changes and construction in flood risk zones; – "River banks reinforcement" through land embankments and river bed levelling; – Construction of dikes aligned very closely each to other ; – Correction of riverbeds and their shortening resulting in flood wave speed and force increase. <p>Based on the above-mentioned we recommend the described good practices to be taken into account and the identified lacks, discrepancies and contradictions to be addressed.</p>	
12	RIEW Shumen Ref. 2886/ 10.06.2014	<p>RIEW Shumen has found the following: In Section II.1.3.1. Surface water:</p> <ul style="list-style-type: none"> - The list of the UWWTP in operation refers to the Shumen plant but UWWTP of Targovishte is omitted. - For the urban sewerage networks without UWWTP the existing sewerage networks holding Discharge permit are enumerated. The settlements with issued Discharge Permits for sewerage network and UWWTP in design phase are not mentioned. Such cases are: Todor Ikonomovo, Kaolinovo Municipality, Danubian Danube Dobrudzha tributaries zone; Valnari village, Municipality N.Kozloevo, Danube Dobrudzha tributaries zone and Varbitsa town, Varbits Municipality, Kamtchia river tributaries zone. <p>RIEW Shumen has no remarks and proposals to the report and the proposed measures.</p>	<p>Summarised data (as of 31/12/2012) about the status of the WSS systems are present in Section II.1.3.3.2 as an abstract of the <i>Report on the implementation of Council Directive 91/271/EEC concerning urban wastewater treatment</i> prepared pursuant to Article 16 of <i>Directive 91/271/EEC concerning urban wastewater treatment</i></p>
13	Black Sea Basin Directorate Ref. 05-08-2971/ 11.06.2014	<p>Black Sea Basin Directorate expresses affirmative statement on the submitted Strategic Environmental Assessment of Operational Programme Environment 2014-2020 and the Draft OPE 2014 - 2020 - Option III.</p> <ol style="list-style-type: none"> 1. The submitted SEA Report is compliant as structure and scope to the statutory requirements. 2. Operational Programme Environment 2014 - 2020 clearly specify the general goal and the specific objectives, corresponding to the headline strategic documents on the development planned for the 	<p>The opinion does not contain remarks, requirements and recommendations requiring addressing</p>

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		<p>period until 2020. The defined investment priorities to the thematic objectives are compliant with the European Union funds regulations.</p> <ol style="list-style-type: none"> 3. The SEA report addresses the recommendations made in our Letter Ref No.04-01-198(2)/14.05.2014 on the Terms of Reference on the scope and content of the SEA. 4. The analysis of all other plans and programmes, oriented to reach consistency with the Community acquis and the national legislation in the field of environment and adaptation to climate change. 5. The SEA Report contains an assessment of the eligible interventions, taking into account: <ul style="list-style-type: none"> - The objectives and measures set in the River Basin Management Plan (RBMP). An assessment of the current stage and forecasts of the likely impacts on the surface and groundwater are made, including these related to climate changes; - The currently developed Preliminary Flood Risk Assessments (PFRA) and the Significant Potential Flood Risk Regions (SPFRR) proclaimed by the Minister of Environment and Water; - The developed Initial assessment of the marine environment status; Good ecological status; Environmental objectives and indicators. <p>The conclusions are made on the consistency of the of OPE 2014- 2020 provisions with the environmental protection objectives given that the financing of the activities correspond to the funding needs according to the RBMP, flood protection, activities on defining and supplementing the marine protected areas network etc.</p> <p>6. The SEA Report presents all priority axes, specific objectives and eligible activities in the three options of OPE 2014 -2020. On the basis of the performed analysis the absence of contradiction with the overviewed strategies and regulatory documents in the water sector was proven in all three options of OPE 2014 - 2020.</p> <p>Concerning the “water” component each one of the OPE 2014-2020 options provides activities related to the priorities for improvement of the water status and contributes to the achievement of the main objectives laid down in the WFD P/D/B 2000/60/E0 and the Directive 2007/60/IEC, the Option III of OPE providing the most clear prioritisation and specification of the eligible activities.</p> <p>Given the above-mentioned an affirmative statement without objection is stipulated regarding the submitted Strategic Environmental Assessment Report of the Environmental Programme Environment</p>	

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		2014-2020 and Draft OPE 2014 - 2020 - Option III.	
14	East Aegean Sea Basin Directorate – Plovdiv centre Ref.No. PM-96/10.06.2014	With regard to the request of statement on the SEA Report of OPE 2014 – 2020 East Aegean Sea Basin Directorate – Plovdiv centre considers that the elaborated SEA Report of OPE 2014 – 2020 addresses the recommendations considering the water issue formulated in the letter Ref. PM-179/06.08.2014	The opinion does not contain remarks, requirements and recommendations requiring addressing
15	RIEW Varna Ref 05-08-2971/ 20.06.2014	Concerning the conducted consultations on the SEA Report of OPE 2014 – 2020 RIEW Varna has no objections and/or proposals for supplements. RIEW Varna has found some discrepancies: - page 125 – WWTP „Grand Hotel Varna is not functioning because in February 2012 an effluent sewer of the household sewage has been commissioned aiming to eliminate the discharges in the area of existing and future water use between embankment 109 and the yacht port; page 125- 126 – The wastewater of Balchik is treated by WWTP Balchik. With the exception of the deep discharge sewer, WWTP Balchik has been constructed and put in operation in March 2010. WWTP is compliant with the EU requirements – including mechanical-biological treatment, denitrification and dephosphatisation of the wastewater.	Addressed in Section II.1.3.1. Addressed in Section II.1.3.1.
16	Ministry of Environment and Water 04-00-1479/ 10.06.2014	<i>I. Concerning SEA and the associated appendices:</i> The SEA Report is prepared in accordance with the Terms of Reference for the scope and the content, consulted at the previous stage of the procedure. All standpoints, requirements and recommendations received in the course of the consultations have been addressed appropriately. In regard of the SEA Report we have the following remarks: 1. In the table on page ii (<i>BG Version</i>), opposite to the abbreviation „UNFCCC“ shall be filled in „United Nations Framework Convention on Climate Change“. 2. On page 54 (<i>BG Version</i>), the paragraph next to the last (Item: EU Strategy on Adaptation to Climate Change) to be revised as follows: Draft framework document <i>Analysis and assessment of the risk and vulnerability to climate changes of the Bulgarian economic sectors</i> has been developed evaluating the risk of the most typical natural disasters for the country on the basis of climatic models and scenarios for Bulgaria. The document provides the basis for the elaboration of the National Adaptation Strategy (NAS), which will guide and facilitate the process of adaptation to climate change in Bulgaria. The NAS will be a	Completed on page. ii Addressed in Section I.3.1

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		<p>key plan of action against the climate change impact, aiming to respond to the existing and growing vulnerability of our country to the effects of climate change."</p> <p>3. On page 97 (<i>BG Version</i>), in the section related to the Fulfilment of the commitments of Bulgaria relative to the Kyoto Protocol Objectives, the third paragraph to be revised as follows: Bulgaria has undertaken active measures for participation in the international emissions trading by virtue of the successful conclusion of two sale/purchase agreement for Assigned Amount Unit (AAU) with the Republic of Austria within the framework of the National Green Investments Scheme. The financial incomes from the sale are used for funding of public and private projects. So far there are concluded contracts for implementation of projects for improving the energy efficiency of public buildings, mainly kindergartens and schools. Private projects for biomass, biogas, transportation; RES, etc. have also been financed.</p> <p>4. In Section II.1.2.5. Ambient Air Quality:</p> <p>4.1. The text under Figure II.1.2-1 <i>Monitoring points distributed by Regions for Assessment and Management of the Quality of Ambient Air (RAMQAA)</i>, the number of the monitoring points for ambient air quality (AAQ) shall be corrected as follows:</p> <p>Over the 2010-2012 period, 54 stationary points were functioning as part of the National Automated Air Quality Monitoring System, including 10 points of manual sampling and subsequent laboratory analysis, 30 automatic measuring stations /AMS/, 10 DOAS situated in the Town of Svishtov, Nikopol, Russe, Silistra, Bourgas and Stara Zagora (Village of Mogila, Village of Rajena and Village of Ostra Mogila), as well as 4 AMS for the monitoring of the air quality in forest ecosystems (Rojen, Yundola, Vitinya and St. Oryahovo Complex Background Monitoring Stations).</p> <p>4.2. Concerning the sulphur dioxide it should be mentioned that in 2012 an exceedance of the Average Hourly Limit and/or the Average 24-Hour Limit for sulphur dioxide was registered only for Galabovo and Pernik. In the other enumerated towns the exceedances have been recorded but the annual limits are met.</p> <p>5. Within Section II update information shall be provided on the water bodies' status and the degree of implementation of the urban sewerage systems using for the latter the latest report of Bulgaria before the EC on the implementation of the Directive 91/271/EEC on the urban waste water treatment.</p> <p>6. In section II.1.7 shall be precisely specified which target species under Annex 2 are also protected species under Annex 3, as to Article 37 of the Biodiversity Act. .</p> <p>7. In Section III.1. Zones with impaired Ambient Air Quality (AAQ)– in reference of the period subject to</p>	<p>Addressed in Section II.1.1.3</p> <p>Rectified in Section II.1.2.5</p> <p>Addressed in Section II.1.2.5</p> <p>Addressed in Section II.1.3.3.2</p> <p>Addressed in Appendix 5 to the SEA Report</p>

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		<p>consideration in this section (2010-2012) the valid list of the Regions of assessment and management of the quality of ambient air (RAMQAAs) is approved by Order No 1046/03.12.2010 of the Minister of Environment and Water. The information provided for the 119 regions approved in 2001 is not up-to-date. The latest updated list of the RAMQAAs is the approved by Order No. 969/21.12.2013 of the Minister of Environment and Water.</p> <p>8. The text of the first paragraph of Section III.6 shall be revised as follow: As of the end of 2012, the area of the landfills for municipal and non-hazardous waste, which are in operation, amount to 4 885 dka for the country as a whole. Over a 5-year period from 2008 to 2012, the areas for disposal have decreased by 1 313 dka, which are subject to reclaiming in a phased way in accordance with the statutory requirements.</p> <p>9. In Section IV.1. Existing pollution of the ambient air in populated settlements– concerning the pollution with sulphur dioxide of Radnevo Municipality it would be correct to specify that allowable limit exceedances are still recorded but as a whole the trend from 2007 to nowadays is to a decrease of the recorded exceedances of allowable limits for sulphur dioxide.</p> <p>10. On page 254, under Section IV.2, the Conclusion of the draft framework <i>Analysis and assessment of the risk and vulnerability to climate changes of the Bulgarian economic sectors</i> shall be taken into account regarding the dangerous phenomena and processes related to climate change which can generate different potential risk for the socio-economical and natural systems, namely: extremely high temperatures (heat waves), dry spells , floods, forest fires, sea level rise, increase of the surface water temperature, alien species etc” (on pages 166 and 167 of the analysis).</p> <p>11. The text of Section IV.7. to be revised as follows:</p> <p>Considering the municipal waste, independently of the already adopted and running interventions aiming the sustainable waste management, the separate waste collection systems are still not sufficiently effective in all settlements; there is no developed systems for preparation for re-use, and this leads to increase in the amount of the waste going to landfill.</p> <p>Considering the construction waste the problems boil down mainly to the fact that National Information System on the generated, recycled, recovered and landfilled CDW is still not established and for this reason the data on the recovered CDW from the available sources are still incomplete.</p> <p>Considering the spent fuels and waste crude oil products the current problems also relates mostly to organisational measures and the need of effective control on the use of the spent fuels in an unregulated manner for heating, replacement of motor oils at places not dedicated for that purpose</p>	<p>Addressed in Section III.1, tables III.1-2 and III.1-3</p> <p>Addressed in Section III.6.</p> <p>Addressed in Section IV.1</p> <p>Addressed in Section IV.2</p> <p>Addressed in Section IV.7</p>

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		<p>The sludge generated by wastewater treatment is an environmental problem when it comes to their generation, storage, recovery and decontamination. Although currently they are in small quantities it shall be taken into account that the WWTPs in construction under OPE 2007-2013 and the planned for construction WWTP for agglomeration of more than 10 000 PE under OPE 2014-2020 will generate new significant amount of sludge. Therefore it will be good to set up the relevant activities to avoid this at early stage, before WWTPs sludge became a serious problem.</p> <p>For hospital and hazardous waste the problem consists in the insufficient measure aimed at the prevention and minimisation of the generated amounts by optimisation of the separate collection process as well as by promotion of the use of recyclable materials.</p> <p>In consequence of the above mentioned, the prioritization of the problems related to the waste management hierarchy, has found that the fundamental problem to be outlined remains the municipal waste management, without neglecting the problem with the WWTPs sludge.”</p>	
		<p>12. Everywhere in the Report the texts related to the implementation of the Installation for recovery of municipal waste combustible fraction /refuse-derived fraction (RDF) by use of RDF-fuels for power generation in Toplofikatsia-Sofia EAD states that measure, given an efficient off gases purification is applied, will result in the reduction of harmful gas emission associated to heat and electric power generation by natural gas combustion. We think that this statement shall be precisely specified in specifying the ground of this allegation – which are the referred pollutants, which emissions the comparison is referred to, etc. In the present form the statement is not correct – it shall be taken into account that Toplofikatsia-Sofia uses as fuel only natural gas.</p>	<p>The intended RDF fired facility at Toplofikatsia Sofia will limit the currently emitted NOx by applying selective non-catalytic reduction (SNCR) technology. The existing heat and electrical power generation units burning natural gas do not apply any methods for NOx emission reduction and do not use low NOx burners Addressed in Section VI.2</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments
		<p>13. Everywhere in the Report is specified intended activity “funding the implementation of facilities for WWTP sludge treatment and supply of the necessary equipment, incl. for WWTP in operation, prioritising sludge quality parameters improvement allowing its subsequent use for energy purposes (as biomass fuel)”. We would like to point out that sludge can not be considered as biomass in consideration of its definition in Article 3, Item 31 of the Directive 2010/75/EU on industrial emissions. The sludge burning falls in the scope of the waste management legislation and particularly in the scope of the Ordinance 4 on the terms and conditions for construction and operation of waste incineration and co-incineration facilities (promulg. SG, issue 36/2013).</p>	Accepted. Rectified
		<p>14. On Table VII.1-1 Measures to be included in the final versions of the programme:</p> <p>14.1. Measure „Groundwater catchments to be eliminated from the list of eligible activities for monitoring water quality under Priority Axis 1” to be re-formulated, taking into account that the water catchments facility is not only for water abstraction purpose but also for allowing water quantity (flow rate) measuring and representative sampling (e.g. the eligible activity doesn’t intend the construction of water abstraction facility for water take off and respectively leading to the mentioned consequences related to altering of the hydrological regime of water courses formed by the springs and drainage of their adjacent habitats).</p> <p>14.2. Concerning the second measure, proposed in the same table it shall be taken into account that the eligible activities under Priority Axis 3 for <i>restoring meanders and old riverbeds</i> and under Priority Axis 4 for <i>restoring floodplains and improving water retention</i> are aimed to decrease the destructive power of water and to ensure its safe spreading upstream the settlements, the industrial sites, the sites of cultural and historical assets etc. In this context and as part of the “green infrastructure” they are one of the most environmentally friendly solutions for reduction of the floods pressure. More over the need of implementation of such activities will be substantiated in the River Basin Management Plans and the Flood Risk Management Plans.</p> <p>15. On Table VII.2-1 Measures to be applied during the implementation of the programme:</p> <p>15.1. The fourth row of the second column, second sentence „The water retained using “green infrastructure” may pose a risk of not meeting the requirements for drinking water.“ shall be deleted because the “green infrastructure” aims the reduction of the flood risk and damages or by water retention to achieve artificial feeding of the groundwater.</p> <p>15.2. The measure at row 8 to be deleted because according the Community legislation the environmental</p>	<p>Accepted</p> <p>Taken into account</p> <p>Accepted.</p>

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report	Modes of addressing the statements and respective arguments															
		<p>damage should as a priority be rectified at source, in order to avoid water treatment prior to its use for different purposes, incl.as drinking water.</p> <p>15.3. The measure at row 12 to be deleted because the requirements concerning EIA and SEA are regulated by the legislation and it is inappropriate to underline only with regards the “green infrastructure”.</p>	<p>Accepted.</p> <p>Accepted.</p>															
		<p>II. Proposal of monitoring and control measures of the impact on the environment and human health during the implementation of the Operational Programme Environment 2014-2020:</p> <p>In the Draft OPE 2014-2020 each Priority Axis of the Programme is associated with the relevant indicators/indexes, as follows:</p> <ul style="list-style-type: none"> - Programme-specific result indicators, by specific objective ; - Common and programme-specific output indicator; - Indicators of the performance framework of the priority axis. <p>Pursuant to Article 20 (8) of the SEA Regulation we propose to include, besides the already formulated indicators, the additionally proposed in SEA Report monitoring and control measures, as follows:</p>	<p>General Directorate OPE has submitted a statement substantiating the proposal of changes in the specified indicators (the modifications are incorporated in Section X of the SEA Report).</p>															
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Monitoring and control measure</th> <th style="width: 30%;">Indicators, measurement unit</th> <th style="width: 30%;">Source of information</th> </tr> </thead> <tbody> <tr> <td colspan="3">Under Priority Axis 1: Water</td> </tr> <tr> <td>Environmental effect resulting from the application of water supply and sanitation measures - construction/replacement/rehabilitation of sewers, sewage collection systems, WWTPs, DWTPs and water supply networks.</td> <td>Drinking and sanitary water quality after the implementation of water supply measures</td> <td>Beneficiaries</td> </tr> <tr> <td colspan="3">Under Priority Axis 2: Waste</td> </tr> <tr> <td>Compliance with health and hygiene standards in the construction and</td> <td>Distance to sites subject to health protection, in metres;</td> <td>Beneficiaries</td> </tr> </tbody> </table>	Monitoring and control measure	Indicators, measurement unit	Source of information	Under Priority Axis 1: Water			Environmental effect resulting from the application of water supply and sanitation measures - construction/replacement/rehabilitation of sewers, sewage collection systems, WWTPs, DWTPs and water supply networks.	Drinking and sanitary water quality after the implementation of water supply measures	Beneficiaries	Under Priority Axis 2: Waste			Compliance with health and hygiene standards in the construction and	Distance to sites subject to health protection, in metres;	Beneficiaries	
Monitoring and control measure	Indicators, measurement unit	Source of information																
Under Priority Axis 1: Water																		
Environmental effect resulting from the application of water supply and sanitation measures - construction/replacement/rehabilitation of sewers, sewage collection systems, WWTPs, DWTPs and water supply networks.	Drinking and sanitary water quality after the implementation of water supply measures	Beneficiaries																
Under Priority Axis 2: Waste																		
Compliance with health and hygiene standards in the construction and	Distance to sites subject to health protection, in metres;	Beneficiaries																

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report			Modes of addressing the statements and respective arguments
		operation of waste installations and facilities	Measures undertaken to protect human health, number of measures and effectiveness of implementation		
		Reducing the noise impact during the construction and operation of waste facilities/installations	Measures undertaken, number of measures and effectiveness of implementation; Identified exceedances of permissible noise limits, dB (A).	Beneficiaries	
		Under Priority Axis 3: NATURA 2000 and Biodiversity			
		Status of the natural habitats and the habitats of species supported under the OPE.	Achieved degree of conservation in comparison to the baseline status.	MA	
		Species with an improved conservation status at national and biogeographical level as well as at Protected Area level. <i>Note: The differentiation of the three levels is necessary in order to take into account the results of the measures implemented both at the PA level and their cumulative effect. For some measures, supported by projects funded under the OPE 2014 – 2020, positive effect on the national level cannot be expected but nevertheless such will be evident at a lower level (biogeographical or PA).</i>	Number	MA, BAS, NGOs, Scientific Institutes	

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report			Modes of addressing the statements and respective arguments
		Habitats with an improved conservation status at national and biogeographical level as well as at Protected Area level. <i>Note: The differentiation of the three levels is necessary in order to take into account the results of the measures implemented both at the PA level and their cumulative effect. For some measures, supported by projects funded under the OPE 2014 – 2020, positive effect at national level cannot be expected but nevertheless such will be evident at a lower level (biogeographical or PA level).</i>	Hectares	MA, BAS, NGOs, Scientific Institutes	
Under Priority Axis 4: Flood Risk Prevention and Management					
Aligning the restoration activities of floodplains with the PFRA and FRMP		Number of project analyses on flood risk during the implementation of the project against number of floodplain restoration projects	Beneficiaries		
Aligning the activities for improving water retention with the PFRA and FRMP.		Number of project analyses on flood risk during the implementation of the project against number of water retention improvement projects.	Beneficiaries		
Under Priority Axis 5: Improvement of Ambient Air Quality					
Effectiveness of the exhaust gas treatment system of waste treatment installations (composting, anaerobic and/or burning).		Emission values of exhaust devices against limit values (LV), %	Beneficiaries		

N	Received opinions of / Date of receipt	Remarks, recommendations, comments, requirements in the submitted statements on SEA Report			Modes of addressing the statements and respective arguments
		Effectiveness of the revised municipal programmes for ambient air quality.	Number of exceedances of PM ₁₀ annual mean emission limits referred to baseline status, %	MoEW, ExEA	
		Emission concentrations of NO _x and PM ₁₀ at the ambient air quality monitoring points.	Number of exceedances of PM ₁₀ daily mean emission limits and NO _x hourly mean emission limits referred to baseline status, %	MoEW, ExEA (AMS and DOAS)	
		Affected population leaving at excessive levels of PM ₁₀ pollution.	Change of the population percentage (%) referred to baseline status, %	MoEW, ExEA	
		Proportion of the population that can be informed about ambient air pollution.	Change of the population percentage (%) referred to baseline status, %	MoEW, ExEA	
		<p>We consider the possibility to present the results of the management and control activities of the impact on the environment in three-year reports on the monitoring and control of the environmental impact of OPE 2014-2020, which shall be submitted pursuant to Article 30 (1) of the SEA Regulation to the Ministry of Environment and Water.</p> <p>Instructions on the next action to be undertaken following the SEA procedure of OPE:</p> <ol style="list-style-type: none"> 1. Pursuant to the provisions of Article 20 (8) of the SEA Ordinance, within 14 days of the receipt of the present letter the monitoring and control measures for application during the implementation of the Operational Programme Environment 2014-2020, proposed in Item II shall be agreed. In case that in the stated period statement has not been submitted, the measures will be considered as agreed. 2. The remarks from Item I of the present letter as well as all received opinion as a result of the consultations as per Article 20 (1) and (3) of the SEA Ordinance, including these presented in the information on the result of conducted consultations shall be addressed. 3. Upon addressing of the remarks a complete application document shall be submitted to MoEW for issuance of SEA Statement within the meaning of Article 23 (1) of SEA Ordinance. 			

APPENDIX 2

Letters for Conducted Consultations

Copies of the originals are submitted in the Bulgarian version

APPENDIX 3

- 1. List of the Experts and the Team Leader having elaborated the SEA (attachment of the qualification Diplomas and Certificates of the experts*
- 2. Declarations for independence and competence of the experts in compliance with art. 16 (1) of Ordinance on the terms and procedures for conducting strategic environmental assessment of plans and programmes*

Originals of the signed declarations and copies of the experts' diplomas and qualification certificates are submitted in the Bulgarian version

LIST OF THE EXPERTS AND THE TEAM LEADER HAVING ELABORATED THE SEA

Team Leader

Eng. Georgi Yordanov Petkov Team Leader

Experts

Eng. Georgi Yordanov Petkov

DSc Biol. Margarita Trifonova Voycheva

Ass.Prof. Eng.Valentin Valkov Kamburov, PhD

MSc Anna Dimitrova Dimitrova

Eng. Todor Dimitrov Stefanov

Ass.Prof. Ivan Stefanov Pandurski, PhD

MSc. Krasimir Borisov Donchev

Eng. Diana Yuliy Straka

Assoc.Prof, DSs. Phys. Asenka Levcheva Chalyova

Assoc.Prof. Georgi Borisov Nehrizov, PhD

Assoc.Prof. Aleksandar Stefanov Spasov, MD

APPENDIX 4

Statement determining the need of SEA

Decision EO-14/2013 of the Minister of Environment and Water)

Copy of the MoEW Statement is submitted in the Bulgarian version

APPENDIX 5

Animal and Vegetation Species listed in Annex 2 to Article 6 (1), items 2 and 3 of the Biodiversity Act, included also in Annex 3

Animal and Vegetation Species, listed in Annex 2 to Article 6 (1), items 2 and 3 of the Biological Diversity Act, included also in Annex 3

Total animal species, out of them 12 species of Bats, 3 species of Rodents, 6 species of Carnivores, 2 Cetaceans , 1 Artiodactyls, 127 Birds, 8 Reptiles, 5 Amphybians, 1 Fish and 24 Invertebrates (Table 5.1.).

The sign "!" before the name of the species means that the species is included in the Annex to the Resolution 6 (1998) of Bern Convention Standing Committee.

The sign "*" before the name of the species means that the species requires priority conservation of its habitat.

The designation "spp." Means all species belonging to this taxon occurring on the territory of Republic of Bulgaria .

Table 5.1. Species, listed in Annex 2 to Article 6 (1), items 2 and 3 of the Biological Diversity Act, included also in Annex 3

	1. VERTEBRATES
	MAMMALIA
	CHIROPTERA
	Rhinolophidae
!	Rhinolophus blasii
!	Rhinolophus euryale
!	Rhinolophus ferrumequinum
!	Rhinolophus hipposideros
!	Rhinolophus mehelyi
	Vespertilionidae
!	Barbastella barbastellus
	Miniopterus schreibersii
	Myotis bechsteinii
	Myotis blythii
!	Myotis capaccinii
!	Myotis emarginatus
!	Myotis myotis
	RODENTIA
	Cricetidae
!	Mesocricetus newtoni
	Gliridae
	Myomimus roachi
	Zapodidae
	Sicista subtilis
	CARNIVORA
	Ursidae

!	*	Ursus arctos
		Mustelidae
!		Lutra lutra
		Mustela eversmanii
		Vormela peregusna
		Felidae
		Lynx lynx(Felis lynx)
		Phocidae
!	*	Monachus monachus
		CETACEA
		Phocoenidae
!		Phocoena phocoena
		Delphinidae
!		Tursiops truncatus
		ARTIODACTYLA
		Bovidae
!		Rupicapra rupicapra balcanica
		AVES
		GAVIIFORMES
		Gaviidae
		Gavia stellata
		Gavia arctica
		PODICIPEDIFORMES
		Podicipedidae
		Podiceps auritus
		PELECANIFORMES
		Phalacrocoracidae
!		Phalacrocorax pygmeus
!		Phalacrocorax aristotelis desmarestii
		Pelecanidae
!		Pelecanus crispus
!		Pelecanus onocrotalus
		CICONIIFORMES
		Ardeidae
!		Ardeola ralloides
!		Ardea purpurea
!		Botaurus stellaris
!		Egretta alba
!		Egretta garzetta
!		Ixobryhus minutus
!		Nycticorax nycticorax
		Ciconiidae

!	Ciconia ciconia
!	Ciconia nigra
	Threskiornithidae
!	Platalea leucorodia
!	Plegadis falcinellus
	ANSERIFORMES
	Anatidae
!	Anser erythropus
!	Aythya nyroca
!	Branta ruficollis
!	Cygnus bewickii (Cygnus columbianus bewickii)
!	Cygnus cygnus
!	Mergus albellus
!	Oxyura leucocephala
!	Tadorna ferruginea
	FALCONIFORMES
	Pandionidae
!	Pandion haliaetus
	Accipitridae
!	Accipiter brevipes
!	Aegypius monachus
!	Aquila chrysaetos
!	Aquila clanga
!	Aquila heliaca
!	Aquila pomarina
!	Buteo rufinus
!	Circaetus gallicus
!	Circus aeruginosus
!	Circus cyaneus
!	Circus macrourus
!	Circus pygargus
!	Gypaetus barbatus
!	Gyps fulvus
!	Haliaeetus albicilla
!	Hieraaetus fasciatus
!	Hieraaetus pennatus
!	Milvus migrans
!	Milvus milvus
!	Neophron percnopterus
!	Pernis apivorus
	Falconidae
	Falco cherrug

!		Falco columbarius
!		Falco eleonorae
!		Falco biarmicus
!		Falco naumanni
!		Falco peregrinus
		Falco vespertinus
		GALLIFORMES
		Tetraonidae
!		Bonasa bonasia
		GRUIFORMES
		Gruidae
!		Grus grus
		Otididae
!	*	Otis tarda
		Rallidae
!		Crex crex
!		Porzana porzana
!		Porzana parva
!		Porzana pusilla
		CHARADRIIFORMES
		Burhinidae
!		Burhinus oedicephalus
		Charadriidae
		Charadrius alexandrinus
		Eudromias morinellus
!		Pluvialis apricaria
		Hoplopterus spinosus
		Scolopacidae
		Limosa lapponica
!		Numenius tenuirostris
!		Philomachus pugnax
		Gallinago media
!		Tringa glareola
		Xenus cinereus
		Recurvirostridae
!		Himantopus himantopus
!		Recurvirostra avoseta
		Phalaropodidae
!		Phalaropus lobatus
		Glareolidae
!		Glareola pratincola

	Lariidae
!	Larus genei
!	Larus melanocephalus
	Larus minutus
	Sternidae
!	Chlidonias hybridus
!	Chlidonias niger
!	Geochelidon nilotica
!	Sterna albifrons
!	Sterna caspia
!	Sterna hirundo
!	Sterna sandvicensis
	STIGIFORMES
	Strigidae
!	Aegolius funereus
!	Asio flammeus
!	Bubo bubo
!	Glaucidium passerinum
!	Strix uralensis
	CAPRIMULGIFORMES
	Caprimulgidae
!	Caprimulgus europaeus
	CORACIIFORMES
	Alcedinidae
!	Alcedo atthis
	Coraciidae
!	Coracias garrulus
	PICIFORMES
	Picidae
!	Dendrocopos leucotos
!	Dendrocopos medius
!	Dendrocopos syriacus
!	Dryocopus martius
!	Picoides tridactylus
!	Picus canus
	PASSERIFORMES
	Alaudidae
!	Calandrella brachydactyla
!	Lullula arborea
!	Melanocorypha calandra
	Motacillidae
!	Anthus campestris

	Laniidae
!	Lanius collurio
!	Lanius minor
	Lanius nubicus
	Muscicapidae
	Turdinae
	Oenanthe pleshanka
	Sylviinae
	Acrocephalus melanopogon
!	Acrocephalus paludicola
!	Hippolais olivetorum
!	Sylvia nisoria
	Muscicapinae
!	Ficedula albicollis
!	Ficedula parva
!	Ficedula semitorquata
	Emberizidae
!	Emberiza hortulana
	REPTILIA
	CHELONIA (TESTUDINES)
	Testudinidae
!	Testudo graeca
!	Testudo hermanni boettgeri
	Emydidae
!	Emys orbicularis
	Mauremys rivulata (Mauremys caspica rivulata)
	OPHIDIA
	Viperidae
	Vipera ursinii
	Colubridae
!	Elaphe situla (Zamenis situla)
!	Elaphe quatuorlineata
!	Elaphe sauromates
	AMPHIBIA
	CAUDATA
	Salamandridae
!	Triturus cristatus (T. cristatus cristatus)
	Triturus dobrogicus (T. cristatus dobrogicus)
	Triturus karelinii (T. cristatus karelinii)
	ANURA
	Discoglossidae
!	Bombina bombina

!	Bombina variegata
	PISCES
	PERCIFORMES
	Percidae
	Gymnocephalus baloni
	2. INVERTEBRATES
	ARTHRODOPA
	INSECTA
	ODONATA
	Gomphidae
	Ophiogomphus cecilia
	Cordulegastridae
	Cordulegaster heros
	Libellulidae
	Leucorrhinia pectoralis
	ORTHOPTERA
	Catantopidae
	Odontopodisma rubripes
	Paracaloptenus caloptenoides
	COLEOPTERA
	Carabidae
	Carabus hungaricus
	Carabus variolosus
	Lucanus cervus
*	Rosalia alpina
	Scarabaeidae
*	Osmoderma eremite
	Cerambycidae
	Cerambyx cerdo
	LEPIDOPTERA
	Pieridae
	Colias myrmidone
	Lycaenidae
	Lycaena dispar
	Maculinea nausithous
	Polyommatus eroides
	Nymphalidae
	Coenonympha oedipus
	Hypodryas maturna (Euphydryas maturna)
*	Nymphalis vaualbum
	Lasiocampidae
	Eriogaster catax

	Geometriade
	Lignyoptera fumidaria
	Noctuidae
	Dioszeghyana schmidtii
	MOLLUSCA
	GASTROPODA
	ARCHAEOGASTROPODA
	Neritidae
	Theodoxus transversalis
	BASOMMATOPHORA
	Planorbidae
	Anisus vorticulus
	BIVALVIA
	Unionoidae
!	* Unio crassus

Table 5.2. Vegetation Species, listed in Annex 2 to Article 6 (1), items 2 and 3 of the Biological Diversity Act, included also in Annex 3

	POLYPODIOPHYTA (PTERIDOPHYTA)
	<i>Marsileaceae</i>
!	Marsilea quadrifolia
	MAGNOLOPHYTA (ANGIOSPERMAE)
	<i>Alismataceae</i>
!	Caldesia parnassifolia
	<i>Asteraceae (Compositae)</i>
	Centaurea immanuelis- loewii
	Centaurea jankae
!	Ligularia sibirica
	<i>Boraginaceae</i>
	Echium russicum
	<i>Brassicaceae (Cruciferae)</i>
	Crambe tataria
	<i>Caryophyllaceae</i>
	Moehringia jankae
	<i>Cyperaceae</i>
!	Eleocharis carniolica
	<i>Droseraceae</i>
!	Aldrovanda vesiculosa
	<i>Iridaceae</i>
	Gladiolus palustris
	<i>Orchidaceaea</i>
!	Cypripedium calceolus
	Dactylorhiza kalopissii