



„БАЛКАНКА”  
www.balkanka.bg

“Balkanka” Association, Sofia, Bulgaria  
*“Nature has all the time in the world, we do not”.*

**COMPLAINT**  
**TO**  
**THE COMMISSION OF THE EUROPEAN COMMUNITIES**  
**CONCERNING FAILURE TO COMPLY WITH COMMUNITY LAW**  
**APPENDIX 8-A**



**Representative for this complaint:**

  
dipl.eng. Dimiter Koumanov,  
Member of the board

Sofia, Bulgaria  
08.01.2019

## **INTRODUCTION**

Regarding the Complaint to the Commission of the European Communities, lodged by Balkanka Association, Sofia, Bulgaria on **30.06.2015**, followed by **8 /eight/** consecutive appendixes - No1 to No8, transferred to **EU Pilot application under reference EUP(2017)9183**, the following document contains new information concerning recently discovered huge infringements of EU law committed by the Bulgarian authorities responsible for the environmental protection in our country - the Bosilegrad ecocatastrophe.

The case was described in previous **Appendix No8** to the original Complaint. It is about the ecocatastrophe currently taking place in Bosilegrad, Serbia and about the forthcoming catastrophe in the region of the municipalities of Kyustendil - Treklyano - Zemen in Bulgaria.

On October 23rd 2018, MEP Angel Djambazky submitted to DG ENV a question, asking is the Directorate General aware of the problem. Here is a link to the question [http://www.europarl.europa.eu/doceo/document/P-8-2018-005389\\_BG.html?fbclid=IwAR3tREk7px6ftlBuahGAqiom9aUneUbJhPTQcG9Luifw4PkffdsV3qprRMl](http://www.europarl.europa.eu/doceo/document/P-8-2018-005389_BG.html?fbclid=IwAR3tREk7px6ftlBuahGAqiom9aUneUbJhPTQcG9Luifw4PkffdsV3qprRMl)

The answer of Commissioner Vella under DG ENV reference **P-005389/2018** dated November 29th, announces that DG ENV is aware and that the issue will be discussed with the Serbian authorities somewhere in the end of March 2019, during some kind of consultation.

We, therefore, feel the need to share all new evidence and information about the case in Bosilegrad we managed to collect since **Appendix No8** was lodged, so that the EC delegation will be better prepared for consultations with the Serbian authorities. It is because we have no knowledge of the information on the case which might have possibly been exchanged between our Ministry of Environment and DG ENV, but we are also pretty sure that our minister is putting his best effort to sweep the problem under the carpet, simply because he has done the same several times in several media interviews here in BG in the last two months.

Anyone who reads this document, please note that you need to have read the **Appendix No8** to original Complaint because Appendix No8 holds information that will not be repeated herein. It will be mentioned briefly only in case of unavoidable necessity or of description integrity.

## **Acknowledgements**

*We dedicate the following document to the poor people on both sides of the border between Bulgaria and Serbia in the region of Kyustendil - Bosilegrad, which are sentenced by their governments not only to the destruction of their rivers and the poisoning of all groundwater bodies in the region, but to real physical extinction, with special dedication to our people in Bosilegrad who are heartlessly betrayed and sold out by our government in the name of Grand Corruption.*

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**ACRONYMS:**

<b>MOEW</b>	- Ministry Of Environment and Waters of Bulgaria
<b>MOES</b>	- Ministry Of Environment of Serbia
<b>RIEW</b>	- Regional Inspectorate/s of Environment and Waters
<b>RBD</b>	- River Basin Directorate/s
<b>WARBD</b>	- West Aegean River Basin Directorate
<b>WA</b>	- Water Act
<b>EIA</b>	- Environmental Impact Assessment
<b>AA</b>	- Appropriate Assessment
<b>RBMP</b>	- River Basin Management Plan
<b>HPP</b>	- Hydropower Plant

## **I. IDENTITY AND CONTACT DETAILS**

### **1. Name:**

“Balkanka” Association, Sofia, Bulgaria

### **2. Sector / field of activity and location(s) where active:**

“Balkanka” Association is a non-profit, non-governmental organization, registered in Bulgaria for action in public benefit, on 07 August 2013, company file 203/2013 of the Sofia City Court, UIC 176566443. The main objectives of “Balkanka” are protection and conservation of river biodiversity, with a focus on conservation and restoration of indigenous Balkan brown trout /*Salmo trutta*/ populations in Bulgarian rivers.

## **3. ADDRESS OR REGISTERED OFFICE**

### **3.1. Surname and forename of complainant:**

Ivan Pandukov, Chairman of the board

### **3.2. Where appropriate, represented by:**

Dipl.eng. Dimiter Koumanov, member of the board

### **3.3. Nationality:**

Bulgarian

### **3.4. Address:**

Petko Todorov blvd, bl.8, en.D, app.87

### **3.5. Town:** Sofia

### **3.6. Post code:** 1408

### **3.7. Country:** Bulgaria

### **3.8. Mobile telephone:**

+359 887 931 241

### **3.8. E-mail:** [dkoumanov@abv.bg](mailto:dkoumanov@abv.bg)

## **4. Correspondence from the Commission can be sent to the complainant**

## **5. Member State or public bodies alleged by the complainant not to have complied with Community law:**

The Bulgarian Ministry of Environment and Waters (MOEW) and the BG West Aegean River Basin Directorate, in complicity with the Ministry Of Environment of Serbia (MOES).

## II. DESCRIPTION OF THE SUSPECTED INFRINGEMENT OF UNION LAW

### **A. General description - additional information**

In the previous document some activities in the area at the Bulgarian side of the border with Serbia were thoroughly described and we have no new information to add there. See Appendix 8 for details about the Pchelina HPP and the Zlogosh mining area, please.

**As for the gold sifting along the Struma River**, we can add the following video for everyone to see what it actually looks like:

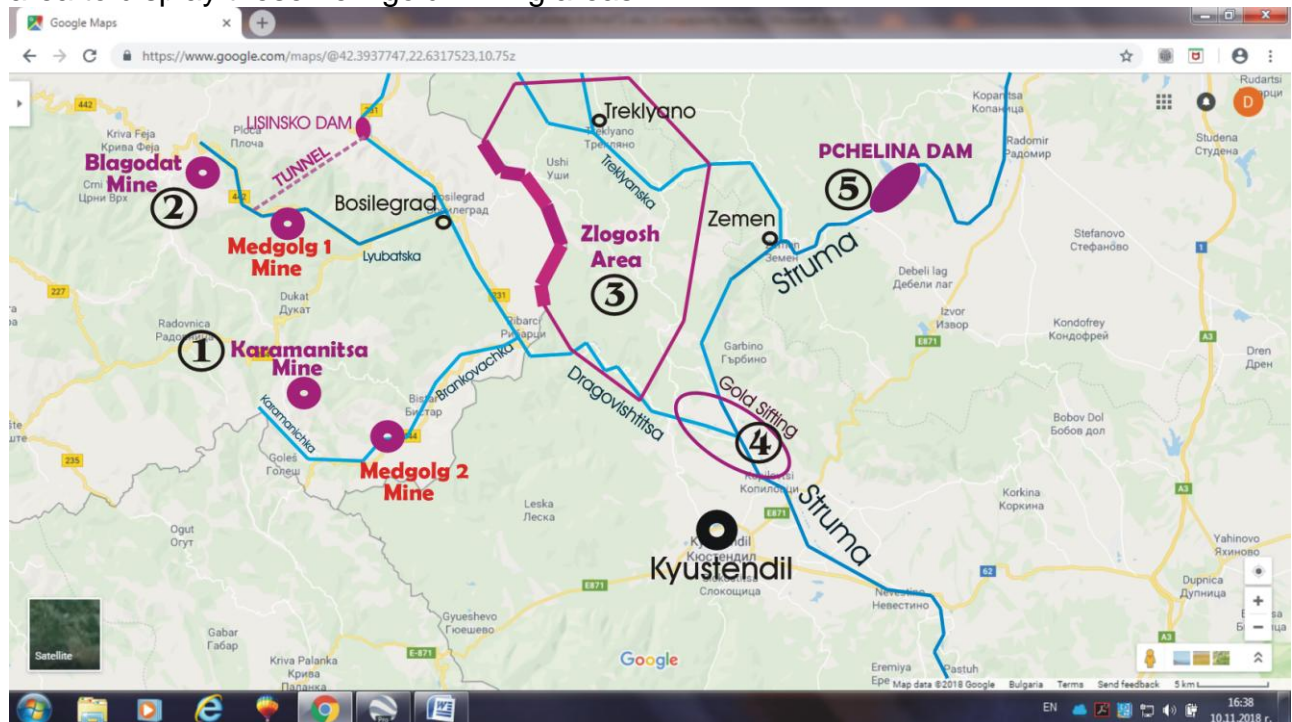
<https://www.youtube.com/watch?v=uz7DINKrz4w&feature=youtu.be>

Here we must remind that this industrial activity is happening along the main road to Bosilegrad in front of the Kopilovtsi village, **inside Natura 2000 Habitats Directive site Zemen BG0001012**, right in front of the widely closed eyes of RIEW Pernik, WARBD and MOEW. This particular undertaking was developed without permission and without any kind of EIA/AA procedure.

**As for the case in Bosilegrad**, we managed to discover that new large scale mining activities will be developed very soon. At the moment explorations for gold are carried out by a company called Medgold in a large piece of territory. Proof can be found in the following link:

<https://medgoldresources.com/>

Therefore we updated the overall map of all industrial activities in the affected area to display these new gold mining areas:



To be enlarged and studied in detail the map can be downloaded from here:  
[https://dams.reki.bg/uploads/Docs/Files/NEWecoCatastrophe\\_Kyustendil.jpg](https://dams.reki.bg/uploads/Docs/Files/NEWecoCatastrophe_Kyustendil.jpg)

The new Medgold mines are marked in red text without numbering.

**Medgold 1** is the Lyubata project - 570 square kilometers of exploration area. Full description can be found here:

<https://medgoldresources.com/crnook-archive/>

**Medgold 2** is the Tlumino project - 192 square kilometers of exploration area. Full description can be found here:

<https://medgoldresources.com/tlamino/>

We have no knowledge on the impacts of the Lyubata project gold exploration activities. The Tlumino project is a few kilometers down the Karamanicka River below the Karamanica Zink-Lead Mine, described in the previous Appendix No8 and we have evidence on the devastating impact caused on the drinking water sources in Tlumino project area by the drilling for the search for gold, which will be discussed in the next section.

## 1. The Ecocatastrophe in Bosilegrad - additional information

### A. The Karamanica Mine:

Here are a few very short videos shot at the Karamanicka - Brankovachka River below the Karamanica mine to start with:

The full beauty of the flotation factory and the waste deposits dumped in the area:

[https://www.youtube.com/watch?v=5pWrF\\_yTe5k](https://www.youtube.com/watch?v=5pWrF_yTe5k)

The "water" discharged into the small gully shot 50 meters below the flotation area:

<https://www.youtube.com/watch?v=6BH3BaH84Ak>

The water running in the river two kilometers downriver below the mine:

[https://www.youtube.com/watch?v=c76c\\_jFSNYE](https://www.youtube.com/watch?v=c76c_jFSNYE)

We visited the area together with reporters from the most popular NOVA TV broadcast - "Gospodari na efira" and they took water samples from the spot shown in the third video in front of our eyes. Tested in a licensed laboratory here in BG these samples showed **lead contents of 2.32mg/l, i.e. 46 times over the limit of 0.05mg/l.**

For proof watch the following official TV footage at 4:25 minutes from the start - it shows the official results:

<https://www.youtube.com/watch?v=DS24JZIOs0o>

For the last two months we have carried out our own study, including tests of water and silt samples, taken from the small gully right below the Karamanica mine, as well as testing water samples taken from the Brankovachka River three kilometers up its confluence with the main Dragovishtitsa River.

Here are the results:

[https://dams.reki.bg/uploads/Docs/Files/REKA\\_KARAMANICHKA.pdf](https://dams.reki.bg/uploads/Docs/Files/REKA_KARAMANICHKA.pdf)

The results show huge amount of all kind of metals, both in the silt and in the water taken from the gully, way over the limits. Our experts say that the silt can be processed again and whoever does it will get immediately rich. It obviously is a very old primitive technology applied in that Karamanitsa mine, to leave so many metals in the waste deposits.

More important is that the tests of the water downriver - three kilometers above the spot where Brankovachka River flows into Dragovishtitsa River - show no contents exceeding the limits and everything seems normal. But then - where do the poisonous contaminants go?

The reason is that the Karamanicka River sinks during low water into the grounds at some point around tree kilometers below the mine and then, few kilometers downriver it emerges again on the surface filtrated and purified.

Here is a video taken at the section where the river is dry:

<https://www.youtube.com/watch?v=8MfC0qowZX4&feature=youtu.be>

But this actually is a bigger problem, because it means that the groundwater body is contaminated. During high water part of the Karamanicka River runs on the surface but then it is diluted to some extent.

This is the reason why Dragovishtitsa River in Bulgaria still shows contaminants inside the limits according to the monitoring carried out by WARBD. Yet again, nobody has ever checked the status of the groundwater body, because our authorities are afraid to find the truth - they are in full complicity with the Serbs.

However, it should always be recalled that there are three HPP in operation and another three future HPPs under construction on the Karamanichka River, thus the river will run only in pipelines very soon, not able to sink into the grounds, thus it wouldn't be filtrated anymore. That is why we wonder - which will be better for the drinking water sources in Bulgaria, many of which are on the same groundwater body, located in the terraces of Dragovishtitsa and Struma Rivers. All the possibly affected drinking water sources are shown on the following map:

[https://dams.reki.bg/uploads/Docs/Files/ZLOGOSH\\_DRINKING.pdf](https://dams.reki.bg/uploads/Docs/Files/ZLOGOSH_DRINKING.pdf)

The map is also showing the Natura 2000 Habitats Directive sites in Bulgaria waiting for the poisonous substances to come along...

The map shows that all the drinking water sources of the Treklyano municipality are located inside the future gold exploration area Zlogosh in BG. It is important to recall that in the Zlogosh area there is a huge amount of Arsenic discovered, as well as a lot of Mercury in the rocks. Arsenic reaches 397grams per ton of rock material, according to the following geological research of the Sofia University:

[https://dams.reki.bg/uploads/Docs/Files/ZLOGOSH\\_Ann\\_SU\\_2010\\_107-126.pdf](https://dams.reki.bg/uploads/Docs/Files/ZLOGOSH_Ann_SU_2010_107-126.pdf)

**This information about the existence of Arsenic and Mercury in the area is very important for two reasons.**

**First**, it comes to explain the contamination of the drinking water sources of the Donje Tlumino village near the border in Serbia, because the whole region is full of Arsenic contents in the rock formations.

**Second**, it tells us exactly what is going to happen to all the nearby drinking sources during the drilling search for gold in the Zlogosh area, taking into account what happened to the Tlumino drinking water sources during the same drilling for gold, described in the following section.

## **B. The impact of the Medgold - Tlumino gold exploration project on the drinking water sources in the vicinity of the village of Donje Tlumino, Serbia.**

One year after drilling for the Medgold - Tlumino project has started, back in June 2017 a survey on the drinking water sources was carried out by the Serbian "Yaroslav Cherni" Institute in Belgrade. Here are the official results:

[https://dams.reki.bg/uploads/Docs/Files/Drinking\\_Tlumina\\_Rupska.pdf](https://dams.reki.bg/uploads/Docs/Files/Drinking_Tlumina_Rupska.pdf)

In the table on the last page point **GW7** in Donje Tlumino shows **54.5** micrograms Arsenic per liter in 2017, and point **GW8/1** in the same village shows **403.6** micrograms Arsenic per liter in June 2017, while the limit is only **10** micrograms per liter.

This year in the end of November we took another sample from point **GW7** in Donje Tlumino again, to see if there is additional contamination. Here are the official results from a report prepared by a licensed laboratory in Bulgaria:

[https://dams.reki.bg/uploads/Docs/Files/Drinking\\_Tlumina\\_Rupska\\_2018.jpg](https://dams.reki.bg/uploads/Docs/Files/Drinking_Tlumina_Rupska_2018.jpg)

This time point **GW7** showed **129** micrograms Arsenic per liter in the drinking water of the village. So, for one year five months the contamination has grown from **5.45 to 12.9 times** the limit of 10 micrograms per liter. And the Serbian authorities declare that this is due to natural processes? Do these guys believe themselves?

For hundreds of years there was pure drinking water in the captured springs of the village and just after the start of the geological search for gold in the dirty rock formations, Arsenic has gone mad on natural reasons only?

**We find that at the Belgrade meeting in the end of March, DG ENV should be prepared to face these arrogant Serbs when they come up with that "Natural" theory.**

The only possible solution that we see is if an absolutely independent team of foreign experts carries out another full investigation, but we will come to this in chapter VI. *Aim of the Complaint* again.

## **2. Actions taken or, rather, not taken by the BG Ministry of Environment**

On **June 29th 2016** the Serbian Ministry of Environment has sent official Notification under their Ref.No 353-02-1533/2016 to the Bulgarian MOEW concerning the Karamanitsa mine. This letter is in strict compliance with the Espoo convention and with all additional Decisions of the parties to the Convention. The document can be found in the following link:

[https://www.moew.government.bg/static/media/ups/tiny/filebase/Industry/EIA/2016/Notifikatsia\\_Serbia\\_exp\\_pilot\\_facility.pdf](https://www.moew.government.bg/static/media/ups/tiny/filebase/Industry/EIA/2016/Notifikatsia_Serbia_exp_pilot_facility.pdf)

It is required from the Bulgarian MOEW to respond in six weeks as well as to provide the State of origin - Serbia with the necessary feedback information as required by Decision I/4 of the parties to the Espoo Convention.

The above letter of the Serbs has reached our MOEW on **August 22th 2017?** 500 kilometers in Europe were taken for 23 days in the Internet Era, which leads to the conclusion that there is some problem with the motorways across the region, which needs a lot of additional EU funding to be solved...

Anyway, the Bulgarian minister of Environment and waters at the time - Ivelina Vassileva, managed to issue an answer on **October 11th 2017** - MOEW No 99-00-161/11.11.2017:

[https://www.moew.government.bg/static/media/ups/tiny/TP/resppilot\\_installation\\_Karamanitsa-bq.pdf](https://www.moew.government.bg/static/media/ups/tiny/TP/resppilot_installation_Karamanitsa-bq.pdf)

Note that this letter is in bad, illiterate Bulgarian language too. We have no clue when was it sent and did it reach the Serbs at all. What matters most is that the response deadline of 42 days was exceeded with 7 or with 32 days depending on which date the counting starts - June 29th or August 22th, because the Serbs will count their date - June 29th of course, and this is only normal.

And most importantly - the answer of MOEW doesn't hold the feedback information as required by the Serbs acc. to Decision I/4 of the parties to the Espoo Convention.

**The above means that for the Karamanica mine the Serbian authorities have followed the Espoo convention strictly as possible. It is the BG MOEW that**



**breached the rules, untying the Serbian's hands to do whatever they wish, and that is exactly what they did!**

**The final step** in the Drama was taken this year by Bulgarian minister Neno Dimov by sending another letter to the Serbs, pretending to be concerned over the issue. This letter can be found here, this time in English:

[https://www.moew.government.bg/static/media/ups/tiny/EO\\_OVOS/2018/Letter\\_2\\_Karamanitsa-en.pdf](https://www.moew.government.bg/static/media/ups/tiny/EO_OVOS/2018/Letter_2_Karamanitsa-en.pdf)

The letter holds a silly question to the Serbs about the status of Dragovishtitsa River above the border, which is no different than the status below the border, and not a single word about the status of the groundwater body and the drinking water sources.

It is also required by minister Dimov that the Serbian party provides MOEW *with the information and documentation under Art.3, Para.5 of the Convention*.

Well, all that *information and documentation* was submitted by the Serbs in their first letter from 2016 and it hangs on our ministry's internet site! Good for our minister, who is just pretending to be active, but is actually doing his best to sweep the case under the carpet.

### **Important**

In several media interviews our minister shared with the public that the monitoring of Dragovishtitsa River in Bulgaria, carried out by WARBD on a regular basis, shows no pollution over the limits, which will still be true, until those three new HPPs on Karamanicka River are set into operation. But he said absolutely nothing about the status of the groundwater body, neither for the drinking water sources.

Moreover, many times he declared that for "pilot projects", such as the Karamanitsa Mine, there is derogation for two years under the Espoo Convention before the transboundary EIA procedure starts. We are not able to find such derogation in the Convention or in the additional Decisions of the Parties.

During the second protest held this year by local people in Bosilegrad, there was a counter protest, organized by the mayor who has ordered all the municipality staff to get out on the street, together with a few mining workers and the management of the mines. Mayor held a speech in which he underlined that acc. to the Serbian and the Bulgarian ministers of environment - There Is No Problem Whatsoever! And he was right as far as Bulgarian minister is concerned, because he's lying all the time that there is no problem.

**So, at the Conference in Belgrade in the end of March DG ENV representatives should be prepared to hear from the Serbian Party the following:**

1. There is no ecological problem at all in the area of Bosilegrad and all the monitoring results are due to a chain of natural processes, which is a huge lie.
2. Acc. to the honorable Bulgarian minister there is no problem at all too, which is true - according to him there is no problem at all.
3. In 2016 the Serbian state has complied strictly with the requirements of the Espoo Convention and the additional Decisions of the parties. It is the Bulgarian party that has breached the Convention by missing the deadline and by not providing the necessary feedback information. This is also true.
4. For "Pilot Projects" in the Convention there is two years derogation before the EIA procedure starts, which we were not able to find and represents another lie of our minister, because it's senseless! For two years those proud Serbian investors, supported by our honorable minister, can actually kill the planet!

It is so obvious that our minister has done everything possible to weaken everyone else's position in the discussion with the Serbs, except for the Serbs themselves! Is he Bulgarian, this guy?

**However, it should always be recalled** that it is the EU citizens' health on both sides of the border involved, as many of the ethnic Bulgarians above the border are Bulgarian citizens too, and at the same time the Dragovishtitsa River falls right below the border within the boundaries of the European Natura 2000 Network site, hosting priority habitats and priority species listed in Annex II of the European Habitats Directive.

**Obviously we are facing now a direct attack from the Serbian party in complicity with the Bulgarian MOEW towards the most important values of the European Union itself - human health and environmental protection.** Therefore an immediate reaction from the European Commission is a must!

### **3. General conclusion**

We really hope that all this new information and evidence will help DG ENV to be better prepared for the conference in Belgrade on one hand. On the other - this time this document should be considered not only as a Complaint against Bulgarian authorities, but against the Serbian state as well. Those poisoned Donje Tlumino village drinking water sources, as well as the videos taken below the Karamanitsa mine are not acceptable in Europe anymore! All mining activities in the area were not developed even during Socialist times regardless of the fact that data for the mineralogy in the entire Bosilegrad - Kyustendil region was collected and available. It is because the devastating impacts were clear and too obvious.

But the Serbian state is not too anxious to get into the EU and that could be a problem? To our view it is no problem at all, when the European values are so brutally disregarded. The question is - is the European Commission ready to cut the Serbian pre-accession funding, which we are pretty sure the Serbs are anxious to keep receiving?

After all, that mining craziness in both Bulgaria and Serbia didn't take place during Socialism, it is happening right now in "modern" Europe, with all its values and with all its basic principles such as the Rule of Law, which obviously mean less than nothing around these territories possessed by Grand Corruption.

We, therefore, expect to see effective action on behalf of the European Commission towards both Bulgaria and Serbia very soon.

**But hey, what about the cumulative effects in the area of Bosilegrad and Kyustendil municipalities?** We almost forgot that, didn't we?

To have better idea about the cumulative effects we must share that the Karamanitsa mine will increase its production capacity **10 times** very soon according to several recent announcements of its manager published in Serbian media. We shall see what our irresponsibly lying minister is going to talk then to convince the public there is still no problem...

### **B. Union laws (e.g. Treaties, regulations, directives, decisions) or principles underpinning Union law that we believe to have been breached by the authorities of the country**

- **Treaty on the Functioning of the European Union**

- **Article 191**

- (ex Article 174 TEC)

- 2. Union policy on the environment shall aim at a high level of protection taking into account the diversity of situations in the various regions of the Union. It shall be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should as a priority be **rectified at source** and that the polluter should pay.

- **Directive 2001/42/EC** of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment:
- **Directive 2000/60/EC** of the European Parliament and of the Council establishing a framework for Community action in the field of water policy
- **Council Directive 92/43/EEC of 21 May 1992** on the conservation of natural habitats and of wild fauna and flora
- **DIRECTIVE 2011/92/EU** OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the assessment of the effects of certain public and private projects on the environment
- **DIRECTIVE 2014/52/EU** OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment
- **The UN Convention on the protection and use of transboundary water courses and international lakes**, approved by Council Decision 95/308/EC(15) and all succeeding agreements on its application.
- **The UN Convention on Environmental Impact Assessment in a Transboundary Context** (Espoo Convention)

**C. Does the EU country concerned receive EU funding relating to the issue that prompted your complaint, or may it receive such funding in future?**

**Yes, a lot of it.** We are not sure about Serbia, but Bulgaria receives a lot of EU funding for environmental protection which usually gets split in different corruption schemes, but DG Environment is pretty well aware of the fact. The European Commission should quit financing the corruption in Bulgaria until we turn into a normal law abiding EU Member State!

**III. LIST OF DOCUMENTS / EVIDENCE**

All the evidence concerning described infringements is included where appropriate in the document above in the form of links to pictures, videos and documents.

**IV. APPEALS/LEGAL ACTIONS/ OTHER ACTIONS**

All the actions we have taken insofar are described in the previous Appendix No8.

**We have tried to contact EU Institutions to request help on the same issues nine times already - one original complaint and eight consecutive appendixes so far.**

We were kindly informed that all these documents are transferred to **EU Pilot application under reference EUP(2017)9183**, therefore we hope that this new appendix No8-A will be transferred to the application under the same reference and will be considered as an integral Part of Appendix No8.

**We do not believe that SOLVIT is better placed to deal with this problem.**

## **V. CONFIDENTIALITY – DATA PROTECTION**

We authorize the Commission to disclose the identity of Balkanka Association and/or the identity of our representative in its contacts with the Bulgarian state authorities, against which we are lodging this complaint.

Moreover, we will be proud if the Commission decides to disclose the identity of Balkanka Association to the Serbian state authorities, should the Commission decide to contact them and warn them.

Furthermore, we have sent copies of all our previous complaints to MOEW, so they are pretty well aware of our actions. Having nothing to hide, we will send a copy of this document too. In due course we will send a copy to the Serbian Ministry of Environment as well.

This time we will inform the Greek authorities as well. They should also be quite interested, shouldn't they?

## **VI. AIM OF THE COMPLAINT**

**Ladies and gentlemen,**

In Appendix No 8 the aim was thoroughly described. We shall not repeat that once again.

**The only one thing we have to add is: there is an urgent need for a foreign team of independent experts to carry out full monitoring and assessment of the entire situation.** Otherwise, both Serbian and Bulgarian officials, and especially our minister Neno Dimov, will keep lying all the time. Minister Dimov will be in charge for no more than a year or two at the worst, therefore he will be trying his best to hand the hot potato over to the next minister in charge while the next minister will be washing hands with the soap that the problem was born before his time and nothing can be done...


Finally, we see no reason for the Serbian state to keep receiving any kind of EU funding if it vastly disregards the European values, as it does! The same is applicable to the Bulgarian state of course, unless we manage to become a normal law abiding EU member state one day. Otherwise the European funds are only wasted to support the Grand Corruption in these territories.

**Thank you all for your kind understanding and cooperation.**

*"Nature has all the time in the world, we do not".*

**Place, date and signature of complainant/representative:**

Representative for this complaint:

  
/dipl.eng. Dimitar Koumanov/  
Member of the board

Sofia, Bulgaria  
09.01.2019