

CONSULTATIONS

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| INSTITUTION | | | | | |
| 1. | EEA | Ref. № P-04-11-1100/ 13.05.2014 | Ref. № 26-00-9931/16.05.2014 | EEA accepts without observations the terms of reference provided and takes into account that the recommendations, that have been made earlier, have been taken into consideration. | Accepted |
| 2. | Kozloduy NPP – New Build EAD | Ref. № P-06-01-1181/ 21.05.2014 | Ref. № 221/28.05.14 | O | All recommendations have been accepted and have been taken into consideration in the preparation of REIA. The mistakes and inaccuracies regarding the content and scope of the REIA, that have been made, have been corrected in the final version of the Updated Terms of Reference. |
| 3. | NCRRP | Ref. № P-04-09-1097/13.05.2014 | Ref. № CNE-10-19/2014.05.30 | Observations and recommendations: The words „CO3/WHO” to be replaced with „C3O/WHO”. <u>Section “Introduction”</u> , the words “Directive 85/337/EEC and its three Amendments from 1997. 2003 and 2009, transposed in “ | All recommendations have been accepted All recommendations have been taken into consideration in the final version of the |

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| | | | | <p>to be deleted.</p> <p>Heading of <u>section 1.6</u>. “Type and amount of the future waste and emissions (water, air and soil pollution; noise, vibrations; radiation – light, heat, radiation and etc.) as a result of the operation of the investment proposal, - The words “radiation – light, heat, radiation and etc.” to be replaced with “ionizing and non-ionizing radiation”.</p> <p><u>Figure 1.2-2</u>: Emergency Planning Zone 2 – PAZ – 2 km radius, the figure belongs to PAZ which has 3 km radius.</p> <p><u>Section 1.6.6.1</u> „Ionizing radiation”. The names of the units to be written in small letters: „gray”, „becquerel”.</p> <p><u>Section 1.7</u> „Description of the licensing process and responsibilities of the various institutions”</p> <p>The words „Ministry of regional development and public works”, „Ministry of economy, energy and tourism” to be replaced with „Ministry of regional development”, „Ministry of economy and energy”.</p> <p><u>Section 3.9.4.2</u> „Impact forecasting”, The names of chemical elements and isotopes to be written in small letters: „uranium”, „plutonium”, „americium”, „tritium”; the symbol for isotopes of iodine is I, not J.</p> <p><u>Section 3.11</u> “Environmental health and hygiene aspects and human health risk”. We propose following paragraphs <u>3.11.2</u> “Impact forecasting” and <u>3.11.3</u>.</p> | <p>Updated Terms of Reference regarding the contents and scope of the REIA.</p> <p>The recommendations have been taken into consideration in the preparation of REIA.</p> |

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| | | | | <p>Human Health Risk – radiobiological effect and radiation risk” to be unified or these paragraphs to be deleted in the duplicate table of contents.</p> <p>The text should include only the terms of reference for implementation of impact assessments, not a popular exposition of the basics of radiobiology and radiation protection.</p> <p>It is not permissible objective quantitative assessments to be replaced with epithets such as: “virtually nil”, “practically absent”, “practically immeasurable” and similar epithets.</p> <p><u>Section 4.4</u> „Transboundary nature of the impacts”, The words „R. Romania” to be replaced with „Romania”.</p> <p><u>Section 5</u> “Structure of REIA, description of the future content and points included in it”</p> <p>The text in bullet “Council Directive 85/337/EEC”, amended and supplemented by 97/11/EC, “Council Directive for EIA” to be replaced with “Directive 2011/92/EC of the European Parliament and Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (codified text)”.</p> <p><u>Section 6.1</u> „List of applicable Bulgarian and international regulations, documents of the EBRD, ICRP and IAEA”.</p> <p>The text on line 27 to be replaced with “Directive 2011/92/EC of the European Parliament and Council of</p> | |

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| | | | | <p>13 December 2011 on the assessment of the effects of certain public and private projects on the environment (codified text)". Line 29 to be deleted.</p> <p>The name of the list "EC Directives" to be replaced with "EC Documents" and the list to be completed with the following documents:</p> <ul style="list-style-type: none"> – Council Directive 2006/117/Euratom of 20 November 2006 on the supervision and control of shipments of radioactive waste and spent fuel; – Commission Recommendation of 11 October 2010 on the application of Art.37 of the Euratom Treaty (2010/635/Euratom); – Council Directive 2011/70/Euratom of 19 July 2011 on establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste: <ul style="list-style-type: none"> - The text on line 47 to be replaced by „Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards (Interim Edition). Safety Standards Series No. GSR Part 3 (Interim), 2011”. <p>The list of relevant documents to the IAEA to be completed with the following publications:</p> <ul style="list-style-type: none"> – Disposal of Radioactive Waste. Safety Standards Series No. SSR-5, 2011; – Near Surface Disposal Facilities for Radioactive | |

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| | | | | <p>Waste. Safety Standards Series No. SSG-29, 2014.</p> <p>– Monitoring and surveillance of radioactive waste disposal facilities. Safety Standards Series No. SSG-31, 2014.</p> <p><u>Section 6.2</u> “List of the information for preparation of REIA of the investment proposal for construction of NDF”:</p> <p>The text on line 61 to be replaced with “Strategy for managing the spent nuclear fuel and radioactive waste until 2030”. It is approved by a protocol decision of the Council of Ministers No 1.5 of 05.01.2011”.</p> <p><u>Section 9</u> „References”, The line [14] to be replaced with „IAEA, Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards (Interim Edition). Safety Standards Series No. GSR Part 3 (Interim), Vienna, 2011”. The Line [24] to be replaced with „Directive 2011/92/EC of the European Parliament and Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment”. The line [26] to be deleted. The line [30] to be replaced with „IAEA, IAEA Safety Glossary: Terminology Used in Nuclear Safety and Radiation Protection, 2007 Edition. Vienna, 2007”. On line [35] the words „last amend. SG 63/2.8.2005” to be replaced with „last amend., SG 18 of 2013.” The line [37] to be replaced with „IAEA, Regulations for the Safe Transport of Radioactive Material, 2012 Edition.</p> | |

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| 4. | RIEW VRATSA | Ref. № P-04-11-1101/13.05.2014 | Ref. № V-981/05.2014 | <p>Safety Standards Series No. SSR-6, Vienna, 2012". On line [38] the words „last amend. SG 19 of 13 March 2009" to be replaced with „last amend. SG 109 of 2013"</p> <p>The word „радиация" <u>throughout</u> the Bulgarian text to be replaced by „лъчение"/„йонизиращо лъчение".</p> <p>I. Statement: The structure of the terms of reference follows the requirements of Art.10, para. 3 of Ordinance on the regulation and procedure for implementation of environmental impact assessment (Ordinance on EIA). It should be taken into account that the REIA should be prepared on the basis of the investment proposal in its integrity and all sites and/or activities related to the its construction and operation.</p> <p>Recommendations:</p> <p>II. Actual data, contemporary knowledge and methods for assessment in compliance with Art.11, para. 1 of the Ordinance on EIA should be used in preparation of the Report on EIA.</p> <p>III. Art. 14, para.1, item 5 - Plan for implementation of the measures ...“to be observed, to be prepared in the form of a table according to Appendix No 2a of the Ordinance on EIA.</p> <p>IV. To be paid attention to the requirements of Art.95, para.3 of the Environmental Protection Act (EPA) and more specifically: to be held consultations with the stakeholders and results to be taken into consideration in the REIA.</p> | <p>All recommendations have been accepted.</p> <p>1.All recommendations made by the team of experts on the impact assessment of the IP on the individual environmental components and factors have been taken into consideration in preparation of REIA</p> <p>2. All recommendations have been taken into consideration in the preparation of REIA.</p> |

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| | | | | <p>V. To be assessed the alternatives discussed in the report in implementation of Art.96, para. 1, item 2 of the EPA.</p> <p>VI. Pursuant to Art.9, para. 5 of the Ordinance on EIA to be prepared and enclosed a reference for consultations held and reasons for the accepted and non-accepted remarks and recommendations as well as evidence for their implementation.</p> <p><i>VII. Regarding the report on the Report on the assessment of the degree of impact (RADI), which is an appendix to the Report on EIA:</i></p> <p>Protected areas of the network of Natura 2000 most closely situated to the site according to the coordinates provided by the contracting authority are: BG0002009 “Zlatiyata” for protection of wild birds – approximately 1 km away from the site as well as the following areas for protection of natural habitats and wild flora and fauna: BG0000533 “Ostrovi Kozloduy” – approximately 3,00 km away, BG0000614 “Reka Ogosta” – approximately 5,5 km away and BG0000508 “Reka Skat” – approximately 6,5 km away from the site for implementation of the investment proposal.</p> <p>To be taken into account the closeness of these areas in the RADI, specifically protected area BG0002009 “Zlatiyata” in assessing the impact of IP on natural habitats and habitats od species, incl. birds, a subject of preservation in them. The requirements of the Ordinance on Compatibility Assessment to be observed in the</p> | |

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| | | | | <p>preparation of RADI</p> <p>To be paid attention to the cumulative impact on above-mentioned protected areas, implementation of this investment proposal in combination with the other investment proposals approved for implementation in the region.</p> <p>VIII. It is necessary to conform to the following recommendations in preparation of the REIA:</p> <p>I. To be clarified the following information in the REIA:</p> <ul style="list-style-type: none"> - Do you plan the implementation of a Programme for carrying out of radiation and non-radiation emission waste water self-control; - Do you plan to integrate systems for control of leakage of radioactive contaminated waste water in occurrence of emergency situations. | |
| 5. | NUCLEAR REGULATORY AGENCY (NRA) | Ref. № P-07-01-1184/21.05.2014 | Ref. № 71-00-89-26.05.2014 | NRA refrains from making concrete remarks or recommendations regarding the documents received as far as the requirements on the scope and content of REIA are regulated by the EPA and its regulations. | |
| 6. | ROAD INFRASTRUCTURE AGENCY (RIA) | Ref. № P-07-00-1190/21.05.2014 | Ref. № 53-00-262/28.05.14. | <p>Statement: Regional Road Administration (RRA) – Vratsa has no requirements, remarks and recommendations to the provided and updated terms of reference for identification of the scope and content of REIA of IP for construction of NDF.</p> <p>RRA-Vratsa shall have requirements to SERAW pursuant to the Roads Act in the part related to special</p> | The requirements have been accepted and they have been |

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| | | | | <p>use of roads /SUR/ if only:</p> <ol style="list-style-type: none"> 1. There shall be a transport access from south i.e. a road connection with republican road II-11 in the section from town of Kozloduy – the village of Harlets for construction and operation of Radiana site where NDF shall be built; 2. The construction of the repository or site affects in some way the scope of republican road II-11. | taken into account in the preparation of the REIA. |
| 7. | Napoitelni sistemi EAD – headquarters | Ref. № P-53-00-1192/ 21.05.2014 | Ref. № AD-53-391-1#1/23.06.2014 | <p>Statement: Having in mind that the existing ameliorative facilities in area of the site have been specified correctly and precisely in the terms of reference, so that we coordinate future changes after the construction of the repository without any additions and remarks.</p> <p>After the preparation of REIA of the site for NDF, the report shall be provided for coordination to us.</p> | Accepted. |
| 8. | Napoitelni sistemi EAD – Miziya Branch | Ref. № P-53-00-1365/ 03.06.2014 | Ref. № 1011/06.06.14 | <p>Consent for use of a drainage channel passing under a departmental road of Kozloduy NPP in the area of AESP to discharge stormwater coming from Radiana site.</p> | The document has been taken into consideration in preparation of REIA as the respective recommendations have been made. |
| 9. | Kozloduy NPP EAD | Ref. № P-06-01-1195/ 21.05.2014 | Ref. № 1967/27.05.14 | <p>In connection with the preparation of REIA of NDF, an ecological assessment report (EAR) of specialized detailed development plan (SDDP) of precautionary action zone (PAZ) around Kozloduy NPP in electronic version has been sent.</p> | The document has been taken into account in the preparation of REIA and RADI. |
| 10. | RIEW Montana | Ref. № P-04-11-1102/13.05.2014 | Ref. № 91405/27.05.14 | <p>Statement: The structure and content of the Updated terms of reference for scope and content of REIA for IP corresponds to the requirements of Art.10, para. 3 of the</p> | |

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| | | | | <p>Ordinance on the EPA. Recommendations:</p> <ul style="list-style-type: none"> - Taking into account the type of water supply of settlements in Kozloduy Municipality, special attention have been paid to the impact assessment on underground water bodies, water supply resources, underground resources and the sanitary-protection zones around them. - The report on EIA should be prepared and conformed with requirements of Art.96, para.1 of the Environmental Protection Act. | <p>The recommendations have been accepted and taken into consideration in the preparation of REIA.</p> |
| 11. | RFD-Berkovitsa | Ref. № P-04-12-1268/27.05.2014 | Ref. № RD-02-61/05.06.2014 | <p>Statement: “Radiana” site, identified as the most suitable site for NDF by SERAW, is situated in the area of the village of Harlets and includes part of proprietries which represent forests pursuant to Forest Act (Prom. SG No 19/08.03.2011 in effect from 09.04.2011/.</p> <p>According to the Forest Development Project of State Forestry Enterprise (SFE) – Oryahovo prepared in 2006, the territory proposed for the site includes division 18, subdivision «и1» - an area of 5.1 ha, acacia tree, 11 years old, division 18 subdivision «з 1» - an area of 2.7 ha, acacia, 11 years old and mountain ash tree, 40 years old, division 18, subdivision «ж 1» - an area of 1.9 ha, acacia tree, 10 years old., division 18 subdivision «е 1» - an area of 1,0 ha, summer oak tree, 15 years old, acacia tree, 6 years old, division 18 subdivision «д 1» - an area of 2,4 ha, acacia tree and gleditsia tree, 13 years old,</p> | |

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| | | | | <p>division 18 subdivision «Г 1» - an area of 0.6 ha, sophora tree, 13 years old, division 18 subdivision «В 1» - an area of 0.9 ha, acacia tree and gleditsia tree, 5 years old, division 18 subdivision «9» - an area of 0.3 ha, barren, part of division 18 subdivision «К 1» - acacia tree, 6 years old.</p> <p>The site proposed is part of Plot No 238 and includes part of division 18 subdivision «Х» - summer oak tree, 15 years old, part of division 18 subdivision «Ц» - small-leaved linden tree (<i>Tilia cordata</i>), 30 years old, mountain ash tree, sycamore maple tree, birch tree, field maple tree, part of division 18 subdivision «Ч» - acacia, 5 years old, part of division 18 subdivision «Ш» - small-leaved linden tree, 30 years old, mountain ash tree, sycamore maple tree, nut tree, acacia tree and part of division 18 subdivision «Ю» - acacia tree, 7 years old.</p> <p>The whole area of the site selected for NDF represents forest which is of great importance for the region where there is low forest cover. Destruction of the forest vegetation during the construction of the repository must be compensated by creating new forests and preserving the existing standing timber to the maximum extent.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - To be studied the existing situation of the forest plants and their main functions. - To be forecasted the impact on the existing forest | <p>Recommendations have been accepted and they have been taken into consideration in preparation of REIA and RADI.</p> |

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| | | | | <p>cover in area of the repository.</p> <ul style="list-style-type: none"> - SE RAW has to create new forests on an area equal to the area destructed during the construction of the repository. - The part of the forest that has been preserved to be turned into park by planting additional trees, suitable for long-term management. | |
| 12. | NCCRP | P-04-09-1146/ 19.05.2014 | Ref. № PД-02-10-40/2014.06.03 | <p>Information has been provided from:</p> <ul style="list-style-type: none"> - Results of the radiation monitoring held by the NCCRP in the area of Kozloduy NPP for 2012 and 2013; - A reference for the annual effective dose of the artificial background radiation estimated for the population living around the Kozloduy NPP by settlements and critical groups for 2012 and 2013. - Results from radionuclides tests on children living nearby Kozloduy NPP for 2012 and 2013 or for the periods when you have made such tests. | The information provided has been taken into account in the preparation of the REIA. |
| 13. | Regional Historical Museum /RHM/, Vratsa | Ref. № P-92-00-1265/ 27.05.2014 | Ref. № 74/04.06.2014 | <p>In connection with the restored REIA procedure for construction of the NDF, it is recommended execution of archaeological field surveys, to be carried out the final stage of rescue archaeological surveys on a tumulus probably dated from the early bronze age, situated in the section of “Radiana” site by archaeologists from RHM-Vratsa.</p> <p>The initial stage of archaeological surveys was carried</p> | <p>The recommendation has been accepted and it has been specified in the REIA.</p> <p>The archaeological surveys that started in 2009 -2010 on “Radiana” site, have been included in the assessment and the respective conclusion have</p> |

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| | | | | out in 2009 - 2010, the tumulus has been partially explored. | been made. |
| 14. | National Institute for Protection of Cultural Monuments to the Ministry of Culture | Ref. № P-04-10-1267/27.05.2014 | Ref. № 4800-280/09.06.2014 | Statement: National Institute of Immovable Culture Heritage does not have any objections regarding the Updated terms of reference for identification of the scope and content of the REIA of the IP for construction of NDF within the territory of Kozloduy Municipality, Vratsa District. | The statement has been accepted. |
| 15. | Ministry of Health | Ref. № P-04-09-1098/13.05.14 | Ref. № 48-00-18/10.06.14 | <p>Remarks and recommendations:</p> <p>Some recommendations have been made on correction of some mistakes and inaccuracies in some words, writing of some elements and isotopes, phrases and references in Section “Abbreviations”, Section “Introduction”, Heading of section 1.6.; Section 1.7. “Description of the licensing process and responsibilities of the various institutions”, Section 3.9.4.2. “Impact forecasting”; Section 3.11. “Environmental health and hygiene aspects and human health risk”, Section 5 “Structure of REIA, description of the future content and points included in it”.</p> <p>In Section 6.1 „List of applicable Bulgarian and international regulations, documents of the EBRD, ICRP and IAEA” has been proposed to be completed:</p> <ul style="list-style-type: none"> – Council Directive 2006/117/Euratom of 20 November 2006 on the supervision and control of shipments of radioactive waste and spent fuel; | <p>The remarks and recommendations have been accepted. All remarks have been accepted. All recommendations have been taken into account in the final version of the Updated term of reference for the content and scope of the REIA.</p> <p>The recommendations have been taken into consideration in preparation of the REIA.</p> |

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| 16. | RIA | Ref. № P-07-00-1190/21.05.2014 | Ref. № 53-00-6697/13.06.14 | <p>– Commission Recommendation of 11 October 2010 on the application of Art.37 of the Euratom Treaty (2010/635/Euratom);</p> <p>– Council Directive 2011/70/Euratom of 19 July 2011 on establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste:</p> <ul style="list-style-type: none"> - The list of relevant documents to the IAEA to be completed with the following publications: <p>It is recommended specific texts to be written in Bulgarian.</p> <p>Section 6.2 “List of the information for preparation of REIA of the investment proposal for construction of NDF”. The text on line 61 to be replaced with “Strategy for managing the spent nuclear fuel and radioactive waste until 2030”. It is approved by a protocol decision of the Council of Ministers No 1.5 of 05.01.2011”.</p> <p>Section 9 “References” – some recommendations regarding the correct writing of several references have been made as well as suggestions for use of other ones.</p> <p>The word „радиация” throughout the Bulgarian text to be replaced by „лъчение”/„йонизиращо лъчение”.</p> <p>We express our positive statement regarding the quality and content of the Terms of Reference.</p> <p>Recommendations:</p> <p>The site selected for construction of NDF, Radiana is</p> | The recommendations have |

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| | | | | <p>situated close to Road II-1 Kozloduy-Harlets, part of the Republican road network. Road II-11 Kozloduy-Harlets is part of routes No 1 and No 2 for evacuation of the population from emergency planning zone around Kozloduy NPP.</p> <p>Having in mind how close the Radiana site is to Road II-11 Kozloduy –Harlets, it is necessary all legal requirements to be observed such as the detailed design and technical design for construction of NDF as well as each modification, should be coordinated with Road Infrastructure Agency.</p> | <p>been accepted and they have been taken into account in the REIA.</p> |
| 17. | Regional Health Inspectorate /RHI/ - Vratsa | Ref. № P-04-09-1182/21.05.2014 | Ref. № KD-04-1261/12.06.2014 | <p>Recommendations:</p> <ol style="list-style-type: none"> 1. In the scope of the assessment of the environmental health and hygiene aspects and human health risk to be made a statement regarding the probable existence of health risk for population located close to the site and facilities because of the implementation of the investment proposal. 2. To be clarified the issue related to the possibility for release of excess pollutants in the ambient air above the settlements situated closest both during the operation and emergency situations. 3. At the time of reviewing the questions related to the condition and probable impact on groundwater, detailed information about hydrogeological structure within the area should be provided. Information should be based on available data as well as data from additional | <p>The recommendations have been accepted. They have been taken into consideration in the preparation of the REIA. Measures have been proposed to reduce to minimum the negative effects on environment and guarantee the prevention of health risk for the regional population.</p> |

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| | | | | <p>hydrogeological studies, if it is necessary, which shall prove that the implementation of the investment proposal shall not have negative impact on the quality and quantity of drinking water resources within the area. Thus, there is information about the existence of 8 drinking water resources for which sanitary-protection zones shall be established pursuant to the procedures specified in Ordinance No 3 on the conditions and procedure for study, design, validation and operation of sanitary-protection zones around drinking water resources and facilities and around mineral water resources used for therapeutic, prophylactic, drinking and hygiene needs, a projection to be made of the impact on the water flow and water quality during the construction and future operation in case of emergency situations and during the decommissioning.</p> <p>4. Complete information for the current condition of the individual environmental factors in the area (ambient air, surface water and groundwater, soil).</p> <p>5. Identification of environmental and work-related risk factors which could harm human health during the construction, operation and decommissioning of the site and facilities related to the investment proposal.</p> <p>6. The degree of expected adverse impact on the individual components and environmental factors based on the mathematical modelling, analyses and forecasts.</p> <p>7. The principles of radiation protection and measures taken for reducing the radiation risk to minimum should</p> | |

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| | | | | <p>be reviewed.</p> <p>On the basis of the projections made for the impact on the environmental components and factors, to be identified the number of potential affected population, territories and zones subject to health protection, depending on the territorial scope of the expected impact. To be characterized and defined the leading risk factors in respect to the impact on human health and be juxtaposed to the existing hygiene standards and requirements both working environment and affected residential areas of the settlements.</p> <p>To be assessed the possibilities for combined, complex, cumulative and remote impact of the risk factors on both workers and adversely affected population.</p> <p>An analysis on the health and demographic status of the population in the closest settlements on the basis of current data about the demographic situation (by indicators fertility, mortality, population growth, infant mortality, etc.) and morbidity (by level and structure) should be made in the report. The data should be compared to those related to the region and state as a whole. A projection to be made on the impact on health and demographic status of the population during the implementation of the investment proposal.</p> <p>On the basis of the information from the above-mentioned issues, a health risk assessment should be made including accidents and emergency situations and</p> | |

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| 18. | RIVER BASIN DIRECTORAT E – PLEVEN | II- 04-10-21/ 29.04.2014 | 2915/05.06.2014 | <p>measures for health protection and risk management should be proposed.</p> <p>Information by the RBD: Statement: Some remarks and recommendations have been made.</p> <p>I. The description and analysis of components of the environment where the investment proposal shall be implemented should be prepared according to the information about the water bodies in the River Basin Management Plan (RBMP) 2010-2015 in the Danube Region.</p> <p>According to the provided coordinates of the potential sites studied: “Radiana”, Marichin valog”, “Brestova padina” and “Varbitsa” for the implementation of the IP, information has been given that they fall into the following surface water and groundwater bodies and protection areas as follows:</p> <p><i>1. Surface water bodies</i></p> <p>1.1. “Radiana” site and “Marichin valog” site fall into a surface water body which is heavily modified, category river of the basin of Danube; it is called Danube and code BG 1 DU000R001.</p> <p>1.2. “Varbitsa” site falls into the surface water body category river of the basin of Ogosta, it is called Skat and code BG 1 OG200R008.</p> <p>1.3. “Brestova padina” site falls into the surface water body category river of the basin of Ogosta, it is called</p> | <p>.Information has been taken into consideration in preparation of the final version of the Updated terms of reference.</p> <p>all recommendations and remarks have been taken into account in the REIA</p> <p>Recommendations for observation of all measures pursuant to RBMP 2010-2015 in Danube Region have been taken into consideration</p> |

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| | | | | <p>Botunya and code BG 1 OG600RO 18.</p> <p><i>2. Groundwater bodies</i></p> <p>2.1. Sites: “Radiana”, Marichin valog”, “Brestova padina” fall into the area of distribution of the following groundwater bodies, codes: BG 1 G0000QPL023 and BO 1 G00000N2034:</p> <p>Groundwater body called <i>Pore water in Quaternary</i> – between Lom River and Iskar River and code BG 1 G0000QPI-023.</p> <p>Groundwater body called <i>Pore water in Neogene</i> – Lom – Pleven depression BO 1 GOOOOON2034.</p> <p>2.2. “Varbitsa” site falls into the area of distribution of groundwater body called Karst water in the Fore-Balkan and code BG 1 G0000 K2S037. The chemical and quantitative condition of the groundwater body is good. Ecological objective for the groundwater body with code BG 1 GOOOOQPL023 is “ Preservation of good condition of the groundwater body”</p> <p><i>3. Water protected areas (pursuant to Art.119a of the Water Act (WA) which fall into and concern the IP:</i></p> <p>Pursuant to Art.116, para.2, item 3 of the WA, all waters and water facilities are preserved from depletion, pollution and damage to maintain the necessary water quantity and quality and healthy water environment, conservation of the ecosystems, landscape preservation and preventing economic damage in order these</p> | |

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| | | | | <p>objectives to be achieved, water protected areas should be identified.</p> <p>3.1. Drinking water protected areas and sanitary-protection zones pursuant to Art.119a, para.1, item 1 of the WA (water bodies and sanitary-protection zones under Art.119, para.4).</p> <p>Groundwater bodies are identified as drinking water protected areas: For “Radiana” site, “Brestova padina” site and “Marchin Valog” site, the groundwater bodies with the following codes: BG 1 G0000QPL023 and BG 1 G00000N2034 are identified as drinking water protected areas: an area with code BGIDGW0000QPL023 and an area with code BG 1 DG W00000N2034 which are in good condition.</p> <p>Regarding “Varbitsa” site, groundwater body with code BG 1 GO000K2s037 is identified as a drinking water protected area with code BG1DGW0000 K2s037 in good condition.</p> <p><i>Water resources, drinking water supply facilities and sanitary-protection zones around them – pursuant to the available information in DRBD do not fall into the borders of the proposed sites in the IP.</i></p> | |
| | | | | 3.2. Water protected areas pursuant to Art.119a, para.1, | The note has been taken into consideration during the |

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| | | | | <p>item 5 of the WA – protected territories and areas designated to preserve habitats and biological species in which maintenance and improvement of water condition is an important factor for their preservation (protected areas by ecological network Natura 2000): “Brestova padina” site falls into birds protected area called “Zlatiyata” and code BG0002009. Ecological objective for these areas is: “Provision of sustainable development of water ecosystems and terrestrial ecosystems related to them within the area until 2051”.</p> <p><u>The following inaccuracies should be corrected in the description of the environmental components and factors – part surface water and groundwater bodies pursuant to the approved RBMP 2010-2015 in the Danube Region:</u></p> <p>The main irrigation channel M-1 which passes through “Radiana” site is not a water body pursuant to the WA. Surface Water and Groundwater Risk Assessment on failing environmental objectives to be achieved is part of the preparation of the RBMP. It is mentioned in the plan but the condition of the water bodies is identified as of 2010.</p> <p>The Sensitive zone pursuant to Order No RD 970/28.07.2003 of the minister of the environment and water is connected with the necessity WWTP of agglomerations above 10 000 p.e. to plan facilities for</p> | <p>correction of the text of the updated terms of reference.</p> <p>All measures specified in RBMP 2010-2015 to achieve the ecological objectives planned in Programmes of measures to prevent and reduce the anthropogenic risk (point and diffuse sources of pollution) and the impact on water resources, measures for control and monitoring and control including measures for water protected areas have been taken into consideration in the REIA.</p> |

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| | | | | <p>removal of nutrients, nitrogen and phosphorous.</p> <p>Programme of measures in RBMP 2010-2015 are planned to achieve good condition of surface water and groundwater bodies and prevent their condition to get worse until 2015.</p> <p>11. To achieve these ecological objectives in the RBMP 2010-2015, Programme of measures are included to prevent and reduce the anthropogenic risk (point and diffuse sources of pollutions) and the impact on water resources, measures for monitoring and control including measures for water protected areas which should be observed in selection of sites for NDF:</p> <p><i>7.1.3 Measures for protection of drinking water resources including measures for protection of their quality with a view to reduce the degree of treatment to obtain water with drinking qualities:</i></p> <p><i>7.1.5.1 Measures for emissions control by identifying prohibitions for entry of pollutants from point sources of pollution or requirements for issuance of permits and their periodical check and update concerning groundwater;</i></p> <p><i>7.1.5.2 Measures for emissions control by identifying pollutants from diffuse sources of pollution and pollution prevention and control measures;</i></p> <p><i>7.1.6 Measures for identification of prohibitions for entry of pollutants from diffuse sources of pollution and pollution prevention or control measures:</i></p> | <p>All measures in the RBMP 2010-2015 on the protected territories and areas designated to preserve habitats and biological species in which maintenance and improvement of water condition is an important factor for their preservation have been taken into account in the REIA.</p> <p>Recommendations have been accepted and taken into consideration during the update of the terms of reference and preparation of</p> |

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| | | | | <p><i>7.1.7 Measures for preventing water pollution with priority substances:</i></p> <p><i>7.1.8 Measures for preventing or reducing the effect from accidental pollutions:</i></p> <p><i>7.1.9 Measures concerning protected territories and areas designated to preserve habitats and biological species in which maintenance and improvement of water condition is an important factor for their preservation:</i></p> <p><i>III. Special attention should be paid to the surface water and groundwater bodies and their protection areas in the scope, content and format of the REIA of the IP as follows:</i></p> <p><i>1. Issuance of permits pursuant to the WA during the implementation of the activities planned in the IP for construction of NDF:</i></p> <p>Activities related to drainage, infiltration and deprivation of natural resources concerning groundwater bodies are subject to authorization pursuant to Art.44 and Art.46 apart from the cases specified in Art. 58, para.1, item 6 of the WA. Water abstraction and water use permits for groundwater body are issued after observation of the requirements pursuant to Chapter Four “Authorization” and Chapter Eight “Water protection and protection of water bodies” of the WA, Ordinance No 1/10.10.2007 on research, use and protection of groundwater and Order 121/28.11.2013 on</p> | the REIA. |

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| | | | | <p>the approved available resources of the groundwater bodies, issued by the Director of DRBD. According to Art.116, para.2 of the WA, total abstraction from groundwater bodies and free water volumes are identified monthly, the resources of groundwater bodies are published on the web page of DRBD.</p> <p>In case of possible damage to water bodies: concerning the future activities related to the construction of the linear infrastructure which crosses water bodies, bridges, transmission networks and pipelines pursuant to Art.46, para.1, item 1, letter “b” of the WA, water use permit should be obtained excluding the cases specified in Art.46, para.5 of the WA.</p> <p>To be paid special attention to stormwater (surface water) during the design, implementation, operation and decommissioning of the IP as observing the requirements of Art.46a, para.1 of the WA, Art.3, item 3,5 and 6 and Art.6, para.1, item 1,3 and 4 of ordinance No2/08.06.2011 on issuance of permits to discharge wastewater into water bodies and identification of individual emission restrictions on the point sources of pollution as well as § 1, 16 of the same ordinance.</p> <p>Water abstraction from existing facilities is subject to authorization pursuant to Art.44 and Art.16 of the WA excluding the cases when the water supply is executed under a contract with Water Supply and Sewerage Company which is registered pursuant to the Water</p> | |

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| | | | | <p>Supply and Sewerage Services Regulation Act.</p> <p>Permit No13750001/20.04.2007 and future modifications concerning the use of surface water body to discharge waste water from Kozloduy NPP, is subject to modification and taking into consideration the entry of waste water from NDF pursuant to Chapter Four, Section III of the WA and Ordinance on use of surface water (accepted by Decree No 200/13.07.2011.</p> <p>Apart from the abovementioned requirements for authorization during the use and abstraction of surface water and groundwater bodies, it is necessary to observe the following requirements: in case of possible damage to water bodies and/or SPZ for drinking water supply from groundwater resources, all activities should be coordinated pursuant to Appendix No2 part of Art.10, para.1 concerning groundwater bodies of Ordinance No3/16.10.2000 during the implementation and operation of the IP.</p> <p>In connection with the implementation of IP, measures related to the protection of groundwater bodies from pollution should be observed during the construction as taking into consideration the prohibition in Art.46, para.2 and Art.118a, para.1, item 1,2,3 and 4 of the WA: item 2 – disposal as well as storage of the priority substances which could lead to indirect discharge of pollutants to the groundwater; item 3 p other activities in the surface water and groundwater bodies which</p> | |

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| | | | | <p>could lead to indirect discharge of priority substances to the groundwater; item 4- use of materials containing priority substances during the construction of structures, engineering structures and etc. when there is contact or a possibility for contact with groundwater.</p> <p>At all stages of implementation (construction, operation and decommissioning) of the IP to be specified according to the requirements of the WA and regulations on water protection: the need and ways to supply water for industrial and domestic use; the treatment of domestic wastewater and industrial waste water discharged; the treatment of stormwater formed during rain and snow thawing. If necessary to provide facilities for treatment of captured atmospheric water from the construction site and during the operation of the NDF from possible releases and spills of petroleum products - fuels and oils.</p> <p>Requirements pursuant to Art.143, item 3 and item 5 of the WA should not be violated, namely: item 3 – prohibition on river beds to be used as a landfills, earth and rock storage; item 5 – storage or warehousing of materials that could increase in great extent the destructive power of water in case of floods.</p> <p>Public interests pursuant to Art.49, para.1 and para.3 of the WA should not be affected or violated during the construction, operation and decommissioning.</p> <p>Regarding the observation of public interests and rights</p> | |

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| | | | | <p>obtained specified in Art.49 of the WA.</p> <p>In order to be avoided and prevented pollutions and accidents regarding surface water and groundwater the requirements pursuant to Art.131, art.132 and Art.143 of the WA should be observed.</p> <p><i>3. To be provided measures for preventing, reducing or, where is possible terminating the significant adverse impacts on water facilities and water bodies and protected areas (water sources, drinking water supply facilities and sanitary-protection zones around them) at all stages of construction, operation and decommissioning within the geographical scope of the impact.</i></p> <p>RBMP in Danube Region has been published on the web page of DRBD www.bd-dunav.org (Section “Water management”, subsection “River Basin Management Plan”).</p> <p><i>This statement does not repeal your obligations to fulfil the requirements of the Water Act and other acts and regulations in the Republic of Bulgaria and it cannot be considered as a reason for your failure to observe the existing regulations.</i></p> | |
| 19. | RIVER BASIN DIRECTORAT E – PLEVEN | P-04-11-996/ 25.04.2014 | 2915/05.06.2014 | The results of the monitoring of National System for Environmental Monitoring (NSEM) on Danube River for 2010-2013 and summarized results of surface water controlled and operative monitoring within the 30-km area around the NDF/NPP. Monitoring on the water | The information has been taken into account in the preparation of REIA. |

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| | | | | protection areas within 30-km area – groundwater. | |
| 20. | "KOZLODUY NPP" EAD | Ref. № P-06-01-990/ 25.04.2014 | Ref. № P-586/28.05.14 | Routes for transportation of workers and staff of "Kozloduy" NPP EAD for 2013. | The information has been taken into account in the preparation of REIA. |
| 21. | "KOZLODUY NPP" EAD | Ref. № P-06-01-1182/21.05.2014 | Ref. № 1266/18.06.14 | <p>In connection with waste water discharge permit from the sewerage of NDF into the sewerage network of Kozloduy NPP, currently SE RAW has a contract for waste water discharge into the sewerage network of Kozloduy NPP. The contract includes the waste water connection points, water nature and pricing terms.</p> <p>Pursuant to the terms specified in the waste water discharge permit, issued by "Kozloduy NPP" EAD, new connections into the sewerage system of NPP of waste water generated by the activity of other legal entities could be made after signing of a contract, its submission to the Danube River Basin Directorate – Pleven and RIEW Vratsa and modification of the issued permit.</p> <p>In connection with the abovementioned, data about the origin of waste water (by technological process, domestic, stormwater), its quantity, information about future treatment facilities, discharge points into the sewerage system of NPP and monitoring points should be submitted in order a new or update of the existing contract between NPP and SE RAW to be prepared.</p> | The information and recommendations have been taken into consideration in preparation of REIA and future measures related to it. |
| 22. | Regional Inspectorate for Protection and | Ref. № P-04-09-1183/21.05.2014 | | | |

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| Control of Public Health (RIOKOZ) -Montana | | | | | |
| 23. | Ministry of Economy | Ref. № P-04-14-1185/21.05.2014 | Ref. № 92-00-892/24.06.14 | <p>Statement: the Updated terms of reference follows the requirements of Art.10, para.3 of the Ordinance on the regulation and procedure for implementation of environmental impact assessment (Ordinance on EIA).</p> <p>Recommendations: regarding the activities and stages for selection of a suitable site to be specified at the stage of terms of reference, comparable characteristics /geological, hydrogeological, tectonic, neotectonic conditions and seismicity, geochemical and other similar natural conditions/ which favor the selection made.</p> <ul style="list-style-type: none"> - to be submitted data, results from studies on the migration of radionuclides in the sites identified which prove the consultations held on the good retention capacity in relation to the diffusion of nuclides in the earth layers - In item 1.1.2. Options for management of similar type of RAW have been described schematically. - In item 1.5.3. Information could be completed with data regarding the future radionuclide inventory of the waste generated. -in item 1.5.5. The information should be detailed by | <p>The remarks and recommendations have been taken into consideration in preparation of the updated terms of reference. They have been also taken into consideration in the preparation of REIA.</p> <p>All remarks and recommendations have been</p> |

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| | | | | <p>inclusion of long-term forecasts and assessment on the probable radiological impact after the closure of the facility.</p> <ul style="list-style-type: none"> - to be completed the motives which explain the statement regarding the information provided that transboundary nature of the impacts caused by activities during the construction and operation of NDF is not expected. <p>In item. 2. <i>Alternatives for implementation of NDF</i>, the information to be completed with a comparative analysis from constructional point of view explaining the selection of the preferable option and information related to the durability, degree of degradation and ageing of materials and structures in particular analyses on the possibility to preserve the mechanical integrity of the reinforced concrete structures at the closure of the facility.</p> <ul style="list-style-type: none"> - Completion of the information related to the risks from occurrence of possible internal and external events for the facility leading to the disturbance of the safety functions of the facility. - eventual completion of information about the importance of future environmental impacts in possible scenarios on occurrence of events, accidents and/or failures within the borders of the site of the facility as well as analyses in case of potential impact from emergency events on the facilities outside the site of the | <p>taken into account in preparation of REIA and RADI.</p> |

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| 24. | Executive Forest Agency | Ref. № P-04-12-1240/26.05.2014 | Ref. № EFA-21126/19.06.14 | <p>repository.</p> <p>The total number of the residents in the settlements within 30-km surveillance area of Kozloduy NPP has not been specified in item 4.2.</p> <p>- Inaccuracies in the references, text repetitions, spelling mistakes. Disproportionate preparation of the individual parts.</p> <p>Statement: Executive Forest Agency coordinates the Updated Terms of Reference for identification of the scope and content of REIA of the investment proposal for construction of a national repository for low- and intermediate-level waste category 2a (NDF).</p> <p>Recommendations: to improve the quality of the REIA and prevent the negative impacts on future users of timber, we propose within the component “Vegetation” to be analyzed the potential impact from the implementation of IP on forest ecosystems in suitable radius from the site of the repository. Procedures and requirements specified in letter № 91-800/10.05.2013 of the Minister of Agriculture and Food should be observed in the implementation of the investment proposal.</p> | The recommendations have been taken into account in preparation of REIA and RADI |

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| 25. | Ministry of Agriculture and Food | | Ref. № 91-800-100513 | <p>Statement: After the receipt of a letter which certifies the presence of conditions Art.73, para.5 of the Forest Act to be applied the following procedures should be performed:</p> <p>Pursuant to the Regulation & Building Plan (RBP) entered into force, the project borders of landed property No 000254 with area of 309,633 daa and No 000355 with area of 129,871 daa to be transformed into final borders. To be issued plot layouts, not plot plans for these properties where it is specified the change in the sustainable use of the territory and the type of permanent use by Municipal Agriculture Office – Kozloduy.</p> <p>Areas, whose use is changed, shall be marked out by the contracting authority or the office concerned which has awarded the DDP – RBP on the field corresponding to the detailed development plan.</p> <p>Pursuant to Art.78, para.4, item 2 of FA, the change in the use is free when sites are constructed under Art.73, para.5 of FA. On this basis, State Enterprise “Radioactive Waste” does not owe any payment for the change of use of the properties in forest territories and does not owe any money on Ministry of Agriculture and Food.</p> <p>Pursuant to the provisions in Art.86, para.5 of the Forest Act in change of use, establishing or occurrence of easements as well as in establishing of limited rights</p> | All remarks and recommendations have been taken into account in preparation of REIA and RADI. |

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| | | | | <p>on forests – state and municipal property, a price is paid for compensatory afforestation determined yearly by an order of the minister of agriculture and food. Regarding forests which are state property, the price determined for compensatory afforestation enters in the form of an income in the respective state enterprise pursuant to Art.86, para.6, item.1 of the Forest Act.</p> <p>Logging is allowed only in areas which use is changed under the procedures in ordinance X a/05.08.2011 on logging in forests (prom. SG No 19/64 – 19.09.2011) after the sums due for compensatory afforestation are paid.</p> <p>Pursuant to Art.78, para.6 of the FA: “In the cases of Art.73, para.5 within 7 days from entering into force of the detailed development plan, the authority, that approved the plan, sends a copy of it to the geodesy, cartography and cadaster office at the location of the properties – to be put on the cadastral map and registers respectively in the municipal agriculture office – to be put on the map of reinstated ownership”. In specific case the obligation to implement the legal provision quoted belongs to Ministry of Regional Development (MRD). I hereby certify the existence of grounds for performance of the abovementioned actions by the MRD.</p> <p>After changing the use of the property, the area of forest territories reduces as well. In view of making the changes occurred within the area of “Northwest</p> | |

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| | | | | <p>State Enterprise” SE [“Северозападно държавно предприятие” ДП] – the town of Vratsa as well as in connection with the production and disposal of timber, you should inform the Executive Forest Agency as providing layouts of newly-formed properties affected by the DDP-RBP specifying the change of sustainable use of the territory and the type of permanent use. The Executive Forest Agency shall inform “Northwest State Enterprise” SE – the town of Vratsa, regional department “State Forestry Enterprise – Oryahovo” and Regional Forestry Directorate – Berkovitsa to reflect the change.</p> <p>Pursuant to art.80, para.1 and para. 2 of the FA, the timber by the landed properties in forest territories whose use is changed, belong to the proprietor of the respective property. The production and disposal of the timber is organized by the proprietor under the procedures of the Forest Act at his/her account. On this basis the production and disposal of timber from the landed properties – state ownership should be executed by “Northwest State Enterprise” SE – the town of Vratsa, “State Forestry Enterprise – Oryahovo”.</p> <p>After changing the use of the property into forest territories under Art.73, para.5 of the Forest Act, SE “Radioactive waste” does not acquire the ownership on state properties. Provision of the areas could be made after establishing the ownership on state properties</p> | |

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| | | | | <p>according to the respective legal procedure.</p> <p>The areas could be handed over after occurrence of the abovementioned conditions.</p> | |
| 26. | MBX | Ref. № П-04-12-1186/21.05.2014 | | | |
| 27. | Regional Directorate „Agriculture ” – Vratsa to MAF | Ref. № P-04-12-1264/27.05.2014 | | <p>The location of the “Radiana” site, identified as the most suitable for NDF (figure 1.1 -3 of the Appendix 3, enclosed to the Terms of Reference) of SE “RAW” is located in the area of the village of Harlets, Kozloduy Municipality. It is 6 600 m northwest from construction borders of the village, borders south with Kozloduy NPP and it is approximately 3 200 m southeast from the regulatory line of the town of Kozloduy.</p> <p>The location of the nuclear facility and selection of “Radian site” as a national site is determined by Decision №898 /08.12.2011 of the Councils of Ministers.</p> <p>The site affects parts of proprieties № 000231, 000238 which are state private ownership for which has been a procedure held under Art. 81 of the Forest Act on the grounds of Order № RD 49-95/29.03.2012 of the Minister of the Ministry of Agriculture and Food (MAF) and their use as landed properties part of agricultural land has been changed into landed properties in forest</p> | <p>The information and recommendations made have been taken into account in preparation of the updated terms of reference. They have been taken into consideration in preparation of REIA and RADI.</p> |

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| | | | | <p>area.</p> <p>Final project of DDP-RBP regarding site: “National repository for burial of radioactive waste” on “Radiana” site in the area of the village of Harlets has been approved by Order № RD-02-14-9/02.01.2013 that has entered into force of the Deputy Minister of MRDPW.</p> <p>After a reference on the map of reinstated ownership made in the register, the properties have new identification numbers №000254 (formed by the separation of property № 000231), area of 309 633 daa and №000355 (formed by the separation of property № 000231), and area of 129 871 daa, sustainable use “other rural area” and type of area “settlements”.</p> <p>“The State” is registered as a proprietor, type of acquisition – expropriation for national needs with Decision of the Council of Ministers under Art.34a of the State Property Act (SPA) for expropriation of properties for construction of sites of national importance. The District Governor of Vratsa District has issued Acts №3220 and №3219 /03.09.2013 on state ownership.</p> <p>Statement: the site does not affect the farm lands of the national land fund. Regional Directorate “Agriculture” – Vratsa does not object and have no recommendations on the updated terms of reference for identification of the scope and content of the REIA of IP of SE RAW for construction of a National repository for burial of low-</p> | |

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| | | | | and intermediate-level radioactive waste. | |
| 28. | Ministry of Internal Affairs (MIA) | Ref. № P-04-01-1187/ 21.05.2014 | Ref. № 812100-3728/2/20.06.14 | Statement: Competent authority of MIA - General Directorate "Fire Safety and Protection of Population" does not have any remarks or recommendations regarding the content of the updated terms of reference for REIA of IP a National repository for burial of low- and intermediate-level radioactive waste category 2A. | |
| 29. | Ministry of Defense | Ref. № P-04-05-1188/21.05.2014 | | | |
| 30. | Ministry of Culture | Ref. № P-04-10-1189/ 21.05.2014 | Ref. № 92-00-241/19.06.2014 | Forwarding to the Director of the National Institute of Immovable Cultural Heritage (NIICH) to make a statement on the terms of reference. | |
| 31. | Water Supply and Sewerage Company Vratsa | Ref. № P-53-00-1194/ 21.05.2014 | | | |
| 32. | Kozloduy NPP EAD | Ref. № P-06-01-1195/ 21.05.2014 | | | |
| 33. | CEZ Electrorazpređenje Bulgaria | Ref. № P-53-00-1177/ 21.05.2014 | | | |
| 34. | BTC | Ref. № P-53-00-1322/ 30.05.2014 | | | |
| Municipalities and mayoralties | | | | | |
| 35. | Kozloduy | Ref. № P-10-00- | Ref. № 53-00-32 | Recommendations: the following aspects should be | Recommendations accepted. |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | Municipality | 1083/12.05.2014 | (1)/ 30.05.2014 | <p>reviewed in more detail in the preparation of REIA: A comprehensive safety assessment of the facility i.e. if the facility can function safely not only in normal operation but also in case of a failure or low - probability events including disturbance of protective barriers due to human activity after the closure of the facility:</p> <ol style="list-style-type: none"> 1. To be considered the probability of occurrence of events such as terroristic attacks, a vehicle explosion, a crash of a small passenger plane; 2. To be taken into account the fact that Danube River passes through state territories and to be considered the probability of radiation pollution in other European countries except the Republic of Bulgaria; 3. On page 124, item 4 to be corrected the information about existence of protected territories under the Protected Areas Act (PPA) and protected areas under the Biodiversity Act within the territory of Kozloduy Municipality. | They have been taken into account in preparation of REIA and RADI. |
| 36. | Mayorality of the village of Harlets | Ref. № P-10-00-1085/12.05.2014 | Ref. № 178/16.05.2014 | <p>Statement: We do not have any recommendations on the technical part of the Updated terms of reference. In the part “Impact forecasting”, it has been specified that the only factor, which bears health hazard, considers being the external radiation of the packages of RAW in their transportation and occurrence of potential</p> | |

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| | | | | <p>external impacts during their storage.</p> <p>The impact of radiation exposure has probabilistic (stochastic) effect which means that increasing the dose the probability of occurrence of cancer increases too i.e. the radiation dose has carcinogenic effect and the ratio of the dose and number of cases of deceases is linear.</p> <p>Recommendations:</p> <p>All negative impacts specified should lead to a specific type of compensations for population in socio-economic aspect i.e. construction and operation of NDF should provide a maximum number of jobs and improvement of infrastructure for the affected settlement as well as special treatment of the farmers within the area.</p> | <p>Recommendations accepted. They have been taken into account in preparation of REIA. Some measures have been planned in the REIA to reduce to minimum the negative impacts on environment and public health within the area and staff on the site.</p> |
| 37. | Mayorality of the village of Glozhene | Ref. № P-10-00-1086/ 12.05.2014 | - | - | |
| 38. | Mayorality of the village of Boutan | Ref. № P-10-00-1084/12.05.2014 | - | - | |
| 39. | Mayorality of the village of Kriva bara | Ref. № P-10-00-1087/ 12.05.2014 | - | - | |
| 40. | Miziya Municipality | Ref. № P-10-00-1086/ 13.05.2014 | Ref. № 53-00-22(1)/21.05.14 | Statement: the Updated Terms of Reference of the REIA of IP is comprehensive. Miziya Municipality expresses a positive statement for its approval. A detailed study for | Recommendations accepted. They have been taken into account in preparation of |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 41. | Voyvodovo | Ref. № P-10-00- 1170/20.05.2014 | - | <p>selection of site for implementation of IP has been made in the Updated Terms of Reference of the REIA of IP for construction of NDF. The site selected does not fall into areas of NATURA 2000 and it is close to Kozloduy NPP.</p> <p>An analysis has been made on the selection of the way of burial of low- and intermediate-level radioactive waste as the most acceptable facility for burial of this type of waste is near-surface multi-barrier engineering facility.</p> <p>New jobs shall be established after the implementation of the IP.</p> <p>All environmental components have been taken into consideration to be included in the REIA with respect to the impact that the investment proposal could have on them.</p> <p>A comprehensive impact forecasting as a result from implementation of the investment proposal on the environmental components has been made.</p> <p>Recommendations: To be paid specific attention on the impact assessment on groundwater bodies, water supply resources, groundwater resources and sanitary-protection zones around them in the preparation of the report.</p> | REIA. |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 42. | Krushovitsa | Ref. № P-10-00-1170/20.05.2014 | - | - | |
| 43. | Lipnitsa | Ref. № P-10-00-1170/20.05.2014 | - | - | |
| 44. | Sophronievo | Ref. № P-10-00-1170/20.05.2014 | - | - | |
| 45. | Saraevo | Ref. № P-10-00-1170/20.05.2014 | - | - | |
| 46. | Valchedram Municipality Mayor of Valchedram | Ref. № P- 10-00-1094/13.05.2014 | - | - | |
| 47. | Mayoralties Mokresh | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 48. | Septemvriytsi | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 49. | Dolni Tsibar | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 50. | Razgrad | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 51. | Zlatiya | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 52. | Cherni vrah | Ref. № P-10-00- | | | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | 1169/ 20.05.2014 | | | |
| 53. | Botevo | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 54. | Bazovets | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 55. | Gorni Tsibar | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 56. | Ignatovo | Ref. № P-10-00-1169/ 20.05.2014 | | | |
| 57. | Hayredin Municipality Mayor of Hayredin | Ref. № P-10-00-1093/13.05.2014 | - | | |
| 58. | Mayoralties Manastirishte | Ref. № P-10-00-1171/20.05.2014 | | | |
| 59. | Mihaylovo | Ref. № P-10-00-1171/20.05.2014 | | | |
| 60. | Rogozen | Ref. № P-10-00-1171/20.05.2014 | | | |
| 61. | Barzina | Ref. № P-10-00-1171/20.05.2014 | | | |
| 62. | Botevo | Ref. № P-10-00-1171/20.05.2014 | | | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 63. | Byala Slatina Municipality Mayor of Byala slatina | Ref. № P-10-00-1252/27.05.2014 | - | | |
| 64. | Altimir | Ref. № P-10-00-1253/ 27.05.2014 | | | |
| 65. | Bardarski geran | Ref. № P-10-00-1253/ 27.05.2014 | | | |
| 66. | Galiche | Ref. № P-10-00-1253/ 27.05.2014 | | | |
| 67. | Tarnovo | Ref. № P-10-00-1253/ 27.05.2014 | | | |
| 68. 9 | Borovan Municipality Mayor of Borovan | Ref. № P-10-00-1260/ 27.05.2014 | - | | |
| 69. | Mayoralties Malorad | Ref. № P-10-00-1261/ 27.05.2014 | | | |
| 70. | Dobrolevo | Ref. № P-10-00-1261/ 27.05.2014 | | | |
| 71. | Sirakovo | Ref. № P-10-00-1261/ 27.05.2014 | | | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 72. | Krivodol Municipality Mayor of Krivodol | Ref. № P-10-00-1258/ 27.05.2014 | Ref. № 92-273-2/16.06.2014 | Statement: No notices of oral or written remarks, requirements and recommendations were received within 14-day prescribed period. | |
| 73. | Mayoralties Phuren | Ref. № P-10-00-1258/ 27.05.2014 | | | |
| 74. 1 | Oryahovo Municipality | Ref. № P-10-00-1095/ 13.05.2014 | Ref. № 53-00-4-1/05.14 | Oryahovo Municipality has no requirements, remarks and recommendations to the Terms of Reference for REIA of IP. | |
| 75. | Gorni Vadin | Ref. № P-10-00-1172/ 20.05.2014 | | | |
| 76. | Dolni Vadin | Ref. № P-10-00-1170/20.05.2014 | | | |
| 77. | Leskovets | Ref. № P-10-00-1262/27.05.2014 | | | |
| 78. | Ostrov | Ref. № P-10-00-1262/27.05.2014 | | | |
| 79. | Selanovtsi | Ref. № P-10-00-1262/27.05.2014 | Ref. № 53-00-6(1)/13.06.14 | Statement: No objections, opinions and statements were received within 14-day prescribed period in the Mayoralty. A statement has been made for approval of the Updated terms of reference for identification of the scope and content of REIA of IP observing the regulations and avoiding environmental pollution. | |
| 80. | Galovo | Ref. № P-10-00-1262/27.05.2014 | - | | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 81. | Boychinovtsi Municipality | Ref. № P-10-00-1255/ 27.05.2014 | Ref. № K-1264-(1)/10.06.14 | Statement: Within the emergency planning zones pursuant to the Emergency Plan of Kozloduy NPP EAD, part of the settlements of Buychinovtsi Municipality fall into Protective Action Zone – zone No 3 and radius of 30 km around Kozloduy NPP EAD in which “Radiana” site is situated. These are the villages of Beli brod and Lehchevo, Boychinovtsi Municipality. We consider that there is a real potential danger of negative impact on public health and environmental components – air, soil, and water in burial of radioactive waste. This impact shall occur during the operational and post-operational period of the site. | Recommendations accepted. They have been taken into account in preparation of REIA. Some measures have been planned in the REIA to reduce to minimum the negative impacts on environment and public health within the area and staff on the site. |
| 82. | Lehchevo Mayoralty | Ref. № P-10-00-1254/ 27.05.2014 | Ref. № 874/11.06.2014 | Statement: In connection with the updated terms of reference for identification of the scope and content of the REIA of the IP for construction of NDF, I inform you that the population of the village of Lehchevo has no requirements, remarks and recommendations on the REIA. | |
| 83. | Beli brod | Ref. № P-10-00-1254/ 27.05.2014 | - | - | |
| 84. | Lom Municipality Mayor of Lom | Ref. № P-10-00-1257/ 27.05.2014 | - | - | |
| 85. | Mayoralties Stanevo | Ref. № P-10-00-1256/ 27.05.2014 | - | - | |

NON-GOVERNMENTAL ORGANIZATIONS

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
|-----|--|---------------------------------|----------|---|---------------------------|
| 86. | For the Earth [За Земята] Ecological Association | Ref. № P-53-00-1239/26.05.2014 | | | |
| 87. | Ekoglasnost National Association (to Mr. Penchev) | Ref. № P-53-00-1238/ 26.05.2014 | | | |
| 88. | Balkani Wildlife Society | Ref. № P-53-00-1237/26.05.2014 | | | |
| 89. | Society for the Protection of Nature – Veliko Tarnovo | Ref. № P-92-00-1325/ 30.05.2014 | | | |
| 90. | Society for the Protection of Nature - Velingrad | Ref. № P-92-00-1324/ 30.05.2014 | | | |
| 91. | Society for the Protection of Nature - Razgrad | Ref. № P-92-00-1326/ 30.05.2014 | | | |
| 92. | NPO Green Balkans | Ref. № P-53-00-1236/26.05.2014 | | | |
| 93. | Bulgarian | Ref. № P-92-00- | Ref. № | Statement: Bulgarian Nuclear society (BNS) supports | Accepted |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | Nuclear Society | 1241/26.05.2014 | 45/17.06.14 | completely and without any remarks on the information provided regarding the Updated terms of reference for identification of the scope and content of the REIA of the IP for construction of a National repository for low- and intermediate-level radioactive waste category 2a (NDF) and states that it is prepared in compliance with the existing national and international legislation and guarantees the observation of the safety standards of IAEA and existing EU Directives. | |
| 94. | Bulatom | Ref. № P-53-00-1235/ 26.05.2014 | | | |
| 95. | Bulgarian Society For Protection of Birds | Ref. № P-53-00-1234/ 26.05.2014 | | | |
| 96. | Bulgarian Energy Forum | Ref. № P-53-00-1233/ 26.05.2014 | | | |
| 97. | Ekoglasnost Political Club | Ref. № P-53-00-1285/28.05.2014 | | | |
| 98. | Mineral Resources Association [Асоциация подземни богатства] | Ref. № P-15-00-1323/ 30.05.2014 | | | |
| 99. | Women in | Ref. № P-92-00- | | | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | Nuclear Association | 1284/ 28.05.2014 | | | |
| 100. | Sokol Oryahivo Hunters & Fishermen Association | Ref. № P-53-00-1251/27.05.2014 | | | |
| Scientific and other institutions | | | | | |
| 101. | Institute for Nuclear Research and Nuclear Energy - Bulgarian Academy of Sciences | Ref. № P-18-00-1287/ 28.05.2014 | | | |
| 102. | National Institute of Geophysics, Geodesy and Geography - BAS | Ref. № P-92-00-1291/ 29.05.2014 | | | |
| 103. | For the Earth [За Земята] Ecological Association | Ref. № P-53-00-1239/26.05.2014 | | | |
| 104. | Bulgarian | Ref. № P-18-00- | - | Statement: The terms of Reference has been prepared by | - |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| National Group of Engineering Geology of IAEG | 1287/ 28.05.2014 | | | <p>means of expert knowledge of the existing geological, geotechnical, hydrogeological and ecological studies in connection with design of the repository;</p> <ul style="list-style-type: none"> - It covers all specific characteristics of the topics on REIA and NDF (impact assessment on the environment together with its flora and fauna, air, water, population etc.) - It covers the assessment on the respective transboundary impacts which Rumania is interested in; - It is prepared in compliance with Bulgarian legislation as well as the documents recommended of the IAEA. <p>We consider that all requirements to this type of documents are observed in the Terms of Reference and we propose to be accepted as a basis for preparation of the updated REIA.</p> | |
| 105. GI-BAS | Ref. № P-18-00-1290/ 29.05.2014 | Ref. № 329-ЕД/12.06.2014 | | <p>Statement: The evaluation of the updated terms of reference is very good which has completely fulfilled its objective – to identify the scope and content of the REIA for NDF. The terms of Reference is prepared in detail and comprehensively and gives reasons an REIA to be prepared which shall comply with all requirements to the Bulgarian, European and international legislation and regulations.</p> <p>A recommendation related to the selection of an alternative on technology for burial:</p> <ol style="list-style-type: none"> 1) It is suitable to be included in the report as reference related to this issue: Bulgarian National Disposal Facility - | <p>The recommendation has been taken into account in preparation of REIA for NDF mainly in the assessment of the alternatives by technology.</p> |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | | | <p>Assessment of conceptual design applicability, 2009. Consortium EAVTEN (Empresarios Agrupados, VT Group and Energo Consult Ltd.) prepared by an independent team of experts; a comparative analysis and evaluation of the trench and tunnel near-surface type repositories in terms of several essential criteria has been made in this report: the risks identified, tested and proven technology, costs, acceptability 'Stakeholders (mainly EBRD and NRA); safety; technological advantages in the construction, operation, maintenance and post-operation phase;</p> <p>2) on page 61 in the paragraph “Contemporary repositories tunnel type have been implemented in Sweden and Finland, such technology is proposed in the Swiss conception [31]” is good to be added that in all cases it is about repositories in rock terrains and they are several centimeters deep;</p> <p>3) on page 62 the phrase “As an essential natural barrier for these types of repositories is considered non-disturbance by construction works natural massif having high waterproofing characteristics ...” is not correct;</p> <p>на even though leaving aside the controversial issue on integrity of natural massif in the construction of an underground mine working in any case the underground working itself plays the role of a natural underground collector (fissure or pore) water due to the nature of the hydraulic convective flow; multilayer soil coating can provide much higher water resistance and non-entry of infiltration flow (from stormwater) in the repository system;</p> <p>I have one editor’s remark which is important and it is</p> | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | | | <p>related to the description of earth layers under the site on page 89:</p> <ul style="list-style-type: none"> - Quaternary sediments are numbered correctly but the numeration of the sublayers in Layer 3 is wrong – the correct numeration is sandy loam, alluvial (3a) and gravel-sand-clay mixture(3b); - Pliocene sediments do not include three layers, they include two as follows: Layer 4 (specified as Layer 3 in the text) – powder clay, yellow rusted and Layer 5 (specified as Layer 4 in the text) – from clay sand to fine sand. - Last layer, Layer 6 (specified as Layer 5 in the text) – fine clay sand, grey, waterlogged does not refer to Pliocene, it refers to Miocene. | |
| 106. | Prof. Dr. Evstatiev GI-BAS | | Ref. № P-94-00-1168/02.06.14 | <p>Recommendations related to chapter 3.4.1. Earth.</p> <ol style="list-style-type: none"> 1. First proposal is about the values of the initial load of loess subsidence $P_{initial}$ <p>On pages 88-89 are specified the following values of the initial load of subsidence $P_{initial}$ of loess layers:</p> <ul style="list-style-type: none"> - for layer 1 $P_{initial} = 13-282 \text{ kPa}$ or $0,13-2,82 \text{ kg/cm}^2$ - for layer 2 - $P_{initial} = 63-400 \text{ kPa}$ or $0,63-4,0 \text{ kg/cm}^2$ <p>These are unrealistic values distributed in a very large interval making them unusable. Perhaps they are derived from a small number of laboratory tests. Furthermore, on the basis of laboratory data it cannot be determined this important parameter. Field tests and data analysis of</p> | <p>The recommendation has been taken into account in preparation of REIA for NDF mainly in the impact assessment on “Earth”.</p> |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | | | <p>collapsed buildings. Based on my experience, which yours truly knows very well and I am one of its creators, I propose to write that the abovementioned data are based on laboratory tests and actual values for $P_{initial}$ used so far are:</p> <ul style="list-style-type: none"> - for layer 1 - $P_{initial} = 0,07-0,12$ MPa i.e. $0,7-1,2$ kg/cm², - for layer 2 - $P_{initial} = 0,12-0,17$ MP i.e. $1,2-1,5$ kg/cm². <p>2. The second proposal refers to conditional calculated load R_0 of Pliocene sediments.</p> <p>On p. 89 for Pliocene layers 3 and 4, the value for conditional calculated load $R_0 = 0,27$ MPa or $2,7$ kg / cm² is very low which is less than in the previous layer alluvial sandy clay - $R_0 = 0,30$ MPa. (Incidentally, you should correct the numeration of layers which is wrong). Experience of the geodetic measurements of V and VI Units that have the same foundation in Pliocene sediments (see Geotechnical Section of the technical design for "Radiana" and in particular the results of the back analysis) shows that after loading the foundation $p = 0.45$ MPa the subsidence is within permissible limits so that their bearing capacity is bigger than the one specified in the ToR.</p> <p>On the basis of the abovementioned for layers 3 and 4, it should be specified that their conditional calculated load $R_0 = 0,40$ MPa is $4,0$ kg/cm².</p> | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 107. | Ministry of Environment and Water | Ref. № 26-00-1943/15.08.2014 | | <p>I also recommend other soil and mechanical properties of the layers given in the ToR on p. 88 and 89 to be reviewed once again and to be complied with those values that designers have used in the Technical design of the “Radiana” repository.</p> <p>We have the following remarks on the proposed scope of the assessment which should be reflected in the final version of the ToR and Report on EIA:</p> <p><u>General:</u></p> <p>Having in mind that a report on the assessment of the degree of impact (RADI) should be prepared, item 3.5.3.1.2. of the ToR on protected areas under Natura 2000 should be deleted.</p> <p><i>Pursuant to Art.34, para.1 of the Ordinance for compatibility assessment of plans and programs, projects and investment proposals with the aims of protection of protected areas, the assessment of the degree of impact of the investment proposal on protected areas should be submitted in the form of an appendix to the Report on EIA and should be added to the proposed list of appendices.</i></p> <p><u>Regarding „Water“ – item 3.2:</u></p> <p>It is clear by the documentation provided (Statement of DRBD Ref No 2915/05.06.2014) that Brestova padina site falls into the borders of protected are (PA)</p> | <p>Recommendations have been taken into account in preparation of the final version of the ToR for scope and content of REIA and in preparation of REIA and RADI.</p> |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | | | <p>“Zlatiyata” which is a water protection area under Art.119a, para.1, item 5. We recommend in the Report on EIA to be complied with the measures in Programme of measures in River Basin Management Plans in respect of the abovementioned PA;</p> <p>The correct phrase for specification of the characteristics of Danube River and Ogosta River identified as heavily modified water bodies is “<i>ecological potential</i>”. In connection with that, we propose the phrases <i>moderate ecological / moderate ecological state</i> from p.73 and 74 to be replaced with <i>moderate ecological potential</i>.</p> <p><u>Regarding item 3.8.2. “Impact forecasting”:</u></p> <p>The obligations of the company/contractor of IP are connected with both <i>safety use</i> and <i>safety storage</i> of the chemical substances and mixtures used in connection with the implementation of the investment proposal. Due to the lack of warehouses/facilities for storage of hazardous substances and mixtures on Radiana site, a safety assessment on the <i>storage</i> of chemical substances and mixtures and documentation of the results to be made.</p> <p>The objective of the assessment before the start of construction is to prepare technical, organizational and management measures on safety storage of hazardous chemical substances and mixtures (incl. paint, fuel and lubricants) used in compliance with the <i>Ordinance on the storage of hazardous chemical substances and</i></p> | |

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| | | | | <i>mixtures</i> as well as the requirements specified in the safety data sheets enclosed. | |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| 108. | NIICH | Ref. 0401-1478/07.07.2014 | | <p>Statement: The area of the town of Kozloduy is characterized by a high density of archaeological immovable cultural valuables. As it is seen on the topographic maps in the immediate vicinity of Kozloduy NPP there are several tumuli which can be affected by the implementation of the investment proposal. By Order of the Council of Ministers № 1711/ 22.10.1962, all local and burial mounds and medieval ramparts are declared as monuments of category "national importance". At the same time we pay attention that the specificity of real archaeological cultural valuables implies the possibility, not yet registered objects having status of national cultural valuables according to Art. 146, para. 3 of Cultural Heritage Act to fall within the borders of site.</p> <p>It should be also noted that close to Kozloduy NPP are situated: Roman Fortress - Regiana, two kilometers east, announced in the State Gazette No 90 /1965 as an architectural and construction monument category "national importance" and the Augusta Ancient Fortress, Kaleto area, declared by RBMS [РБМС] № 14/25.06.1984 on the archaeological reserve.</p> <p>In connection with the abovementioned the National institute of Immovable Cultural Heritage requires the following:</p> <ol style="list-style-type: none"> 1. The part of the Report on EIA concerning the cultural and historical heritage to be prepared by a specialist – archeologist and to be based on preliminary site inspection on the terrains which shall be affected by the construction of new site and technical infrastructure related to it. The aim of the inspection is to identify the existence or lack of immovable cultural valuables in these terrains and to what extent the investment proposal shall have impact on the existing immovable cultural valuables. A written report including results from the inspection should be sent to the NIICH. 2. If it has been found that immovable cultural | <p>The recommendations have been taken into consideration. Archeological valuables have not been found during preliminary studies within the borders of Radiana site. Thracian tumulus is out of the site for NDF.</p> <p>The part related to the cultural heritage assessment is prepared by a specialist who has the necessary qualification. Recommendations have been given to avoid the adverse impacts on the cultural heritage in the REIA.</p> |

| № | Consultations held (municipality, institution, controlling authority, etc.) | Sent | Received | Description of statements/recommendations/ remarks expressed | Accepted/ Non-accepted |
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| | | | | valuables have been affected during the implementation of the investment proposal, further activities should be coordinated with the Minister of Culture pursuant to Art.83 of CHA. | |
| 109. | „Women in Nuclear– Bulgaria | Ref. № 16/30.06.2014 | | Statement and conclusion: After a review of the documents provided and clarifications made in the Updated ToR of IP for construction of NDF, WiN – Bulgaria gives a positive assessment. We think that the conclusions, made by the authors as a result of scientific surveys held and important statistical data collected are logical. | |
| 110. | RHI - Montana | Ref. № ИД-01-05-4933/30.06.2014 | | <p>Statement: after a detailed review of the information provided by the updated ToR for identification of the scope and content of REIA of IP for construction of NDF and comprehensive review of the existing appendices specifying the objectives of IP, it is obvious that the activity and operation of the future site – NDF for burial of low- and intermediate-level radioactive waste establishes a risk and possible negative impacts on health of this generation and future generations too.</p> <p>Taking into account the nature of the investment proposal related to the burial of conditioned and packaged low- and intermediate-level radioactive waste category 2a which are obtained by the operation of new nuclear facilities of Kozloduy NPP, decommissioning of Kozloduy NPP as well as RAW category 2a which are generated after the use of radioactive sources of ionizing radiation in the industry, medicine, agriculture and scientific studies. Project impacts and their importance at first place on public health status and respectively the condition of ambient air, water, soil and geological base during the construction, normal operation, closure and emergency situations should be specified and assessed.</p> | Recommendations have been taken into account in preparation of the REIA. |

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| | | | | In connection with the abovementioned, RHI – Montana think that the scope and content of the Report on EIA for investment proposal “Construction of a National repository for low- and intermediate-level radioactive waste/Category 2A (NDF)” should include a detailed report and a systematic analysis of the above-listed risk factors in view of preservation and prevention of possible negative impact on public health. | |