

3rd June 2018, Rome, Italy

To

Mr. Karmenu VELLA

Commissioner Environment, Maritime Affairs and Fisheries

Mrs. Corina CRETU

Commissioner Regional Policy

Mr. Daniel CALLEJA CRESPO

Director-General

Directorate-General for Environment

Mr. Marc LEMAITRE

Director-General

DG REGIO — Directorate-General for Regional and Urban Policy

Object: Constructing Struma Highway Lot 3.2. in the Kresna Gorge (L.n.25/2018)

Honorable Ladies and Gentlemen,

we would like to express our perplexity and dissatisfaction with the position the Bulgarian government has taken on the construction of the Struma highway in the Krupnik-Kresna section (LOT 3.2) and the followed decision of the Supreme Administrative Court.

As world-class rafting experts, we claim that the Struma River in the Kresna Gorge represents the best rafting route in the Balkans. There is no other river on the Balkan Peninsula so suitable for practicing sport and commercial rafting as Struma. Therefore if, for example, ten boulders or ten meters of its shore are destroyed, if ten stones from the nearby rocks fall down into its waters, which is inevitable along any construction (even one related to the extension of an existing road), immediately its rapids, swirlings, thresholds, the entire profile of the rafting route, used already for decades, would change.

Why this is important?

Over the last 10 years the sport rafting has gained unwavering strength around the world. Four months ago, we established a new World Rafting Federation (WRF) with the sole aim to work

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towards rafting development, getting support from every country, so that the rafting is being recognized by the International Canoe Federation (this way, WRF is operating under the umbrella of the International Olympic Committee).

Along these lines, we have to admit that the Bulgarians do not lag behind this development. On the contrary, with their own means and without any help from the state they participate in international competitions where they perform very well. There are already several rafting clubs in Bulgaria and the most successful ever European rafting competition was held there, bringing together more than 30 teams in 2008.

Rafting as a team sport, is increasingly used by schools and companies: the management of the group dynamics and the team balance, whether it aims at achieving sport or social goals, is the way to co-opt into water experience an important number of people from the educational and labour sector.

The World Health Organisation (WHO) guidelines regarding sport activities and their social impact laid down in the Council of the European Union's Recommendations 15575/13 on promoting health-enhancing physical activity across sectors (HEPA), find in rafting a complete fulfilment: rafting is a tool of inclusion and overcoming differences.

Physical activity, as recommended by the WHO, is important for all age groups, and has particular relevance for children, the working population and the elderly. Being it a prerequisite for a healthy lifestyle and a healthy workforce, it contributes to the achievement of key objectives defined in the Europe 2020 Strategy, notably with regard to growth, productivity and health .

In this respect, the World Rafting Federation has taken part in an important initiative aiming at encouraging the development and implementation of effective HEPA policies, developing some special educational pathways for teachers and coaches.

The popularity of the commercial rafting is also growing. The lovers of this extreme sport are getting more and more each year, there are thousands also in Bulgaria. Hundreds of them come every spring down to the river not only because of the positive emotions, the fresh air and the organic food produced by local people. Here they can enjoy the unique nature, because the Kresna Gorge is one of the richest in wild plants and animals places in Bulgaria, part of the Natura 2000 network, CORINE and an important ornithological area. It contains rare plants and animals protected by law, as many of them are of European and global conservation importance.

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The fate of Struma river and the Kresna Gorge it is to be put at serious risk, because some Bulgarian entrepreneurs are more comfortable in building 3.2. LOT of the highway in the gorge, not out of it, with other words, destroying this natural heritage with the participation of European funds. The local business and people will also suffer great losses from such a decision.

Dear Ladies and Gentlemen,

there is nothing more valuable in this world than nature and the gifts we receive from it. We believe that it is always possible to find **an alternative to the construction of any motorway**, and we know that there are other options available on the table. There is no one to rebuild a natural entity or restore ecosystems. We, the rafting practitioners, urge you to rethink once again and not to bury the future of the Bulgarian rafting, but to do your best to keep Struma river and Kresna Gorge safe and sound not only for the sake of the white water fans and sportsmen in Bulgaria, Europe and the world, but for the sake of all humanity.

Sincerely yours,



Danilo Barmaz

President of the World Rafting Federation



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