



Atanas Rusev

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EUROPEAN COMMISSION

Directorate D: Implementation, Governance and Semester

Avenue de Beaulieu 5/Beaulieustraat 5
1160 Bruxelles/Brussel
Belgique

Attention: Mr. Georges Kremlis

Head of Unit

Dear Mr. Kremlis

Your answer to our complaint to the European Commission registered under reference No CHAP /2013/ 00755

Thank you very much for your letter of 4th of March 2013 answering our complaint **CHAP /2013/ 00755**. We appreciate your detailed attention and understanding of our concerns and frustration regarding construction permits issued by local authorities and our worries about conservation of habitats in the area.

In reference to the opportunity you have provided we would like to submit our comments and draw your attention to the following pertinent remarks.

Unfortunately we know Koral territory does not fall within a Natura 2000 site, having been omitted during the procedures. Today our team concentrates efforts to open such a procedure in order to save the place under EU nature legislation. In the same time the new case regarding Karadere area shows that the Bulgarian government doesn't attach that much

importance to Natura 2000, announcing the future Karadere project as Class A Investment Project even being part of a Natura 2000 site! As you undoubtedly know this caused a huge wave of protest in the last days in Bulgaria.

Further, as you have described in your letter the species *Leucojum Aestivum L* is protected under national legislation but even to date, we haven't received any reply to our officially submitted documentation to the Ministry of Environment and Water with a request for declaring Koral protected area, registered under reference number № 48-00-598/28.05.2013.

As you have emphasized in your analysis the habitat types of Community interest are 2110 Embryonic shifting dunes; 2120 Shifting dunes with *Ammophila arenaria* along the coastline / white dunes /; 3150 Natural Eutrophic lakes with vegetation of Magnopotamian oh Hydrocharition type; 91F0 Riparian mixed forests. Although not designated as Natura 2000 all efforts should be taken to preserve these habitat types at favorable status. Against your expectations and based on the last construction development and its dubious regulation character unfortunately there is not a sufficient number of sites for these habitats. Especially the dunes on our seaside, being poorly mapped, are constantly being destroyed by construction works.

Further to the information you have researched we would like to emphasize that the repealed construction permit, as confirmed by a final decision of the national court regarding Iberdrola Inmobiliaria's project, is unfortunately not the only permission for this project but just the one concerning the electricity supply. Please note the document we have presented to the European Commission issued by ***the Ministry of Regional Development in Bulgaria*** which provides comprehensive information to our official request for access to public information about the number of building permits, sanctions, detected irregularities and so on.

In conclusion, we appeal to you and your Directorate in particular asking for further support and monitoring. Basing our request on European Union policy on the environment and the precautionary principle and preventive action, we emphasize the fact that the area is still endangered and needs your attention. Society, the nature and the principle of justice deserve this.

We shall continue to inform you of all further news concerning the issue.

We would like to conclude by saying that your institution is held by us in the highest esteem and we trust that you will continue to be involved in monitoring the worrying developments at Koral beach!

Truly yours,

Atanas Rusev

Encl.

1. Request for access to public information
2. Official response DNSK / Direction National Construction Control/