

To: the European Commission
Directorate-General for Energy and Transport
TEN-T Revision
Office: DM 24 7/16

September 10, 2003

Dear European Commission,

We would like to thank you for the opportunity to comment on the *Report of the High Level Group on the Trans-European Transport Network*, published on June 27, 2003.

We would like to raise your attention to several factual omissions (as well as factual misrepresentations) in regard to two priority projects passing through Bulgaria, respectively N 6 and N 17.

1. N17 “Motorway Greek/Bulgarian border-Sofia-Nadlac-Constanca”

This priority project is slated to pass through the region of the Kresna gorge CORINE site, a future NATURA 2000 and EMERALD Networks site. The Standing Committee of the Convention on the conservation of the European wildlife and natural habitats (Bern Convention) in December 2002 asked the Bulgarian government to seriously consider bypassing the Kresna gorge CORINE site, thus ensuring the protection of the territory (Recommendations N 98 of the 22nd meeting of the Standing Committee).

In her letter to Bulgarian NGOs from September 13, 2001, Commissioner Margot Wallstrom also pointed out that EU funds would be allocated for the Sofia-Kulata motorway *only if* alternative routes outside Kresna gorge are developed. However, as it stands, the project for the Sofia – Kulata motorway currently being promoted by the Bulgarian government contradicts both the Bern Convention and Commissioner Wallstrom’s recommendation.

These facts are crucial to the project's development and cost. Therefore we conclude that, in this case, the High Level Group did not properly study the financial, legal and administrative obstacles to this project. To a large extent the same problems also apply to the project N 6 “*Mixed railway line Greek/Bulgarian border-Sofia-Budapest-Wien-Praha-Nurbrng*”, which also passes through the region of the Kresna gorge CORINE site.

(for further information about the Kresna gorge case please refer to www.kresna.org)

2. The report states that several sections complementary to the N 17 project are already finished or are on the way to being completed by 2008 (p.33, Annex with Project Fishes).

In fact one of the sections, named Vidin/Calafat- Sofia, has not even been designed and we doubt very much whether its 2008 completion date can be met. We have information from colleagues in Romania that the sections in Romania, specifically the Sibiu-Constanta section, are also slated, very optimistically, for completion by 2008. Moreover, the section between Nadlac and Vidin has also still to be planned. Thus the statement that the Sofia-Kulata motorway will connect the Greek motorway network with the rest of the European network does not stand up - the section between Sofia and Vidin (and others) will become a bottle-neck. Once again we conclude that there has been insufficient investigation into the financial aspects of the project's implementation.

3. Projects N17 and N 6 “Mixed railway line Greek/Bulgarian border-Sofia-Budapest-Wien-Praha-Nurbrng” share the same route in Bulgaria. Thus both projects together will lead to a serious expansion of the corridor capacity.

We conclude that a lack of consideration vis-a-vis the cumulative impact/benefits of both projects violates the TEN-T objective of interoperability, especially for international transit traffic. Furthermore the Sofia-Kulata railway was recently upgraded with EU funding (a fact also obscured in the report) and the first attempts for railway freight transport to Greece started in September 2003.

4. Both projects are slated to pass through a number of settlements

We would like to ask how human health and local development can possibly benefit from these projects. The High Level Group report talks only about fostering transit traffic and trade. The current planning of the Sofia-Kulata motorway and rehabilitation of the railway shows very little respect for the local population. For example, the railway line is set to pass through the middle of Kresna town without any protection measures.

In conclusion, we are very concerned that the investigations into projects N 6 and N 17 in the High Level Group report are insufficient and therefore would cause the Commission to take a decision on the priority projects based on deficient grounds.

In general we welcome the development of the transport corridor from Vidin/Calafat to the Bulgarian/Greek border. However we would like to request:

- a careful re-investigation of projects N 6 and N17
- a Strategic Environmental Assessment and Cost-Benefit Analysis of the proposed projects
- full consideration (including the development of alternative routes where necessary) be given to the important nature territories along the corridor such as the Kresna gorge, all within the scope of the provisions of the BERN Convention, the Habitat and the Bird Directives.

We look forward to receiving a response from you and would like to thank you in advance for your understanding and cooperation.

Best regards,

Environmental Association "Za Zemiata" (For the Earth)

Anelia Stefanova

Sofia 1000, PO box 975

tel./fax: + 359 2 980 41 09, e-mail: anelias@bankwatch.org, zemiata@iterra.net

"BALKANI" Wildlife Society

Andrey Kovatchev

Sofia 1164, 8 Dragan Tzankov St.

tel: 963 14 70, e-mail: akovatchev@intech.bg

Centre for Environmental Information and Education

Petko Kovatchev

Sofia 1303, 17-A Sofroniy Vrachanski, 3 fl., ap. 9

tel./fax: 989 27 85, e-mail: petkok@bankwatch.org, ceie@iterra.net

