To the Ministry
of Environment Protection and
Natural Resources of Ukraine

Hereby, ÎCS „Danube Logistics" SRL provides its feedback to the letter no 25/1-21/4075-23 from 17.03.2023, submitted by the potential affected party, Ukraine, with recommendations towards the EIA documentation for the planned activity "*Extension of the universal pier on the Danube River in Giurgiulesti International Free Port (GIFP), Cahul district, Giurgiulesti village*".

The current planned activity, namely "*Extension of the universal pier on the Danube River in Giurgiulesti International Free Port (GIFP), Cahul district, Giurgiulesti village*", is part of the Giurgiulesti International Free Port, territory and activity that have been assessed back in 2007, being subject to EIA including transboundary consultations were organized. For information, the link to the consultations is provided: https://unece.org/eiaicinfo3-republic-moldova

Although, the planned activity, was already subject to EIA back in 2007 for the whole Port and the one focused explicitly on the extension/construction of the quay in 2023, subject to the current assessment, it contains most of the information recommended by Ukraine. Respectively, each recommendation will be addressed and explained below how it was integrated into the Report and what information it contains.

No	**Recommendations provided by Ukraine**	**How it was integrated/addressed in the Report**	
1	The report should contain detailed information about the project itself, including the location of the project, works, and a description of the proposed works (sections, transverse and longitudinal profiles of objects related to the project). Indicate how the works planned for implementation differ from those related to the functioning of the existing port.	The EIA Report contains information on planned activity, with the following topics addressed in the sections specified below	
		- ***location of the project works***	- Section 3.1. *Initiative*
		- ***description of the proposed works (sections, transverse and longitudinal profiles of objects related to the project)***	- Section 3.1.2. *Final State;* - Section 3.1.3. *Construction Activities*; - Annex 6 *Schematic Planning of the Design Works for the Planned Activity*; - Annex 7 *Workplan and Technical Data Sheet for Works for the Maintenance of the Navigable Waterway on the Prut River Section at the confluence with the Danube River and the Waters of Giurgiulesti International Free Port (GIFP)*

		- ***Differences between the works planned for implementation and the works related to the functioning of the existing port***	- Section 1.3. *Initiator*; - Section 3.1.2. Final State; - Figure 2; - Section 3.1.3. *Construction Activities*
		The quay will be similar to the existing one without any differentiation.	
2	A description of reasonable alternatives to the planned activity (at least three), including the Status Quo, must contain a proper justification of the chosen alternative.	The planned activity cannot offer/provide three alternatives as the Republic of Moldova has only one port and one sole location for the port activity.	
3	Information on the data of the latest depth measurements in the water area of the active port and on the volumes of dredging soils formed as a result of works to maintain the navigational depths of the active port during the period of its operation	The information contained in Section 1.1. *General Information*, in Section 4.5. *River Characteristics (Hydrology)* under the last para, as well as in Annex 7constitutes the detailed working plan for the maintenance works of the navigable waterway.	
4	Calculation of the volumes of soil for operational dredging in order to maintain navigational dimensions with an indication of the place of their storage, subject to the implementation of the planned activity in the short, medium-, and long-term perspectives	The information contained in Section 3.1.3, *Construction Activities*, Section3.4. *Logistics* (the subsection about dredging), Section 4.5. *River Characteristics (Hydrology)* (last paragraph), Section 6.3.4. *Impact on River Characteristics (Hydrology)*, andin Annex 7 constitutes the detailed working plan on the maintenance works at the navigable waterway as well at the location of storage of sedimentary alluvium.	
5	Development of a predictive numerical	The initiator described in detail the planned activity, including the current state of water quality, hydrological characteristics, the	

	model regarding the dynamics of water flow, its redistribution, primarily at the confluence of the Danube and Prut rivers, sedimentation and climate change in the area affected by the project, taking into account future maintenance management (desalination, dredging and management silt deposits). The results of the model must be presented in the ATS documentation	potential impact on water quality during the operational phase, and river characteristics, which arerequirements according to the legal framework of the Republic of Moldova. Still, a predictive numerical model is a long-term activity that indicates the authorities responsible for surface water of the Prut River, which could and needs to be made, as the port does not ultimately influence the water flow. Some projects in the country intended to develop a numerical model for water flow. This activity was dropped as there is a current need for financial, human and expertise knowledge of this aspect. Besides, in 2020 the research conducted by the Institute of Ecology and Geography from Moldova indicates that "*the Prut river flow is regulated by the Costesti-Stinca reservoir*"[1] situated in the northern part of the country, respectivelly the dynamics of water flow, its redistribution, primarily at the confluence of the Danube and Prut rivers is managed mainly by the respective reservoir. The responsible authority in Moldova for water management (Apele Moldovei) indicated that the speed of the watercourse varies between 0.4-0.6 m/s, maximum - 1.0 m/s (Crihana village). This information is also included in Section 4.5. *River Characteristics (Hydrology).* ÎCS Danube Logistics SRL considers that the data used from the database of the public authorities on the performed test cover sufficient information to show the medium and long-term impact.
	On the cartographic materials of the proposed works, indicate the massifs of surface water and massifs of underground water within the basins of the Danube River and the Prut River, which are likely to be affected by the design works.	Cartographic materials showing the surface water and underground water that can be potentially affected by the planned activity are shown in **Figure 8** and **Figure 6** in the Report.
	The water object / bodies of surface	The information related to the water quality test, which was performed, is described in the Report in Section 4.3. *Water Quality,*

[1] https://ibn.idsi.md/sites/default/files/imag_file/28-29_17.pdf

	water / bodies of groundwaters affected by the design works should be considered as transboundary joint bodies and their hydromorphological, biological and chemical parameters should be analyzed in accordance with the requirements of the Water Framework Directive 2000/60/EC.	in Section 4.4. *Groundwater Quantity and Quality*, as well as in Annex 4 and Annex 5 which include the tests of the surface and underground water quality. Regarding the analysis of hydromorphological parameters in the sense of the Water Directive, the national legislation needs to provide for a methodology for monitoring and evaluating hydromorphological changes. It is to be established by the Government. Therefore, the evaluation of the change in hydromorphological parameters must be carried out in accordance with a legal framework applicable on the territory of the Republic of Moldova. Nevertheless, the information that has been included in the Report based on desk research, especially reference 8 from the List of references has been elaborated based on EU Directive.
	Indicators of the quality of water and bottom sediments according to physical and chemical indicators in accordance with the requirements of the Water Framework Directive 2000/60/EU in dynamics during the period of operation of the operating port. Provide an adequate forecast of changes in water quality and the possible formation of an additional amount of contaminated bottom sediments as a result of the implementation of project works.	The quality of water is described in the Report in Section 4.3. *Water Quality*, Section 4.4. *Water Quantity and Quality*; as well as in Annex 4 and Annex 5 which include the the tests of the surface and underground water quality. The information on sediments is included in Section 4.2. *Soil Quality of and Shoreline Condition*. information is also contained in Annex 1, which include the results of a bottom sediments test . The tests are performed by an internationally accredited state laboratory in linw with international treaties and agreements (Cooperation Convention for the protection and sustainable use of the Danube River). It is essential to highlight that data of the test performed at GIFP and other assessments are shared with Ukraine and Romania based on bilateral agreements. Respectively, Water Quality Laboratory (that collects tests from GIFP as well) perform the tests according to Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for Community action in the field of water policy.
	Hydraulic research in the city of the confluence of the Danube and Prut rivers: before and after	The researches are foreseen to be implemented including in the Danube, Prut, and Black SEA River Basin Management Plan of the Republic of Moldova for 2022-2027. The measures reffer especially to:

	the implementation of the project	- Support of hydraulic engineering measures for morphological restoration of the watercourse The activity is foreseen to be implemented by Moldova Water State Authority.
	Impact of the proposed works on transitional and coastal waters and assessment of compliance with the requirements of the Water Framework Directive 2000/60/EU regarding transitional and coastal waters	The current point is not relevant for the Republic of Moldova, as there are no coastal waters in our country.
	Impact of project works on groundwater regime	Information can be found in Section 6.3.3.*Impact on Groundwater*
	Proposals for measures to be proposed to the International Commission for the Protection of the Danube River (ICPDR) for inclusion in the Danube River Basin Management Plan in order to achieve good ecological status within the Danube River Basin and the Prut River Subbasin	The proposal and measures for the ICPDR are based on a hierarchic model. The country representative provides recommendations and measures based on the information collected from the Working Groups and meetings at domestic level. Nevertheless, the current Moldova's Management Plan for the Danube, Prut, and Black Sea for 2022-2027 includes measures representing GIFP's point of view, with relevant data and tests to be shared, and support to be provided within the framework of the relevant measures.
	Assessment of the impact of the planned activity on the hydromorphology of the Danube River and Prut River	Relevant information is shown in Section 6.2. *Transboundary Impact*, Section6.3.2. *Impact on water quality*, and Section 6.3.4. *Impact on River Characteristics (Hydrology)*
	Assessment of the impact of planned activities on aquatic and coastal ecosystems, including	The immediate territory comprising the 100m quay that is the subject of the planned activity is located in a developed port that has been active for more than 15 years. Consequently, the change in the natural landscape is something that has been around for a while. Respectively, on the entire waterfront sector of the port, the natural

	the analysis of the potential impact on bio- and landscape diversity in the short-, medium- and long-term perspectives	situation has been almost totally modified in the process, and as a result, of consolidation and brushing of the shore, building of quays, building and furnishing of the port platform. Nevertheless, Section 6.3.11 *Impact on Landscape* describes the potential impact on the landscape during the construction phase as well as during the operation phase.
	Assessment of the impact of planned activities in the context of flood risk management in the Danube River basin and its Prut River sub-basin, proposals for inclusion in the Flood Risk Management Plan of the Danube River Basin and the Prut River Sub-Basin	Proposals for inclusion in the Flood Risk Management Plan of the Danube River Basin and the Prut River Sub-Basin are made by the relevant state authorities, which can invite Danube Logistics representatives to participate as observers during the meetings of the working groups. However, in 2019 GIFP carried out a research dedicated to earthquake and flood Natech risk assessment. The Report is open to the public and can be accessed at https://publications.jrc.ec.europa.eu/repository/handle/JRC129450.
	A list of surface water and groundwater bodies adjacent to the location of the project and the conclusions of relevant assessment studies (impact assessment studies in accordance with Council Directive 92/43/EEC of May 21, 1992, on the protection of habitats and wild flora and fauna	Information is described in Section 4.5. *River Characteristics (Hydrology)*; The Republic of Moldova did not transpose the requirements of the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. These will be applicable starting from October 2023.
	A list of measures planned to prevent and minimize the negative impact of project implementation on the water body and coastal ecosystems	The Republic of Moldova does not have coastal ecosystems. Nevertheless, the Report contains information on the potential impact on the shore condition (Section 6.3.1.), on the surface and underground waters (Sections 6.3.2 and 6.3.3), the impact on the hydrological characteristics (Section 6.3.4) and on the landscape (Section 6.3.11).
	A list of compensatory measures to minimize potential negative	The report contains a list of measures that should be carried out to minimize the potential negative consequences. If these measures are followed, the impact will not affect the neighbouring countries.

	consequences in the cross-border context	
	Proposals for a list of measures for the joint Management Plan of the Danube River Basin, aimed at minimizing the possible transboundary impact on the Danube River Basin and the Prut River Subbasin and in order to achieve and maintain a good ecological status of surface water bodies and groundwater bodies, designed in accordance with the requirements Water Framework Directive 2000/60/EC	At the Water State Authority's invitation to participate as a member/observer, GIFP can provide measures and recommendations to be included in the Management Plans. Nevertheless, the current Moldova's Management Plan of for the Danube, Prut, and Black Sea for 2022-2027 includes measures that represent GIFP's point of view, with relevant data and tests to be shared, and support to be provided within the framework of the relevant measures.