

L-AUT-0048 / 27.05.2024

TO

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COPY

Ministry of Environment, Water and Forests
12, Libertatii Blv, Sector 5
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Romania
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Subject: *Statement of the Investor for public discussion of the Environmental Impact Assessment Report for “Neptun Deep” project for extraction of natural gas in the Black Sea on the territory of Romania, titleholders OMV Petrom S.A. and Romgaz Black Sea Ltd.*

Dear Sir/Madam,

As per the requirements of the Ministry of Environment and Water in a letter dated No. 99-00-200/15.04.2024 and according to the art. 97 of the Environmental Protection Act and art. 17, para. 5 of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment were held public access and meeting for public discussion of the Environmental Impact Assessment Report (EIA) with all its annexes for the “Neptun Deep” project for extraction of natural gas in the Black Sea on the territory of Romania, with titleholders OMV Petrom SA and Romgaz Black Sea Ltd. in relation with a transboundary EIA procedure, according to the Convention on EIA in a Transboundary Context and Art. 7 of Directive 2014/52/EU of the European Parliament and of the Council of April 16, 2014 amending Directive 2011/92/EU on the assessment of the impact of certain public and private projects on the environment (EIA Directive).

The public discussion meeting was held on 15.05.2024, from 10:00 a.m. in the hall of the Municipality of Kavarna at address 26, Dobrotitsa Street, Kavarna as per the notice on website of Kavarna Municipality - <https://www.kavarna.bg/> in the News and announcements section.

During the meeting minutes were taken by Mrs. Elitsa Petrova, appointed with Order No. 511/13.05.2024 of the Mayor of Kavarna Municipality to keep minutes of the public discussion and a list of participants in the public discussion was completed. According to the requirements of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment, the appointed official provided the materials with the results of the public discussion to the Titleholders within 3 days from the date of the meeting.

During the 30-day period for public access to the EIA Report and all its annexes and during the public discussion meeting, oral comments were made and written objections and written opinions on the project were received.

Written objections, written comments and recommendations on the project were received within 3 days of the public hearing (as required by art. 97, par. 6 of the Environmental Protection Act).

The Statements of the titleholders is prepared as per the letter of the Ministry of Environment and Water dated № 99-00-200/23.05.2024 and in accordance with art. 17, para. 5 of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment, in connection with a meeting held for public discussion of the Environmental Impact Assessment Report with all its annexes for the “Neptun Deep” project for extraction of natural gas in the Black Sea on the territory of Romania, titleholders OMV Petrom S.A. and Romgaz Black Sea Ltd. in relation with a transboundary EIA procedure, according to the Convention on EIA in a Transboundary Context and Art. 7 of EIA Directive.

In accordance with art. 17, para. 5 of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment the titleholder presents to the respective municipalities and mayoralties written statement for proposals, recommendation, opinions and objections.

According to the requirements of art. 17 para. 6 of the Ordinance on EIA, the relevant municipalities and mayoralties must provide public access of the statements for a period of 7 days on their website and/or in another appropriate way to the attention of the interested persons or organizations and the submitters of proposals, recommendations and opinions as a result of the public discussion, for which they provide information to the competent authority.

I hereby present you the Statement of the Investor for public discussion of the Environmental Impact Assessment Report for “Neptun Deep” project for extraction of natural gas in the Black Sea on the territory of Romania, titleholders OMV Petrom S.A. and Romgaz Black Sea Ltd. Pursuant to art. 17, para. 6 of the Ordinance on EIA, please make the statement publicly available for a period of 7 days on your website and/or by other appropriate means and provide information to the competent authority.

Enclosed: *Statement of the Investor for public discussion of the Environmental Impact Assessment Report for “Neptun Deep” project for extraction of natural gas in the Black Sea on the territory of Romania, titleholders OMV Petrom S.A. and Romgaz Black Sea Ltd.*

Sincerely,

27.05.2024

Martin Urquhart
Neptun Deep Vice-President
OMV Petrom

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Alexandru Maximescu
Regulatory and Corporate Public Affairs Vice-President
OMV Petrom

DocuSigned by:
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STATEMENT

on the proposals, recommendations, opinions and objections as a result of the held public discussions of Environmental Impact Assessment Report for project "Neptun Deep" for natural gas extraction in the Black Sea on the territory of Romania, with titleholders OMV Petrom SA and Romgaz Black Sea Ltd.

This statement was prepared according to art. 17, para. 5 of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment, in connection with a meeting held for public discussion of the Environmental Impact Assessment Report (EIA) with all its annexes for the Neptun Deep project for natural gas extraction in the Black Sea on the territory of Romania, with titleholders OMV Petrom SA and Romgaz Black Sea Ltd. in relation with a transboundary EIA procedure, according to the Convention on EIA in a Transboundary Context and Art. 7 of Directive 2014/52/EU of the European Parliament and of the Council of April 16, 2014 amending Directive 2011/92/EU on the assessment of the impact of certain public and private projects on the environment (EIA Directive). The meeting was held in accordance with the instructions of the Ministry of Environment and Water (MOEW) in a letter dated No. 99-00-200/15.04.2024, as well as in connection with Art. 97 and Art. 98, para. 2 of the Environmental Protection Act.

The meeting for the public discussion was held on 15.05.2024, from 10:00 a.m. in the hall of the Municipality of Kavarna at address 26, Dobrotitsa Street, Kavarna. During the meeting the minutes were taken by Mrs. Elitsa Petrova, appointed with Order No. 511/13.05.2024 of the Mayor of Kavarna Municipality to keep minutes of the public discussion and a list of participants in the public discussion was completed. According to the requirements of the Ordinance on the conditions and procedures for carrying out an environmental impact assessment (EIA Ordinance), the appointed official provided the materials with the results of the public discussion to the Titleholders within 3 days from the date of the meeting.

The meeting was led by the Titleholder (Mr. Daniel Dinu – Senior Project Manager "Environmental Permits"). The attendees were informed on the main aspects of the project by Mr. Daniel Dinu. A brief presentation of the results of the environmental impact assessment carried out in a cross-border context was provided by Ms. Gabriela Stanciu - senior environmental consultant and representative of Blumenfield - a team of certified experts who prepared the environmental impact assessment and the appropriate assessment (assessment for compatibility). The representatives of the municipal administration, as well as all interested persons present at the meeting, were given the opportunity to ask questions and express their opinions.

REGARDING THE MEETING HELD:

1. Public discussion in the Municipality of Kavarna - The meeting took place on May 15, 2024, at 10:00 a.m. in the hall of the Municipality of Kavarna at address 26, Dobrotitsa Street, Kavarna.

During the public consultation, the following questions were asked:

1. **Question from Ventsislava Venkova** - regional coordinator of "Junior Achievement Bulgaria": Where can this report be found?

D. Dinu's answer: on the MoEW website - published since November last year.

2. **Question from Martin Tomov - "Greenpeace" - Bulgaria.** Please note that this consultation is an OMV presentation, which is funny. According to him, Bulgarians do not need to know how many gas stations OMV has. He believes that there is misleading information in the

presentation. E.g. according to him, "Neptun" is not 130 km from Bulgarian waters, but 30 to 40 km from Bulgaria's EEZ. Considers that the presentation compares the climate impact of one project with the climate impact of entire countries. Informs that "Greenpeace" - Bulgaria has the following proposals for improving the EIA: 1/ Since 2022 in Ukraine, there are aggressive actions by the Russian side, which pose a severe threat to the ecological system in the Black Sea - e.g. impacts on cetaceans and dolphins and water pollution. There are a lot of mines in the sea, which make the work of many scientists difficult. The EIA does not have a plan to deal with an accidental collision of a mine with the platform and suggests that the EIA is amended with an analysis for the period of construction and operation. Mr. Tomov opined that along with this war there are many other threats in the Black Sea - overfishing and heavy pollution from other sources. Neptun Deep will add another threat. He therefore proposes to assess the cumulative impact. He also asked the following questions: 1/ since there will be no personnel on the platform, does this mean that there will be no measures to protect the dolphins during maintenance as well? 2/ The other vulnerable species – Mediterranean petrel, was not mentioned in the presentation 3/ During the presentation, it was not presented that in the event of a spill after 14 days it will reach the southern parts of the Bulgarian coast, and only after one day - the northern parts of the Bulgarian coast.

Answers by Daniel Dinu:

- Regarding distances: the distances from the platform to the 12-mile zone to the territorial waters and to the shore are presented. The reason why the distances to the sea border with Bulgaria are not indicated is because the two countries have not defined an exact maritime border between them. Measured from the coast, the distance to the coastal facilities is shown in the EIA from the gas metering station to the land border of Bulgaria - it is 26 km;
- The war between Russia and Ukraine - currently there are operational facilities and since before the war and until now no incidents have been recorded. The operators monitor the geopolitical situation and are in constant contact with the relevant authorities. There are also plans developed that are not shared for security reasons. It is important to remember that our countries are NATO members. Regarding floating mines in the Black Sea, it is important to understand that the platform itself is designed to withstand a collision with an entire ship that has lost control. The force of this collision is greater than the force of a mine explosion. Such analysis has been made and provided to the competent authority under the Romanian Offshore Safety Directive. Each competent authority under the Directive has a duty to check that all offshore projects meet safety conditions. These issues were not discussed with the environmental authorities, but with the authorities responsible for the engineering and safety aspects. All project and executive documentation will be checked and approved by independent international organizations to confirm that the project meets international safety requirements. Only after these approvals and agreements can the project move forward;
- Regarding overfishing – the project cannot affect the process of overfishing. There will be minimal impact on fishermen in Romania during construction as there will be delineated security areas. The vessels involved in construction will be far in the sea and will not particularly affect local fishermen. No more than 3 months of impacts are expected, after which activities will move entirely to deeper waters in which no fishing is conducted. There will be no impact at all for fishermen in Bulgaria;
- Regarding the protection of dolphins during operation, it was stated that there would be no impacts on dolphins. The Greenpeace representative specified that in the event of an incident there would be more ships, therefore impacts could occur. Mr Dinu explained that there would only be one vessel during the operation and the impact would be no

different to any other vessel. The Greenpeace representative said he expects underwater noise impacts from the ship. Mr Dinu explained that the noise from the engines could not be a problem as it is not loud and had no impact underwater. He specified that there will be a potential impact from underwater noise only when the piles are driven, but this will be a one-time activity when installing piles for the platform legs. Modelling has been done. In the worst case, this piling will take 32 hours. Under normal working conditions, it will take 22 hours or less. To mitigate this impact, the requirements of the ACCOBAMS and JNCC international conventions will be applied. These conventions provide guidance on how to protect dolphins and prevent impacts on them. Activities that generate noise and impact dolphins are also listed. Piling is such an activity and it is included in these conventions, but not the engine noise when vessels are in motion. Mr. Dinu also explained that there will be marine mammal observers watching to confirm that there are no dolphins in the area when piling begins. A "soft start" technique will also be used, where the intensity of the noise is gradually increased, causing the dolphins to move away to a safe distance for it. The last question (about the spills) was answered that Neptun Deep is a gas project, not an oil project. But because spills need to be modelled, the EIA report considered the worst-case scenario of a collision between two ships, one of which was full of fuel, leaking into the sea. This is a very unlikely scenario. Modelling was done on how such a spill would spread without taking into account the influence of wind, waves and without taking any measures to contain the spill. The result is that even in this unlikely event there would be no impact on the coasts. A more realistic scenario was also modelled, taking into account the action of wind, waves and spill response. Modelling showed that under the action of wind and waves, the spilled fuel would evaporate. With wind, waves and the application of containment measures, it was proven that the spill could not reach Bulgaria.

3. **Question from Semira Hadjinikolova** - citizen of Bulgaria: What are the benefits for Bulgaria?

Answer by Daniel Dinu: The most obvious benefit is sustainability and security of energy supply for our region. The changing geopolitical situation has made it so that there are countries that find it difficult to achieve energy independence. This project gives flexibility and sustainability to the region and we will not need to depend on other sources which could theoretically be banned by the EU.

4. **Question from Semira Hadjinikolova - a citizen of Bulgaria:** What have you built so far and what phase is the construction in?

Answer by Daniel Dinu: We have not started construction yet. So far, we have only done exploration. The project is in the phase of obtaining an environmental permit, but there are many other additional permits. Next phase is construction, in which the platform with the facilities will be built.

5. **Question from Miroslav Matev, citizen:** What is the effect of the construction works on the tourist business?

Response from Daniel Dinu: We do not expect any impact. In terms of tourism, we would consider impacts such as increased traffic or construction taking place in areas where there are tourists. When we talk about impacts on the tourism most often we are talking about activities on land. Hypothetically, there could be impacts from the construction of the facilities on land in Romania. The only activity with a possible impact on tourism is the construction of the microtunnel, which will pass under the beach. The equipment will be located on land and when it reaches the water it may cause turbidity as a visual impact. Our plans are to perform construction outside the tourist season. Additional measures are planned, such as fencing off areas where there may be turbidity and limiting the movement of sand. These impacts will be mainly in Romania. Another potential impact could arise from traffic, but most of the

equipment will be delivered by water, so there will be no oversized cargo vehicles to restrict land traffic in Bulgaria.

6. **Question from Dimitar Simov - citizen:** What experience do you have in other similar projects?

Answer by Daniel Dinu: We have experience in many other countries: New Zealand, Norway and others. For the "Neptun" project, the advantages and strengths of experience from Norway were taken and also international experts with practical experience were appointed. This gives the team confidence that they have the necessary knowledge to complete the project in the safest way possible.

7. **Question from Vlad Katuna, a citizen of Romania:** So far they have only heard the information of the Consultant, paid by the titleholders, who said that there is no impact on the Bulgarian population. But the Bulgarian Ministry of Health has assessed the EIA and expressed concerns about the project. Mr. Katuna considers it very important that the Bulgarian authorities provide information about the concerns expressed by the Ministry of Health. It is important to know that the ecotoxicity tests done by the Marine Institute are hidden from the public. Mr Katuna calls for the test results to be made available.

Answer from Mrs. Maya Gandzhova - MOEW EIA coordinator: Please note that the procedure originates in Romania. Bulgaria has been notified in accordance with the Espoo procedure for a possible cross-border impact. Mrs. Gandzhova confirms that the Ministry of Health of Bulgaria has requested to supplement the EIA report and this was done, and the supplemented report was presented in March. Mrs. Gandzhova specified that the communication about the cross-border EIA procedure is carried out between the Ministries of the Environment of Bulgaria and Romania and that the Ministry of Environment does not communicate with the titleholders. The amended report was reviewed by the Ministry of Health, which reviewed it in conjunction with the National Centre for Public Health and Analyses. In April, opinions were received from the institutions that they had no objections to the amended EIA. The Bulgarian Ministry informed the Ministry of Environment of Romania that they accept the EIA for the project and that they have set measures and conditions for inclusion in the final decision on the EIA. Mrs. Gandzhova emphasized that all documentation and correspondence between all participants is publicly available on the website of the Bulgarian Ministry in Bulgarian and in English.

8. **Question by Mr. Vlad Katuna:** Does this mean that the EIA was approved before this consultation?

Answer of Mrs. Maya Gandzhova: the approval of the EIA report by the competent authority is part of the overall approval procedure. In order to allow a public consultation, all remarks of the competent institutions - Ministry of Health, Basin Directorates, etc. - must be addressed. Only after that the report becomes public and a public discussion is held. Currently, the Ministry of Environment and Water is consolidating all received opinions, incl. from this meeting, after which the minutes of this public consultation and all opinions will be forwarded to the Ministry of Romania. As a result, they will expect the titleholders to submit responses to all received statements within 10 days of this discussion. According to Bulgarian legislation, it is the right of the titleholders to decide whether to supplement the report - e.g. if there is newly received information different from that presented in the EIA, new alternatives, etc. According to the Espoo Convention, the EIA procedure in a cross-border context is conducted according to the national legislation of the country of origin - Romania. The purpose of this discussion is to give Bulgarian citizens and NGOs the opportunity to learn more about the project and the evaluation in a cross-border context. Within a period of 10 days, the Contracting Authority must submit a statement with answers to the Municipality of Kavarna and the Ministry of Environment and Water. The statement will be publicly announced by the

Municipality and the Ministry. The Bulgarian Ministry will then inform the Romanian Ministry and request the implementation of the measures it has already indicated.

Response of Daniel Dinu regarding the issue of withholding ecotoxicity information from the public. First, the information with the data and conclusions for these tests are included in the EIA report. This is the document that provided, not withheld, information that such tests were done. In addition, as far as we know, "Greenpeace" - Romania were invited by the Basin Directorate on site to familiarize themselves with the ecotoxicity report, which contains the information they are asking about. The requirements of the legislation are that the discharge limits are established per chemical elements (not chemical products). In order to achieve this, access to the recipe for the product is needed to conduct the ecotoxicity tests. This product recipe is confidential from the manufacturer, it is a trade secret. That is why it is not published. For this reason we took only the results and conclusions of the tests in the EIA. But if you want, you can check that the conclusions in the EIA really correspond to the conclusions in the analyses - they are available and you can check them.

Vlad Katuna replied that "Greenpeace" wants full transparency for such research. Information about the toxicity was not presented to them by the Romanian authorities and they filed a lawsuit. They hope that the court's decision will come out before the EIA decision. The EIA is incomplete and this information will be provided in court, to the Bulgarian, Romanian and European society.

Daniel Dinu replied that commercial law protects this information. All other data, results and conclusions are published in the EIA. Regarding ecotoxicity, there is a public database - HOCNOF - in which substances can be checked.

9. **Question by Meglena Antonova, "Greenpeace" - Bulgaria** - you said that Bulgaria would benefit from gas extraction. Do you mean that you are already negotiating for the supply of gas to Bulgaria? We have a lot of gas, contracts until 2035, with unfavourable conditions, which means that we will pay penalties if we decide to use gas from your field. Or are you just assuming there will be a need for more gas in the area?

Answer by Daniel Dinu: Neptun Deep will provide gas and available resource. If you want you may buy it or not. I cannot say what contracts have been signed or will be signed, all I say is that there will be an additional resource of natural gas available.

10. **Question by Meglena Antonova, "Greenpeace" - Bulgaria** - You are talking about zero net emissions of CO₂. Have you accounted for the gas combustion process?

Daniel Dinu's answer: In the EIA we are talking about Scope 1 and 2 emissions, not Scope 3. Scope 3 is not subject to the EIA as we cannot control who buys gas and how it will be used. In the EIA you will find Scope 1 – consumption for our needs for production and operation.

11. **Question by Meglena Antonova, Greenpeace** - Are other locations planned for public consultations?

Answer of Maya Gandzhova from the Ministry of Environment: When the Ministry of Environment received the notification in 2022, the potentially affected municipalities were identified, taking into account that part of the Black Sea is mainly affected. The MoEW identified the municipalities of Varna, Kavarna and Shabla as affected. To hold this public consultation, MoEW has contacted the three municipalities, guided by the understanding that one public consultation is sufficient for the territory of Bulgaria, as this is a procedure initiated by Romania, in which one public consultation was held. The MoEW has approached the Municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the Municipality of Varna and Shabla replied that they did not object to the public discussion being held in Kavarna. At this stage, Mrs. Gandzhova

emphasized that the procedure does not require the holding of another public discussion. Please note once again that the EIA is publicly available, comments may still be submitted. But the 30-day public access and public comment period ends today. Ms. Gandzhova also informed that all opinions have so far been submitted to the MoEW. No opinions have been received in Kavarna Municipality.

12. **Raluca Petcu from Bankwatch Romania** commented on Scope 3 emissions. According to her, it is not impossible to calculate Scope 3 emissions, but the Employer has displaced these emissions with coal use activities.

Daniel Dinu's answer - this was explained during the public hearing in Romania, but we can explain it again. The question is not whether it can, but whether it should and how reliable these calculations are. A scenario that allows calculation of Scope 3 emissions is completely unreliable and unrealistic. It should build on other projects that change energy production from coal to gas. This project is also regional and will not be for the needs of Romania only. I.e. Scope 3 should also account for other countries switching from coal to gas.

13. **Question by Raluca Petcu from Bankwatch Romania** - The report does not give all the possible impacts resulting from fuel spills. For example, the mitigation scenario states that only 4 million tonnes will be caught. Her question is what is the impact on the environment - biodiversity, of the amount of oil not caught.

Daniel Dinu's answer - Your statement contains inaccuracies. First - there is no oil, but light diesel fuel (MGO), which is volatile and evaporates. Second inaccuracy is that the purpose of the spill modelling is not to assess the impact, but to give information about the behavior of the spill under the influence of air, wind, waves. Considering that it is a light diesel fuel that evaporates quickly, it was concluded that the impact is minimal. Marine diesel fuel (MGO) does not sink to depth, but forms a layer on the water, standing on the surface unlike oil.

14. **Question by Raluca Petcu from Bankwatch Romania** - The EIA mentions an action plan only for this accidental spill. But other accidents are possible - on the platform, gas leakage and others. It is our opinion that further assessments should be made in this regard.

Answer provided by Gary Regan - Senior EIA Manager: You are mixing two different processes - EIA and impacts and topics under the Offshore Safety Directive. These impacts are differently assessed by the institutions. This legislation originated in Great Britain, then was adopted by the EU based on bitter experience. In Romania there is such an institution that makes decisions - ACROPO. In accordance with the applicable legislation, action plans are made for major accidents. The design must demonstrate that provisions are made for such accidents and that it is safe by implementing measures that prevent accidents. These measures are part of the project itself and their implementation is monitored by ACROPO and internationally recognized independent institutions. This process of certifying the suitability of the project is similar to the EIA process, a report is prepared for major accidents, consequences. Your concerns about potential explosions are part of the process of assessing the technical safety of the site, not the environment. In the EIA report, this topic is touched upon and discussed in Chapter 9.

15. **Question by Alin Tanase - Greenpeace - Romania:** Inform that his question is to the Ministry of the Environment of Romania regarding the Offshore Safety Directive.

Clarification from Daniel Dinu: The representatives of the Romanian Ministry are here only as observers. Gary Regan will give you an answer.

Alin Tanase retorted that the importance of the directive and the obligation of each country to have a competent authority for the safety of activities at sea was mentioned. According to him, the Romanian government has poorly transposed this directive. An infringement procedure has

been initiated by the EU against the manner of transposition of the Directive into Romanian legislation.

Daniel Dinu's answer: The Investor is obliged to submit the legally required information to ACROPO. Even if there is an infringement procedure against Romania, it has nothing to do with our project. We are here to talk about the project.

Alin Tanase explains that he is raising the issue because the Directive requires a functioning institution.

Gary Regan's response: What we are doing is to comply with the legislation and we have submitted the necessary documentation. Personally, I have worked in many countries and I see that the same process is applied in Romania as in other countries.

Alin Tanase retorted that ACROPO cannot be trusted until the proceedings are over.

Gary Regan's response: The understanding for Neptun Deep is that the procedure before ACROPO will take place, and an independent audit will be done by an internationally recognized and certified company.

16. **Question by Alin Tanase - Greenpeace - Romania:** You said that the company already has operational projects in the Black Sea. We guess that all these facilities are not in good shape. How old are these facilities, have they reached the end of their useful lives?

Answer by Daniel Dinu: I cannot answer for other projects or facilities. The ones you're asking about are really from the 90's. As far as I know, some of them are being decommissioned, but that is not the point of today's discussion. Today we are talking about Neptun, designed to the best standards.

17. **Question by Vlad Katuna:** So you can't confirm that your platforms are safe?

Answer by Gary Regan - The introduction of the Directive has required an inspection of existing facilities as well.

18. **Question by Vasil Chavgov - citizen** - Will there be Bulgarian participation in the project? Is another approval from the Bulgarian authorities necessary?

Daniel Dinu's answer: We are in the process of selecting contractors. The main contractors have already been selected. Currently, there is a great demand for services accompanying the construction. The main contractors will certainly need additional services and they will make additional tenders. But we do not influence whether the subcontractors are from Bulgaria, Romania, or another country.

19. **Question by Vasil Chavgov - citizen** - How long will it take to build all the elements of the project?

Daniel Dinu's answer: Expected timeline is 2 years.

20. **Question by Vasil Chavgov - citizen** - Is this 3D model - "Twin" is something innovative?

Answer by Gary Regan - the technology exists and is proven, although it is new. It has already been implemented on other platforms and in other projects. What Neptun Deep is trying to do is to improve and develop it. The goal is to remotely manage all processes from onshore.

21. **Question by Vasil Chavgov - citizen** - Did the project requires other necessary approvals from the Bulgarian authorities?

Maya Gandjova's answer - it is not about approval. Within the framework of the EIA Convention and the Bucharest Agreement, we can object, express agreement, disagreement, as this project is Romanian. We rely on the good relations and cooperation between our two

ministries and that our Romanian colleagues will reflect the comments made by the Bulgarian side. The project will continue according to the Romanian EIA decision.

22. **Question from Ventsislava Venkova - regional coordinator of "Junior Achievement Bulgaria":** what are the specifics and deadlines regarding permits and what types of environmental permits and procedures are forthcoming? How did you contract with subcontractors without having the permits?

Answer by Daniel Dinu: With regard to the permits, we are currently at the EIA stage. After that we need a permit from ACROPO and after we get that, we will need a construction permit. We expect to receive the permits by the end of this year. We have concluded contracts only with companies that provide services and products corresponding to the stage of development of the project - for example, for a working project or for elements that must be ordered a year or two in advance.

23. **Question by Hristiyan Hristov - citizen, ecologist, marine biologist:** By what procedure did you choose to work with "Blumenfield"? My opinion is that Blumenfield assessment is biased.

Answer by Daniel Dinu: We were looking for a contractor with experience in offshore projects. There are not many experienced companies in this area. We chose this company based on its experience in offshore projects and based on its knowledge of national legislation. "Blumenfield" is one of the few companies with such an experience in Romania.

24. **Question by Hristiyan Hristov - citizen, ecologist, marine biologist:** Is the contract with "Blumenfield" is publicly available?

Answer by Daniel Dinu: Of course not, it is a commercial contract between two companies.

No other questions were asked during the meeting for public hearing of the EIA Report and its annexes for Neptun Deep project for extraction of natural gas in the Black Sea in the territory of Romania, with investors OMV Petrom SA and Romgaz Black Sea Ltd, in connection with the transboundary EIA procedure, according to the Convention on EIA in a Transboundary Context.

No opinions were received during the public access and public discussion in Kavarna municipality.

During public access to the EIA Report and within 3 days after the public discussion (in accordance with the requirements of Art. 97, Para. 6 of the Environmental Protection Act), the Ministry of Environment and Water received written objections, written opinions and recommendations on the project.

The answers and comments of OMV Petrom SA and Romgaz Black Sea Ltd. on all received statements, recommendations, opinions and objections are presented in the table below:

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
1.	<p>Letter Ex. No. 05/11/03/2024 To the Minister of Environment and Water From "For the Earth"</p> <p><i>SUBJECT: Conducting a public consultation on the report on the assessment of the transboundary impact on the environment of the Neptun Deep gas project on the territory of Romania</i></p> <p>Dear Mr. Minister,</p> <p>Za Zemiata read the information provided on the website of the Ministry of Environment and Water in connection with the consultations on the project for gas extraction in the Romanian Black Sea - Neptun Deep.</p> <p>We are aware that the Minister of Environment and Water of the Republic of Bulgaria has expressed his interest in participating in the cross-border EIA procedure by letter 99-00-200 dated 07.08.2023.</p> <p>We would like to bring to your knowledge the conclusions we made on the basis of the facts of the matter and the applicable environmental regulations - both Bulgarian and Romanian legislation.</p> <p>Art. 26, para. 1, letter "a" of the Ordinance on the terms and conditions for carrying out an environmental impact assessment states: 26. The environmental impact assessment of investment proposals with transboundary impact, which will be carried out on the territory of other countries where the Republic of Bulgaria is an affected country, shall be carried out in the following sequence: (amend. SG 29/10) upon receipt of a notification for an investment project that will be implemented on the territory of another country and which can be expected to have a significant impact on the territory of the Republic of Bulgaria, within the deadline specified in the notification, the Minister of Environment and Water shall</p>	<p>The project followed all legal provisions regarding transboundary procedure, part of the environmental impact assessment of the project. Therefore, the legal provisions mentioned in the letter were observed.</p> <p>The Ministry of Environment and Water have been highly active in the Transboundary procedure and participated as far back as 2022. Both the Ministries in Romania and Bulgaria have exchanged comments and dialogue to clarify the EIA in a number of areas.</p> <p>Despite there being no significant environmental impact from the Project on Bulgaria, a public consultation in Bulgaria, for the Bulgarian public, in Bulgarian language has been called and written comments from the public have been collected. The Espoo Convention (on Environmental impact assessment in a transboundary context) has been</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>notify the State of origin of its decision to participate or not to participate in the EIA procedure: (a) If consent to participate is given, the national procedure of the country of origin shall be followed, unless an international treaty provides otherwise.;"</p> <p>It is indisputable that the Minister of Environment and Water of the Republic of Bulgaria has agreed to participate in the procedure for cross-border EIA and therefore the requirements of the national procedure of the country of origin - in the case of Romania - must be met.</p> <p>Romanian Law</p> <p>No 292/2018 of 03.12.2018 on the assessment of the effects of certain public and private projects on the environment ('Law No 292/2018') is applicable. Article 16 (1) The public concerned, in accordance with the provisions of Annex 5, shall have the opportunity to participate effectively from the outset in the procedure provided for in Article 4(1), to document and submit proposals/recommendations to the competent public authorities, where all options are possible, and before a decision is taken to approve the development. (2) Information and participation of the public shall be coordinated by the competent authorities for the issuance of a permit for the project and by the competent authorities for environmental protection, according to their specific competences and shall be carried out in the following way: a) way of informing the public: through posters on a certain territorial territory, publications in the central and/or local press, organization of exhibitions with plans, sketches, tables, graphs, mock-ups related to the respective project, etc.; (b) the method of advising the public concerned, either in writing or by public deliberations. (3) The relevant information shall be made available to the public in electronic format, on the own website of the authorities referred to in (2). (4) The relevant time limits for the various stages so as to allow sufficient time for informing the bodies provided for in Article (b)(1) and the public, as well as for their</p>	<p>followed throughout. The public consultation meeting for the transboundary potential impact was held in Kavarna, on 15 May 2024.</p>	

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	<p>preparation and effective participation in the procedure provided for in Article 4(1) are set out in Annex 5.</p> <p>(5) The deadline for conducting the public consultations on the environmental impact report shall be at least 30 days.</p> <p>Article 17 (6) The Central State Environmental Protection Authority shall enter into consultation with the public environmental authorities of other States on the potential transboundary effects of the project and the measures envisaged to reduce or eliminate those effects and, together with those authorities, shall establish a time frame for the duration of the consultations. Such consultations may also be organised through an appropriate joint body.</p> <p>(7) The central state authority for environmental protection, together with the competent authorities from the territory of the possibly affected state, shall establish measures to allow the effective participation of the interested public in the procedure referred to in Article 4 (1), including in the case of projects with a possible significant impact on the territory of Romania, initiated in other countries.</p> <p>We also remind you that under Article 6.of the Aarhus Convention, signed by both Parties, interested members of the public should be given with opportunities to participate and the Public Participation Procedures allow the public to submit, in writing or, if appropriate, at a public hearing or inquiry to the applicant, any comments, information, analyses or views it considers relevant to the proposed activity.</p> <p>In this case, the two ministers have not fulfilled the obligations under Art. 17, para. 7 of Act No. 292/2018 in conjunction with Art. 16, para. 2, letter "b" of Act No. 292/2018, and the Minister of Environment and Water of the Republic of Bulgaria has unilaterally decided to hold consultations with the affected public only in writing - by submitting opinions to the Minister of Environment and Water.</p> <p>The above-described violation is even more significant and represents a serious defect of the procedure due to the fact that the Bulgarian public has the attitude to participate in a consultation procedure only within the framework of public</p>		

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	<p>discussion - Art. 97, para. 4 of the Environmental Protection Act of the Republic of Bulgaria.</p> <p>We consider that the obligations under Article 17(7) of Act No 292/2018 in conjunction with Article 16(2)(a) of Act No 292/2018 have not been fulfilled. Moreover, there is no trace of information to the affected public in the Republic of Bulgaria by any of the methods listed in Article 16(2)(a) of Law No 292/2018.</p> <p>On the basis of the above, we asking the following:</p> <p>We ask you to take steps to implement the provisions of Art. 17, para. 7 of Law No. 292/2018 in conjunction with Art. 16, para. 2, letters "a" and "b" of Law No. 292/2018, informing the affected public in Bulgaria about the project for gas extraction in the Romanian Black Sea "Neptun Deep" and to organize public consultations according to the requirements of Romanian, but also of the Bulgarian legislation in order to comply with the requirement of art. 16, para. 1 of Law No 292/2018, and the affected public in Bulgaria to be provided with the opportunity to participate effectively from the very beginning of the procedure and submit proposals and recommendations to the competent authorities.</p> <p>Sincerely,</p> <p>Ventseslava Kozhuharova, Coordinator, Energy and Climate Team, Environmental Association "Za Zemiata"/International Network CEE Bankwatch</p>	<p>The revised EIA was published on the website of the Ministry and the public notices informing about the date and location of the public consultation meeting were published on the Ministry website and Bulgarian newspaper.</p> <p>The public consultation too place in at the Kavarna cityhall on 15th of May 2024.</p> <p>The interested public who could not participate at the meeting provided written comments.</p>	<p style="text-align: center;">NO</p>
2.	<p>Letter Ex. No. 37/29.04.2024 To the Minister of Environment and Water From "Greenpeace" - Bulgaria</p> <p><i>SUBJECT: Statement on a report on a cross-border environmental impact assessment of the Neptun Deep project for gas extraction on the territory of Romania</i></p> <p>Dear Mr. Minister,</p>		

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	<p>Civil Environmental Organization Greenpeace – Bulgaria continues to monitor the development of cross-border consultations on the Environmental Impact Assessment Report (EIA) on the Neptun Deep project in the Black Sea. In connection with a public consultation on the EIA report, we ask you to take into account this opinion, which expresses a position on the transboundary consultation procedure on an EIA report of the Neptun Deep project in Romanian territorial waters.</p> <p>On 05.04.2024 a letter was sent by the Minister of Environment, Water and Forestry in Romania to the Minister of Environment and Water in Bulgaria, enclosing a revised EIA report with corrections in response to letter No. 99-00-200/11.03.2024. After reviewing the revised report materials, we would like to express our strong concerns about the enormous risks that Neptun Deep will expose the biodiversity of the Black Sea and the health of the citizens of the Republic of Bulgaria. Despite the revisions, the EIA report still does not address most of the threats to nature and human health originally presented.</p> <p>The methodology in the report is completely unclear as there is no clear framework for assessing the significance of the environmental impact of various threats, which can cause serious confusion even in experts. In addition, the report is inconsistent in exposing the necessary measures for nature conservation in the Black Sea and their proposed application. For example, section D.1.1. mentions strongly necessary measures to mitigate the impact of the construction of the platform on the endangered species <i>Phocoena phocoena</i>, but no significant impact on the species was found in the table of specific conservation purposes. Another similar example is the data on the Mediterranean shearwater (<i>Puffinus yelkouan</i>), whose migration routes are clearly shown as passing through the construction area, but the report does not find this bird species to be significantly affected. Due to the presence of this species in the project area and the presence of a collision risk, it should be considered as potentially affected and the impact on it should be analysed in the study. We would like to draw your attention to the fact that both mentioned species are defined as endangered and of extremely high conservation value. The threats to these and other migratory species will also affect their population in Bulgaria.</p>	<p>The revisions brought to the EIA report addressed the topics raised by the Bulgarian institutions involved in the assessment of the EIA report and, after their review of the amended EIA report, public consultation was held in Kavarna, Bulgaria. The results of the EIA report conclude that there are no significant impacts for Bulgaria or Romania.</p> <p>The EIA report has been prepared by an independent certified expert following the EIA EU Directive 2011/92 - Assessment of the effects of certain public and private projects on the environment (amended 2014/52/EU Directive) transposed into national legislation of the EU member states.</p> <p>It is not a matter of inconsistency but rather of different approaches in the Appropriate Assessment Report and the EIA due to the different methodologies in the specific guidelines for each type of study, which, however, complement each other.</p>	<p>NO</p> <p>NO</p>

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		<p>Regarding impact on marine mammals, pile hammering operations during the installation of the platform are very short (22 hours expected). The proposed mitigation measures, which are in line with international good practices and guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) include using marine mammal observers to confirm the area is clear of marine mammals before commencing operations, combined with the soft start technics allowing the dolphins to distance themselves from the noise source to a distance at which the noise levels pose no threat.</p> <p>Regarding <i>Puffinus yelkouan</i>, the vessel that installs the pipeline on the sea floor will be present in the nearshore area for a limited amount of time as it progresses with the construction and moves towards the platform which is approximately 160 km offshore. The presence of the construction vessel nearshore poses the same risk to birds as any other vessel which enters or exits any of the ports on the Black Sea coastline. A risk of bird collision with a very slow-moving construction vessel is</p>	

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	<p>Another serious omission in the EIA report is the complete lack of analysis of the impact that Neptun Deep will have on areas identified as important for the development of marine mammals (IMMA) proposed by the International Union for Conservation of Nature (IUCN), the International Committee for Protected Areas for Marine Mammals (ICMMPA) and the World Commission on Protected Areas (WCPA). The project crosses two such areas - the Western Black Sea (IMMA) and Kaliakra to Danube Delta (IMMA). Both of these zones fall partially under Bulgarian jurisdiction, so it is necessary for Bulgarian institutions to pay additional attention to the potential threats that this gas extraction project will bring. In case of chemical pollution or spillage from the platform or gas pipelines, the negative effects will quickly affect the designated as important for the development of marine mammals zone "Emona IMMA", which is the only such area falling entirely under Bulgarian jurisdiction. Neptun Deep's EIA report should take into account the potential it presents to cetaceans in the Black Sea and conduct further analysis of this pressure.</p>	<p>highly unlikely and therefore deemed not significant.</p> <p>The International Union for Conservation of Nature (IUCN) and BIRDLIFE International do not mention collisions with ships or platforms under the pressures and threats section. Only wind farms are considered a collision risk factor worth considering for this species, and Neptun Deep Project does not include such activities.</p> <p>As explained above the potential impact on marine mammals is very short term and localized around the platform during the pile hammering activities which are expected to last for approximately 22 hours. This is a one-time event during the construction phase. The area where PTS (Permanent Threshold Shift) occurs is localized around the platform, therefore these areas are not impacted.</p> <p>In order to mitigate this potential impact the Project implemented the measures provided by international guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) which require the use of marine mammal observers to</p>	<p>NO</p>

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	<p>The report draws attention to the cases of accidental pollution and discharges of water into the sea, but fails to provide an in-depth analysis of the impact on three areas of the Natura 2000 network in the maritime spaces on the territory of Bulgaria. These are "Emona" (BG0001501), "Ropotamo" (BG0001001) and "Strandzha" (BG0001007). In these areas are some of the most beneficial habitats for the Black Sea ecosystem, which deserve specific conservation and protection measures, such as communities with brown, red and green algae on rocky seabeds; constantly covered by sea water sandy and silty shoals; extensive shallow bays and others. These areas also host key, carbon-rich ecosystems, such as seagrass meadows, the conservation of which is enshrined in the EU's 2030 Biodiversity Strategy, as their destruction would lead to carbon being released into the atmosphere and conservation would help absorb a huge amount of this greenhouse gas. These and other threats need to be taken into account, especially given the increased pressure on the Black Sea ecosystem caused by hostilities in Ukraine and increasing climate change. The cumulative impact on the Black Sea ecosystem is not mentioned anywhere in the report.</p>	<p>confirm the area is free of marine mammals before commencing operations, combined with the soft start technics allows the dolphins to distance themselves from the noise source to a distance at which the noise levels pose no threat.</p> <p>The Domino and Pelican reservoirs which will be produced by the Neptun Deep Project are biogenic gas reservoirs and do not contain any liquid hydrocarbons such as crude oil or condensate. The only contain natural gas and water.</p> <p>The credible potential release of liquid hydrocarbon is deemed to be an accidental diesel (MGO) spill resulting from a vessel collision. Diesel (MGO) is highly volatile and considered a non-persistent oil as it will typically evaporate within 5 days due to the action of wind and waves.</p> <p>The risk of release is deemed to be similar for all shipping traffic within the Black Sea, this risk is not specific to Neptun Deep.</p> <p>The spill modeling provided in the EIA shows the expected case of such a highly unlikely event.</p> <p>This Expected Case which models the most realistic parameters, shows that a potential spill does not impact the</p>	<p>NO</p>

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	<p>The Romanian authorities still refuse to provide the ecotoxicity tests and their technical documentation, which are otherwise necessary for the authorisation of the project under consideration. There are references in the report to the following studies, but their full content is not yet available to the community, either in Bulgaria or Romania:</p> <ul style="list-style-type: none"> • Study on the assessment of the impact of discharges into the Black Sea of waste water containing substances whose maximum permitted limits are not provided for in NTPA 001/2002, prepared by Blumenfield S.R.L.; 	<p>territorial waters of Bulgaria and therefore presents no risk to the shoreline, bathing waters or the Bulgarian Natura 2000 maritime areas, including the ones mentioned in the letter.</p> <p>The cumulative impact of the Neptun Deep Project has been assessed with other existing projects as the guidelines require. We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics are addressed in security plans which are not part of the environmental permitting procedure.</p> <p>OMV Petrom operates existing platforms in the shallow waters of the Black Sea and have not seen any increased threat from the Ukraine war. From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p> <p>To our knowledge, the Romanian authorities have made the Ecotoxicity study available to be viewed at the offices of the authorities. Moreover, the data, substances and conclusions of that study are already clearly stated in the EIA report. There are no significant impacts from the studies.</p>	<p>NO</p>

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	<ul style="list-style-type: none"> ● Ecotoxicity study for the environmental documentation of the Neptun Deep project, prepared by the National Institute for Marine Research and Development "Grigor Antipa"; ● Preliminary study of ecotoxicity, prepared by the National Institute for Marine Research and Development "Grigor Antipa". <p>This is extremely worrying as there is a lack of specific information on what chemicals and substances will be used and/or released in Black Sea waters. Considering that even during the period of operation of the project alone, more than 5 million m³ waste water will be dumped in the Black Sea and in the event of an accident, the pollution would reach the northern parts of the Bulgarian aquatory in a few days and in just two weeks and its southernmost parts, these data are extremely necessary.</p> <p>The health of all Bulgarian citizens continues to be questioned, despite the criticism that the Ministry of Environment and Water has already addressed to the Romanian side and the shortcomings in the report in letter No 99-00-200/05.01.2024. We pay</p>	<p>This is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters in the hypoxic zone. It is a common practice which is done in other hydrocarbon producing nations, including Norway.</p> <p>This is a gas project, with no liquid hydrocarbons.</p> <p>The substances used in the technical process are licensed by the European authorities and are being used globally. OMV Petrom has used technology developed in mature oil and gas basins like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the Environment. The modelling is called DREAM modelling and the study is included in the EIA report. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p> <p>As explained above, the EIA report has been revised to address the topics raised by the Bulgarian institutions</p>	<p>NO</p> <p>NO</p>

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	<p>serious attention to the fact that the risk of such incidents and spills is significantly increased as a result of Russian aggression in Ukraine. The report lacks a real plan to deal with such incidents that would lead to rapid pollution of the entire Bulgarian waters and detrimental consequences for the health of Bulgarians, as well as for fishing and tourism in the country.</p> <p>In view of this risk, we believe that the consultations adopted by the Ministry of Environment and Water are extremely insufficient and ineffective. On 12.02.2024, the Ministry of Environment and Water in Bulgaria announced a public consultation on the cross-border consultation for Neptun Deep, to be carried out only in the municipality of Kavarna. Although we appreciate the efforts of the Bulgarian authorities to consult the public, this consultation would not provide real opportunities for all affected Bulgarian citizens to be informed and involved. For the initial response from the Ministry of Environment and Water to the Romanian side, opinions from the municipalities of Varna, Shabla and Kavarna are required, but a public discussion will be held only in the last mentioned municipality. Although the MOEW has considered the municipalities of Varna and Shabla as competent and affected municipalities, the citizens of the municipalities in question will not have equal access to public consultations. We believe that a public discussion and information campaign should also be organized in these municipalities. The municipality of Shabla is in an extremely vulnerable position, as in the event of a potential accident, bathing waters would be affected there first.</p>	<p>involved in the assessment of the EIA report prior to organizing the public consultation in Bulgaria. The EIA report clearly concludes that there are no significant impacts for Bulgaria in general or in particular to Bulgarian health, fishing or tourism.</p> <p>OMV Petrom has a full incident and security management framework in place to respond to any threat from Russian aggression but these are confidential given the sensitivity of the issue.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the debate in Kavarna was considered entirely appropriate under the Espoo Convention.</p> <p>Furthermore, as explained by Mrs. Maya Gandjova from the Bulgarian Ministry of Environment and Water during the public consultation meeting, the Ministry of Environment and Water defines municipalities of Varna, Kavarna and Shabla as potentially affected. To conduct the public discussion, the Ministry of Environment and Water turned to the three municipalities, led by the understanding that one public discussion is enough for the territory of Bulgaria, considering that impact was assessed as being not significant . The Ministry of Environment and Water has</p>	<p style="text-align: center;">NO</p>

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	<p>In addition, the mentioned modeling in case of a potential accident envisages reaching the Bulgarian waters in a day, after 10 days to the sea zone "Emona", after 12 days to the sea zone "Ropotamo" and after 13 days to the sea zone "Strandzha". In letter 99-00-200/05.01.2024, the MOEW rightly concludes that the districts of Burgas, Varna and Dobrich would be affected. However, it follows that citizens of the areas in question should also have equal access to information and public consultation. That is why we consider it necessary to organize public consultations in the regional centers of Varna, Burgas and Dobrich, as well as in the municipality of Balchik, which is in close proximity to the other northern municipalities.</p>	<p>turned to the municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the Municipality of Varna and Shabla replied that they do not object to the public discussion being held in Kavarna.</p> <p>The Domino and Pelican reservoirs which will be produced by the Neptun Deep Project are biogenic gas reservoirs and therefore do not contain any liquid hydrocarbons such as crude oil or condensate. They only contain natural gas.</p> <p>The only potential release of liquid hydrocarbon is deemed to be an accidental diesel (MGO) spill resulting from a vessel collision. Diesel (MGO) is highly volatile and considered a non-persistent oil as it will typically evaporate within 5 days due to the action of wind and waves.</p> <p>The risk of release is deemed to be similar for all shipping traffic within the Black Sea, this risk is not specific to Neptun Deep.</p> <p>The conservative spill modeling scenario provided in the EIA shows the probability of such an event to be unlikely (1% probability).</p> <p>A more credible scenario which models the most realistic parameters (e.g.</p>	<p>NO</p>

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	<p>Last but not least, we want to draw your attention to the impact that Neptun Deep will have on the fight against the worst effects of climate change. In shallow water, such as on the Domino borehole section and the 160 km pipeline to the coast, accidents can have fatal consequences for the climate. In the event of a leak, the gas would quickly rise to the surface and leak into the air, some of which would be absorbed into the water. In a similar leak in September 2022 from Nord Stream 1 and 2, about 115,000 tons of gas were released in just six days, impacting the climate and damage amounting to 15 million tons of carbon equivalent. Such an incident at the Neptun Deep project would quickly cause damage equivalent to the annual climate pressure from the platform. In an open letter, Greenpeace Austria and 76 scientists called on OMV and its largest shareholder, ÖBAG AG, to cancel the Neptun Deep mega-project in the Black Sea. The signatories warn that the development of new gas reserves is not compatible with the goals of the Paris climate agreement. Among the signatories are prof. Dr. Lucas Kenner and Dr. Isabella Pali from the Medical University of Vienna, prof. magus. Catherine Waatschinger and Dr. Maximilian Sommen from the Medical University of Innsbruck.</p>	<p>winds, spill intervention measures), shows that the spill does not impact the territorial waters of Bulgaria and therefore presents no risk to the shoreline, bathing waters or the Bulgarian Natura 2000 maritime areas.</p> <p>Utilisation of natural gas is a transitory solution to strengthen the region's energy security and to reduce its carbon emissions via coal to gas switching. Moving forward, the power generation mix is expected to change, driven by a decrease in coal and liquid hydrocarbons use and an increase in wind, solar and biomass capacities. Natural gas will be important in this mix, playing a critical role in mitigating the volatility of renewable capacities. Natural gas has been recognized by the EU as a transition fuel. According to the European Commission, including electricity generated from natural gas in its green investment guidelines will help the EU meet its 2030 targets for decarbonizing power as coal-dependent EU countries will switch to natural gas, lowering their overall emissions. State-of-the-art technology and expertise are selected and applied in order to produce the gas safely and in an environment-friendly manner.</p>	<p>NO</p>

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	<p>Please take into account the above information when conducting public consultations in Bulgaria and when preparing a response to the Ministry of Environment, Water and Forests in Romania. The Bulgarian side should criticize the methodological inconsistencies in the EIA report of Neptun Deep, demand clear measures for the conservation of endangered species in the Black Sea, request additional analysis of the impact on important areas for marine mammals and potential pollution in the protected areas in the Bulgarian aquatory, as well as to require public access to all studies referred to in the report. We ask you to prioritize the health of Bulgarian citizens and the care for nature in the Black Sea, as well as to mention the discrepancy of the project with the objectives of climate neutrality of the European Union. In addition, additional public consultations and an information campaign should be organized in all municipalities and districts concerned.</p> <p>Sofia, 29.04.2024</p> <p>Sincerely: Meglena Antonova, Director of Greenpeace – Bulgaria</p>	<p>The expected direct carbon intensity of the project during production in normal conditions is 2.18 kg CO₂e/boe, which is significantly below industry average and one of the lowest carbon intensive gas developments in the world.</p> <p>The EIA report has been revised to address the topics raised by the Bulgarian institutions involved in the assessment of the EIA report prior to organizing the public consultation in Bulgaria. The EIA report clearly concludes that there are no significant impacts to Bulgaria.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the debate in Kavarna is entirely appropriate under the Espoo Convention.</p>	<p style="text-align: center;">NO</p>
3.	<p><i>E-mails sent by neptundeep@petition.greenpeace.bg to the Ministry of Environment and Water at edno_gishe@moew.government.bg</i></p> <p>On dates: 26/04/2024, 29/04/2024, 30/04/2024, 01/05/2024, 02/05/2024, 03/05/2024, 04/05/2024, 05/05/2024. , 05/06/2024, 05/07/2024, 05/08/2024,</p>		

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	<p>05/10/2024, 05/12/2024, 05/13/2024, 05/14/2024, 05/15/2024, 05/16 .2024, 05/18/2024, 05/19/2024, 05/20/2024, 05/22/2024</p> <p>Dear Mr. Minister,</p> <p>The Black Sea is in danger! Bulgaria's waters will be exposed to huge risks from the Romanian mega-gas project Neptun Deep. This project will have a negative impact on the Black Sea ecosystem and will destroy Europe's climate neutrality ambitions. Neptun Deep will lead to a number of impacts on the Black Sea waters, with a huge chance that this will also threaten the health of Bulgarians. Because of this mega-project, more than 5 millions m3 of wastewater will be dumped in the Black Sea. Due to the natural currents in the sea, all the released waters will quickly move to its Bulgarian part and will endanger our health and nature.</p> <p>As part of an Environmental Impact Assessment (EIA) consultation, Bulgaria should expand public discussions and criticise the methodology in the EIA report. Please note the following aspects:</p> <p>1. The methodology in the report is incomplete and unclear. For example, although it mentions many times the need for measures to protect endangered species such as the porpoise or the Mediterranean shearwater, no real ones are foreseen.</p>	<p>This is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters in the hypoxic zone. It is a common practice which is done in other hydrocarbon producing nations, including Norway.</p> <p>This is a gas project, with no liquid hydrocarbons.</p> <p>The substances used in the technical process are licensed by the European authorities and are being used globally. OMV Petrom has used technology developed in mature oil and gas basins like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the Environment. The modelling is called DREAM modelling and the study is included in the EIA report. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p> <p>The EIA report has been prepared by an independent certified expert following the EIA EU Directive 2011/92 - Assessment of the effects of certain</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>2. The report does not provide for any mitigation of environmental impacts during operation of the project. In the event of an accident and spillage of hazardous substances into the waters, there would be a serious effect on marine protected areas in Bulgaria. The report does not assess the cumulative impact on the Black Sea ecosystem, which is under enormous pressure due to the war in Ukraine and climate change.</p>	<p>public and private projects on the environment (amended 2014/52/EU Directive) transposed into national legislation of the EU member states. Mitigation measures where required have been proposed and are in line with the internationally accepted guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee). Regarding <i>Puffinus yelkouan</i>, the vessel that installs the pipeline on the sea floor will be present in the nearshore area for a limited amount of time as it progresses with the construction and moves towards the platform which is approximately 160 km offshore. The presence of the construction vessel nearshore poses the same risk to birds as any other vessel which enters or exits any of the ports on the Black Sea coastline.</p> <p>There is a difference between the EIA and the impacts and topics under the Offshore Safety Directive. These impacts are assessed by other institutions differently. In accordance with the applicable legislation, major accident action plans are made. The project must demonstrate that means</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>3. This report does not take into account the enormous damage that Neptun Deep would cause to marine mammals in the Black Sea. The gas project will cross two zones important for the development of marine mammals.</p>	<p>are provided for such accidents and that is safe by implementing measures which prevent accidents. These measures are part of the project itself and their implementation is monitored by the relevant national institution and internationally recognized independent bodies. This process of certifying the suitability of the project is similar to the EIA process, a report on major accidents and their consequences is prepared. In the EIA report, the topic of major hazards is addressed in Chapter 9.</p> <p>The cumulative impact of the Neptun Deep Project has been assessed with other existing projects as the guidelines require. We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics are addressed in security plans which are not part of the environmental permitting procedure.</p> <p>From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p> <p>As explained above the potential impact on marine mammals is very short term and localized around the platform during the pile hammering activities which are expected to last for approximately 22 hours. This is a one-</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>4. Despite the huge risk of pollution and the significantly high levels of toxic materials that will be released into the Black Sea waters, the Romanian authorities do not provide information on the specific chemicals that will be released into the waters.</p>	<p>time event during the construction phase. The area where PTS (Permanent Threshold Shift) occurs is localized around the platform.</p> <p>In order to mitigate this potential impact the Project implemented the measures provided by international guidelines as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) which require the use of using marine mammal observers to confirm the area is free of marine mammals before commencing operations, combined with the soft start technics allows the dolphins to distance themselves from the noise source to a distance at which the noise levels do not pose a threat.</p> <p>The discharged water is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters in the hypoxic zone of the Black Sea. It is a common procedure; it's being done everywhere in the world.</p> <p>This is a gas project, with no liquid hydrocarbons.</p> <p>The substances used in the technical process are mentioned in the EIA</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>The numerous risks in this project are highly worrying, and the lack of clarity on how Bulgarian waters will be affected is deeply worrying. Please be critical of the megaproject and show concern for nature. Bulgarians have no chance to participate in a real public discussion, as the consultations will be held in the town of Kavarna. That is why I ask you to extend the process of public consultations to those living in all Black Sea municipalities, including Varna, Shabla and Balchik.</p> <p>Save the Black Sea alive!</p> <p>Sincerely, Todor Koychev</p>	<p>report, are licensed by the European authorities and are being used globally by the industry.</p> <p>OMV Petrom has used technology developed in mature oil and gas basins like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the Environment. The modelling is called DREAM modelling and the study is included in the EIA report. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p> <p>To our knowledge, the Romanian authorities have made the Ecotoxicity study available to be viewed at the offices of the authorities. Moreover, the data, substances and conclusions of that study are already clearly stated in the EIA report. There are no significant impacts from the studies.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the public discussion event in Kavarna met the requirements under the Espoo Convention. To accommodate the individuals who cannot participate in person at the public consultation in person, the process provides that they can submit comments or questions in writing.</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>Nadia Aliyeva Hristo Martinov Nadia Tabakova Valentina Kostova Elena Nikolova Diana De-Rosario Iveta Lukova Alexander Dunchev Kremena Varshilova Ralitsa Stoyanova Irena Dureva Iskra Tihova Maria Harbova Dima Kostova Isabella Stanilova Rosen Davchev Alexander Vasilev Manuela Prodanova Stephanie Roshkova Gabriela Kirilova Veselin Todorova Petya Deneva Julieta Bosilkova Jordan Dimitrov Mara Shopova Plamen Nedyalkov Anna-Maria Tsocheva Aneta Tsocheva Dimitar Daskalov Silvia Chilova Alana Kotseva Ralitsa Yotseva Petar Mihalev</p>	<p>Furthermore, as explained by Mrs. Maya Gandjova from the Bulgarian Ministry of Environment and Water during the public consultation meeting, the Ministry of Environment and Water defines municipalities of Varna, Kavarna and Shabla as affected. To conduct the public discussion, the Ministry of Environment and Water turned to the three municipalities, led by the understanding that one public discussion is enough for the territory of Bulgaria, considering that the impact was assessed as being non significant. The Ministry of Environment and Water has turned to the municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the Municipality of Varna and Shabla replied that they do not object to the public discussion being held in Kavarna.</p>	

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Nonka Todorova Doncho Petkov Peter Pelovski Pavlin Dankov Veronika Miteva Tsetsa Ilieva Kostadin Volevski Christina Krumova Nina Yaneva Ben Blunt Anastas Turpanov Greenpeace Kremena Rasheva Greta Yaneva Ivaylo Dimitrov Iveta Stoyanova Kaloyan Vukov Lilia Staneva Maria Sineva Marianka Krasteva Martin Dimitrov Miroslav Miroslav Todorov Nikolay Stanchev Nina Avramova Petar Anev Plamen Laskaev Stefan Grigorov Venera Micheva Happy Zozikova Aksinia Dimitrova Albena Tsoneva Alexandra Bakalova Alexandra Vladimirova Alexandra Lacheva		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Alexandra Meshkova Alexandra Fakirova Alexandrina Georgieva Alexandrina Stefanova Alexander Atanasov eat the rich Alexander Kostadinov Alexander Martinez Annabella Todorova Angelina Gyurova Angela Pehlivanova Anelia Stoynova Anetta Amersdorffer Aneta Bakova Aneta Petrova Ani Boyanova Anna Draganova Anna Kraeva Anna Rusinova Anna Topova Aspar Karahyuseinov Asya Yordanova Bilyana Trayanova Bozhidara Nedyalkova Borislav Mishev Boryan Andreev Boryana Slavkova Boyan Arshinkov Boyan Mitov Valentin Bozhilov Valentina Yorgakieva Vanya Georgieva Vanya Georgieva Vanya Dimitrova		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Vanya Zheleva Vasil Mladenov Veneta Pavlova Veneta Pavlova Veneta Sarbeeva Vencislav Georgiev Vera Georgieva Veronica Veronica Veronika Kavrakova Veronika Nedelkova Vesela Panova Veselin Mitrev Veselin Tsanev Veselinka Kostadinova Victor Penev Victoria Shtereva Vladimir Nikolchev Vladimir Tsvetkov Vera Doctorova Gabriela Vladinova Gabriela Garlanova Gabriela Zhelyazkova Gabriela Petkova Galina Borisova Galina Georgieva Galina Dimitrova Galina Sbirikova Georgi Georgiev Georgi Gerdzhikov Georgi Stanchev Georgi Trifonov Georgi Tsutsumanov Gergana Guleva		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Mrs. Maria Petrova Daniela Vasileva Daniela Georgieva Daniela Peeva Daniela Simova Danita Nikolova Daffy Petrova Delia Nedyalkova Denisa Georgieva Denis Dade Denitsa Vasileva Denitsa Todorova Desislava Boyukliyska Desislava Dilovska Desislava Dimova Desislava Myanova Desislava Slavovo Desislava Torozova Diana Dimitrova Dimitar Anakshev Dimitar Bakalov Dimitar Dolnooryahov Dimitar Petkov Dimo Astadzhov Dobrin Stoyandjov Dobrinka Tsaneva Dobromir Kisev Donna Kuyumdzhieva Donka Kincheva Dr. Galina Tsoneva Ekaterina Kaloyanova Elena Nikolova Elena Petkova		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Elitsa Garbeva Elka Necheva Ella Todorova Emil Dimov Emil Mandajiev Emil Rashkovski Emilia Petkovska Zhelyazko Yanev Maria Hristova's wife Zara Stoyanova Zlatka Zdravkova Ivan Vazharov Ivanina Mineva Ivelina Belcheva Ivelina Nikolova Ivelina Hristova Ivo Jovanovic Ilian Slavchev Ilian Giin Iliana Kazakova Ilonka Mikovska Ina Vasileva Ina Dimitrieva Ira Ivanova Irena Ivanova Iskra Zaharieva Sincere Ivanov Yolita Doncheva Kalin Staykov Kalina Efremova Kalina Tsaneva Kaloyan Vukov Kaloyan Goranov		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Katelina Samardzhieva Katerina Zhelyazkova Katerina Taneva Katya Mihailova Katya Sherbetova Kiril Stoyanov Claudia Todorova Konstantin Gavazov Christina Dimitrova Christina Dimitrova Christina Yordanova Kuzman Belev Lilia Marinova Liliana Laleva Lina Vogel Laura Rahneva Laura Stoyanova Lyuba Valcheva Lyubka Dancheva Lyubov Ivanova Lyubov Ilieva Lubomir Polyanov Lubomira Kostova Lyudmila Kirova Lyudmila Kovacheva Marian Nikolov Mariana Paunova Marin Velikov Marin Tsankov Marina Grebenarova Mario Ivanov Mario Shimbov Maria Antova		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Maria Dimitrova Maria Kirova Maria Koleva Maria Kostova Maria Panovska Maria Urilska Petya Osenska Maria Yankova-Bozadvzhieva Marijana Vasileva Martin Marinov Martin Ruskov Martin Tomov Meglena Antonova Miglena Nedyalkova Miglena Panayotova-Dimitrova Milen Ivanov Milena Atanasova Milena Ivanova Milena Pavlova Milko Belberov Mina Nedelcheva-Datsova Mikhail Trifonov Michelle Georgieva Momchil Ivanov Nadezhda Dimitrova Nadezhda Tsekova Nazan Ali Natalia Basheva Natalia Todorova Neda Doneva Neda Dunchovska Neli Tsvetanova Nikol Georgieva		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Nikola Laskov Nikolay Ilchev Nikolay Todorov Nikoleta Mincheva Nikolina Nikolaeva Nikolinka Dimova Nikolinka Hristova Nilufer Göchgeldi Nina Vutova Olga Palagacheva Pavlina Stefanova Penyu Penev Petko Pamukchiiski Peter Glaveev Peter Dimitrov Dr. Petar Kardzhilov Petya Dimitrova Petya Dimitrova Petya Marinova Petya Neikova Petya Terziivanova-Argirova Plamen Nikolov Preslava Koleva Radko Todorov Radoslav Velkov Radoslav Dachev Radoslava Kaneva Radostina Slavkova Raina Ilieva Raina Cheshmedjieva Ralitsa Kamenova Rangel Dimitrov Rita Todorova Rita		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>Romil Kusturov Rositsa Alexandrova Rositsa Vicheva Rositsa Deseva Rostislav Kandilarov Rumen Gatev Rumen Stoilov Rumyana Mitova Rumyana Sabeva Rusanka Panayotova Sanya Kuncheva Sasho Nikolov Svetla Popova Svetlana Mihova Svetlana Petrova Svetoslav Zahariev Silvena Nedyalkova Silvia Georgieva - I live in the town of Kavarna, Dobrich region, and this will also hinder tourism, which is only 3 months old, the town is located on the northern Black Sea coast Silvia Marinova Silvia Milcheva Silvia Stoyanova Silvia Tomova-Novkova Simona Ahmed Simona Grinnell Sirma Boykova Slavka Zhekova Slavka Loukipoudis Snezhina Kancheva Sonia Vertiyska Sonia Petrova Sofia Nikolova</p>		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Stanislav Georgiev Stanislava Vucheva Stanko Tomov Stephanie Zhekova Stefka Georgieva Stoyan Brashnarov Stoyan Kostov Stoyan Rusev Tear Palpurina Tanya Zheleva Tatyana Chonova Teodor Mladenov Teodora Zlateva Teodora Lilova Teodora Mishovska Teofan Konstantinov Tinka Georgieva Philip Zahariev Flora Dulgeryan Christiana Petkova Christina Ivanovska Christian Hristov Hristo Angelov Hristo Kochev Tsvetelina Lazarova Tsvetina Nikolova Tsvetomir Iliev Chavdar Yordanov Yavor Hadjiev Jan Spasov Ivan Nedelchev Tsvetelina Tonozlieva Gabriela Nedelcheva		

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	Borislava Tonozlieva		
4.	<p>E-mail sent from neptundeeep@petition.greenpeace.bg to MoEW at: edno_gishe@moew.government.bg</p> <p>Date: 29.04.2024</p> <p>Dear Mr. Minister,</p> <p>I turn to you as the Black Sea is in danger!</p> <p>Bulgaria's waters will be exposed to huge risks from the Romanian mega-gas project Neptun Deep. This project will have a negative impact on the Black Sea ecosystem and will destroy Europe's climate neutrality ambitions. Neptun Deep will lead to a number of impacts on the Black Sea waters, with a huge chance that this will also threaten the health of Bulgarians. Because of this mega-project, more than 5 millions m3 of wastewater will be dumped in the Black Sea. Due to the natural currents in the sea, all the released waters will quickly move to its Bulgarian part and will endanger our health and nature.</p> <p>As part of an Environmental Impact Assessment (EIA) consultation, Bulgaria should expand public discussions and criticise the methodology in the EIA report. Please note the following aspects:</p>	<p>The discharged water is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters. It is a common procedure; it's being done everywhere in the world. This is a gas project, with no liquid hydrocarbons.</p> <p>The substances used in the technical process are licensed by the European authorities and are being used globally. OMV Petrom has used technology developed in mature oil and gas basins like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the Environment. The modelling is called DREAM modelling and the report is included in the EIA. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>1. The methodology in the report is incomplete and unclear. For example, although it mentions many times the need for measures to protect endangered species such as the porpoise or the Mediterranean shearwater, no real ones are foreseen.</p> <p>2. The report does not provide for any mitigation of environmental impacts during operation of the project. In the event of an accident and spillage of hazardous substances into the waters, there would be a serious effect on marine protected areas in Bulgaria. The report does not assess the cumulative impact on the Black Sea ecosystem, which is under enormous pressure due to the war in Ukraine and climate change.</p>	<p>The EIA report has been prepared by an independent certified expert following the applicable EU and Romanian regulations for such assessments. Mitigation measures where required have been proposed and are in line with the internationally accepted guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee).</p> <p>Regarding Puffinus yelkouan, the vessel that installs the pipeline on the sea floor will be present in the nearshore area for a limited amount of time as it progresses with the construction and moves towards the platform which is approximately 160 km offshore. The presence of the construction vessel nearshore poses the same risk to birds as any other vessel which enters or exits any of the ports on the Black Sea coastline.</p> <p>There is a difference between the EIA and the impacts and topics under the Offshore Safety Directive. These impacts are assessed by other institution differently. In accordance with the applicable legislation, major accident action plans are made. The project must demonstrate that means</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>3. This report does not take into account the enormous damage that Neptun Deep would cause to marine mammals in the Black Sea. The gas project will cross two zones important for the development of marine mammals.</p>	<p>are provided for such accidents and that is safe by implementing measures which prevent accidents. These measures are part of the project itself and their implementation is monitored by the relevant national institution and internationally recognized independent bodies. This process of certifying the suitability of the project is similar to the EIA process, a report on major accidents, consequences is prepared. In the EIA report, the topic of major hazards is addressed in Chapter 9.</p> <p>The cumulative impact of the Neptun Deep Project has been assessed with other existing projects as the guidelines require. We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics are addressed in security plans which are not part of the environmental permitting procedure.</p> <p>From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p> <p>As explained above the potential impact on marine mammals is very short term and localized around the platform during the pile hammering activities which are expected to last for approximately 22 hours. This is a one-</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>4. Despite the huge risk of pollution and the significantly high levels of toxic materials that will be released into the Black Sea waters, the Romanian authorities do not provide information on the specific chemicals that will be released into the waters.</p> <p>The numerous risks in this project are highly worrying, and the lack of clarity on how Bulgarian waters will be affected is deeply worrying. Please be critical of the</p>	<p>time event during the construction phase. The area where PTS (Permanent Threshold Shift) occurs is localized around the platform.</p> <p>In order to mitigate this potential impact the Project implemented the measures provided by international guidelines as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) which require the use of using marine mammal observers to confirm the area is free of marine mammals before commencing operations, combined with the soft start technics allows the dolphins to distance themselves from the noise source to a distance at which the noise levels do not bother them anymore.</p> <p>To our knowledge, the Romanian authorities have made the Ecotoxicity study available to be viewed at the offices of the authorities. Moreover, the data, substances and conclusions from that study are already clearly stated in the EIA report. There are no significant impacts from the studies.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>megaproject and show concern for nature. Bulgarians have no chance to participate in a real public discussion, as the consultations will be held in the town of Kavarna. That is why I ask you to extend the process of public consultations to those living in all Black Sea municipalities, including Varna, Shabla and Balchik.</p> <p>Save the Black Sea alive!</p> <p>Sincerely, Kamelia Tomova</p>	<p>debate in Kavarna is entirely appropriate under the Espoo Convention. To accommodate the individuals who cannot participate in person at the public consultation in person, the process provides that they can submit comments or questions in writing.</p> <p>Furthermore, as explained by Mrs. Maya Gandjova from the Bulgarian Ministry of Environment and Water during the public consultation meeting, the Ministry of Environment and Water defines municipalities of Varna, Kavarna and Shabla as affected. To conduct the public discussion, the Ministry of Environment and Water turned to the three municipalities, led by the understanding that one public discussion is enough for the territory of Bulgaria, considering that impact was assessed as being non significant. The Ministry of Environment and Water has turned to the municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the Municipality of Varna and Shabla replied that they do not object to the public discussion being held in Kavarna.</p>	

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
5.	<p>E-mail sent from neptundeeep@petition.greenpeace.bg to MoEW at: edno_gishe@moew.government.bg</p> <p>Date: 07.05.2024</p> <p>Dear Mr. Minister,</p> <p>Information about a serious intervention in the Black Sea, related to gas extraction, was leaked into the public space!</p> <p>This information is not sufficiently clear, comprehensible and transparent for the population of Bulgaria. According to expectations, the planned investment is of a serious scale, which will inevitably be felt here as well.</p> <p>The concerns are that Bulgaria's water area will be exposed to huge risks from Romanian gas extraction from Neptun Deep. The probability that this project will have a negative impact on the Black Sea ecosystem and destroy Europe's climate neutrality ambitions seems very real. "Neptun Deep" will lead to a number of impacts on the Black Sea' waters, and there is a huge chance that this will also endanger the health of Bulgarians. Analyses say that more than 5 million m³ of waste water will be discharged into the Black Sea because of this megaproject. Due to the natural currents in the sea, all released waters will quickly move towards the Bulgarian part of it and will endanger our health and our nature. All this seems particularly worrying for the future of nature in Bulgaria.</p> <p>As part of an Environmental Impact Assessment (EIA) consultation, Bulgaria should expand public discussions and critique the methodology in the EIA report. Please pay attention to the following aspects:</p>	<p>This is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters in the hypoxic zone. It is a common practice which is done in other hydrocarbon producing nations, including Norway.</p> <p>This is a gas project, with no liquid hydrocarbons.</p> <p>The substances used in the technical process are licensed by the European authorities and are being used globally. OMV Petrom has used technology developed in mature oil and gas basins like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the Environment. The modelling is called DREAM</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>1. The methodology in the report is incomplete and unclear. For example, although it mentions many times the need for measures to protect endangered species such as the porpoise or the Mediterranean shearwater, no real ones are foreseen.</p> <p>2. The report does not provide for any mitigation of environmental impacts during operation of the project. In the event of an accident and spillage of hazardous substances into the waters, there would be a serious effect on marine protected</p>	<p>modelling and the study is included in the EIA report. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p> <p>The EIA report has been prepared by an independent certified expert following the applicable EU and Romanian regulations for such assessments. Mitigation measures where required have been proposed and are in line with the internationally accepted guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee). Regarding Puffinus yelkouan, the vessel that installs the pipeline on the sea floor will be present in the nearshore are for a limited amount of time as it progresses with the construction and moves towards the platform which is approximately 160 km offshore. The presence of the construction vessel nearshore poses the same risk to birds as any other vessel which enters or exits any of the ports on the Black Sea coastline.</p> <p>There is a difference between the EIA and the impacts and topics under the Offshore Safety Directive. These</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>areas in Bulgaria. The report does not assess the cumulative impact on the Black Sea ecosystem, which is under enormous pressure due to the war in Ukraine and climate change.</p>	<p>impacts are assessed by other institution differently. In accordance with the applicable legislation, major accident action plans are made. The project must demonstrate that means are provided for such accidents and that is safe by implementing measures which prevent accidents. These measures are part of the project itself and their implementation is monitored by the relevant national institution and internationally recognized independent bodies. This process of certifying the suitability of the project is similar to the EIA process, a report on major accidents, consequences is prepared. In the EIA report, the topic of major hazards is addressed in Chapter 9.</p> <p>The cumulative impact of the Neptun Deep Project has been assessed with other existing projects as the guidelines require. We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics are addressed in security plans which are not part of the environmental permitting procedure.</p> <p>From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p>	

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>3. This report does not take into account the enormous damage that Neptun Deep would cause to marine mammals in the Black Sea. The gas project will cross two zones important for the development of marine mammals.</p> <p>4. Despite the huge risk of pollution and the significantly high levels of toxic materials that will be released into the Black Sea waters, the Romanian authorities do not provide information on the specific chemicals that will be released into the waters.</p>	<p>As explained above the potential impact on marine mammals is very short term and localized around the platform during the pile hammering activities which are expected to last for approximately 22 hours. This is a one-time event during the construction phase. The area where PTS (Permanent Threshold Shift) occurs is localized around the platform.</p> <p>In order to mitigate this potential impact the Project implemented the measures provided by international guidelines as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) which require the use of using marine mammal observers to confirm the area is free of marine mammals before commencing operations, combined with the soft start technics allows the dolphins to distance themselves from the noise source to a distance at which the noise levels do not bother them anymore.</p> <p>To our knowledge, the Romanian authorities have made the Ecotoxicity study available to be viewed at the offices of the authorities. Moreover, the data, substances and conclusions from</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>The numerous risks in this project are highly worrying, and the lack of clarity on how Bulgarian waters will be affected is deeply worrying. Please be critical of the megaproject and show concern for nature. Bulgarians have no chance to participate in a real public discussion, as the consultations will be held in the town of Kavarna. That is why I ask you to extend the process of public consultations to those living in all Black Sea municipalities, including Varna, Shabla and Balchik.</p> <p>Save the Black Sea alive!</p> <p>Sincerely, Katya Valerieva</p>	<p>that study are already clearly stated in the EIA report. There are no significant impacts from the studies.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the debate in Kavarna is entirely appropriate under the Espoo Convention. To accommodate the individuals who cannot participate in person at the public consultation in person, the process provides that they can submit comments or questions in writing.</p> <p>Furthermore, as explained by Mrs. Maya Gandjova from the Bulgarian Ministry of Environment and Water during the public consultation meeting, the Ministry of Environment and Water defines municipalities of Varna, Kavarna and Shabla as affected. To conduct the public discussion, the Ministry of Environment and Water turned to the three municipalities, led by the understanding that one public discussion is enough for the territory of Bulgaria, considering that impact was assessed as being non significant. The Ministry of Environment and Water has turned to the municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
		Municipality of Varna and Shabla replied that they do not object to the public discussion being held in Kavarna.	
6.	<p>E-mail sent from neptundeeep@petition.greenpeace.bg to MoEW at: edno_gishe@moew.government.bg</p> <p>Date: 13.05.2024</p> <p>Dear Mr. Minister,</p> <p>I am writing to you as a mother of a 9-month-old baby, whom I would like to be able to take to the beach on the Black Sea - as I have done every summer. If the Romanian Neptun Deep gas extraction project is implemented, this will not be possible without risk to my child's health due to the serious pollution from which our water area will also suffer. We are also facing serious consequences for the harvesting of fish in our sea. I ask you for immediate action, in dialogue with your Romanian counterparts, so that we can exercise our right to stop this project, from which we can only lose.</p> <p>The Romanian megaproject Neptun Deep poses enormous risks to our waters. It will have a negative impact on the marine ecosystem and the health of Bulgarians, including my child. More than 5 million cubic metres of waste water are expected to be discharged into the Black Sea! Due to the natural currents in the sea, all the discharged water will quickly move towards the Bulgarian part and endanger us and our nature.</p> <p>As part of an Environmental Impact Assessment (EIA) consultation, Bulgaria should extend public consultations and hold them in many more cities. You should also criticise the methodology in the EIA report. Please address the following issues:</p>	<p>The discharged water is mainly sea water that is being used in the production process for cooling. This discharge is regulated by the water permit and will happen at a depth of 90 meters. It is a common procedure; it's being done everywhere in the world. This is a gas project, with no liquid hydrocarbons. The substances used in the technical process are licensed by the European authorities and are being used globally. OMV Petrom has used technology developed in mature oil and gas basins</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>1. The methodology in the report is incomplete and unclear. For example, although it mentions many times the need for measures to protect endangered species such as the porpoise or the Mediterranean shearwater, no real ones are foreseen.</p>	<p>like Norway, the UK, Denmark and the Netherlands to model the effects of these substances on the environment. The modelling is called DREAM modelling and the study is included in the EIA report. The studies show that the impact is not significant, with no effect on the Bulgarian waters.</p> <p>The EIA report has been prepared by an independent certified expert following the EIA EU Directive 2011/92 - Assessment of the effects of certain public and private projects on the environment (amended 2014/52/EU Directive) transposed into national legislation of the EU member states. Mitigation measures where required have been proposed and are in line with the internationally accepted guidelines such as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee). Regarding <i>Puffinus yelkouan</i>, the vessel that installs the pipeline on the sea floor will be present in the nearshore area for a limited amount of time as it progresses with the construction and moves towards the platform which is approximately 160km offshore. The presence of the construction vessel</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>2. The report does not provide for any mitigation of environmental impacts during operation of the project. In the event of an accident and spillage of hazardous substances into the waters, there would be a serious effect on marine protected areas in Bulgaria. The report does not assess the cumulative impact on the Black Sea ecosystem, which is under enormous pressure due to the war in Ukraine and climate change.</p>	<p>nearshore poses the same risk to birds as any other vessel which enters or exits any of the ports on the Black Sea coastline.</p> <p>There is a difference between the EIA and the impacts and topics under the Offshore Safety Directive. These impacts are assessed by other institution differently. In accordance with the applicable legislation, major accident action plans are made. The project must demonstrate that means are provided for such accidents and that is safe by implementing measures which prevent accidents. These measures are part of the project itself and their implementation is monitored by the relevant national institution and internationally recognized independent bodies. This process of certifying the suitability of the project is similar to the EIA process, a report on major accidents, consequences is prepared. In the EIA report, the topic of major hazards is addressed in Chapter 9.</p> <p>The cumulative impact of the Neptun Deep Project has been assessed with other existing projects as the guidelines require. We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>3. This report does not take into account the enormous damage that Neptun Deep would cause to marine mammals in the Black Sea. The gas project will cross two zones important for the development of marine mammals.</p>	<p>are addressed in security plans which are not part of the environmental permitting procedure. From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p> <p>As explained above the potential impact on marine mammals is very short term and localized around the platform during the pile hammering activities which are expected to last for approximately 22 hours. This is a one-time event during the construction phase. The area where PTS (Permanent Threshold Shift) occurs is localized around the platform.</p> <p>In order to mitigate this potential impact the Project implemented the measures provided by international guidelines as ACCOBAMS (Agreement on the conservation of cetaceans of the Black Sea, Mediterranean Sea and contiguous Atlantic area) and JNCC (Joint Nature Conservation Committee) which require the use of using marine mammal observers to confirm the area is free of marine mammals before commencing operations, combined with the soft start technics allows the dolphins to distance themselves from the noise source to a distance at which</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>4. Despite the huge risk of pollution and the significantly high levels of toxic materials that will be released into the Black Sea waters, the Romanian authorities do not provide information on the specific chemicals that will be released into the waters. This is unacceptable!</p> <p>I am very concerned about the many risks to our sea in this project. Please be critical of Neptun Deep and show concern for nature. The vast majority of Bulgarians will not have the opportunity to participate in a real public consultation, as the consultation will only take place in Kavarna. Therefore, I also ask you to extend the public consultation process to residents of all Black Sea municipalities, including Varna, Shabla and Balchik.</p> <p>Please save the Black Sea for us and our children.</p> <p>Please provide me with the incoming reference number of this letter.</p> <p>With respect, Ani Kodzhasheva</p>	<p>the noise levels do not bother them anymore.</p> <p>To our knowledge, the Romanian authorities have made the Ecotoxicity study available to be viewed at the offices of the authorities. Moreover, the data, substances and conclusions of this study are already clearly stated in the EIA report. There are no significant impacts from the studies.</p> <p>Given that it was assessed there will be no significant impact on Bulgaria, the debate in Kavarna was considered entirely appropriate under the Espoo Convention. To accommodate the individuals who cannot participate in person at the public consultation in person, the process provides that they can submit comments or questions in writing.</p> <p>Furthermore, as explained by Mrs. Maya Gandjova from the Bulgarian Ministry of Environment and Water during the public consultation meeting, the Ministry of Environment and Water defines municipalities of Varna, Kavarna and Shabla as affected. To conduct the public discussion, the Ministry of Environment and Water turned to the three municipalities, led by the understanding that one public</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
		discussion is enough for the territory of Bulgaria, considering that impact was assessed as being non significant. The Ministry of Environment and Water has turned to the municipality of Varna, but the date was not convenient for the municipality. The Municipality of Kavarna kindly responded, and the Municipality of Varna and Shabla replied that they do not object to the public discussion being held in Kavarna.	
7.	<p>Letter Ext. No 41/14.05.2024 To the Minister of Environment and Water From Greenpeace – Bulgaria</p> <p><i>SUBJECT: Supplement to the opinion on a report on a cross-border environmental impact assessment of the Neptun Deep project for gas extraction on the territory of Romania</i></p> <p>Dear Mr. Minister,</p> <p>In connection with the public consultation procedure, the EIA report for the Neptun Deep project for gas extraction in the Black Sea on the territory of Romania, we send an addition to our opinion with ex. No 37/29.04.2024, with entry No 99-00-200/29.04.2024</p> <p>1) Cumulative effect</p> <p>The Romanian authorities have not yet asked the investor to submit in the Environmental Impact Assessment (EIA) report an adequate assessment of the cumulative impact on the Black Sea ecosystem. According to the report "Pressures, threats and impacts on life in the Black Sea", produced by the Romanian Consultanta</p>	<p>The cumulative impact of the Neptun Deep Project has been assessed in chapter 6.4 of EIA report with other existing projects as the applicable guidelines require. We continuously monitor the geopolitical context, and</p>	<p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>de Mediu, a wide range of factors can irreparably destabilize the Black Sea ecosystem. The Black Sea is subject to many and various threats, including changing climatic conditions, hostilities in Ukraine, water pollution, eutrophication, exploitation of water resources and overfishing. As the Black Sea ecosystem is vulnerable, the EIA report should include a further assessment of the cumulative impact of Neptun Deep.</p> <p>2) A comprehensive assessment of greenhouse gas emissions</p> <p>The Neptun Deep project poses a serious threat to the reduction of greenhouse gas emissions and puts the European Union's climate targets at risk.</p> <p>The environmental assessment report (EIA) of the project does not take into account emissions from gas production and consumption outside Romania. The operator, together with the environmental authorities in Romania, should assess the actual impact of both forms of greenhouse gas emissions resulting from the development and exploitation of gas fields before approving the EIA report.</p> <p>An independent study on the total amount of greenhouse emitted gases that will be generated over the life of the project is approximately 209 million tons of carbon dioxide. This data on Neptun Deep's carbon footprint is published in the report "The Carbon Footprint of Neptun Deep", produced by ERCST - Roundtable on Climate Change and Sustainable Transition. We insist on this analysis or comprehensive analysis of the project's emissions, construction and operation of Neptun Deep, and their correlation with the climate objectives of the European Union, to be included in the EIA report.</p> <p>3) Risk of environmental catastrophes due to ongoing war</p> <p>The risk of environmental catastrophes in the Black Sea is significantly increased as a result of Russian aggression in Ukraine. The presence of numerous naval mines hampers the work of both scientific institutes and maritime industries. However,</p>	<p>we are in close contact with the Romanian authorities relevant for our activities. Such topics are addressed in security plans which are not part of the environmental permitting procedure. From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p> <p>The EIA has been conducted in accordance with the applicable guidelines. The emissions data for Neptun Deep project is provided in the EIA report and detailed in Annex K to this report, as required by the regulations. The expected direct carbon intensity of the project is significantly below industry average. OMVP cannot comment on Scope 3 emissions as ultimately this will be a matter for the purchaser of the gas and dependant on the end use.</p> <p>We continuously monitor the geopolitical context, and we are in close contact with the Romanian authorities relevant for our activities. Such topics</p>	<p>NO</p> <p>NO</p>

no	Suggestions, recommendations, opinions and objections	Opinion and comments of OMV Petrom SA and Romgaz Black Sea Ltd.	Conclusion on the need to supplement the EIA Report (YES / NO)
	<p>this risk is not addressed in the EIA report for Neptun Deep. The operator should carry out an analysis with regard to the impact of floating marine mines on its own installations and take the necessary measures to reduce the risk associated with the possibility of detonating mines during the construction of the project and its operation. This analysis should be carried out before the environmental permit is issued. In addition, the operator should list all challenges regarding the detection and avoidance of unexploded munitions existing on the seabed and the necessary measures to reduce the associated risk.</p> <p>Attached to this opinion are the reports 'Pressures, threats and impacts on life in the Black Sea' and 'The Carbon Footprint of Neptun Deep' mentioned above.</p> <p>We hope that you will take into account the above risks to the environmental health of the Black Sea and require additional analysis of the project's climate footprint, cumulative impacts on the Black Sea ecosystem and incident risk analysis. These additions to the EIA report are of utmost importance for the health of Bulgarian citizens and for the environmental health of the Black Sea.</p> <p>Sofia, 14.05.2024</p> <p>Sincerely: Meglana Antonova, Director of Greenpeace – Bulgaria</p>	<p>are addressed in security plans which are not part of the environmental permitting procedure.</p> <p>From a security point of view, it is important to remember that both Romania and Bulgaria are part of NATO.</p>	

Based on the prepared assessment (EIA report) for the Neptun Deep project for extraction of natural gas in the Black Sea on the territory of Romania, with investors OMV Petrom SA and Romgaz Black Sea Ltd. in connection with a cross-border EIA procedure, according to the EIA Convention in a transboundary context and the EIA Directive, as well as the result of the public hearing held in the Municipality of Kavarna and the responses given to the suggestions, recommendations, opinions and objections made, no other possible ways have been proposed in writing for the implementation of the project and/or new information based on an expert assessment that differs from that presented in the EIA Report. In view of this and taking into account the above-mentioned reasons, the assessment is not to commission additions to the EIA Report and its annexes.

This statement is sent to the Ministry of Environment and Water of the Republic of Bulgaria and the Municipality of Kavarna. According to the requirements of Art. 17 para. 6 of the Ordinance on EIA, the relevant municipalities and mayoralities must provide public access for a period of 7 days on their website and/or in another appropriate way to the attention of the interested persons or organizations and the submitters of proposals, recommendations and opinions as a result of the public discussion, for which they provide information to the competent authority.

TITLEHOLDER:

27.05.2024

Daniel Dinu
Senior Project Manager Environmental Permitting
Neptun Deep Project

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