

**To: Mrs. Heidi Hautala**  
Presidency of the Greens/European Free Alliance  
European Parliament  
ASP 08G306  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Paul Lannoye**  
Presidency of the Greens/European Free Alliance  
European Parliament  
ASP 08G103  
Rue Wiertz  
B-1047 Bruxelles

**Mrs. Danielle Auroi**  
Vice-President of the Greens/European Free Alliance  
European Parliament  
ASP 08G210  
Rue Wiertz  
B-1047 Bruxelles

**Mrs. Nelly Maes**  
Vice-President of the Greens/European Free Alliance  
European Parliament  
ASP 08H154  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Joost Legendijk**  
Vice-President of the Greens/European Free Alliance  
Member of the Delegation for Relations with South-East Europe  
European Parliament  
ASP 08G351  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Giorgio Celli**  
Group of the Greens/European Free Alliance  
Member of the Delegation to EU –Bulgaria Joint Parliamentary Committee  
European Parliament  
ASP 08G146  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Theo Bouwman**  
Group of the Greens/European Free Alliance  
Member and Coordinator of the Committee on Regional Policy, Transport and Tourism  
European Parliament  
ASP 08G317  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Reinhold Messner**

Group of the Greens/European Free Alliance  
Member of the Committee on Regional Policy, Transport and Tourism  
European Parliament  
ASP 08G108  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Camilo Noguera Roman**

Group of the Greens/European Free Alliance  
Member of the Committee on Regional Policy, Transport and Tourism  
European Parliament  
ASP 08H243  
Rue Wiertz  
B-1047 Bruxelles

**Mr. Jose Ortuondo Larrea**

Group of the Greens/European Free Alliance  
Member of the Committee on Regional Policy, Transport and Tourism  
European Parliament  
ASP 08H248  
Rue Wiertz  
B-1047 Bruxelles

**Mrs. Heide Ruhle**

Group of the Greens/European Free Alliance  
Member of the Delegation for Relations with South-East Europe  
European Parliament  
ASP 08G165  
Rue Wiertz  
B-1047 Bruxelles

**Mrs. Loyola de Palacio del Valle-Lersundi**

Vice President of the European Commission  
Commissioner  
DG Energy and Transport  
Rue de la Loi/Wetstraat 200, B-1049 Bruxelles

**Mrs. Margot Wallstrom**

Commissioner  
DG Environment and Nuclear Safety  
Rue de la Loi/Wetstraat 200, B-1049 Bruxelles

**Mr. Gunter Verheugen**

Commissioner  
DG Enlargement  
Rue de la Loi/Wetstraat 200, B-1049 Bruxelles

**Mr. Michel Barnier**

Commissioner  
DG for Regional Policy  
Rue de la Loi/Wetstraat 200, B-1049 Bruxelles

**Mr. Rutger Wissels**

Head of Bulgaria Team, DG Enlargement  
Rue de la Loi 170, Charlemagne 3/86, B - 1040 Bruxelles  
Fax: 0032 2 29 53 644

**Mr. Marc Franco**

Director, Directorate F, ISPA and Pre-accession Measures  
Avenue de Tervuren 41, Cours St Michel 2 07/63, B 1040 Bruxelles  
Tel/fax: 0032 2 29 51430

**Mr. Bruno Julien**

DG Environment - Nature Conservation Unit  
European Commission, 200 Rue de la Loi, B-1049 Bruxelles, Belgique  
Fax: 332 2 296 95 56

**Mr. Eladio Fernandez-Galiano**

Head of Nature and Landscape Division,  
Council of Europe/Conseil de l'Europe  
F- 67075 STRASBOURG Cedex France  
Fax. (33) 388 41 37 51

**Dr. Gerard Boere**

Chairman of the Bern Convention Standing Committee  
Division of International Affairs, Directorate for Nature Management  
Ministry of Agriculture, Nature Management and Fisheries  
PO Box 20 401, NL 2500 EK, The Hague  
Fax: + 31 70 379 3751

**Mr. Jacques Wunenburger**

Ambassador of the European Commission to Bulgaria  
Delegation of the European Commission to Bulgaria  
36 Dragan Tzankov Blvd., 1040 Sofia, Bulgaria  
Fax: (+359 2) 97 33 872

**Mr. Philippe Maystadt**

Chairman of the Board of Directors  
European Investment Bank  
100, boulevard Konrad Adenauer  
L-2950 Luxembourg

**Re: Planning of Trans-European Corridor No. 4 through Bulgaria**

September 21, 2000

## APPEAL

Dear Madams/Sirs,

We, the undersigned Bulgarian environmental NGOs, appeal to you to draw your attention and to not allow violation of European legislation during the design and construction of the Struma Highway in Bulgaria, part of Trans – European Corridor No.4. According to existing plans of Bulgarian General Road Administration, it will run through, and destroy, the Kresna gorge.

The Kresna gorge is an area of outstanding biodiversity and landscape value. It is a CORINE Biotopes site, expected to become part of the European Ecological Network NATURA 2000 and Emerald Network.

Our appeal to you is to support the design and construction of an alternative road-bed for the highway OUTSIDE the Kresna gorge.

We believe it is of primary importance for EU and International institutions to be aware of two major issues concerning the highway planning:

### 1. Protected habitats and species directly affected by the project:

According to the current plans, the highway will run through the whole length of the Kresna gorge (17 km) and destroy it. The gorge includes habitats of 123 species of nesting birds; 17 species of bats; 31 species of reptiles and amphibians, 14 species of fish.

a) The gorge is situated along the bird migration route - Via Aristotelis European bird migration route, and is a region with a narrow front of migration. Twenty-three bird species included in Annex I of the EU Birds Directive 79/409, nest in the area. The Tissata Reserve on the territory of the gorge is a site of global conservation importance.

b) Four types of habitats presented in the gorge are included in the Habitats Directive, Annex 1. The Site is one of the most or the most important sites in the region for two of these habitats: Oriental plane woods and Grecian juniper woods.

c) Five species of reptiles are included in Annex 2 of the Directive and in the Annex of the Bern Convention: two tortoises, one terrapin and two snakes. According to the classification of CORINE Biotops, Kresna is one of the 5 most important sites in the region for the two snakes species. In addition, the area of the "Kresna gorge" is a region with a highest importance for conservation of both species of tortoises because of their high-density population and well preserved habitats in comparison to other parts of the country.

The gorge provides habitats for 8 of bats species included in the list of Annex 2 of Council Directive 92/43/EC and the Bern Convention. There is no other area on the Balkans, where on such a small territory such a high diversity of bats occurs! Of particular conservation importance is the presence of several roosts that shelter big breeding colonies of three species

and for two of them these localities are the only known places in the valley of the river Struma, where these bats reproduce. Each year hundred of bats are using these roosts during their breeding. Most of the shelters are located near the river and thus are highly vulnerable to any disturbance or change in the surroundings.

The project will therefore violate the provisions of EU Directives 92/43 and 79/409, and will breach the provisions of the Bern Convention, in particular Art. 4 of the Convention.

**2. In addition, this project will also have a considerable detrimental impact on socio-economic activities for the area and local population:**

The town of Kresna is situated at the southern exit of the gorge. Resident areas spread to the east and the west, reaching the mountain slopes and the borders of the CORINE Site. Traditional trade along the existing road and nature oriented tourism are important income sources for local people. The latter has an ever growing importance as one of the most promising potential development areas for the region. A highway through the gorge will inevitably cross the town, causing:

- Destruction of houses, deterioration of air quality, safety and life conditions of local people;
- Elimination of current incomes and long-term sustainable development opportunities related to nature oriented tourism;
- An end to traditional local trade along the existing road.

We would therefore like to draw your attention to the fact that the destruction of nature assets and degradation of urban environment will have direct negative health, social and economic impacts on local people.

For the first time we got information on the development of the Struma Highway and EU funding in 1997. The main contradiction we found was that General Road Administration (GRA – the implementing state agency) plan to develop the Struma highway right through Kresna gorge CORINE site. Moreover, in the reports presented by GRA as Environmental Impact assessment (EIA) studies was written that there would not be significant environmental impacts of the motorway. Fortunately the Ministry of Environment and Waters rejected these reports and did not start the EIA formal procedure. In fact, THERE IS NO EIA procedure started yet.

In April 2000, the Bulgarian Government contracted the Italian company SPEA Ingeneria Europea, for a feasibility study and technical planning of the Struma and Lyulin highways. The contract is financed by PHARE - Cross Border Co-operation Programme. As far as we have been informed, the Bulgarian government intends to apply for financial support for the construction to European Union programmes (ISPA), as well as to the European Investment Bank. The feasibility study of SPEA Ingeneria Europea is still not completed.

There are feasible technical alternatives to the current plans, including:

1. A different route OUTSIDE the Kresna Gorge, involving construction of viaducts;
2. A different route OUTSIDE the Kresna Gorge, involving construction of tunnels;
3. A Zero alternative involving other modes of transport for the corridor section on the Bulgarian territory (combined railway/road transportation).

We have formally addressed the General Roads Administration requesting them to consider alternatives for this section of corridor No 4. The Ministry of Environment and Waters of Bulgaria have also addressed them with such a requirement, in order to save the site for the NATURA 2000 network. But the General Roads Administration only considers the existing nature reserves, which account for 3% of the Kresna CORINE Site. In general it has been difficult to obtain information from the GRA on their plans concerning the highway construction, and until recently, we had no information on the Terms of reference that had been given to the Italian contractor. There is lack of understanding on the part of the GRA of the importance of consulting the public in project development, or of the need to consider EU nature protection requirements.

We, the undersigned environmental NGOs, recognize that our country needs economic growth, road infrastructure improvement. But we all have to make sure that national economic growth, supported with EU funds, is not at the expense of our nature heritage, and contrary to EU environmental legislation. We believe that any national or EU investment projects should not result in the destruction of our nature, habitats of rare and endangered species, and should not impair the future potential of our local communities for sustainable development.

This is why we are addressing the EU Institutions responsible for the implementation and enforcement of EU environmental legislation, with a request to bind future financing of the construction of the "Struma" highway with the conservation of the Kresna gorge, as part of the Emerald Network and future European Ecological Network NATURA 2000. More specifically, we would like to request for:

1. **Development of alternative technical plans OUTSIDE** the Kresna Gorge for this section of the highway, under the PHARE-CBC project for construction planning.
2. **Independent economic, environmental and social assessment** of technical alternatives for the highway.
3. **A meeting** with EC representatives to present and discuss in detail our concerns and alternative options.
4. **Supervision by the European Commission and the European Parliament** on the involvement of **EIB** in the project implementation, in order to ensure that Bank financing will not violate EU Environmental Directives.
5. **A decision by the Standing Committee of the Bern Convention to open a case file and to request further information from the Bulgarian authorities and the European Commission on the funding of the project and its impact on protected habitats and species in the area.**
6. We would like to emphasise the importance of **early involvement of the public and environmental NGOs**, from the very initial stages of project planning. It would help foresee and address potential problems as early as possible, and provide valuable input to the planning process.

We are looking forward to your response! For further communication, please contact:

Andrey Kovachev - Balkani Wildlife Society  
8 Dragan Tzankov Boulevard, 1421 Sofia, Bulgaria  
Tel: + 359 2 963 14 79; Fax: + 359 2 963 31 93; e-mail: [balkani@bluelink.net](mailto:balkani@bluelink.net)

Petko Kovachev - Centre for Environmental Information and Education  
c-x Ilinden, Bl. 9 (G 1), ent. 3, ap. 2, 1309 Sofia, Bulgaria  
Tel/Fax: + 359 2 920 13 41; e-mail: [ceie@iterra.net](mailto:ceie@iterra.net)


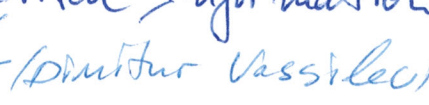
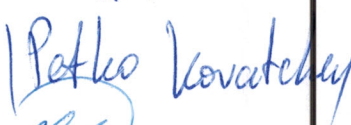


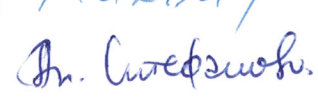

Dimiter Vassilev - ECO-CLUB 2000  
27 Svetoslav Terter Street, Fl. 2, ap. 7, 1124 Sofia, Bulgaria  
Tel/Fax: + 359 2 46 60 62; e-mail: [ecoc2000@bitex.com](mailto:ecoc2000@bitex.com)



Anelia Stefanova - Za Zemiata  
P.O. Box 975, Sofia 1000, Bulgaria  
Tel/Fax: + 359 2 963 31 25; e-mail: [zemiata@iterra.net](mailto:zemiata@iterra.net)

We would be happy to provide further information and answer your questions.

Thank you in advance for ensuring that EU assistance to Bulgaria supports sustainable development, fully respects our natural heritage and the interests of local communities!

Centre for Environmental Information & Education   
ECO-club 2000  (Dimiter Vassilev)  (Petko Kovachev)  
BALKANI Wildlife Society  (Andrey Kovachev)  
Green Balkans - federation of Nature  
conservation NGOs  
 (Simeon Marin)  
ZA ZEMIATA -  (Anelia Stefanova)  
BSPB/ BirdLife Bulgaria - Stefan Avramov   
BBPS - SEMPERVIVA - Atila Sedetchev 