

To European Commission

**Letter of support for a complaint from Bulgarian NGOs**

Prepared by BALKANI Wildlife Society, Institute for Green Policy, Vlaha School of Nature

For breach of Articles 3 and 4 of the Directive 2008/96/EC in planning and adoption of the Lot 3.2 of Struma Motorway – part of TEN-T

Dear commissioners,

Association Justice and Environment supports the Bulgarian NGOs' complaint related to serious violations of Art. 3 and 4 of Directive 2008/96/EC on road infrastructure safety management, during the planning of the Struma motorway in section of Kresna Gorge (Lot 3.2). The complainants draw attention to the fact that:

- The project for the construction of the Struma Motorway in the Kresna Gorge section (Lot 3.2) has not been subjected to a safety assessment at an early stage and with all alternatives included as required by Art. 3 of the Directive. Such an assessment is lacking completely and the official procedure for selecting a construction alternative is flawed.
- There is no audit under Art. 4 of the Directive. There are however significant safety issues with the alternative selected by the Bulgarian government:
  - on a whole section of the motorway, such as the use of the present E79 road through the Kresna Gorge as part of the motorway;
  - the lack of local road and the combination of local and transit traffic, passing pedestrians and animals in difficult road conditions - only two lanes in one direction of traffic, with sharp turns, no road berms.

The motorway project in the Kresna Gorge section (Lot 3.2) is part of the larger Struma motorway project, which is part of the TEN-T. The project is funded by EU Cohesion Funds, which should not be allocated unless all relevant EU laws have been followed. We would like to highlight that although this complaint only concerns the assessment of road safety, issues have been raised also with regard to the environmental impact assessment of the project which is intended to pass through a biodiversity hotspot.

Based on the above, we urge you to treat this complaint with the heightened attention this project deserves.

With best regards,

Siim Vahtrus



Chairman of the Board, Justice and Environment