

Appendix 6.2: Comments Received during the Development Phase – EIA Public Hearings

Table 6.2.1 Development Phase EIA Public Hearing Stakeholder Comments and South Stream Transport Position Statements

№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
<i>Questions and comments received during the public hearing in Varna (19.12.2013)</i>				
1.	Resident of Local Community	Question about the access and closing of Pasha Dere Beach.	<p>It will be possible to freely use Pasha Dere Beach during construction and during the Operational Phase.</p> <p>In connection with security, during construction, access to some parts of the beach located directly above the tunnels may need to be restricted for short periods of time while the tunnel boring machine moves under the beach. This will affect a strip of 150 m width which will be closed for a few days while the tunnel boring machine moves under the beach. In general, people will continue to be able to visit the beach.</p>	NO

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2.	Resident of Local Community	Is it true that the shore crossing point on Pasha Dere Beach will not be changed? bTV reported that Gazprom representatives had said that the shore crossing point on Pasha Dere Beach will not be changed, that is, the site where the pipeline comes ashore cannot be changed.	<p>In the choice of route all aspects of the natural and social environment have been taken into account, including the people and households.</p> <p>In order to plan the route, many surveys have been done since 2009. The crossing from the deep areas of the sea to the shallow waters is very steep, and this is a very important limitation to consider when planning the route in the sea. Following the choice of route in the sea and the choice of point of crossing the continental slope, an analysis was made to find a suitable shore crossing location on the Bulgarian coast. The examined locations vary from a site 60 km north of Varna to a possible site 34 km south of Burgas. One big limitation is that a great part of the Bulgarian coast line is either covered by Natura 2000 protected areas or protected areas of national defence. Besides, along the coast, many residential areas and tourist resorts are located. This is why the decision was made to select a pipeline location and route near the existing Galata gas pipeline so that their impacts are aggregated while the two protected areas of Liman and Rakitnik are avoided, and while a safe distance between the installations and the residential areas and resorts is ensured.</p>	NO

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3.	Resident of Local Community	The beach is important to us, but the problem is the large industrial complex. The most important thing to us is that a compressor station will be built.	The South Stream Offshore Pipeline - Bulgarian Sector investment proposal will not build any of the installations that are mentioned in the statement. This investment proposal (IP) will not generate noise or pollution of the environment during the operational phase. The IP will be built and operated in full compliance with the applicable normative order of the Republic of Bulgaria.	NO
4.	Resident of Local Community	We have already presented our position statement that the compressor station and receiving terminal cannot be built at a distance of 1 km from 800 houses on the territory of Rakitnika, they do not belong here because they will generate noise - 50 dB - as well as infrasound, to which we will be exposed day and night, Noise levels below 15 Hz kill the population even without being heard. Moreover, you will be filtering toxic substances in proximity of the groundwater source protection zone. In the vicinity there are herbs, animals; yesterday I saw living hares, and you are going to chase them away! With the receiving terminal you are going to poison the earth and the air!.... Do have in mind that you are in violation of the Territorial Organisation Act, which has prescriptions on how to perform such construction work.	The questions raised concerning the compressor station and the receiving terminal are outside of the scope of the South Stream Offshore Gas Pipeline IP, and are not subject to this EIA procedure. They are subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD (the investing company for the land part of the pipeline in Bulgaria).	

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5.	Resident of Local Community	<p>Do you know of any bonuses (in the form of fees) that have been given to representatives of the Oceanology Institute at the BAS for having worked on this project in 2009 to 2011?</p> <hr/> <p>This research has been manipulated, it was made using corruption.</p>	<p>The URS contract with South Stream Transport B.V. (South Stream Transport) was concluded in 2012. In 2013, through the GeoMarine company, experts from IO-BAS were hired to carry out marine surveys for the EIA Report, the results of which have been published and have been made public via the EIA Report. There are engineering and oceanographic surveys carried out in the 2009 to 2010 period. The results of these have also been used in the EIA Report.</p> <hr/> <p>Any corruption signals need to be referred to the court. South Stream Transport has not received any such signals.</p>	NO
6.	Resident of Local Community	<p>How many kilometres away from Varna is the gas pipeline?</p>	<p>Rakitnika (a Varna quarter) is 1.7 km away.</p>	NO
7.	Resident of Local Community	<p>Are you aware that according to projects, on less than 5 km, 100 000 residents of Varna live, which is also a recreation and tourism area. The residents of Varna will be left without oxygen. Do you know how many deserted industrial areas there are around Varna? Why doesn't the pipeline pass through one of them? The city of Varna, the largest seaside city and second biggest in Bulgaria, is planning to grow in that direction but you will prevent this.</p> <p>What does "significantly" mean?!</p>	<p>The impact assessment takes into account all receptors, both existing and future, including the people. The IP is not expected to have a significant impact on them. The possible alternatives for implementation of the IP have been reviewed in Chapter 4 of the EIA report (EIA).</p> <p>Chapter 8 of the EIA describes in detail the methods for assessment of the significance of impacts, and the criteria applied in making the assessment have been specified.</p>	NO

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8.	Resident of Local Community	<p>The project contradicts the Bulgarian legislation on gas conveyance under a pressure of 100 atmospheres. What is going to happen in the event of a failure? We will all burn, there are holiday stations and holiday-goers.</p> <p>In the project which was presented in July you say there is not going to be any impact, but that is not true! The compressor station will generate a lot of noise which will be multiplied by the noise of the existing compressor station.</p> <p>Move the compressor station and the receiving terminal 15 km further south.</p>	<p>The IP will be built and operated in full compliance with the applicable normative order of the Republic of Bulgaria.</p> <p>Unplanned events are very unlikely. The pipes are made of extremely hard steel, almost 4 cm thick, and everything possible will be done to prevent any faults. In the unlikely scenario of gas leakage or rupture, the gas pipeline will be shut off immediately. The operation of the gas pipeline will be monitored 24/7 using a state-of-the-art control and sensor system. The gas pipeline will be built in such a way as to be one of the most secure means of gas transportation.</p> <p>The South Stream Offshore Pipeline – Bulgarian Sector investment proposal will not build the compressor station or the receiving terminal. The questions raised are outside of the scope of the South Stream Offshore Gas Pipeline IP, and are not subject to the EIA procedure. They are subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD (the investing company for the the land part of the pipeline in Bulgaria).</p>	NO

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9.	Resident of Local Community	<p>We, the residents of Varna, have organised a petition of more than 1100 people that we do not want the project (the gas pipeline and the compressor station) to pass less than 5 km from Varna? Are you aware of this? What is it that we, the residents of Varna, can do, so that the gas pipeline does not come ashore on Pasha Dere?</p> <p>Due to the crossing location, the shore installations and the compressor station are connected. Is there something we can do to change this?</p>	<p>South Stream Transport was informed of the petition and therefore the company decided to use a trenchless method for shore crossing.</p> <p>Of the elements of the gas transportation system listed, South Stream Transport only develops the shore crossing.</p> <p>In the choice of route and shore crossing all aspects of the natural and social environment have been taken into account, including the population. The route selection process and the shore crossing are detailed in Chapter 4 of the EIA.</p>	NO
10.	Resident of Local Community	<p>Have any of you visited the places that we are discussing tonight in the summer?</p> <p>Do you know that people work all the time there and many fishermen have also taken bank loans? Many people earn their living there, and isn't obstructing their activities going to impact their means of living?</p>	<p>All experts have visited the area many times in connection with the elaboration of the EIA.</p> <p>The EIA assesses the impact both on fishing and on the species of fish. Surveys and interviews with fishermen from Ada Bacha have been conducted - the closest fishing village - as well as with other fishing organisations from Varna. The data and information obtained have been used in the EIA to develop measures to minimise potential impacts.</p>	NO

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11.	Resident of Local Community	There [Pasha Dere Beach] is the only place people can go without falling in the concessioners' trap.	<p>A number of surveys were conducted to collect information on the utilisation of the beach. The chosen trenchless method for the shore crossing ensures the free use of the beach during construction and operation.</p> <p>In connection with security, during construction, access to some parts of the beach located directly above the tunnels may need to be restricted for short periods of time while the tunnel boring machine moves under the beach. This will affect a strip of 150 m width which will be closed for a few days while the tunnel boring machine moves under the beach.</p>	NO
12.	Resident of Local Community	<p>bTV and NovaTV cannot be trusted at all.</p> <p>There would be a 100,000 people expansion [of the city in a southern direction], and at the same time he wants it to remain a villa area.</p> <p>Regarding corruption - I personally know a couple of people (experts) who not only have received no bribes, but haven't even received their fees.</p> <p>Another petition is currently active in support of the project.</p>	The IP will be built and operated in full compliance with the applicable normative order of the Republic of Bulgaria.	NO

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13.	Resident of Local Community	Does the project have an alternative site [for the compressor station] because the noise level is really great?	<p>This investment proposal will not generate noise or pollution of the environment during the operational phase.</p> <p>The questions raised concerning the compressor station and the receiving terminal are outside of the scope of the South Stream Offshore Gas Pipeline IP, and are not subject to this EIA procedure. They are subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD (the investing company for the land part of the pipeline in Bulgaria; SSBAD). Information on the alternatives for positioning of the compressor station and the receiving terminal has been included in the EIA by SSBAD.</p>	NO
14.	Member of "Progress for Varna" Movement	<p>An alternative route should be considered.</p> <p>Varna's future development can only happen in a southern direction, there is no other possibility. If you think that this compressor station won't affect tourism and the image of Varna as a tourist destination and even from an environmental point of view, you are hugely mistaken.</p>	<p>Section 4 of the EIA reviews different alternatives for the route of the IP. The cumulative impact of the above-ground installations has been reviewed in item 11.4.9 of the EIA.</p> <p>The questions regarding the compressor station and the receiving terminal that were raised are subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD and its respective EIA procedure.</p>	NO

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15.	Member of "Progress for Varna" Movement	Where else is there a compressor station of a similar type located less than 2 km from a city of half a million.	<p>The question has been submitted by the Regional Governor to SOUTH STREAM TRANSPORT formulated as follows: "Is there another settlement in the EU of the size of the city of Varna where a compressor station and a receiving terminal have been built at a distance of less than 2 km from the outermost houses in the city quarter?"</p> <p>The Regional Governor of Varna received the following response to refer to the stakeholders:</p> <p>"In the EU, several sites of above-ground installations and/or compressor stations exist that are located near smaller settlements, for instance Mofat, Saint Fergus (Scotland), Bacton, Easington, Teddington (England), Molnow, Olbernhau, Riukersdorf (Germany)."</p>	NO
16.	Resident of Local Community	How many microtunnels are there going to be and how many of them are going to reach the compressor station which is going to be the largest industrial enterprise in the region?	<p>4 pipes begin from Russia. For the shore crossing at Pasha Dere Beach, 4 microtunnels will be built, 10 m apart from each other. The pipes will emerge on the surface at about 400 m inland, and the depth of the microtunnels under the beach is going to be about 20 m. In the remaining section on the land, the pipe will be laid in a trench 2 m deep. Nothing will be seen on the surface but the above-ground elements of the land installations, located on the respective site.</p>	NO

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17.	Resident of Local Community	On an area of 500 m, where there are 4 pipes with a total area of 60 m, and less than 2 km from the compressor station, how can you go to the beach in such a place? Will you feel comfortable going to the beach there?	<p>The pipelines on the land will be underground and will not be visible. The microtunnels will be at a depth of 20 m. Beach-goers are not expected to feel any discomfort during the operation of the pipeline.</p> <p>The construction of the pipelines will last 1 year according to schedule. The beach will be open the entire time with access restrictions in place to certain sections for short intervals during the construction period (see answer to question 1).</p>	NO
18.	Resident of Local Community	I would like to make a slightly political commentary. This is a formal discussion, everything has already been decided, do not think that anyone will pay us any attention. South Stream is fatal for Bulgaria. You are going to make a thorough job of it here, but it is going to have a devastating impact throughout the country. If the compressor station site is to remain here - it belongs underwater, or in Shabla, where traces of oil drilling are still visible.	<p>The public hearing of this EIA is conducted in accordance with the requirements of Bulgarian and European environmental legislation.</p> <p>Section 4 of the EIA reviews different alternatives for the route of the marine pipeline.</p> <p>The question regarding the location of the compressor station that was raised is subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD and its respective EIA procedure and EIA.</p>	NO

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19.	Resident of Local Community	Is there going to be a joint debate of both companies [SSBAD and South Stream Transport] with the residents of Varna because indeed, the shore crossing location is the reason why the compressor station is going to be at that location.	<p>South Stream Transport develops the marine section of the whole South Stream gas transportation system. The land section is developed by South Stream Bulgaria AD. The two projects are connected and one cannot exist without the other. At the same time, these are two separate investment proposals, for which in Bulgaria there are two separate EIA procedures, and, respectively, separate public hearings are conducted.</p> <p>Representatives of the company developing the other IP are present at the public hearing of the EIA of the other IP, in order to answer questions by the public which fall within their area of competence. For us, these hearings are joint.</p>	NO
20.	Resident of Local Community	<p>Will you deny that the compressor station site is the result of the pipeline's shore crossing point?</p> <p>Is it necessary that the compressor station and the receiving terminal are located on the same site? In the Nord Stream project, are the compressor station and the receiving terminal located on the same site?</p>	<p>Section 4 of the EIA reviews different alternatives for the route of the marine pipeline and its shore crossing.</p> <p>The compressor station needs to be close to the pipeline's shore crossing point, which is in fulfilment of international safety requirements. Best practices recommend that they are located on the same site for safety reasons. Currently, the Nord Stream project does not have a compressor station near the receiving terminal, but the construction of one is planned for a later stage of the project. The compressor station will be built at the site of the receiving terminal near the town of Lyubmin, Germany.</p>	NO

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21.	Resident of Local Community	It is obvious to everyone that Gazprom's participation in both projects is 50%, it is also obvious why they are separated - in order for them to be able to shift responsibility.	<p>The South Stream system has a length of over 2000 km with several compressor stations. Is it normal that the responsibility for such a large scale project is divided among a number of companies. The experience necessary for laying a pipeline on the seabed is specific and requires companies having the respective experience for performing the various activities.</p> <p>Both companies, South Stream Transport and SSBAD are in strict compliance with Bulgarian legislation.</p>	NO
22.	Resident of Local Community	<p>Why do the pipelines cross shore at Pasha Dere? Why isn't investment made in moving the gas pipeline and the compressor station farther south (there are a few shore crossing points between the southern part of Varna and Kamchia, 5 km from Varna and 5 km from Kamchia)?</p> <p>You need a location having a sloping shore and broad glades. Kamchia is such a place.</p>	<p>For the pipeline's shore crossing an area was sought that has a suitable access location for the pipeline to the shore from the sea, shore crossing, and a place for compressor station and receiving terminal site. These places must fulfill many different conditions and criteria, including engineering, safety and environmental.</p> <p>The EIA (Chapter 4) reviews various alternatives for the shore crossing and the marine pipeline route on the land and in the sea. The SSBAD alternatives have been detailed in the EIA of "Construction of South Stream gas pipeline on the territory of the Republic of Bulgaria" investment proposal.</p>	NO

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23.	Resident of Local Community	The problem isn't that the gas pipeline is going to explode, but the noise from the compressor station, which is increased many times in wind and may be heard in the centre of Varna. And what about the infrasound?	<p>Unplanned events are very unlikely. The pipes are made of extremely hard steel, almost 4 cm thick, and everything possible will be done to prevent any faults. In the unlikely scenario of gas leakage or rupture, the gas pipeline will be shut off immediately. The operation of the gas pipeline will be monitored 24/7 using a state-of-the-art control and sensor system. The gas pipeline will be built in such a way as to be one of the most secure means of gas transportation.</p> <p>The questions regarding the compressor station and the receiving terminal that were raised are subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD and its respective EIA procedure.</p> <p>At the meeting, the question was explained to those attending by the noise expert who took part in elaborating the EIA of South Stream Bulgaria AD's IP, Prof. Draganchev</p> <p>During the visit of residents of Varna at Portovaya Compressor Station at the end of last November, the levels of noise and infrasound were measured at the compressor station. They do not exceed hygienic norms.</p>	NO

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24.	Resident of Local Community	Can't the compressor station be moved 5 km southward instead of utilising other technologies.	<p>The question regarding the location of the compressor station that was raised is subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD and its respective EIA procedure and EIA.</p> <p>At the meeting, the question was explained to those attending by Valentin Stanchev, Dipl. Eng., representative of Stream Bulgaria AD's IP, who also attended the meeting.</p>	NO
25.	Resident of Local Community	<p>The EIA has been done extremely professionally. The compressor station near Anapa, where tourism is developed, is much more powerful.</p> <p>What is the distance from the compressor station to Anapa?</p> <p>As far as I know, there is an existing compressor station which is closer to Varna, please compare with it.</p>	<p>The compressor station at Anapa is in Russia's recreation area and is going to be more than 4 times larger than the compressor station at Varna. The distance to the nearest settlement Gai Kodzor having 3273 residents is 1200 m. The next two settlements are Sukko (3153 residents) at 2900 m and Varvarovka (2253 residents) at 4250 m.</p> <p>The compressor station is subject to the "Construction of South Stream Gas Pipeline on the Territory of the Republic of Bulgaria" investment proposal by South Stream Bulgaria AD and its respective EIA procedure and EIA. South Stream Transport cannot make such a comparison.</p>	NO

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26.	Resident of Local Community	What is the cumulative impact of the visual perception in the neighbourhood, since your tower is 30 m tall?	The combined cumulative impact has been assessed as insignificant (item 9.10 and item 11.4.9 of the EIA). The visible installations (1 stalk of South Stream Transport of 30 m height and 4 stalks of 30 m height and a lattice construction tower of 35 m height of SSBAD) will be suitably painted to blend in with the surrounding landscape.	NO
27.	Resident of Local Community	<p>What necessitated the width of the construction corridor outside the ravine area to have a width of 120 m, which means more trees are going to be cut?</p> <p>This is a Natura 2000 area and Varna's green zone. The corridor I am talking about has natural oak forests.</p>	<p>The construction corridor. For most of its part, the land route's construction corridor has a width of 60 m, and coincides with the permanent right-of-way of the pipeline, except for the section crossing the ravine. It is necessary to increase this width to 120 m for engineering reasons. The additional area will be used for storing equipment, manoeuvring and other activities.</p> <p>The trees which are cut during construction outside of the pipeline's right-of-way may be restored.</p> <p>In the EIA, the impact is assessed on the grounds of the IP project presented. The area also has some unnatural forests, as well as other crops. The natural forests which will be affected constitute less than 1% of the area. Re-afforestation with natural oak trees is envisaged.</p> <p>The cumulative loss of suitable habitats - natural oak forests - for both projects is 1.3%.</p>	NO

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28.	Resident of Local Community	<p>Has geological and hydrogeological surveying been done? Is there going to be enough water for the population?</p>	<p>Complete geological surveying of the entire region has been done. Water supply installations in the region draw water from a depth of 60+ m, from the water-bearing horizon under pressure of the water body. According to data of the Basin Directorate for Water Management in the Black Sea Region, the water body has sufficient operational resources, and if necessary to draw water from it for the needs of the IP, this will not have an effect on water supply in the region.</p> <p>The IP does not fall within the sanitary protection area of any water sources.</p>	NO
29.	Resident of Local Community	<p>The General Development Plan envisages areas and zones for recreation. I want a map of places where the 35 dbA norm is exceeded, as the EIA only has outlines of the areas where noise levels are above and below 55 dBA.</p> <p>I would like to know how assumptions for both projects are different and have different results.</p>	<p>The EIA contains noise modelling only for the period of construction because no noise is expected to be generated during operation. For clarity, the maps show the outlines of noise level 55 dBA - the noise level norm for residential areas for the daytime. Results for the representative receptors (including residential areas and recreational areas) have been shown in tables. A more detailed map including the 35 dBA outline will be sent to Mr Genchev as soon as possible.</p> <p>In the area there are settlements (for example Rakitnika) which are residential areas as well as recreational areas - the Pasha Dere Beach and Chernomorets. The impact assessment in item 9.6 of the EIA accounts for the nature of these areas and has been made in accordance with applicable noise legislation in Bulgaria.</p>	NO

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30.	Resident of Local Community	<p>Isn't traffic going to be the biggest noise source, particularly in the area of Krushkite?</p> <p>This is a dirt road where a car runs every 10 minutes, and now they will be 10 lorries every 6 minutes. People's houses are located 20 to 30 metres away and the people are used to the silence.</p> <p>How then is the noise level going to increase by only 1 dB when there are going to be 100 lorries.</p>	<p>Traffic generated by the project is only expected during the construction of the IP. In the EIA, assessment has been made of the traffic noise, including for the area of Krushkite. The construction traffic will use the SSBAD 's access road which will pass near Krushkite. Currently, this is an existing dirt road, which is going to be reconstructed.</p> <p>A measurement has been taken of the level of current noise background of this dirt road in the Krushkite area, which indicates that the noise level is 51 dBA during the day, and 39 dBA during the night.</p> <p>Since construction is going to take place in the daytime, assessment has been made* of the peak (maximum) load during the day, which is planned to last for a few months, mostly in the winter. The traffic noise is variable and its equivalent level for a 12-hour day period is calculated at 52 dBA, which exceeds by only 1 dBA the current noise background during the day.</p> <p>During construction, noise monitoring is envisaged and if necessary, appointing further measures.</p>	NO

* Pursuant to the methods of Regulation No. 6 on indicators for environmental noise, taking into account the degree of discomfort in different parts of the day, the limit values of indicators of environmental noise, methods for assessing the performance levels of noise and harmful effects of noise on health (State Gazette. No. 58/2006).

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31.	Resident of Local Community	<p>Your colleagues from SSBAD have proposed building noise barriers, are you going to do something?</p> <p>What does it mean, you are going to wait for the monitoring. How would you feel if you lived on a road like that?</p>	<p>In case the results of the monitoring show that noise screens need to be placed or that some other measures need to be taken, South Stream Transport will do whatever necessary to implement these measures. South Stream Transport will supply detailed data on noise levels from the monitoring.</p> <p>The project has a mechanism for complaints, and the people can use it as a means of feedback to the Contracting party.</p>	NO
32.	Resident of Local Community	<p>Is this conclusion in the EIA a final one? Will assessment be made by someone else in order to verify your conclusions?</p> <p>Where is the assessment of the noise impact presented?</p> <p>Where is the trend of the Radon gas presented?</p>	<p>The EIA was presented to the competent authority - the Ministry of Environment and Water - and has received a positive evaluation of quality (letter by the MoEW, outgoing No. OVOS-229/14.11.2013).</p> <p>The conclusion of the EIA is final. When a final decision is made by the Supreme Expert Environmental Council at the MoEW the comments and recommendations received at the public hearings will be reviewed.</p> <p>The assessment of the noise impact is presented in Chapter 9.6 of the EIA.</p> <p>The IP will not use Radon.</p>	NO
33.	Resident of Local Community	<p>Has a method for microtunnelling been chosen or can controlled horizontal probing be applied?</p>	<p>The microtunnel crossing method has been chosen.</p>	NO

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36.	Resident of Local Community	The report says that 30 tonnes of fuel will be used per day. Is this the most appropriate solution for Varna's green zone and a Natura 2000 area?	<p>The fuel consumption specified only applies for the period of construction of the land section and includes all vehicles and equipment working at full load. The assessment made using these data is a conservative one, in view of the fact that hardly all vehicles and equipment will work simultaneously at full load. The fuel consumption is subject to further optimisation in the process of elaboration of the project.</p> <p>The use of diesel fuel cannot be avoided as a large part of the mechanisation runs on diesel fuel.</p>	NO
37.	Resident of Local Community	The Forest Agency has given up the cut timber, whose is it going to be? You had better sell it and use the money to build noise barriers rather than wait to receive complaints from the people.	The timber is going to be the property of South Stream Transport but the company will not sell timber. South Stream Transport will hold consultations on the possible ways to utilise the timber and will elaborate a Community Investment Programme.	NO
38.	Resident of Local Community	Have any locations been specified for compensatory afforestation?	<p>An Afforestation Plan is going to be prepared which is going to be coordinated with the competent authorities. In it, the locations and types of afforestations are going to be specified. Since it is optimal that afforestation be in Galata Natura 2000 PA BG0002060 (pursuant to the Birds Directive) and as close as possible to the area of the IP, the Afforestation Plan will also be subject to a Compatibility Assessment.</p>	NO

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Questions and comments received during the public hearing in the village of Priseltsi (20.12.2013)

39.	Chairman of the Municipal Council of Avren Municipality	<p>I guess you are interested in the opinion of the residents of Avren Municipality about the project. There are 10,000 residents in the municipality. This year the Municipal Council of Avren Municipality approved unanimously that the project pass through Avren Municipality. The most important for us question is the economy of the municipality and the choice of subcontractors. Unemployment is large, as you know, and it will be good to include people from the municipality in the construction.</p>	<p>South Stream Transport will urge the construction works contractor to hire local labour.</p> <p>Expectations are that as a result of the construction of the IP there will be demand in the services sector in the region and the local business, including local construction and transportation companies.</p> <p>The company has made the decision to perform project logistics completely from the ports of Varna and Burgas, and this is going to create new jobs in the region.</p>	NO
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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
40.	Resident of Local Community	<p>I have been following the project carefully since 2008... I live in Borovets Yug and have a direct visual contact with the future compressor station. I would say, however, that it is better to die of noise, than of starvation.</p> <p>The South Stream route is not much different from the Drouzhba gas pipeline route, and in 1980, no one bothered to organise a public hearing.</p> <p>The gates of NPP Kozloduy are in my father's land, who protested then? These people can't see farther from their noses, how can they think and react in this way? All the talk I heard yesterday was only for commercial purposes. The residents of Varna only go to the beach when they have guests.</p>	The EIA assessment shows that no noise impact is expected on the territory of the Borovets quarter.	NO

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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
40.	Resident of Local Community	<p>Nothing came out of the Nabucco project and now the pipes that were made for it will come here and fill up the shortage. In my opinion, the person who objects to the project can't think and can't see farther from their nose.</p> <p>Let us not be like the people of Burgas who, in order not to ruin tourism, ruined the Burgas-Alexandropoulis project. It is better to have jobs. This is not a political but an emotional statement, thank you!</p>	No response required.	
41.	Resident of Local Community	I would like to know about the laying of the pipes in the microtunnel. What are the connections, where does the microtunnel begin and where does it end?	<p>There are going to be 4 microtunnels - one for each pipe, each approximately 1 km in length and a diameter of 2.4 m. In the sea, the microtunnel exits at approximately 330 m at water depth of approximately 12 m. The microtunnel will cross under the shore at a depth of approximately 20 m. The shaft on land will be located approximately 400 m from the shore.</p> <p>After construction of the microtunnel, the pipeline is installed inside and the pipes are welded on the pipe-laying barge and then pulled through the microtunnel to the land.</p>	NO

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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
42.	Resident of Local Community	The marine section says that the trench width is between 300 m and 8 km. Isn't this going to interfere with the trailing?	<p>The pipeline is designed in such a way that even of fishermen trail above it, the pipeline will not be affected. During the Operational Phase, all fishermen will be promptly notified about the location of the pipeline and about the safety zone, in which trailing will not be possible. The gas pipeline goes parallel to the existing Galata pipeline, which too has a safety zone with a similar prohibition, and fishermen are aware of it. The new zone will coincide with the existing one to a large extent.</p> <p>There will be temporary restrictions for fishermen during construction, in the area of construction works at sea. Fishermen using trailing, vessels and all who use the sea will be promptly notified of the restrictions. These activities are not expected to cause any inconvenience to the fishing community.</p> <p>Each pipeline will be installed in a separate trench from the microtunnel exit point in the sea to a water depth of approximately 24 m. With regard to width, the transition trench will be the largest with a width of 7.5 m on the seabed and banks having a slope of 1:5. It starts at the microtunnel exit in the sea and has a length of 100 m. From the end of the transition trench to 24 m depth, the pipelines will be installed in a trench 2.5 m deep.</p>	NO

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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
43.	Resident of Local Community	Are these activities [dredging] planned to be done outside of the season?	Dredging activities are planned to commence in the beginning of 2015 and continue for about 6 months. Plans are dredging activities near the beach to be done outside the active summer season. Closing of the beach is not planned.	NO
44.	Resident of Local Community	A 300 m safety zone is envisaged on the land and this affects three paths to the beach. Will there be access to this zone?	The safety zone on the land is connected to restrictions, for instance in construction and some other activities, but it will not obstruct access to the paths to the beach.	NO
45.	Resident of Local Community	I would like to know about the choice [of shore crossing point] between Kamchia and Pasha Dere. GeoMarine have conducted surveys mainly in the Natura 2000 areas opposite Pasha Dere. Is it possible to move the pipeline further south to Kamchia and has this possibility been surveyed?	<p>This is a very complex and complicated project. It has been reviewed in its entirety and complexity. There are two critical points - where the pipe enters the sea from the land, and where the pipe exits the sea to the land. Pre-project surveying has been carried out for its implementation. There are many variables which need to be taken into account, such as the crossing from the continental slope and the pipeline's coming ashore, as well as the location of the compressor station which needs to be near the shore crossing point.</p> <p>There are only a couple of places in the Black Sea where the pipeline can pass along the slope. It is difficult to choose a variant in which all variables coexist.</p>	NO

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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
45.	Resident of Local Community	As above.	The possible alternatives for implementation of the IP have been reviewed in Chapter 4 of the EIA. The chosen variant, including the crossing of Pasha Dere Beach, has been assessed in the EIA. In the process of assessment, it was established that there will be safety issues in the Kamchia area and the requirements for minimum distance from buildings will not be met. This requirement has been met in Pasha Dere. In addition, it is possible to build a compressor station and a receiving terminal at this location.	
<i>Comments by the public, delivered in the comment boxes, in the period for public access to the EIA report (19 November - 19 December 2013), placed inside the buildings of Varna Municipality, Asparuhovo Region (Varna Municipality), Avren Municipality, and the village of Priseltsi (Avren Municipality).</i>				
46.	Resident of Local Community 26.11.2013	Positive attitude towards the proposed investment proposal because it will increase the amount of gas supplies to the population. He believes that measures need to be taken to reduce the clearing of forest massifs.	During construction, forest massifs are planned to be cleared for the construction sites and inside the construction corridor. During operation, no trees will be allowed to grow in the pipeline's right-of-way which has a width of 60 m. The trees which are cut during construction in areas outside of the pipeline's right-of-way may be restored. Re-forestation with natural oak trees is envisaged, which will compensate the cut trees. We value greatly the positive comments received by the public.	NO

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№	Name and Organisation	Question / Statement / Proposal	Position Statement of South Stream Transport / Relevant Section of EIA Report	Conclusion about Necessity to Supplement the EIA Report (YES/NO)
47.	Resident of Local Community 29.11.2013	<p>Expresses his opinion that "there is no immediate threat to the area if safety and operation norms are observed".</p> <p>Proposes the following particular measures that can be taken by the IP to protect the environment and settlements.</p> <p>"Draw on the experience of the USA, Canada, and Russia.</p> <p>Workers should go through special training in safety measures."</p>	<p>South Stream Transport B.V. will prepare and implement an Integrated System for Management of Health, Safety, Security, and the Environment, which will also be executed by the subcontractors. Part of this system is the use of best industry practices internationally, including education and training of the staff and workers. The Natural and Social Environment Management Plan and measures envisaged in it are also part of this system.</p> <p>This way it will be ensured that the investment proposal and all of the auxiliary infrastructure is designed, built and is operated in compliance with Bulgarian and international requirements and the best industry practices internationally.</p> <p>We value greatly the positive comments received by the public.</p>	NO

Complete.

Table 6.2.2 Development Phase EIA Stakeholder Written Comments received 30 December 2013 and 10 January 2014 and South Stream Responses

Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	-	The enormous infrastructure project - the South Stream gas conveyance system, part of which is the South Stream Offshore Gas Pipeline investment proposal fails to take into consideration the social and environmental characteristics of the region of the city of Varna.	No response required.	No
			-	The entire land sector of South Stream Transport B.V.'s investment proposal is situated in a region which, according to Varna's General Development Plan is a recreation and tourism area in green forest environment.	Pursuant to Order No ПД-02-14-2035 of 14.08.2012 of the Minister of Regional Development and Public Works a National Expert Council for spatial planning and regional policy at the MRDPW has been held, the decisions of which are recorded in Minutes of the meeting No.YT-01 -02-25 21.08.2012. The compatibility of the Varna GDP with the design solution for the "South Stream Pipeline" route were discussed at the Council meeting. On page 6 of the same MoM, it is written that a comparison of Varna GDP and the investment proposals for the implementation of the onshore and offshore sections of the "South Stream Pipeline" is carried out and that both projects are in line with the GDP.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	-	The entire coast and land sector of South Stream Transport B.V.'s investment proposal is situated in one or two Natura 2000 protected areas. The choice of point of shore crossing predetermines the presence nearby of huge industrial installations (inspection station, receiving terminal and compressor station), which are not called "shore installations" by accident, which installations will have an adverse impact for an extremely long period of time (over 55 years) both on protected species found in the protected area and all residents and visitors of the city of Varna (more than 1,000,000 tourists annually) who want to be able to use the recreation opportunities presented by this quiet and clean area which has an amazing combination of a beach, forests and fields, just 2 km outside of Varna.	The protected sites (Natura 2000 sites and the nationally protected territories) located in close vicinity or crossed by the offshore pipeline are assessed in details the EIA Report and the AA Report accordingly.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	-	In connection with this, please provide a well-grounded and complete comparative analysis of alternatives done from a social and environmental point of view, for the choice of point of shore crossing and situation of the shore installations, where, beside comparing with Kamchia (page 9 of Chapter 4), you also review and compare the industrial area around Devnya - Povelianovo - Beloslav, for example, since the area there has for many years now been affected by industrialisation, and the sensitivity of social and environmental receptors will be minimal, in contrast with the quiet southern areas of the land of the city of Varna.	EIA Report discusses various alternatives of the landfall and the pipeline route of onshore and at sea. All these are alternatives which are feasible and they are studied and described as appropriate in Chapter 4 of the EIA Report.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	-	<p>I believe that, before such a transparent analysis is done, it is ill-considered for the residents and visitors of Varna from all over Bulgaria and Europe that the next step be made towards the implementation of the project under the parameters specified in the current EIA.</p> <p>The comments and remarks that follow illustrate and advance arguments for my main thesis formulated above, or give directions for improvement of the investment proposal, in case that after a real and scientifically grounded analysis it is proven that the Pasha Dere Beach is indeed the most suitable location for the shore crossing, and the Kitkata area is the best site for setting up the permanent shore installations.</p>	No response required.	
			1.	<p>All inaccuracies in the report must be corrected.</p> <p>Pipeline route runs 11 km outside of the city of Varna.</p>	<p>The 11 km distance referenced in the Report is measured from the proposed route of the landfall section of the pipeline to the centre of the city of Varna. However, the impact assessments presented in the EIA consider the potential impacts on the closest receptors to the proposed route of the pipeline, including the closest residential areas. For example, the south-west area of Rakitnika is located approximately 1.7 km north of the pipeline and 3 km north east of the landfall facilities.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	1.	The fact that the rural settlements Borovetz Yug (located 1.5 km away from the pipeline's right-of-way, and not 4 km away as indicated in Chapter 7, page 6.1) and Rakitnika (1.8 km away from the right-of-way), which have recently been included in the administrative area of the city of Varna, the Galata quarter has been part of the city of Varna for over 30 years now (5-6 km away from the right-of-way), and not knowing that the Asparuhovo quarter has been part of Varna since its establishment about 100 years ago, and has never been a separate residential development -- all this while studying the social and environmental impact -- is inadmissible for such a serious assessment of such a large scale investment proposal (see page 13.6 of Chapter 7).	<p>The distance of 4 km was measured to the centre of Borovetz Yug and not the nearest dwelling. The nearest residential dwelling in Borovetz Yug to the proposed pipeline route is around 2.2 km away. The impact assessment considers the actual distance to the closest residential areas.</p> <p>South Stream Transport B.V. is aware that Rakitnika, Galata and Asparuhovo are part of the city of Varna, as indicated in the General Development Plan, according to which Asparuhovo is a region („район“) of Varna, and Galata is designated as quarter („квартал“) in this region, while Rakitnika is a part of the quarter Galata.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	1.	On page 6 of Chapter 3 - Impact Assessment Procedure - it is incorrectly indicated in the preliminary assessment matrix that during the operational phase, the land habitats - flora and fauna - will not be impacted even though the project envisages laying concrete/asphalt on an area of approximately 200 dca (20 ha) located within the Galata Natura 2000 Protected Area, and that does not include the South Stream Bulgaria AD project.	<p>No laying of concrete/asphalt will be performed during the Operational Phase of the Project. This activity is envisaged for the Construction Phase of the Project and is relevant only for the access road and the parking area in the landfall facilities site, after, when the access road will become a permanent road. The construction corridor will be reinstated and no concrete or asphalt are planned there.</p> <p>The matrix on page 6 of Chapter 3 is, as quoted, a "Preliminary Assessment Matrix". All the impacts are further assessed in the relevant sections of both the EIA and AA Reports.</p> <p>The cumulative impacts due to SST and SSB activities and facilities are assessed in Section 9 and are summarized in Section 11 of the EIA Report.</p> <p>The potential Project impacts on the Galata SPA Natura 2000 site, and the species within it that are subject to protection, are assessed in the AA Report (Appendix A of the EIA Report).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	2.	The village of Bliznatzi is visually impacted according to page 10.6 of Chapter 7, but this is not true because between the highest point of the village of Bliznatzi and the highest point of the investment proposal there is a hill whose height exceeds the height of those two points by at least 50 m.	<p>On the quoted page 10.6 of Chapter 7 are listed the settlements that may have a potential visual impact from the Project, including the village of Bliznatsi.</p> <p>Section 7.10.3.2 Settlements in the Report states: <i>'Potential views for residents of Bliznatsi have been scoped-out, because the village is visually separated from the Project by intervening landform and woodland, therefore there are no views of the landfall section from the settlement.'</i></p>	No
			3.	The position of the nearest residential building of the villa area of Priseltzi. This villa area is not 6 km away from the pipeline on the land, but less than 3 km (see page 3.15 of Chapter 9), and there is a residential receptor located less than 50 m from the access road.	<p>The distances queried here refer to Receptor 4, which includes the area of Priseltzi VZ located at about 3.8 km from the landfall facilities and about 6 km from the pipeline crossing the coastline.</p> <p>The nearest building to the access road has been confirmed to be a distance of at least 50 m from the edge of the nearside carriageway using satellite imagery.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	4.	An extremely incorrect approach has been used in the choice of Pasha Dere as a shore crossing point. The main thesis detailed on page 52 of the Non Technical Summary and in Chapter 4, Alternatives, is that "Choosing a site that has been used before allows the impacts to be concentrated in one area rather than doing construction work in an area where such work has not been done," and alludes to the fact that the Galata gas pipeline emerges on the shore at the Pasha Dere Beach. Such logic may be applicable for areas that are not within Natura 2000 protected areas such as the Galata Protected Area, or areas that are not identified as recreation-and-tourism-in-green-forest-environment areas, but this is not the case for the land of the city of Varna.	When choosing a route all aspects of environmental and social environment, including people and households must be taken into account. To determine the route many studies were conducted since 2009. The intersection of the deepest parts of the sea to the shallow waters is very steep, and this is important constraint in determining the route to the sea. After selecting a path in the sea and the choice of crossing the continental slope, was analyzed to find a suitable place to leave the coast in Bulgaria. Considered locations vary from site 60 km north of Varna to possible sites 34 km south of Bourgas.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	4.	If we apply such logic, this would mean that we consent to transforming a protected area that attracts tens of thousands of visitors and has the potential of serving as a recreation area in natural green environment for hundreds of thousands of people, into an industrial area, because when another project for gas pipeline or oil pipeline is developed in the Bulgarian Black Sea region, the new investor could simply say, "well, there already are 2 sites (the Galata station and the South Stream installations), so it shouldn't be a problem to build another one." HOW FAR CAN THIS GO? Let us not forget that when the Galata gas pipeline was built, the Natura 2000 protected areas had not been created, and this area had not been defined as a recreation-and-tourism-in-green-forest-environment area.	One major limitation is that much of the Bulgarian coastline is designated or protected as Natura 2000 sites or protected areas of national defense. Moreover, there are many beach towns and tourist resorts. The route of South Stream pipelines also continues on land across Bulgaria and therefore it also took into account buildings and populations further down the route. Therefore it was decided to select a site and route of the pipeline near the existing pipeline Galata, so as to combine their effects, while avoiding both sites Liman and Rakitnik and ensure safe separation facilities and route of settlements and resort areas.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	4.	As above.	<p>The practice to “bundle” energy infrastructure together, especially if there is a need to route infrastructure through protected areas, has been used elsewhere to concentrate environmental and social impacts in as small an area as possible and to optimise mitigation and monitoring by both the developers and the regulators. This approach has been adopted previously for pipeline projects, including, for example, the Breagh Pipeline Project in the United Kingdom, which selected a pipeline route and shore crossing adjacent to existing pipeline corridors, as this was deemed to have the lowest environmental impact despite the shore crossing location being situated in a Natura 2000 Special Protection Area (SPA).</p> <p>The environmental and social impacts associated with the bundled projects need to be assessed, as well as the specific impacts to the features and species that create the conditions for the site to be designated as a Natura 2000 site. South Stream Transport B.V. has undertaken this in the EIA and AA Reports.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	4.	As above.	<p>The impacts on the Natura 2000 sites due to the implementation of the Project are assessed in the Appropriate Assessment Report (Appendix A of the EIA Report). Appropriate assessment is carried out in compliance with the Bulgarian environmental legislation (EPA and AA Regulation) as well as the EU Habitat Directive 92/43/EEC to ascertain that the project will not adversely affect the integrity of the site concerned.</p> <p>The findings of the Appropriate Assessment confirm that the impacts are acceptable and consistent with the objectives of the Natura 2000 designated sites, which do not exclude industrial developments as long as they are compatible with the features of the protected areas.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	4.	As above.	<p>The Project has been designed to ensure that the current and planned recreational vocation of the area is not significantly affected. The choice of microtunneling versus open trenching through the Pasha Dere Beach is a clear example of the commitment of South Stream Transport B.V. to ensuring that access to the beach is uninterrupted and the integrity of the beach itself is preserved during and after construction of the pipelines.</p> <p>Any future projects that may be proposed for this area will also be subject to the requirements of Bulgarian legislation including the assessment of environmental and social impacts and an Appropriate Assessment, if needed. Such projects will need to satisfy any requirements under these assessment process to ensure that the integrity of the Natura 2000 sites is not adversely affected.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	5.	<p>If the project's main goal is to minimise clearing forests, then it follows that, at the point of crossing the Karabuyuk ravine, the construction corridor should have a width of 120 m only in the steepest section, which has an approximate length of 200 m, and not as detailed in the report - a corridor which is 120 m wide and 1 km long. In the remaining 800 m, it should be possible to lay the pipes using a 60 m wide construction corridor since the slopes are 5 degrees and less than 10%. This will spare 48 hectares of forests, most of which are natural oak forests, located in the Galata Natura 2000 Protected Area BG0002060. Page 44 of the Non Technical Summary reads that "It is assumed that after completion of the construction works, the areas in this 120 m wide corridor but outside the 60 m right-of-way area, will be re-afforested." Is it not proper that the investor should have a firm commitment to re-afforest?</p>	<p>For the most part, the construction of the route corridor of land has a width of 60 m, coinciding with permanent pipeline easement, except the section of crossing the ravine. If there is a need, this width can be increased to 120 m for engineering reasons. The extra space is used for storage of equipment, manoeuvring, other activities etc.</p> <p>The trees that will be cut during the construction of the pipeline outside the easement can be recovered as stated in the ESMMP which is appended to the EIA Report (Appendix 13.1).</p>	No
			6.	<p>Regarding the pipeline construction on the land. A section of less than 3 km length (from the entrance shafts of the microtunnels to the permanent ground installations) with four pipes is planned to be completed in 8 months in uninterrupted construction works (see page 34 of the Non Technical Summary).</p>	<p>The construction of the 4 onshore lines onshore will take about 9 months (Chapter 5.3.1, Figure 5.7a). It is planned that the construction is carried out of the summer season (Q4 of 2014 and Q1-Q2 of 2015).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	6.	<p>Meanwhile, South Stream Bulgaria AD is going to be laying pipes at the same ground depth at a speed of approximately 1 km per day. Even if we take into account that South Stream Bulgaria AD's pipes are two, and not four, and if we disregard the fact that the South Stream Transport pipes are smaller, I find it unacceptable that the construction works should last over a month, in view of the fact that this is the Galata Natura 2000 Protected Area BG0002060, and this location is frequently visited by nature lovers in the summer half-year. What is more, the period of construction works for this section should be between October and February in order not to disturb the birds' mating season and the visitors of the Pasha Dere area. The construction of the microtunnels should also be carried out in the same time of the year.</p>	<p>The entire construction of the 4 microtunnels, including the entry and exit shafts, will take about 1 year in which one summer season. The access to the beach and forest will not be restricted but limited as described in the EIA Report.</p> <p>The construction of the 4 lines onshore and the microtunnels overlaps in time.</p> <p>The project schedule is preliminary and the investor will look for optimising the construction schedule together with the contractor. However, the RoW from microtunnel entry to the gully is of 60 m only. Within this limited area an access road to support all the tunneling operations will be necessary. The construction will hence require some sequencing as it is more complex than a cross country pipeline laying operation.</p> <p>Appropriate mitigation measures to protect people and fauna species in the Project Area are proposed in Chapter 9 of the EIA Report as well as in Chapters 7 and 8 of the AA Report (Appendix A to the EIA Report).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	7.	The construction works should be planned and executed in such a way as to account for the fact that in the event of rainfall, all waste will accumulate in the Liman Protected Area via the ravines, which will prove fatal for the local biodiversity. All this requires that at every stage of the construction much more serious measures be taken than those detailed in the report. Monitoring the water in the Liman lake by taking samples very frequently ought to be mandatory during the construction phase.	An assessment of potential impacts to surface water was undertaken as part of the EIA (see Chapter 9.4). Mitigation measures are outlined in the EIA Report that will reduce any potential impacts in relation to pollution or sediment entering the Karabiyuk Stream and Pasha Dere River to low significance, both of which flow into Liman Lake. As presented in Monitoring Plan – Appendix 13.1, Table 8, the Project has committed to monthly monitoring of surface water during the Construction Phase of the Project to ensure that the mitigation measures implemented are effective.	No
			8.	Avoiding noise-, dust-, vibrations-, light pollution-, and other adverse impacts-generating activities during the mating season cannot have a recommended character, as detailed on page 68 of the Non Technical Summary, it ought to be mandatory.	A variety of measures to mitigate any impacts from noise, dust, vibrations and light pollution are detailed in the proposed ESMMP of the Project. These measures are listed in Appendix 13.1 as well as Appendix D of the EIA Report.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	9.	Page 82 of the Non Technical Summary reads: "Many of the mitigating measures will be the responsibility of the construction works contractor (will not be directly supervised by South Stream Transport B.V.), including measures related to managing the interaction between workers and the population." Who, in the end, is going to be responsible and what guarantee is there that all those nice-sounding measures detailed in the report will not remain on paper only?	<p>South Stream Transport will contractually require its subcontractors to comply with a series of mitigation measures. A monitoring team within South Stream Transport will be responsible for ensuring full compliance with these requirements and subcontractors will be audited accordingly on a regular basis. A report of the Project monitoring will be made available on the South Stream Transport website.</p> <p>The Project Grievance Mechanism will enable stakeholders, including the local community, to provide feedback to South Stream Transport and serve as a means of monitoring impacts to ensure that the actual level of impact is not greater than predicted. If additional significant impacts are identified and verified, these will be a priority for resolution through supplemental mitigation measures. Resolution will be developed in consultation with affected stakeholders and any further impacts and related mitigation will be monitored as part of the regular Project monitoring process.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	10.	<p>The report fails to account for the social impact on permanent and temporary residents in the rural settlements that are part of the administrative area of the city of Varna - Rakitnik, Borovetz and Kantara, and the villa area of the village of Priseltzi - Krushkite and Pazarliata. Many of them use the forests for recreation, eco-tourism, herb- and mushroom-gathering etc. The area's potential for development of organised and non-organised pedestrian and educational tourism, as well as bicycle tourism and sports activities, has not been considered either. It is wrongly stated that only 500 people live in Rakitnika, and in the villa area of Priseltzi there are less than 100 permanent residents (see pages 13.7 and 13.8 of Chapter 7). The actual numbers are much greater. Enquiries should be made with the mayor's offices of the Galata quarter and the village of Priseltzi about the number of real estates in the above mentioned areas on which there are residential buildings, or a satellite photograph should be taken. The report needs to be compulsorily amended by reviewing the area's development potential taking into account amendments in Varna's General Development Plan for 2012 that grant permission for higher and denser building to be raised there.</p>	<p>Impacts were considered on beach users regardless of where they come from, which means that the impact on all people living within the Local Communities (including the places mentioned in this comment) has been considered within the EIA Report. The impact on camping activities behind the beach was considered as part of the impact assessment on beach users, and it was concluded that there would be a low adverse impact and only during the Construction Phase of the Project.</p> <p>While walking and cycling through part of the forest areas that fall within the construction corridor and Project Right of Way will be restricted because of construction activities during the Construction Phase, this restriction will only be temporary and people, including both local residents and visitors to the area, will be able to use the forest either side of the construction corridor during the Construction Phase as they currently do.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	10.	As above.	<p>Further, while part of the forest will be felled to allow for construction of the Pipeline and the permanent maintenance of a cleared Right of Way (i.e., trees will not be able to be replanted), the proportion of the forest that will be affected relative to the extent of the forest in that area is small and isolated. Once construction has completed, people will be able to walk and cycle across the Right of Way and continue to use the other areas of forest on either side of the Right of Way as they do currently, including for uses such as eco-tourism, herb- and mushroom-gathering, etc. Therefore, it was considered that these issues did not require formal consideration within the impact assessment.</p> <p>In addition, a plan for replanting trees will be prepared and agreed with the competent authorities. It will determine the types and locations for replanting. Since it is optimal to replant within the SP Galata BG0002060 (after the Birds Directive) replanting will be undertaken as close to the Project area as possible.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	10.	As above.	In regard to the population of certain local communities, the Baseline section of the EIA Report [section 7.13] acknowledges that there were some challenges to obtaining complete data in respect of population for some communities. The Impact Assessment collected and presented information on local population based on the available information, and the Mayors of Asparuhovo and Priseltsi were consulted during preparation of the assessment, in order to obtain the most thorough estimate of population possible based on the information that the Mayors had available. Neither Mayor was able to give precise data for the population of Rakitnika or Priseltsi Vilna Zone (i.e. Krushkite). However, for reasons stated in the report, it is considered that the impact assessment as conducted and presented has not been compromised in any way; as the Project will not give rise to any significant (medium or high) adverse socio-economic impacts on residents of Rakitnika or Priseltsi Villa Zone, or of any other Local Communities.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	10.	As above.	In regard to the General Development Plan of Varna, it is not considered that the construction and operation of the pipeline will prejudice the planning and development of the areas cited within the comment. The pipeline does not cross any existing residential area and new areas designated for residential development in the General Development Plan of Varna are not prevented or restricted by the pipeline. Areas such as Galata quarter and Priseltsi, including the villa area, will still be able to be developed at any stage in accordance with the General Development Plan.	No
			11.	Page 96 of the Non Technical Summary contains an incorrect inference: "The conclusions show that insignificant residual cumulative impacts are expected on the quality of the air, the physical environment, biodiversity, health and safety, cultural heritage in the sea and on the land, as well as waste." Such an estimation cannot be true because in South Stream Bulgaria AD's EIA report, some impacts have been assessed as low, even medium, and that is without accounting for the cumulative effect.	The full cumulative assessment is presented in the technical sections of Chapter 9 and summarised in Chapter 11 of the EIA Report. The cumulative assessment considers those impacts where the residual impacts of the Project have been assessed as having greater than a 'low' significance.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	11.	As above.	<p>On this basis, the assessment of cumulative impacts focuses on the stages of construction and prior to commissioning of the investment proposal. There is only one component, which is expected importance of the effects of the exploitation phase to be greater than "low" - this is the landscape and visual impact, that impact will remain for the entire life cycle of IP.</p> <p>During the Construction and Pre-Commissioning Phase, cumulative impacts are expected only for Landscape and Visual and Noise and Vibration. These impacts will be limited to this phase of the Project and therefore are temporary in duration.</p> <p>For example, with respect to Landscape and Visual impact, the Valley of Pasha Dere will be subject to direct, short term and reversible landscape and visual impacts as a result of the Project, accounting for the development of large-scale activities and site clearance. Construction impacts for tourists visiting the Galata pipeline easement and the forest will vary considerably along the zone of theoretical visibility. However the overall significance of the impacts of such activities related to the Construction Phase will be moderate post-mitigation.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	12.	Page 109 of the Non Technical Summary reads that the preparation of both EIA reports was coordinated between South Stream Bulgaria AD and South Stream Transport B.V. Why is it then obvious from page 48 of Chapter 9.9 that an interface for managing both projects has not been developed yet? Has there even been any real assessment of cumulative impacts? And why then the request for a joint meeting of both companies with local stakeholders received no reply whatsoever on 19.12.2013? An ongoing shifting of responsibility between the two investors is seen regarding impacts on the Varna region.	<p>South Stream Transport B.V. confirms that both companies are coordinating with each other. Representatives of SSBAD and South Stream Transport B.V. have been formally nominated and meet regularly to ensure the coordination of environmental and technical aspects of both the projects. Expert level meetings are also organized on an 'as needed' basis.</p> <p>Regarding the cumulative impact assessment, each company is responsible to assess the additional impacts that could arise from the presence of other projects. This means that South Stream Transport did not assess all impacts from the presence of both projects but only the areas where either project could increase the impact from the other project. For example, South Stream Transport B.V. assessed how the SSB project could adversely impact noise levels at receptor locations directly affected by noise from our Project but not at locations where noise from the SSB project is not influenced by South Stream Transport Project.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	12.	As above.	<p>South Stream Transport develops the marine section of the entire South Stream pipeline system. The onshore section is developed by the company South Stream Bulgaria AD. The projects are linked, however, these are two separate investment proposals for which Bulgaria has two separate EIA procedures and separate public consultations are carried out.</p> <p>The meetings for public hearings of the EIA for each of the projects have been attended by the representatives of the company which develops the other project, to answer questions from the public that are within their competence. In this way, the public had the opportunity at the public hearings for each project to ask questions of the relevant representatives of both the projects.</p>	No
			13.	I believe that water for the construction works and subsequent needs should be supplied from a location outside the area of the investment proposal, and should be delivered in water-tanks.	In Chapter 5 (section 5.3.7.1) of the EIA it is stated that the water needed for the construction of the pipeline will be supplied from outside the Project Area. Four potential options are being examined and are summarised below. After further assessment, the most appropriate option will be selected.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	13.	As above.	<p>Obtain industrial water from an existing well at Varna West Port and transfer the water by a tanker vessel/barge to Varna East Port. Water is then loaded onto road tankers and transported from Varna East Port to the Project landfall section.</p> <p>Abstraction of water from the Kamchia River (located approximately 20 km south of the Project landfall section). Possible abstraction points are unknown at this time. The water will be transported from the river to the Project landfall section by road tankers.</p> <p>Drilling a borehole within the footprint of the Project landfall section to obtain water.</p> <p>Abstraction of seawater within the Project nearshore section which is pumped via a hose to a desalinisation plant located within the Project landfall section temporary facilities.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	14.	Is it truly necessary to clear an additional 5 metres of forest on each side of the already sufficiently wide 10-metre asphalt road in order to build the access road - after all, this is a protected area, and engineering practice (for example in mountain regions) allows construction works to be carried out at a smaller width.	<p>There are measures included in the ESMMP (Appendix 13.1 – C-BIO06 second paragraph) which plan for replanting of the trees after construction in the areas where open space is not required during operation.</p> <p>The EIA Report assesses the most conservative approach which will be optimised wherever possible as part of the detailed design for the Project. During this design process, one of the aims will be to further reduce tree cutting from that specified in the EIA Report, however, this may not be always be possible depending on the technical needs of the Project construction.</p>	No
			15.	The report fails to provide a detailed review of the cumulative impact. Thus, for instance, page 3 of Chapter 11, says that the area affected by South Stream is only 300 decares, but this does not include the area to be occupied by roads, gate valves and temporary sites. It is not clear what the right-of-way (forest cutting) width is going to be. It is not clear why South Stream Transport B.V. assesses the cumulative impact as insignificant, given that the South Stream Bulgaria AD report states a low impact.	Borovetz is not considered in the EIA cumulative assessment because, in accordance with the methodology, receptors assessed as having a 'non-significant' residual impact in the main Project assessment are not considered within the Cumulative Assessment Chapter.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	15.	Why, in reviewing the cumulative impact on the landscape, the residents of Borovetz have not been included as the main receptor (see page 21 of Chapter 11), although Borovetz clearly stands out as a place from where construction works and above-ground installations are going to be visible (see figures 9.10.1, 9.10.2 and 9.10.3)?	Figures 9.10.1 – 3 are all theoretical and therefore do not confirm actual intervisibility. As stated in the EIA Report, they are based on 'bare-earth' computer generated modelling, and they represent a 'worse-case' potential impact. They are then clarified by site investigations. The photomontages 9.10.10.3 and 4 show views from the selected viewpoint within Borovetz of the cumulative development proposals, and clearly indicate the potential impact of the two developments within the greater panoramic landscape views which may be experienced by this receptor group. The horizon formed of the elevated landform in the far distance is only broken by the taller elements of the SSBAD development, and photomontage 9.10.10.3 (the rendered cumulative photomontage) reflects how this is barely perceptible with the naked eye at this distance and within this landscape.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	<p>The report's Chapter 9.6 on noise needs a complete reworking, one that takes into consideration all of the below recommendations. In many respects [the project] not only fails to comply with the best practices, but it also fails to comply with Bulgarian legislation. Thus, for instance, the villa area of Priseltzi is not a residential area but a recreational area and as such the maximum permissible noise levels are 45 dBa during the day and 35 dBa during the night. This is clearly stated in South Stream Bulgaria AD's report, where exceeding the 35 dBa noise level for the villa area of Priseltzi (see Alternative 2 for location of the compressor station in their report) is the main reason for taking the other possible location of the compressor station off the list. The background noise level for the region of the entire project is 25-35 dBa according to South Stream Bulgaria AD's report (see results of measurements given in Chapter 10 of the South Stream Bulgaria AD EIA) and 35 dBa according to this report.</p>	<p>The region has localities, such as Rakitnika, which are residential areas and others which are recreational areas - Pasha Dere Beach and Chernomorets. The impact assessment in section 9.6 of the EIA Report takes into account the nature of these areas and undertaken in accordance with the requirements of current legislation on noise in Bulgaria.</p> <p>Modeling of the noise has been undertaken only for the Construction Phase of the Project. Modeling of the noise levels during operation has not been undertaken since no noise is expected during this Project phase. For clarity, the maps comprise only the contour with noise level 55 dBA - the norm for noise in residential areas during the day. The results for representative receptors (including residential areas and recreational areas) are given in tables.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	<p>Considering the fact that this is a Natura 2000 protected area, and in view of the extreme sensitivity of local population to noise, I think it is compulsory to draw a map of noise levels, similar to the maps made available by South Stream Bulgaria AD for noise levels above 35 dBa, and not like in this report - only for noise levels above 55 dBa. The new noise level map needs to include the region from the access road after the lay-by for Krushkite on the old Varna-Burgas road - to the above-ground installations and entrance shafts for the microtunnels, where isolines are not less than 5 dBa.</p>	<p>The EIA Report presents the Villa Area of Preseltsi as a recreational area, however this was not shown in the supporting figures in the chapter. Maps have now been prepared showing the noise levels emitted by the construction activities, with contours from 35 to 55 dB(A) (Refer to Attachment A). A map has also been prepared showing the noise levels emitted by the construction traffic on the access road, along with the noise levels emitted by Scenario 2 of the Construction Phase and this is included as Attachment B.</p>	No
				<p>Other specific incongruities in Chapter 9.6.</p> <p>The nearest building is less than 50 metres away, and its background level is incorrectly determined, and if correctly determined, it is not representative. This fact can be easily ascertained by a second measurement.</p>	<p>The nearest building to the access road has been confirmed to be a distance of at least 50 m from the edge of the nearside carriageway using satellite imagery.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	<p>Project related traffic impacts are only expected during the Construction and Pre-Commissioning Phase of the Project. The EIA Report presents an assessment of the traffic noise, including in the area of Krushkite. Existing background noise level measurements of the rural road near Krushkite were 51 dBA during the day and 39 dBA at night.</p> <p>Construction will be undertaken during the daytime and the peak daily vehicle movements are expected to last for several months in the autumn and winter months. Traffic noise is not constant and its level, equivalent for a 12-hour day period is estimated to be 52 dBA, which exceeds existing background noise during the day by only 1 dBA.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	The Project will undertake noise monitoring throughout the Construction Phase to ensure that the mitigation measures implemented are effective. On-going stakeholder engagement will also serve as a means of monitoring impacts to ensure that the actual level of impact is not greater than predicted. If additional significant impacts are identified and verified, these will be a priority for resolution through supplemental mitigation measures already identified in the EIA Report such as noise barriers. Resolution will be developed in consultation with affected stakeholders.	No
				The position of Receptor 5 in figure 9.6.1 is different from that in figures 9.6.2 through 9.6.10. Which one is the correct position?	The correct location for Receptor 5 is shown in Figure 9.6.1. The location of Receptor 5 was incorrectly placed in Figures 9.6.2 through to 9.6.10. These figures have now been corrected in the new figures presented in Attachment A to this document. The figures will be uploaded to the EIA documentation section of the South Stream Transport website in due course.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	<p>In the noise modelling, an incorrect condition has been set in the software that there is earth cover at Receptor 5 (see page 10 of Chapter 9.6). For the same receptor, another condition has been incorrectly set - that 28 lorries will pass per hour, whereas pages 38-39 of Chapter 9.3 indicate that during peak traffic, for a period of 4-5 months, there are going to be 48 return runs per hour. This means 96 lorries passing per hour or more than a lorry per minute. This is going to be a huge stress for everyone living and visiting the quiet area of Pazarliata, which is part of the villa area of Priseltzi. IT IS ABSOLUTELY MANDATORY that NOISE BARRIERS are put and constant monitoring used. Even the estimated noise level of 54 dBa at 28 lorries per hour (see page 47 of Chapter 9.6) is definitely much higher than the background, and this certainly exceeds the legally permissible norm of 45 dBa, which invalidates the claim on pages 60 and 72 of Chapter 9.6 that the norms will not be exceeded.</p>	<p>Table 9.6.9 of Chapter 9.6 presents the noise modelling assumptions, where the earth cover conditions are described. Based on information collected during the site visits, it is assumed that the majority of the ground over which the sound has to travel, between the source and receptor, is covered with vegetation. As explained in Chapter 9.6 the ground absorption factor G is taken to be 0.8. Ground cover conditions are assumed to be consistent for all modelling, and this is considered a reasonable assumption. This applies to all calculations of the noise level at Receptor 5.</p> <p>Incorrect traffic flow data was used in Chapter 9.6 of the EIA Report, The correct traffic flow data is presented in Appendix C of the EIA Report which shows the correct number of vehicle movements on the access road. This has been calculated to be a maximum of 174 vehicle movements in a 12 hour period (which equates to 87 vehicles entering and leaving the site). The appropriate calculations have been re-done and are presented here. Noise contour maps are presented in Attachments A and B of this document.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	<p>Chapter 9.6 states that there will be a daily peak of 48 movements per hour (i.e. 24 vehicles return trips) during the busiest period of the Project. While this figure is correct, when assessing noise traffic a daily average should be used. The average number of vehicle movements per hour over a day, during the period when the traffic flow due to the Project will be at its maximum, has been re-calculated to be 15 (please note that the air quality assessment is based on a peak daily flow of 48 movements).</p> <p>From this, the noise level at Receptor 5 has been re-calculated to be a LAeq 12 hour of 28.5 dB. This is 22 dB(A) below the background noise level of 51 dB(A) as measured at Receptor 5. It is also 16 dB(A) below the daytime norm of 45 dB(A) given in Ordinance 6/2006 for recreational areas. As such, the magnitude of the impact will be negligible, and the impact will be not significant. The noise levels that will be emitted by these vehicles have been modelled and the resultant noise contours are provided in Attachment B.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	However, noise monitoring will be undertaken during the Construction Phase, as detailed in Appendix 13.1 of the EIA Report. On-going stakeholder engagement will also serve as a means of monitoring impacts to ensure that the actual level of impact is not greater than predicted. If the noise monitoring results or stakeholder engagement show that it is necessary to take further measures to reduce noise impacts, South Stream Transport will ensure these are implemented, for instance the erection of noise barriers.	No
				Table 9.6.13 is extremely inaccurate because, firstly, the noise level in the environment is not 51 dBa and, secondly, the estimated noise level column does not account for the construction traffic and practically leads to arriving at very wrong conclusions in the subsequent columns, and the absurd claim written under the table that the estimated noise levels during the construction phase will be 17-27 dBa lower than those of the environment.	Table 9.6.13 does not include construction traffic. The impact of construction traffic is assessed on page 9.6.47. However, as the traffic flow data used in Chapter 9.6 was incorrect, the noise levels have been re-calculated based on the correct data which is presented in Appendix C of the EIA Report, as explained in the previous response in this document.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	The position of Receptor 7 is incorrectly chosen as it is not located near the loud-noise-generating microtunnels entrance site (for example Receptor 7.1) and near the permanent shore installations site (for example Receptor 7.2). These sites are also located within the Galata Protected Area but the noise there will be greater and will last longer than in the position chosen for Receptor 7. It is obvious from the maps that the noise level there will exceed 55 dBa, but this has not been adequately assessed. Let us not forget that this forest area is also a place of recreation and tourism for the local population, and it is appropriate that a more detailed noise level map be drawn, especially for noise levels above 45 dBa. Why is there no adequate assessment for Receptor 7 on page 57, where a noise level of 58.8 dBa has been indicated? I believe that a noise barrier around the compressor is mandatory (page 62 of Chapter 9.6).	<p>The location of Receptor 7 was selected to represent the surrounding ecological receptors close to the pipeline. The assessment of the impact of the noise levels on the Galata SPA has been performed in Chapter 9.5 Terrestrial Ecology and the Appropriate Assessment Report, and it is based on the area within which the predicted noise levels will exceed 55 dB(A) as there are no normative requirements for biological receptors.</p> <p>The impact assessment has shown that no significant impact is expected on ecological receptors as a result of noise emissions from the Project. In the Appropriate Assessment Report, commitments were made to reduce noise impact as far as possible using buffer zones and the suppression of machinery noise. These are documented in the Project Environmental and Social Management and Monitoring Plan.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	<p>Mitigation measures to reduce the noise effects have been developed and are presented in Appendix 13 of the EIA Report. One of the key measures is the timing of construction works, which will be undertaken mainly in the winter period. This will minimise effect on recreation activities.</p> <p>There will be no noise impacts during the Operation Phase of the Project. Disturbance from noise will be only from the short-term construction works lasting only several months.</p>	No
				<p>Page 51 of Chapter 9.6 says that there may be night runs, too. What is their maximum hourly number? And why has this been not assessed adequately?</p>	<p>The road traffic noise generated by the marshalling yards was assessed appropriately; by calculating the predicted noise levels emitted by the traffic, at the most exposed receptors in the vicinity of the marshalling yards. The significance of the impact of the noise was assessed by comparing the predicted noise levels to the noise norms in Bulgarian Ordinance 6/2006.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	16.	As above.	<p>It was assumed in the assessment that, as a worst-case scenario, the marshalling yards may generate traffic during the night. The maximum hourly number of traffic movements associated with each marshalling yard was assumed to be half of that generated by the Project as a whole. This is again a worst-case scenario based upon the assumption that all the traffic during a day may travel from and to both of the marshalling yards.</p> <p>In Section 9.6, page 52 it is calculated that this would involve 14 vehicle movements per hour for each of the marshalling yards. The noise levels at the closest receptor to the road in the vicinity of the marshalling yard have been calculated. At this location the noise levels were predicted to be 34 dB(A) (Page 50). The significance of the impact was found to be negligible.</p>	No
				<p>Page 51 of Chapter 9.6 says that according to the satellite photograph the nearest residential receptor is ONLY 12 M AWAY. Where exactly is it? And why has an adequate assessment not been made for this receptor?</p>	<p>Page 51 of Chapter 9.6 reads that according to satellite imagery the nearest residential receptor is at 12 m. This refers to the marshalling yards at Varna and Burgas Ports, and not to the access road.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	17.	The noise impact has not been reviewed in detail, particularly considering the cumulative effect of the construction works and operation of installations of South Stream AD. The background level for the area is 35 dBa, whereas only the levels above 55 dBa have been chosen as problematic. Yes, but this constitutes an increase of more than 20 points, while, according to the methods of South Stream Bulgaria AD, an increase of more than 5 points leads to discomfort. How much of the Galata Protected Area will be exposed to noise levels exceeding 55 dBa? And exceeding 45 dBa? And exceeding 35 dBa? Don't you think that this will prove to be pernicious for some of the animals there?	The assessment of the impact of the noise on the Galata SPA is performed in the Terrestrial Ecology Chapter of the EIA Report. The cumulative impact of the noise generated by the road traffic and the construction of the South Stream Bulgaria AD Pipeline has been re-calculated, using the calculated noise level of 28.5 dB(A) at Receptor 5 due to the construction traffic and construction activities associated with Scenario 2. The cumulative noise level at Receptor 5 was found to be 37 dB(A). The magnitude of the impact is therefore negligible, and the impact is therefore not significant.	No
			18.	Why has the impact of low-frequency noise not been assessed?	There are no sources generating low-frequency noise.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	19.	The impact on air quality in the villa area of Priseltzi has been assessed inaccurately. According to page 14 of Chapter 9.3, the nearest residential receptor is 200 m away. This, however, contradicts the very report where the noise assessment takes the nearest receptor as located 50 m away from the road. And the truth is that there is a building there which is located less than 40 m away. This error results in extremely inaccurate calculations of the degree of impact, especially considering that the receptors are located in an especially clean environment.	An average distance to the settlement of Preseltsi of 200 m from the roadside and 3.8 km from the landfall facilities was used in the air quality assessment. This receptor point formed the basis of the impact assessment of the Construction Phase activities. It is correct to state that the nearest receptor to the roadside is within 50 m, however, this is only relevant to traffic related air quality impacts. As stated in Chapter 9.3, traffic related air quality impacts were screened out of the assessment. This screening exercise took into consideration the 50 m distance of the nearest residential dwelling to the roadside; this is described in more detail below. As shown in the air quality contour figures presented in Chapter 9.3, air quality impacts from the Construction Phase activity do not affect Preseltsi. Appendix C of the EIA Report presents the Traffic and Transportation Study; this study shows that peak Project vehicle movements are estimated to be 174 per day. These movements may not be evenly spread throughout the day and a peak flow of 48 movements is predicted during the busiest time of the Project.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	19.	As above.	As described in Chapter 9.3, air quality impacts relating to traffic movements were scoped out of the impact assessment. This was based on a screening exercise undertaken using a standard spreadsheet intended to be used to identify the need for more detailed modelling when carrying out air quality assessments of road traffic effects. The calculation assumed a fleet mix for the year 2000 roughly approximating to Euro I emission standards for trucks), and assumed that the peak daily movements would occur throughout the entire year. By using the year 2000 fleet, the screening exercise has taken a conservative approach considering older and less fuel efficient vehicles. The full results of the screening exercise were not presented in the EIA Report, but are detailed below for clarity.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	19.	As above.	<p>In this case, a conservative screening calculation has been undertaken to illustrate this conclusion. If it is assumed that all the 174 vehicles are trucks, that they emit pollutants of Euro I specification (which is very unlikely as most trucks in the EU are now of Euro IV or V standard), and that such a level of traffic would occur throughout the entire year, the predicted change in annual mean concentrations of nitrogen dioxide would be 0.6 µg/m³ at a distance of 50 m from the road centreline, which is 1.5% of the EU air quality limit value. The change in annual mean PM₁₀ concentrations would be 0.1 µg/m³, which is 0.3% of the EU limit value. Due to the robust assumptions made in the calculations and the existing good standard of air quality in the Priseltsi area, an air quality impact of this magnitude would be of negligible significance.</p>	No

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26 th December 2013	Letter	Resident of Local Community	20.	Pages 38-39 of Chapter 9.3 say that during the peak traffic there are going to be 48 return runs per hour, which is too much for the extremely sensitive area of Pazarliata, part of the villa area of Priseltzi, where some of the buildings are located less than 50 m from the access road. Most of the people there use their properties to grow especially clean organic produce of fruit and vegetables, and the road is used very intensively in the period of May-September. Therefore, the peak traffic should be outside this period, and the prompt placing of noise and dust barriers is mandatory.	The peak construction traffic is expected during the autumn and winter months. Short-term impact on air quality during construction will be considerably lower than the admissible limit values. As shown in Table 9.3.13 of the EIA, air pollution in the villa area of Priseltzi resulting from all the machinery used during construction, which is highest as regards the nitrogen dioxide under unfavourable weather conditions, is less than 9% of the admissible limit value and therefore the impact will be insignificant. As detailed in the answer to point 17, the impact of road traffic movements on local air quality would be of negligible significance. Considering that the access roads will be sealed (asphalt or concrete) no significant dust emissions are expected as a result of traffic.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	21.	<p>One of the branches of the Pasha Dere river crosses the access road, and this is evident from the maps provided in the report (see figure 7.4.2) The claim to the contrary on page 2 of Chapter 9.4 is incorrect. In this connection, this fact needs to be seriously considered, because in the event of rain or in the event of a high-water season, all the water is accumulated in the Liman Protected Area. In this connection, I think it is not merely recommended (see page 14 of Chapter 9.4), but mandatory that during the construction of the temporary road and during the laying of the pipes, the Karabuyuk ravine is only crossed in dry weather. The best engineering practices need to be employed to prevent spills and breaks in order to avoid fatally polluting the Liman Protected Area. In this connection, a bad impression is made by yet another incongruity between individual parts of the impact assessment. In contradiction to Chapter 9.4, Chapter 9.5, pages 40-41, make the extremely inaccurate inference that there is no likelihood that indirect adverse impacts may arise from pollution of the Liman Protected Area. It is obvious from the above, and from the assessment in Chapter 9.4, that the likelihood not simply exists, but is also not negligibly small.</p>	<p>A temporary access road, crossing an ephemeral (i.e. seasonal – it does not always have water in it) tributary of Pasha Dere River will be constructed by South Stream Bulgaria AD. This access road is outside the scope of the current project. An approximately 1.3 km of permanent access road from the end of the SSBAD access road to the Project landfall facilities will be constructed by South Stream Transport B.V., as illustrated in Figure 7.4.18 in Chapter 7.4 of the EIA. This section of the road will include road edge drainage (Section 5.3.6.3 in Chapter 5). Adequate measures and good international industry practice in relation to engineering to mitigate contamination of the surface water are included in the ESMMP – Appendix 13.1 of the EIA Report.</p> <p>Chapter 9.4 assesses the impact on water, which after mitigation will be of low significance. Therefore, in Chapter 9.5, addressing the impacts on biodiversity, it is stated that following the implementation of the mitigation measures leading to an impact on water of low significance, there is no likelihood that indirect adverse impacts on biodiversity may arise from pollution or hydrological changes.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	22.	The impact on biodiversity in the Liman PA has not been reviewed in detail in Chapter 9.5. In the same chapter, on page 41, the distance between the pipes and the Liman PA is not indicated, and the noise level data on the same page are incorrect as well.	<p>Impact on biodiversity in the Liman Protected Area could be only resulting from open construction works. The nearest location of such onshore works to Liman Protected Area is the shaft that will be used for the trenchless pipe-laying, which is located 450 m away from Liman Protected Area as specified in the EIA Report. The pipes that will be laid in open trenches are further away (from 450 m to about 2000 m) from the Liman Protected Area than the shaft.</p> <p>Noise impact on species of conservation significance, including those in the Liman Protected Area, is assessed in the Appropriate Assessment to the EIA Report. As stated on page 41 of the EIA Report, and further illustrated in Figure 7.17 of the AA Report, noise pollution will not affect adversely the biodiversity in the Liman Protected Area.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	23.	I believe that the compensatory afforestation should by no means be performed at the expense of cutting new trees, whether they are non-typical deciduous or coniferous cultures. The afforestation must be carried out in an area where there are no trees.	A Plan for compensatory replanting of trees will be prepared in coordination with the competent authorities. The tree species and the location for replanting will be specified in this plan. Since it is optimal that the replanting is within Galata BG0002060 SPA site (as per the Birds Directive), replanting will be undertaken as close to the Project area as possible. The replanting will not be on behalf of new tree cuttings. South Stream Transport B.V. will seek to plant new trees in areas that are currently devoid of trees or agricultural activities. However, this activity is to be coordinated with the competent authorities and be compatible with the forestry plans. South Stream Transport B.V. will comply with the requirements of the authorities in this regard.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	24.	The villa area of Priseltzi uses water solely from its own natural water sources - wells. Polluting the ground waters will prove fatal for the hundreds of producers of organic fruit and vegetables there. Will you help ensure in that South Stream Bulgaria AD utilises the safest technology for the expansion and asphaltting of the access road near the villas and gardens? What further measures can you take to guarantee that an accident during use of the construction road will not result in polluting the ground waters?	<p>As mentioned above in this document, the access roads will be sealed and therefore any spillage of fuel from vehicles, however unlikely, would be collected in the surface drainage and would not enter groundwater.</p> <p>In addition, South Stream Transport B.V. has developed adequate measures and plans to implement good international industry practices in engineering to avoid and mitigate any potential contamination due to the Project. These are included in the ESMMP – Appendix 13.1 of the EIA Report.</p> <p>The Project will also undertake monitoring of a range of factors to ensure that the mitigation measures implemented are effective.</p> <p>South Stream Transport B.V. is coordinating with SSBAD and representatives of both projects meet regularly to ensure the coordination of environmental and technical aspects of both the projects. Expert level meetings are also organized on an 'as needed' basis.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	25.	Why has a receptor point located 200 m away from the road been used (see page 19 of Chapter 9.9) when there are closer-situated residential buildings?	An average distance to the settlement of Preseltsi of 200 m from the roadside and 3.8 km from the landfall facilities was used in the air quality assessment. This receptor point formed the basis of the impact assessment of the Construction Phase activities. It is correct to state that the nearest receptor to the roadside is within 50 m, however, this is only relevant to traffic related air quality impacts. As stated in Chapter 9.3, traffic related air quality impacts were screened out of the assessment. This screening exercise took into consideration the 50 m distance of the nearest residential dwelling to the roadside. As shown in the air quality contour figures presented in Chapter 9.3, air quality impacts from the Construction Phase activity do not affect Preseltsi.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	26.	<p>The issue of the risk of vehicle accidents is a very serious one. In the period of May-October, around the villa area of Priseltzi there is intensive traffic involving passenger cars, many pedestrians and cyclists. The measures should compulsorily include alcohol tests for each driver before their first run for the day and dismissal in the event of an accident which is their fault. A speed limit needs to be set for the road around the villa area of Priseltzi. Particular attention needs to be paid to two dangerous junctions - the first one is the lay-by from the main first-class road to the villa area of Priseltzi (there is a monument of a car crash victim next to it) and the second one is the big turn at the exact location of the planned connection of the newly asphalted road with the old asphalt road. The two junctions are located about 600-700 metres from each other.</p>	<p>The risk of vehicle accidents is addressed in the EIA Report. Mitigation measures include:</p> <ul style="list-style-type: none"> • Management of the traffic and transportation activities through specially designated Plan for Management of the Construction Activities (as part of the ESMMP); • Use of preliminary determined roads; and • Determination of the exact locations of hospitals, clinics, medical offices and pharmacies in order to provide guarantees for the free access to all of them during the construction period. In case of need additional access roads will be used or selected. <p>A number of measures are prescribed, including an obligation for all the Project drivers to abide to all the driving rules, and additional training that will be provided by the Contractor. Driving will be assessed and monitored according to the contracts concluded under the Project, and reporting and analysis of accidents and incidents will be required. Details can be found in the ESMMP – Appendix 13.1 of the EIA Report and more detailed measures will be developed as part of the Construction Management Plan.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	26.	As above.	<p>Regarding the existing road network, the Traffic and Transportation Study concludes that the highway network is capable of accommodating the additional traffic without there being any perceptible impact on other road users.</p> <p>Regarding the new access road, South Stream Transport will undertake further traffic assessments at the community of Priseltzi VZ to determine whether public use of the new permanent access road during the Construction Phase of the Project will have an adverse impact on community use of the road.</p> <p>Road safety is given serious consideration by the Project. South Stream Transport will contractually require its subcontractors to comply with a series of mitigation measures. A monitoring team within South Stream Transport will be responsible for ensuring full compliance with these requirements and subcontractors will be audited accordingly on a regular basis. A report of the Project monitoring will be made available on the South Stream Transport website. On-going stakeholder engagement will also serve as a means of monitoring traffic and safety impacts to ensure that the actual level of impact is not greater than predicted.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	26.	As above.	If additional significant impacts are identified and verified, these will be a priority for resolution through supplemental mitigation measures. Resolution will be developed in consultation with affected stakeholders, including the local community.	No
			27.	I believe that the measure on page 23 of Chapter 9.9 - a code of conduct for workers - is insufficient. The dismissal measure must be made explicitly clear for workers deliberately harming the health of the population, whether within working hours or outside.	<p>The Code of conduct will be developed by the selected Contractor in cooperation with South Stream Transport B.V. The Code of Conduct will cover worker conduct both during working hours and outside working hours including during any periods of leave or transit through Bulgaria.</p> <p>The Construction Contractor for South Stream Transport will undertake a rapid appraisal of the potential socio-economic and health impacts related to the preferred option(s) for workforce accommodation during the Construction and Pre-Commissioning Phase of the Project. The purpose of this appraisal is to avoid adverse impacts on Local Communities by identifying potential impacts and appropriate mitigation and management measures before the start of construction.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	27.	As above.	The appraisal will include consultation with applicable local and regional authorities, including health and social service providers.	No
			28.	What are the real dangers of gas leaks mentioned on page 25 of Chapter 9.9? Is there going to be gas discharge during normal operation? What is to be made of the claim that there is a possibility that recreational visitors may be bothered by the smell of gas? Is such a smell going to be a normal occurrence? And if yes, what are the quantities and composition of the gas going to be?	Under normal operating conditions there will be no routine emissions of gas and nobody, including workers at the site, will be able to smell gas during routine operations. Due to the presence of hydrogen sulphide and mercaptans (sulphur containing organic compound) in the gas being transported by the pipeline, perceptible odour impacts may be expected to occur on a short-term infrequent basis during occasional venting of gas during a planned shutdown for maintenance or repairs. The odour would not represent a risk to health.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	28.	As above.	<p>The air quality study notes that it is not expected that there will be significant odour issues associated with the very unlikely event of an unplanned gas release (this would be the scenario where most gas was released); odour impacts would be limited to occasional short term events when the presence of hydrogen sulphide may be perceptible. The composition of vented gas would include approximately 7 mg/m³ hydrogen sulphide and approximately 16 mg/m³ mercaptans. In the very unlikely event of an unplanned release of natural gas, it is expected that the gas from the pipeline would take 2.4 to 4 days to vent to atmosphere at a rate of 150,000-250,000 m³ per day. The frequency of unplanned venting is assumed to be less than once a year.</p> <p>The unplanned events are very unlikely. The pipelines are made of very strong steel with almost 4 cm thickness of the wall. In the very unlikely event of a leak or rupture, the pipeline will be closed immediately. Operation of the pipeline will be monitored around the clock through an advanced control system and sensor system. The pipeline will be constructed so as to be one of the safest means of transporting gas.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	29.	For the accommodation premises (see page 7 of Chapter 9.14), the option must be taken off the list that they will be situated next to the construction site because not only is this going to involve greater risk for nearby residents, but also because attempts should be made to minimise as much as possible the adverse impact on the Natura 2000 protected area.	<p>The Construction Contractor for South Stream Transport will undertake a rapid appraisal of the potential socio-economic and health impacts related to the preferred option(s) for workforce accommodation during the Construction and Pre-Commissioning Phase of the Project. The purpose of this appraisal is to avoid adverse impacts on Local Communities by identifying potential impacts and appropriate mitigation and management measures before the start of construction. The appraisal will include consultation with applicable local and regional authorities, including health and social service providers.</p> <p>South Stream Transport will also require from its subcontractors to take into consideration the local conditions and availability of the utilities when deciding on the accommodation of the workers.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	30.	The use of the harmful substance monoethylene glycol should be minimal and be substituted with compressed air where possible (see Chapter 9.14). It is better for the waste product to be returned to the supplier.	<p>Alternatives to the use of monoethylene glycol have been discussed in the EIA (Section 5.4.2.3) and will be evaluated by the construction contractor.</p> <p>It should be noted that glycol will not be discharged to the environment because it will be used during the drying operations when the pipeline is fully sealed from Russia to Bulgaria.</p>	No
			31.	The constant lighting during the Operational Phase of both investors' above-ground installations should be minimal, and stronger light sources should be fenced off using deflectors and thick and high natural vegetation barriers, particularly in a north-north-eastern direction, that is, towards Rakitnika and Borovetz Yug, which are going to take the biggest impact.	According to the mitigation measures described in Chapter 9.10 of the EIA Report, impacts during the Project construction and operation will be mitigated by using deflectors for all the lighting (including the vessels used in construction). Another measure envisaged to mitigate the impact on landscape is land restoration and remediation after the end of construction works in line with the "Project for land remedial and post-operation activities."	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	31.	As above.	This plan is to be produced in detail by the Contractor and will include, as noted under section 9.10.6.3, ' <i>Directional shielding for any permanent lighting at landfall facilities</i> '; and ' <i>Appropriately selected vegetative screening should be applied around the landfall facilities to minimize the visual impact of all above ground facilities according to the "Technical and Biological Remediation Plan"</i> '.	No
			32.	The visual perception of residents and recreation visitors in Borovetz has been incorrectly assessed as insignificant. In the appendices to Chapter 9.10, the Borovetz Yug area stands out most clearly as an area having the best visibility of the shore installations and the construction fascia, and the area is much more impacted with regard to visual perception than any other area, including Rakitnika. This is due to the fact that in Borovetz Yug many more properties are located at an altitude exceeding 140 m above sea level, for which there are no visual barriers for the permanent installations and the construction fascia.	There will be no visual impact from the construction fascia. During construction only the top parts of the high construction machinery, such as cranes, may be seen on the horizon by the residents of Borovetz and Priseltsi. Borovetz Yug is at a distance of more than 4 km from the nearshore works and any construction vessels would be barely perceptible and taken in the context of the intervening landscape and built form. The scale of offshore vessels at a similar distance is demonstrated by the photomontage from Fichoza Neighbourhood in 9.10.5.2.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	32.	The adverse impact on residents, recreational visitors and visitors to the villa area of Priseltzi has also been undervalued. For instance, from the access road, the amazingly scenic landscape is going to be marred by the permanent above-ground installations.	<p>Viewpoint J has been selected as a representation of views within this area. The visibility of the landfall facilities and section are clearly shown in photomontage 9.10.10.2 and the impacts there are barely perceptible from this viewpoint. The distance of approximately 3 km from the construction works and the dark backdrop of the hills in the far distance would result in a barely perceptible view of the Project.</p> <p>Viewpoints L and M have been selected as representative of views within the area of Priseltzi vVZ and Priseltzi. Photographs 9.10.12.2 and 9.10.13.2 both clearly show barely perceptible impacts from the Project.</p> <p>Detailed assessment of the potential impacts of road improvements has not been included in the scope of the assessment. During the site work it was concluded that '<i>There are no scenic lookout points within the ZTV</i>' (Table 9.10.7) and therefore this receptor is allocated a 'low' sensitivity in accordance with the methodology.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	33.	<p>The conclusion on page 59 of Chapter 9.10 is extremely inaccurate about the visual perception of tourists visiting the forest where the above-ground installations and the denuded of forests pipeline corridor are going to be. It is reckless to claim that the cumulative impact will be a short-term one, since more than 450 decares of forest terrain is going to become an industrial zone for more than 50 years, and besides, another 500 decares of forests are going to be cleared around Varna and the pipeline right-of-way. Every lover of eco-tourism around Varna remembers how much more scenic and appealing the road to Pasha Dere used to be before the forest cutting for the Galata gas pipeline was made. Now this denuded of forests strip is going to expand from 40 m to 100 m, and in combination with the permanent loss of one of the most beautiful places having an incredible blend of deciduous and coniferous forests with many glades - the Kitkata area (where the permanent above-ground installations are going to be) - will once and for all chase away the lovers of eco-tourism in the region. The impact for those who enjoy a hike in the forest is great and long-term and it can hardly be reduced to even medium, even after the best mitigating measures.</p>	<p>The EIA Report recognises that impact for tourist visitors to the Galata RoW and the forest will be moderate during the Construction and Pre-Commissioning Phase. The Project will implement the most significant mitigation measure to reduce impacts to landscape which is undertaking microtunnelling for the shore crossing which preserves the Pasha Dere Beach. In addition, during the detailed design process the construction contractor will aim to minimise the area needed for construction and the number of trees that will need to be cut and after construction disturbed land will be remediated.</p> <p>Views of users of the forest are noted as being short-distant and constantly changing as visitors move through the densely forested area; therefore the views of the Project are considered to be experienced for a short period of time (i.e. recreational users on horseback or quad bikes or hikers with constantly changing views). The existing use of the Galata RoW as access for the beach means that the proposed Project RoW (after remediation planting) may be utilised by recreational visitors as an additional recreational track.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	33.	As above.	<p>Vegetative screening around the landfill facilities will also be implemented. This screening will form a backdrop of similar appearance to the existing deciduous and coniferous forests.</p> <p>The conclusion of the cumulative impact assessment acknowledges however that '<i>The visual receptor group 'Recreational visitors to the Galata RoW and forest' will experience a significant moderate adverse effect due to the increased size of the cumulative construction area, however this is short-term and largely reversible in the case of the RoWs'.</i></p>	No
			34.	<p>I believe that, should risk events occur of pollution of the water on and around Pasha Dere Beach, notification will need to be sent to not only the regional health inspectorate. There should be information on prominent spots in Pasha Dere and in the regional media. As a beach lover, I would like to be sent a personal email.</p>	<p>The quality of the water in the nearshore section (bathing water) will be monitored during the construction of the pipeline. The results will be reported to the respective competent authorities (for example Black Sea Basin Directorate, Regional Inspectorate on Environment and Water, Ministry of Health).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	34.	As above.	<p>South Stream Transport B.V. does not expect that any pollution will occur at Pasha Dere Beach. To further ensure this, a voluntary restriction on treated wastewater from vessels, (a restriction which exceeds the MARPOL and national regulations) will be implemented. In the event of the very unlikely unplanned release of hydrocarbon or sewage South Stream Transport B.V. will implement its emergency response plan, which, in compliance with Bulgarian legislation and good international industry practice will include prompt notification of any hazards to the beach and other marine users.</p> <p>The Project also commits to ongoing communication and information disclosure with stakeholders which will include updates to inform the users of Pasha Dere Beach about the timing of construction activities, including the dissemination in advance of information on any restrictions related to the use of Pasha Dere Beach.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	35.	I am fully in support of the idea that the construction works should not be carried out during the weekends of the active beach season in the period of June-September, and it is best that there are no construction works near the shore in this period. It is mandatory to put notification boards containing the construction works schedules at the 3 land approaches to the Pasha Dere Beach - north, i.e. the ravine of the Galata gas pipeline, middle, i.e. the camping site from the direction of the Galata gas station, and south, i.e. from the direction of the village of Priseltzi and the Rodni Balkani military section.	<p>The EIA considers the importance of access to the beach for beach users, especially during peak season or weekends. In the Chapter 9.13 – Socio-economic Impact assessment it is stated that the restriction time for the access to Pasha Dere Beach, including any construction activities on the beach, will be minimized and the Project will avoid, as much as practicable, any construction activities during the periods of active visit of the beach (weekends and national holidays).</p> <p>The Project also commits to ongoing communication and information disclosure with stakeholders which will include updates to inform the users of Pasha Dere Beach about the timing of construction activities, including the dissemination in advance of information on any restrictions related to the use of Pasha Dere Beach.</p>	No
			36.	What are additional restrictions for the marine areas because of the South Stream project during the operational phase? Are amateur angling, swimming and sea sports and recreational activities going to be restricted in some way?	In general, the recreational activities currently practiced at and near the Pasha Dere Beach would continue to be possible after the construction of the South Stream Transport offshore pipeline.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	36.	As above.	<p>To ensure that the subsea pipelines are not damaged by third party activities (e.g. dragged anchors, fishing gear, etc.) during the Operational Phase, exclusion zones from the shoreline up to a depth of about 100 m will be put in place along the pipeline route to restrict activities of third parties that could come into contact with the pipelines (e.g. dragged anchors, fishing gear, etc.) and thereby damage the pipelines or place themselves at risk.</p> <p>The proposed exclusion zones will be agreed in consultation with the appropriate authorities. It is anticipated that the exclusion zone will extend to 0.5 km (0.27 NM) either side of the outermost pipelines.</p> <p>This exclusion zone (the South Stream Project operational phase safety exclusion zone) will fall almost entirely within the boundaries of the existing Galata Gas Pipeline exclusion zone, out to over 10 km from the shoreline – from which point the route of the South Stream Pipeline and the Galata Gas Pipeline, and their associated exclusion zones, start to diverge. See Figure 5.53 as included in Chapter 5 of the submitted EIA.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
26 th December 2013	Letter	Resident of Local Community	36.	As above.	<p>At this point, the exact nature of the restrictions in the exclusion zone is yet to be agreed with the appropriate authorities. However, it is expected that the restrictions that apply within the South Stream Pipeline Operational Phase safety exclusion zone will be very similar, if not identical, to the restrictions that apply within the existing Galata Gas Exclusion Zone.</p> <p>Hence, as the two exclusion zones almost entirely overlap, the physical extent of any zone where additional restrictions would apply is likely to be very limited.</p>	No
6 th January 2014	Email	Resident of Local Community	-	I want to express my negative citizenship opinion to the project as a whole! This is unacceptable to build such a facility so close to populated areas and especially to destroy the forest and fauna protected by Natura 2000! This is a pointless and unnecessary project for Bulgaria. The cost is unreal and a corruption scheme can be seen clearly from anywhere! Damage to this beautiful and still clean area of the coast will be irreparable! So stop this project and do not curse present and future generations!	<p>The EIA Report is prepared in accordance with Bulgarian and European environmental legislation and also considers the requirements of the international financial institutions on the environmental and social characteristics. More detailed information is included in Chapter 2 of the EIA Report.</p> <p>The impacts on the Natura 2000 sites due to the implementation of the Project are assessed in the Appropriate Assessment Report (Appendix A of the EIA Report).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Letter	Resident of Local Community	-	As above.	<p>Appropriate assessment is carried out in compliance with the Bulgarian environmental legislation (EPA and AA Regulation) as well as the EU Habitat Directive 92/43/EEC to ascertain that the Project will not adversely affect the integrity of the site concerned.</p> <p>The findings of the Appropriate Assessment confirm that the impacts are acceptable and consistent with the objectives of the Natura 2000 designated sites, which do not exclude industrial developments as long as they are compatible with the features of the protected areas.</p> <p>The Project has been designed to ensure that the current and planned recreational vocation of the area is not significantly affected. The choice of microtunneling versus open trenching through the Pasha Dere Beach is a clear example of the commitment of South Stream Transport B.V. to ensuring that access to the beach is uninterrupted and the integrity of the beach itself is preserved during and after construction of the pipelines.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Email	Resident of Local Community	-	I would like to express my outrage at the impending passage of the gas pipeline and the construction of the related facilities, so close to town.	<p>The EIA Report is prepared in accordance with Bulgarian and European environmental legislation and also considers the requirements of the international financial institutions on the environmental and social characteristics. More detailed information is included in Chapter 2 of the EIA Report.</p> <p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European legislation in relation to the distances from nearest settlements and their safety. There are many examples for the successful operation of pipelines near towns and villages both in Bulgaria (Yovkovo, Lozenets, Rupite, Polski Senovets, Petko Karavelovo, etc.) and in Europe (Moffat, St. Fergus (Scotland), Bacton, Easington, Theddlethorpe (England), Mallnow, Olbernhau, Rueckersdorf (Germany)).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Email	Resident of Local Community	1.	<p>Ladies and Gentlemen, I make the following objections against the EIA:</p> <p>Why in the draft EIS indicated the pipeline capacity of 63 bcm / year, while in the intergovernmental agreement between Bulgaria and RF agreed twice smaller capacity of the pipeline? Does this mean that the two tubes of sea pipeline are absolutely illegal? How they affect the environment?</p>	<p>There are two South Stream projects in Bulgaria – for the pipeline in the sea and for the pipeline on land. The current project is constructing the offshore pipeline and is developed by South Stream Transport B.V.</p> <p>The second project is named “South Stream Pipeline on the territory of Republic of Bulgaria” and is for the pipeline land crossing the territory of Bulgaria and is developed by another company – South Stream Bulgaria AD.</p> <p>More information about the “South Stream Pipeline on the territory of Republic of Bulgaria” can be requested from the developer – South Steam Bulgaria AD.</p> <p>The South Stream Offshore Pipeline – Bulgarian Sector comprises 4 pipelines, each 813 mm in diameter with capacity 15,75 bcm/y, overall 63 bcm/y.</p> <p>The South Stream Pipeline on the territory of the Republic of Bulgaria comprises 2 pipelines, each 1400 mm in diameter and overall capacity also 63 bcm/y.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Email	Resident of Local Community	1.	As above.	The South Stream Offshore Pipeline – Bulgarian Sector has been subject to an environmental impact assessment the results of which are contained in the EIA Report prepared in accordance with Bulgarian and European environmental legislation. This legislation requires assessment of the potential Project impacts on the environmental and social characteristics of the areas in which the Project is located, which includes the region of the City of Varna.	No
			2.	<p>In shore facilities will include an exhaust system connected to the exhaust unit with a height of 30 m. When they are used, if necessary four pipes simultaneously be decompressed and gas to be released into the atmosphere, the following questions arise:</p> <ul style="list-style-type: none"> - For how long, how much gas will be emitted. - How this amount will affect the purity of the air in the region, on humans, animals and plants that are located in nearby neighborhoods bulb Rakitnika balance, Pazaraliyata and Galata. 	<p>Detailed information on the gas release system is provided in the Chapter 5 of the EIA Report (section 5.2.4.6) and is considered in the impact assessment.</p> <p>During normal operations, the vent stack will not emit any gas. Venting will only take place during planned maintenance or shutdown activities that may require gas within certain areas of the landfall facilities to be released to atmosphere. The vent stack will be fitted with appropriately designed silencers to reduce the noise associated with the venting process. There will be no flaring from the vent stack.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Email	Resident of Local Community	2.	<p>How will the fire safety in the vicinity of nearby neighborhoods bulb Rakitnika, scales, and Galata Pazaraliyata with concomitant release of gas from the four pipes.</p> <p>I think that should not issue a decision approving the EIS prior to decide issues raised in the above problems.</p>	<p>In the very unlikely case of unplanned release of natural gas in the atmosphere through the stack it is estimated that 2.4 to 4 days are needed to release the gas at mean speed of 150 000-250 000 m³/d. It is not expected that the unplanned emissions will affect the air quality in the region as stated in chapter 9.3.5.6 of the EIA Report.</p> <p>The very unlikely unplanned release of gas in the atmosphere and the issue of fire safety are assessed in Chapter 10 (sections 10.4.2.2 and 10.4.2.3) of the EIA Report. Following the implementation of the mitigation measures outlined in that Chapter, no adverse impacts on people, their health and dwellings are expected.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	-	<p>Dear Ladies and Gentlemen, I am a resident of the city of Varna and own a real estate in proximity of the Pasha Dere Beach and the potential installations which have been planned to be constructed under the South Stream project. I have lived and worked both in Bulgaria and in Europe. On 19.12.2013, in Varna, I attended the public hearing of the South Stream Offshore Gas Pipeline investment proposal for the territory of the Republic of Bulgaria, organised by South Stream Transport B.V. I was highly disappointed by this company and by the way it presented itself to us. In Varna, these people had thus far held one meeting with residents to discuss this project, but they had apparently paid no attention to our concerns and remarks. This is a huge mistake. If they had, I am sure many of the problems arising from the people's uninformedness, as well as those problems that arise from the investor's lack of information about our problems. They would have understood that they are required to respect the civil rights of the residents of this city. I also believe that your officers should have conducted preliminary meetings with stakeholders from the region. And I recognise this as a serious omission of yours.</p>	<p>South Stream transport BV has developed and implemented a stakeholder engagement programme as part of the permitting process for the Project. The requirements of the Bulgarian and European environmental legislation for consultations and public engagement in the EIA process have been taken on board along with the standards and guidelines of international financial institutions and good international industry practice. The activities and the specifics of this process are outlined in Chapter 6 of the EIA Report.</p> <p>As part of the EIA process, in early 2013 (January and February), South Stream Transport initiated a series of consultations on the scope and content of the EIA Report. The stakeholders' feedback was collected during meetings, round tables, as well as in written form via comment boxes and direct communication with the Project through letters and emails.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	-	<p>I believe that the EIA for IP South Stream Offshore Gas Pipeline on the territory of the Republic of Bulgaria has some serious omissions that were made even more apparent at the public hearing. Many other residents of Varna and neighbours of mine from the affected areas share my opinion. This is a large report, but in it I see that the experts who have prepared it have not offered any real protection of the population. Therefore, I am asking you to pay particular attention to the following recommendations and comply with them.</p> <p>The main recommendation is to not accept the EIA for the South Stream Offshore Gas Pipeline investment proposal on the territory of the Republic of Bulgaria in the part concerning the municipality of Varna. This is necessary for the following very important reasons:</p>	<p>Special attention was paid to the communities in the Project area. Two meetings with the communities of the Project area were organised - in Galata on 06.02.2013 and in Priseltsi on 07.02.2013. Meetings were advertised in the newspapers and via announcements at public places.</p> <p>A Scoping Report/Terms of Reference document containing the preliminary findings of the EIA process, along with a non-technical summary of this Scoping Report and other Project information such as brochures, were distributed in advance of the meetings. This was to ensure that stakeholders had enough information to understand the potential Project impacts and give their feedback on these to the Project team.</p> <p>During the meetings the EIA team presented the Project and was available to answer questions. Comment boxes and contacts of the company were distributed and advertised to facilitate stakeholders' response. The results of these consultations were considered by the Project and were used in preparation of the EIA Report.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	-	As above.	<p>During these consultations the Project collected valuable information about Pasha Dere Beach and its importance for the local communities as well as the concerns regarding issues such as traffic and noise. One of the outcomes of the feedback process was the very significant change in the Project design for the shore crossing – from open cut method to microtunnelling – due to the concerns of local stakeholders about the short and long term impacts on the beach from the open cut trenching method. The microtunnelling construction method allows for the preservation of Pasha Dere Beach intact during the lifetime of the Project, including during construction.</p> <p>Attention was also paid to the routes to be used by construction traffic and currently the routes avoid most communities by utilising existing main roads with the local access road bypassing the majority of v.z. Priseltzi and passing nearby to very few residential dwellings.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	1.	<p>An unjustified partitioning of the project passing through the municipality of Varna has been done. No integral project has been presented that includes an assessment of the impact of the construction of the pipeline in the 23 kilometres of the sea territory of Bulgaria, and the first 2-3 kilometres from the shoreline on to the land in conjunction with the land part and including the compressor station and the receiving terminal. For me, this is inexplicable and violates both the natural progress of such a public hearing and the respective assessment by experts from the Ministry of Environment and Water, as well as infringes on legal norms of the Republic of Bulgaria and the EU. The investment proposal for the construction of the South Stream gas pipeline has been split into a marine and land part, where for each, two separate EIAs are available - both have been prepared at different times, a long period of time apart from each other, and besides, the public is not allowed to get an overall picture of the investment proposal's impact in its entirety (which is in conflict with the Aarhus Convention according to which timely and complete information about the investment proposal must be presented to the public).</p>	<p>The entire South Stream Gas Pipeline System spans over 2300 km, crossing a number of countries and different geographies to transport natural gas from Russia to the countries of Central and South-Eastern Europe. Along the route, the system will go through the Black Sea and then connect to different national grids in the countries it passes, each country having its own technical and regulatory requirements. To manage such a complex project, a number of joint ventures have been formed. For example:</p> <ul style="list-style-type: none"> • Bulgarian Energy Holding EAD together with Gazprom is part of South Stream Bulgaria AD, helping to realize the pipeline in Bulgaria and connecting it to the national Bulgarian grid. • For the offshore section, four leading energy companies formed the international joint venture South Stream Transport B.V. – Gazprom, Eni, EDF and Wintershall. <p>These companies bring with them experience in building and operating offshore pipelines, such as the Blue Stream Pipeline through the Black Sea or the Nord Stream Pipeline in the Baltic Sea.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	1.	<p>What arguments is the investor going to adduce for splitting the investment proposal, considering that the currently available EC interpretations in similar cases seem to prove that what we are looking at is a "salami slicing".</p> <p>My concrete proposal is to temporarily suspend the EIA procedure for the South Stream MGPIP on the territory of Bulgaria, and to re-examine both projects simultaneously (at least in their part for the sea territory of the Republic of Bulgaria together with the receiving terminal and the compressor station).</p>	<p>The implementation of the Project for the South Stream Pipeline System, including splitting the pipeline into different sectors for assessment and construction, is similar to the Nord Stream and Blue Stream Projects. In terms of the EIA procedure splitting the Project does not breach either the European legislation nor the Aarhus Convention. The EIA Report considers the facilities of the South Stream Project on the territory of the Republic of Bulgaria being developed by SSBAD and assesses the cumulative impacts of both projects – onshore and offshore (Chapter 9 and Chapter 11).</p>	No
			2.	<p>No objective assessment has been made of the opportunities provided by other alternatives for the pipeline to cross shore at a location different from the Pasha Dere Beach. I very clearly raised the question a couple of times at the public hearing that I would like to see an official document for this ridiculous decision, a document that has been approved by a Bulgarian state institution, in which an integral investigation is evident of the decision that the pipes should cross shore right next to our homes.</p>	<p>The South Stream Offshore Pipeline – Bulgarian Sector has been subject to an environmental impact assessment the results of which are contained in the EIA Report prepared in accordance with Bulgarian and European environmental legislation. This legislation requires assessment of the potential Project impacts on the environmental and social characteristics of the areas in which the Project is located, which includes the region of the City of Varna.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	2.	<p>This question was asked but no answer was given: Who, when and where took the decision that these pipes should cross shore at that location in the city of Varna. I did not receive any document for such a responsible decision. I believe that the Ministry of Environment and Water should form an expert group and that these experts should carry out a meticulous investigation of the possible options for the pipes' shore-crossing point being located further away from the city of Varna. In this way the compressor station and receiving terminal installations will not be in such close proximity to the city of Varna. They will arrest the development of Varna and will generate many negatives for the affected population. The development is going to be arrested because this city can now only expand in a southern direction. And this has been reflected in Varna's new General Development Plan. Instead there will be a new industrial area south of Varna. In the middle of the best beaches and forests.</p>	<p>The EIA Report discusses the technically and financially feasible alternatives in Chapter 4.</p> <p>To establish the route, SST performed many surveys since 2009. The crossing from the deep seas to shallow waters is very steep, so this was an important restriction in finding a possible offshore route. After selection of the offshore route and a feasible crossing of the continental slope, an analysis was made to find a suitable landfall location on the Bulgarian coast. Considered locations ranged from a site 60 km north of Varna to a possible site 34 km south of Burgas. A major constraint was that a large portion of the Bulgarian coastline is designated as either Natura 2000 protected areas or nationally designated protected sites. Furthermore, there are a number of residential communities and tourist sites located along the coast. Therefore, it was decided to place the landfall site and the pipeline close to the existing Galata pipeline, to bundle the impacts, while avoiding the two nationally protected sites Liman and Rakitnik.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	2.	My concrete proposal is that the gas pipeline should cross shore further away from the boundaries of Varna, and not here, amidst one of the most densely populated regions of Bulgaria. There are many possibilities in less densely populated areas that are further away from Varna. If you do not consider my proposal, do have in mind that just a few kilometres south of Pasha Dere there are plenty of non-urbanised areas for the pipeline to cross shore and for the compressor station and receiving terminal to be built.	<p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European legislation in relation to the distances from nearest settlements and their safety. There are many examples for the successful operation of pipelines, near towns and villages both in Bulgaria (Yovkovo, Lozenets, Rupite, Polski Senovets, Petko Karavelovo, etc.) and in Europe (Moffat, St. Fergus (Scotland), Bacton, Easington, Theddlethorpe (England), Mallnow, Olbernhau, Rueckersdorf (Germany)).</p> <p>The impacts on the Natura 2000 sites due to the implementation of Project are assessed in the Appropriate Assessment Report (Appendix A of the EIA Report). Appropriate assessment is carried out in compliance with the Bulgarian environmental legislation (EPA and AA Regulation) as well as the EU Habitat Directive 92/43/EEC to ascertain that the project will not adversely affect the integrity of the site concerned.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	2.	As above.	<p>The findings of the Appropriate Assessment confirm that the impacts are acceptable and consistent with the objectives of the Natura 2000 designated sites, which do not exclude industrial developments as long as they are compatible with the features of the protected areas.</p> <p>The Project has been designed to ensure that the current and planned recreational vocation of the area is not significantly affected. The choice of microtunneling versus open trenching through the Pasha Dere Beach is a clear example of the commitment of South Stream Transport B.V. to ensuring that access to the beach is uninterrupted and the integrity of the beach itself is preserved during and after construction of the pipelines.</p> <p>Any future projects that may be proposed for this area will also be subject to the requirements of Bulgarian legislation including the assessment of environmental and social impacts and an Appropriate Assessment, if needed. Such projects will need to satisfy any requirements under these assessment process to ensure that the integrity of the Natura 2000 sites is not adversely affected.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	2.	As above.	In regard to the General Development Plan of Varna, it is not considered that the construction and operation of the pipeline will prejudice the planning and development of areas as quoted in the comments. The pipeline does not cross any existing residential area and new areas designated for residential development in the General Development Plan of Varna are not prevented or restricted by the pipeline. Galata and Priseltsi including vz Priseltsi will still be able to be developed at any stage in accordance with the General Development Plan.	No
			3.	We, the residents of Varna, have started a petition in which we demand that the South Stream installations are located not less than 5 km away from the city. We believe that in the report's descriptive part, which includes the investment proposal, the distances to the residential areas must be registered, in compliance with the newly voted General Development Plan of the municipality of Varna, which envisages expansion of building in a southern direction, that is, in the direction of the investment proposal site, which has been planned for 50 years.	The distances to the closest to the Project existing residential areas, as well as information on these areas, is provided in Chapter 7.13.3.2 of the EIA. Any future projects that may be proposed for this area will need to assess the impacts from the existing projects. The National Expert Council to the Ministry of Regional Development and Public Works has stated that the Project is compliant with the GDP of Varna (Protocol No YT-01-02-25 / 21.08.2012).	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	3.	<p>This is also necessary because of the fact that the impact will affect these regions. It is obvious that the future development of the city in this direction is impossible, and that has been clearly implied in both reports of the companies that are working on the South Stream project in Bulgaria. This is ridiculous. This means that we are guaranteed 50 years of discomfort.</p> <p>Taking into account the large population density in the region, the enormous adverse impact is staring us in the face. Varna has a population of almost half a million. To cite as examples, the North Stream in Germany, and the Blue Stream in Turkey, both Gazprom projects, have only a receiving terminal at the point of shore crossing. There are no compressor stations on the shore in either of these two countries. The installations are not in proximity of cities of hundreds of thousands, like in the case of Varna. Blue Stream crosses shore 60 km away from the large city of Samsun in Turkey. And in Germany, there is no city of a similar size within dozens of kilometres. Not to mention that there are no protected areas.</p>	<p>It is not considered that the construction and operation of the pipeline will prejudice the planning and development of areas such as Galata quarter and Priseltsi, including the villa area. These will still be able to be developed at any stage in accordance with the General Development Plan.</p> <p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European legislation in relation to the distances from nearest settlements and their safety. There are many examples for the successful operation of pipelines near towns and villages both in Bulgaria (Yovkovo, Lozenets, Rupite, Polski Senovets, Petko Karavelovo, etc.) and in Europe (Moffat, St. Fergus (Scotland), Bacton, Easington, Theddlethorpe (England), Mallnow, Olbernhau, Rueckersdorf (Germany)).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	3.	In Russia, the starting point of the North Stream is located more than a 100 km away from St. Petersburg. I believe that these examples are more than enough to demonstrate the apparent injustice being done to the residents of Varna by the nearby, at less than 2 km away from the city, positioning of the South Stream.	No response required.	No
			4.	The report says that the planned shore crossing point of the South Stream pipeline on the Bulgarian is 11 km away from Varna. The actual distance is less than 2 km. This is an undeniable and very significant error, which, I think discredits the entire report.	The 11 km distance referenced in the Report is measured from the proposed route of the landfall section of the pipeline to the centre of the city of Varna. However, the impact assessments presented in the EIA consider the potential impacts on the closest receptors to the proposed route of the pipeline, including the closest residential areas. For example, the south-west area of Rakitnika is located approximately 1.7 km north of the pipeline and 3 km north east of the landfall facilities.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	5.	In a number of places in the report we read that "the Black Sea basin has all preconditions for occurrence of geological dangers in the sea by virtue of it being a semi-closed sea basin, marked out by active faults and high tectonic activity", as well as "for some of the faults, it is impossible to make even an approximate estimate" and so on and so forth. I think that, in view of these dangers, the right thing is for the route to cross shore in an area that is as low populated as possible, and not in the vicinity of our Black Sea's largest city. This is a measure to ensure that as few as possible people are affected in the event of seismic incidents. Which means I insist, once again, that the site of the pipeline's shore crossing point be changed to a less densely populated area.	The pipelines have been designed to withstand seismic events. Several seismic studies have been undertaken and we have established that the Project is within an area of low seismic intensity – meaning few or minor earthquakes, which would not damage the pipeline. The geohazards along the pipeline route are discussed in details in Chapters 7 and 9 of the EIA.	No
			6.	The report clearly states that archaeological research is on-going. This means that the EIA is incomplete in the Archaeology part, respectively the entire report is incomplete. Therefore, this document needs to be re-assessed by the Ministry of Environment and Water when the archaeological research is complete.	The Project is developed in compliance with Bulgarian legislation on cultural heritage. For the purposes of the EIA Report surveys regarding cultural heritage and consultations with the competent authorities were carried out.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	6.	As above.	<p>A total of 83 potential underwater cultural heritage objects have been identified in the course of the Project. This has enhanced the national record of marine heritage and contributed to the development of effective marine archaeological survey methodologies and integrated design controls for major pipeline projects.</p> <p>The recommendations of the Bulgarian Ministry of Culture, the National Institute of Immovable Cultural Heritage and the Centre for Underwater Archaeology have been addressed during the assessment, particularly in terms of reporting requirements, survey and assessment methodology, and mitigation measures. Organisations including the Bulgarian National Association of Underwater Activity, the Bulgarian Navy, the Marine Administration and the Institute for Marine Research (Oceanology Institute) were also consulted.</p> <p>The offshore route has been adjusted to avoid marine cultural heritage objects by at least 150 m where possible.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
27 th December 2013	Letter	Resident of Local Community	6.	As above.	<p>Microtunnelling will be undertaken in the area of Antique structure BG-TCH-003 to avoid any impacts on the monument.</p> <p>An archaeological watching brief will be held on onshore and offshore construction works.</p> <p>Further surveys will be undertaken in the anchor corridor and nearshore area to identify any remains buried under sediments.</p> <p>Impacts on cultural heritage will be systematically controlled and monitored by the application of a Cultural Heritage Management Plan, an Anchoring Management Plan, Chance Find Procedures and Cultural Heritage Awareness Training for Project staff.</p> <p>The further survey work to be carried out for the Project is to support the implementation of the mitigation measures rather than to further assess the impacts of the Project.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
6 th January 2014	Email	Resident of Local Community	-	I am a citizen from the city of Varna who owns land next to Pasha Dere Beach and I am concerned about the planned landfill facilities. On Dec 19 2013 in the city of Varna, I took part in the public consultations for the investment proposal for the South Stream Offshore Pipeline Project, represented by South Stream Transport BV, and was disappointed about the way South Stream Transport represented itself. I think that the EIA for the South Stream Transport Project in Bulgaria has serious gaps, and these gaps became apparent during the Public Hearing. Many citizens of Varna and my neighbours from the affected area share this opinion. Although the report is extremely long, I am not satisfied that enough attention is paid to the protection of the Local Communities. Please could you review and address the following recommendations.	No response required.	
			1-6.	This part of the email is identical with the statements 1-6 set in the letter of 27th December 2013. The statements received are appended in Annex 2 to the cover letter of the SST current response.	The comments and issues in the rest of the email are identical with the comments and issues of the letter of 27th December 2013. The SST responses to these statements are given above in the table.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
9 th January 2014	Email	Resident of Local Community	-	I own a villa near Galata South of Varna District of Varna and would like to register my objection the above pipe line. I feel that the additional traffic moments would have a detrimental impact on the surrounding area and also have a massive impact on noise and dust pollution. I also don't believe the residents who will be most affected by this construction have been compensated to a level that justifies the inconvenience they will incur over three years.	<p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European legislation in relation to the distances from nearest settlements and their impact on noise and dust pollution.</p> <p>There are many examples of the successful operation of pipelines, including their facilities, near towns and villages both in Bulgaria (Yovkovo, Lozenets, Rupite, Polski Senovets, Petko Karavelovo, etc.) and in Europe (Moffat, St. Fergus (Scotland), Bacton, Easington, Theddlethorpe (England), Mallnow, Olbernhau, Rueckersdorf (Germany)).</p> <p>The construction traffic of the project will use route which is outside the residential areas. The closest residential area is Krushkite, where only several dwellings (less than 10) are in close proximity (less than 200 m) to the access road. The impacts related to the noise and dust from construction traffic are assessed in the EIA Report, in chapter 9. The duration of the construction onshore is planned for a period of 1 year.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
9 th January 2014	Email	Resident of Local Community	-	<p>Dear Ladies and Gentlemen,</p> <p>I have acquainted myself with the published EIA for the construction of South Stream gas pipeline on the territory of the Republic of Bulgaria.</p> <p>I believe that South Stream cuts across Bulgarian and European laws - both moral and environmental - because concealed in it are dangers and adverse impacts on people and nature. There are no trained specialists in Bulgaria that can participate in the construction of the pipeline.</p> <p>The EIA is not objective; rather, it resembles a custom-made report that protects someone's "investment proposal". It fails to produce an objective assessment of the true pernicious impact on local residents and the environment, of the destruction of the region's only beach which hasn't been contaminated with hotels with drinking bars, sunshades and loungers.</p> <p>The power of the compressors determines the production of incredibly loud noise, accompanied by the insidious infrasound, not to mention harmful emissions which will be released into the atmosphere, the pollution of water, soil, and the sea shore.</p>	<p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European legislation in relation to the distances from nearest settlements, their safety and impact on noise pollution.</p> <p>There are many examples of the successful operation of pipelines, near towns and villages both in Bulgaria (Yovkovo, Lozenets, Rupite, Polski Senovets, Petko Karavelovo, etc.) and in Europe (Moffat, St. Fergus (Scotland), Bacton, Easington, Theddlethorpe (England), Mallnow, Olbernhau, Rueckersdorf (Germany)).</p> <p>The Environmental Impact Assessment has been carried out by team of national and international experts studying the environmental and social potential impacts and includes a series of mitigation measures to address these.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
9 th January 2014	Email	Resident of Local Community	-	<p>I define your insidious intentions as a monstrous encroachment on the people and on nature. Do realise what crime you are about to commit against the environment and the people in the area.</p> <p>We will continue to fight against you using all legal means.</p>	<p>The issues about the compressor station and the receiving terminal are outside the scope of the investment proposal "South Stream Offshore Pipeline – Bulgarian Sector" and are not subject to this EIA procedure. They are subject to the investment proposal of South Stream Bulgaria AD "Construction of the South Stream gas pipeline on the territory of the Republic of Bulgaria" (company, developing the onshore section of the pipeline in Bulgaria).</p>	No
10 th January 2014	Email	Resident of Local Community	-	<p>Dear Ladies and Gentlemen who have prepared the EIA of South Stream Gas Pipeline - Bulgarian Sector.</p> <p>Having acquainted myself with the report, I would like to present my comments and questions.</p>	No response required.	

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	1.	What makes it necessary to have 4 pipes in the sea, and not fewer, for instance 2 larger-diameter pipes as in South Stream Bulgaria AD?	The offshore pipeline will be composed of four 813 mm diameter pipelines made of exceptionally strong steel with a thickness of almost 4 cm. Having two pipelines instead of four would have required larger diameter pipes with bigger wall thickness which would have resulted in increased weight. Laying such welded pipes at depth of 2000 m would have been impossible as the total weight of the pipes would imbalance the ship dangerously.	No
			2.	Has construction in the marine section in Russia begun yet?	The construction in the Russian marine section has not started yet.	No
			3.	Page 8 of Chapter 4 Alternatives says that the main objective of the analysis is to look for and identify locations where it is possible to cross shore, which are not within protected areas or in immediate proximity of settlements or tourist regions. It is the precise opposite which is done when choosing Pasha Dere - Liman and Pakitnik are protected area and lie just metres away from the pipeline, the entire route of the pipeline in land and near the shore is inside Natura 2000 areas.	When choosing a route the technically and financially feasible alternatives are considered and the related environmental and social characteristics, including people and households must be taken into account To determine the route many studies were conducted since 2009. The intersection of the deepest parts of the sea to the shallow waters is very steep, and this is important constraint in determining the route to the sea.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	3.	<p>To cap it all, it crosses shore on a beach attracting 20,000 visitors annually, next to a resort area (the Chernomorets complex is 1 km away from the pipeline, and the largest city on the Bulgarian Black Sea - the resort city of Varna - is only 2 km away).</p> <p>Which natural person or persons proposed Pasha Dere Beach to Gazprom as the best alternative? When exactly did this happen?</p> <p>Which Bulgarian institution and when exactly was the first to agree that Pasha Dere Beach will be the shore crossing point and that the above-ground installations - the compressor station, receiving terminal, and inspection and measurement devices will be located in the land of the city of Varna?</p> <p>Has the option even been entertained for the pipes to come ashore in an industrial area, e.g. Varna-West, Beloslav, Poveyanovo etc, and are there any technical impediments to making this happen?</p>	<p>After selecting a path in the sea and the choice of crossing the continental slope, was analysed to find a suitable place to leave the coast in Bulgaria. Considered locations vary from site 60 km north of Varna to possible sites 34 km south of Burgas. One major limitation is that much of the Bulgarian coastline is designated or protected as Natura 2000 sites or protected areas of national defence. Moreover, there are many beach towns and tourist resorts. The route of South Stream pipelines also continues on land across Bulgaria and therefore it also took into account buildings and populations further down the route. Therefore it was decided to select a site and route of the pipeline near the existing pipeline Galata, so as to combine their effects, while avoiding both sites Liman and Rakitnika and ensure safe distance from the facilities and route to the settlements and resorts areas.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	3.	As above.	<p>The practice to “bundle” energy infrastructure together, especially if there is a need to route infrastructure through protected areas, is used throughout the world to concentrate environmental and social impacts in as small an area as possible and to optimise mitigation and monitoring by both the developers and the regulators. This approach has been adopted previously for pipeline projects, including, for example, the Breagh Pipeline Project in the United Kingdom, which selected a pipeline route and shore crossing adjacent to existing pipeline corridors, as this was deemed to have the lowest environmental impact despite the shore crossing location being situated in a Natura 2000 Special Protection Area (SPA).</p> <p>The Project has been designed to ensure that the current and planned recreational vocation of the area is not affected. The choice of microtunneling versus open trenching through the Pasha Dere Beach is a clear example of South Stream’s commitment to ensuring that access to the beach is uninterrupted and the integrity of the beach itself is preserved during and after construction of the pipelines.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	3.	As above.	The bundling concept does not mean that the Project will pave the way for further developments in this area. On the contrary, the Project, together with the SSB Project will create conditions whereby no additional industrial developments could take place within this area, because the cumulative impacts of the existing and planned developments will have saturated the carrying capacity of the local territory.	No
			4.	<p>Why hasn't any modelling been done of the risk of failure of the pipeline in the shore section (within 3 km) during the operation of the pipeline?</p> <p>Will the pipe withstand the impact of a sinking ship? What measures have been taken for the spots when ships cross their paths not far from the Bulgarian shore?</p> <p>Is there a risk of combustion of the hydrogen sulphide in the Black Sea in the event of rupture of the pipe during operation?</p>	<p>In the very unlikely event of a leak or rupture, the pipeline will be closed immediately. Operation of the pipeline will be monitored around the clock through an advanced control system and sensor system. The pipeline will be constructed so as to be one of the safest means of transporting gas.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	5.	Is it possible that part of the traffic moves through Asparuhovo quarter, and if yes - to what will this be owed if the access road will be along the motorway, the first-class I-9 road and the road to Krushkite?	<p>The route of the access road avoids most communities, by utilising existing main roads with the local access road bypassing the majority of v.z. Priseltzi and passing nearby to very few residential dwellings as described in the EIA Report.</p> <p>It is not planned for the construction traffic to use the road through Asparuhovo.</p>	No
			6.	Although assessed as low, the residual impact on the European night-hawk may in practice prove significant, and therefore it is appropriate to take the most serious of measures.	The mitigation measures for the European nightjar are detailed in Section 7.8.1 of the AA Report. The conclusion of the residual impact assessment is that after applying these mitigation measures, impact on European nightjar is not expected to be significant (Section 7.9.1 of the AA Report).	No
			7.	What makes necessary the large right-of-way area of 120 m around the Karabuyuk ravine during operation, when the requirement is 60 m?	For the most part, the construction of the route corridor of land has a width of 60 m, coinciding with permanent pipeline easement, except the section of crossing the ravine. If there is a need, this width can be increased to 120 m for engineering reasons.	No

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10 th January 2014	Email	Resident of Local Community	7.	As above.	<p>The extra space is used for storage of equipment, manoeuvring, and other related activities.</p> <p>The 120 m width quoted in the EIA Report is a worst case scenario in order to properly assess the impacts. During the detailed design process the construction contractor will aim to minimise the area needed for construction and the number of trees that will need to be cut. Following this it may be that an area less than 120 m is needed at the point of the crossing of the ravine, however, this will only be known after the detailed design has been completed.</p> <p>A plan for replanting trees will be prepared and agreed with the competent authorities. It will determine the types and locations for replanting. Since it is optimal to replant within the SP Galata BG0002060 (after the Birds Directive) and as close to the Project area as possible. Further details can be found in the ESMMP which is appended to the EIA Report (Appendix 13.1).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	8.	<p>I am outraged that the report says the investor may (is not required to) afforest the area outside the right-of-way after completion of the construction works. I ask myself, why bother define Nature 2000 protected areas when the report explains that the law permits industrial activities to be performed within these areas.</p> <p>Is there any guarantee that a third pipeline, or another industrial site, will not emerge near Pasha dere and inside the Natura 2000 protected area Galata?</p>	<p>A plan for replanting trees will be prepared and agreed with the competent authorities. It will determine the types and locations for replanting. Since it is optimal to replant within the SP Galata BG0002060 (after the Birds Directive) and as close to the Project area as possible. Further details can be found in the ESMMP which is appended to the EIA Report (Appendix 13.1).</p> <p>There are also measures included in the ESMMP (Appendix 13.1 – C-BIO06 second paragraph) which plan for replanting of the trees after construction in the areas where open space is not required during operation.</p> <p>The EIA Report assesses the most conservative approach which will be optimised wherever possible as part of the detailed design for the Project. During this design process, one of the aims will be to further reduce tree cutting from that specified in the EIA Report, however, this may not be always be possible depending on the technical needs of the Project construction.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	8.	As above.	Any future projects that may be proposed for this area will also be subject to the requirements of Bulgarian legislation including the assessment of environmental and social impacts and an Appropriate Assessment, if needed. Such projects will need to satisfy any requirements under these assessment process to ensure that the integrity of the Natura 2000 sites is not adversely affected.	No
			9.	I am left aghast by the photomontage showing the land installations, and I find it hard to believe, and I can't accept that in the place that I have chosen for recreation and sustainable organic agriculture for myself and my family, over a period of dozens of years, we will be watching (and probably hearing) the repulsive industrial installations of South Stream and we will be "enjoying" the insignificant or low cumulative residual impacts!	There will be no visual impact from the construction fascia. During construction only the top parts of the high construction machinery, such as cranes, may be seen on the horizon by the residents of the surrounding settlements.	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	9.	As above.	<p>Borovetz Yug is at a distance of more than 4 km from the nearshore works and the any construction vessels would be barely perceptible and taken in the context of the intervening landscape and built form. The scale of offshore vessels at a similar distance is demonstrated by the photomontage from Fichoza Neighbourhood in 9.10.5.2.</p> <p>Viewpoint J has been selected as a representation of views within this area. The visibility of the landfall facilities and section are clearly shown in photomontage 9.10.10.2 and the impacts there are barely perceptible from this viewpoint. The distance of approximately 3 km from the construction works and the dark backdrop of the hills in the far distance would result in a barely perceptible view of the Project.</p> <p>Viewpoints L and M has been selected as a representative of views within the area of Priseltzi vZ and Priseltzi Photographs 9.10.12.2 and 9.10.13.2 and they both clearly show barely perceptible impacts from the Project.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	9.	As above.	<p>The overall cumulative visual impact is assessed as negligible (9.10 and section 11.4.9 of the EIA). Facilities that will be visible (first FTA BV stack height 30 m and 4 stack with a height of 30 m and a lattice tower with a height of 35 meters YUPBAD) will be appropriately painted to fit into the surrounding landscape.</p> <p>The noise emissions from compressor station and the receiving terminal are outside the scope of the investment proposal "South Stream Offshore Pipeline – Bulgarian Sector" and are not subject to this EIA procedure. They are subject to the investment proposal of South Stream Bulgaria AD "Construction of the South Stream gas pipeline on the territory of the Republic of Bulgaria" (company, developing the onshore section of the pipeline in Bulgaria).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	-	<p>I have acquainted myself with the published EIA of the investment proposal to build the South Stream gas pipeline on the territory of Bulgaria and I believe that the proposed document is indeed 'custom-made' and only serves the interests of the 'investment proposal', while leaving nature and the people (which it refers to as the 'locals') have been pushed far into the background.</p> <p>This so called EIA is incomplete, below par in professional standards, and full of ambiguities, contradictions and, in some parts, nothing but wishful thinking.</p> <p>This is the advertising brochure for the 'investment proposal'. This is so because its objective was not to produce a real assessment of the impact on the environment and the people, but to eye-wash and soothe the ever growing resistance of people against the intentions to poison and ruin their homes, and banish them from their birth places in the name of a foreign cause.</p> <p>No, ladies and gentlemen, this will not happen, not this time.</p>	<p>The Bulgarian Sector of the South Stream Offshore Pipeline is compliant with the Bulgarian and European environmental legislation</p> <p>The Environmental Impact Assessment has been carried out by international experts studying the environmental and social potential impacts and includes a series of mitigation measures to address these. On 14.11.2013 the Ministry of Environment and Water granted positive quality check of the EIA Report.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	-	<p>I am not an engineer, ecologist, or hydrologist, and have no intention to argue with you about the power of the compressors, the intensity of the infrasound, the amount of emissions released in the atmosphere, the pollution of the water and soil and so on and so forth.</p> <p>I call on you to perform a real and accurate analysis, to tell the whole truth!</p> <p>Rest assured we will not give up the fight using all legal means against such a monstrous violation of the nature and people of our mother land.</p>	As above.	No
10 th January 2014	Email	Resident of Local Community	-	<p>Strong protest against the construction of the "South Stream" with access to the beach "Pasha Dere" meters from residents and residents of gr.Varna.Protestiram terminal you will need to build 450 dk.s powerful pumping station gas near plazha.Myastoto is leisure locals, not to satisfy the insatiable interests in the Black Sea / pipes not less than 5 km end houses Galenci.</p>	<p>The compressor station and the receiving terminal are outside the scope of the investment proposal "South Stream Offshore Pipeline – Bulgarian Sector" and are not subject to this EIA procedure. They are subject to the investment proposal of South Stream Bulgaria AD "Construction of the South Stream gas pipeline on the territory of the Republic of Bulgaria" (company, developing the onshore section of the pipeline in Bulgaria).</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	-	As above.	<p>The access to Pasha Dere Beach will not be restricted as the pipelines will be installed approximately 20 meter below the beach via microtunnelling.</p> <p>The EIA considers the importance of access to the beach for beach users, especially during peak season or weekends. In the Chapter 9.13 – Socio-economic Impact assessment it is stated that the restriction time for the access to Pasha Dere Beach, including any construction activities on the beach, will be minimized and the Project will avoid, as much as practicable, any construction activities during the periods of active visit of the beach (weekends and national holidays).</p> <p>Restriction of access to a short section of the beach would not compromise enjoyment of the remainder of the beach, particularly the northern section where most users find it most convenient to access the beach.</p>	No

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Date Comment Received	Type	From	Comment Point	Comments	Position Statement of South Stream / Relevant Section of EIA Report	Need to amend EIA report (Yes/No)
10 th January 2014	Email	Resident of Local Community	-	As above.	<p>The Project also commits to ongoing communication and information disclosure with stakeholders which will include updates to inform the users of Pasha Dere Beach about the timing of construction activities, including the dissemination in advance of information on any restrictions related to the use of Pasha Dere Beach.</p> <p>In general, the recreational activities currently practiced at and near the Pasha Dere Beach will also continue to be possible after the construction of the South Stream Transport offshore pipeline.</p>	No

Complete.