



**Dobrogea's Natura 2000 sites (including Danube Delta), Romania:
Inadequate implementation of the EU Nature Directives is resulting in site
deterioration and species disturbance
November 5th 2009**

Dobrogea Natura 2000 sites

In 2007 a series of natural areas were identified as Important Bird Areas (IBA) according to IBA C criteria (EU-level criteria) by the Romanian Ornithological Society (SOR), the BirdLife Partner in Romania. At the end of October 2007, the Romanian Government adopted Government Decision no. 1284/2007 which designates 108 Special Protection Areas (SPAs) for the conservation of wild birds.

In Romania, Dobrudjia is an area with a natural and landscape heritage with very high biodiversity and international importance. In Dobrogea are presented 26 SPAs which are overlapping more or less with some of the 37 protected areas (national parks, landscape or natural reserves) designated according to national legislation.

Dobrogea territory belongs to two counties: Tulcea and Constanta. Tulcea County has the largest legally protected area in the country (436143.2 ha) that includes 31 protected areas that were proposed by the EMRI Tulcea (Eco-Museal Research Institute), also on the basis of proper field studies, 5 protected areas that were elaborated by other institutions and 10 SPAs.

Danube Delta Natura 2000 site

The Danube Delta and Razim-Sinoe Lagoon Complex (total surface 512.380 ha) is one of the biggest Dobrogea Natura 2000 sites (official identification reference - ROSPA0031). The majority of the area covered by the current SPA designation has also been proposed as a Site of Community Importance (SCI) (ROSCI0065 - total surface 450 540 ha) through Minister Order no. 776/2007.

The Danube Delta is the second largest delta in Europe and the only Delta in the world entirely declared (in 1990) as a Biosphere Reserve in 1990 by UNESCO (MAB). Designated as a Ramsar site in 1990, it is one of the biggest wetlands of international importance in the world, habitat for waterfowl

and the biggest area of compact reed beds on the planet. With 30 types of ecosystems and 5,300 flora and fauna species, the Danube Delta is a natural genetic bank with inestimable value for natural heritage (a fact which has been recognized by its inclusion in the World Heritage List under the World Cultural and Natural Heritage Convention).

Razim-Sinoie lagoon complex is the part of the SPA/pSCI and of the Danube Delta Biosphere Reserve (DDBR) and is the largest lagoon area of Romania covering 101,500 ha. This area is isolated from the Black Sea by beach ridges (levees) which divide the former lagoon into a rather heterogeneous lacustrine complex, 85% of which is lakes.

Over 320 bird species have been identified in the SPA/pSCI, 97 of which are listed in Annex I of Birds Directive, 151 under the Bonn Convention on migratory species and 17 are globally threatened species. The Danube Delta Natura 2000 site is important for hundreds of thousands of birds. During the migration period about 130.000 – 250.000 individuals/day can be observed here, especially geese, ducks, gulls and waders.

The Danube Delta is also protected by national legal instruments concerning biodiversity protection and conservation: Law no. 82/1993 concerning the creation of the DDBR, Government Decision no. 248/1994 which delineates the areas within the DDBR with different functions and the activities which are permitted in these different types of 'functional areas' (the DDBR has 18 strictly protected areas surrounded by buffer zones, the rest of the Biosphere Reserve contains economical areas), and the OUG (Government Urgent Ordinance) 202/2002 concerning the management of the coastal area.

Inadequate implementation of the Natura Directives is resulting in damage

SOR/BirdLife is extremely concerned that the Romanian Authorities - Ministry of Environment (MoE), National Agency for Environmental Protection (NAEP) and the Danube Delta Biosphere Reserve Administration (DDBRA), which is the Environmental Authority for the DDBR – are not properly implementing the site and species protection provisions of the Birds and Habitats Directives. For example, the requirements of Article 6(2) on site deterioration/species disturbance, Articles 6(3)(4) concerning the planning of projects/activities affecting Natura 2000 sites and the general obligation to take protective measures for pSCIs to avoid damage to these sites before completion of the evaluation/designation process.

Inadequately controlled economic development and unregulated tourism have already had impacts on habitats and species protected by the Birds and Habitats Directives – eg reducing the areas of habitats and disturbing species populations. For example, priority habitats as 2130* Fixed coastal dunes with herbaceous vegetation ("grey dunes"), 62C0* Ponto-Sarmatic Steppes, threatened plant species (*Convolvulus persicus*, *Crambe maritime*, *Leymus racemosus* ssp. *Sabulosa*, *Eryngium maritimum*, *Onosoma arenarea*) and Annex I bird species (e.g. *Aythya nyroca*, *Branta ruficollis*, *Burhinus oedicephalus*, *Charadrius alexandrinus*, *Gelochelidon nilotica*, *Pelecanus crispus*, *Glareola pratensis*, *Falco vespertinus*, *Aquila pomarina*, *Haliaeetus albicilla*, *Circus aeruginosus* and other migratory raptors,) have and continue to be affected by the unregulated tourism in the Danube Delta (as example in the following areas Chituc (Vadu), Portita, Edighiol, Sf. Gheorghe, and Sulina), and other Natura 2000 sites as Babadag, Cheile Dobrogei, Macin Mountains.

I. Inadequate site protection

To ensure conservation of the Delta's natural value it is essential that land management and development decisions and activities properly integrate biodiversity concerns. To achieve this the Romanian Authorities should be implementing the requirements of the EU Nature Directives,

including establishing conservation measures (in accordance with Article 4 of the Birds Directive and Article 6(1) of the Habitats Directive) to maintain or restore the site to favourable conservation status e.g. through a management plan and taking steps to avoid habitat deterioration and species disturbance in accordance with the provisions of Article 6 (2) of the Habitats Directive.

However, unfortunately, to date an appropriate legal framework is not in place to ensure implementation of these requirements in the Danube Delta SPA/SCI and as a result, the site is being damaged. We therefore urge the European Commission to ensure that these requirements are properly implemented as soon as possible. Further information about some of the key problems relating to site protection is provided below.

- *Delay of agreement and adoption of the Danube Delta law and compliance with EU legislation*

The Habitats and Birds Directives are transposed in the Romanian legislation through GUO no. 57/2007 (Government Urgent Ordonance). However, the key legal instrument for the Danube Delta is the Law no. 82/1993 which is a normative document superior to an Ordonance. In this moment DD Law isn't harmonized with the GUO no. 57/2007 and with the legal framework which complies with the Nature Directives.

The Romanian authorities started to adopt a new Danube Delta Law in 2006. This is still to be finalized.

However, even if it seems that the authorities intend to adopt a key legal instrument to ensure an appropriate legal framework for the Danube Delta which complies with the Nature Directives we consider that the process of approbation is delayed and this is resulting in damage on the habitats and species for which the Danube Delta was designated as SPA and pSCI.

At the same time a series of laws/decisions have been approved to the detriment of the DD biodiversity protection, ie the **Government Decision 897/5 August 2009** which passed the proprieties of the "Sulina Free Zone" Administration (SFZA) from the public domain of the state into public domain of the Tulcea County Council. It also passed the SFZA Direction from the Ministry of Transport and Infrastructure to the Tulcea County Council orders/administration. This action can be linked with the below information concerning the Sulina beach project.

- *Delay of the enforcement of the Article 28 of GUO (Article 6 of Habitats Directive) considering the regime of natural protected areas, conservation of natural habitats, flora and fauna and compliance with EU legislation*

The Article 28 (2) of the Government Urgent Ordinance 57/2007 *considering the regime of natural protected areas, conservation of natural habitats, flora and fauna* transposes Article 6(3) of the Habitats Directive (HD). In 2008, the GUO 57/2008 was modified through inclusion of the amendments considering the appropriate assessment procedure (GUO 154/2008). However, even if Article 6(3) of the HD was transposed in the national legislation in 2008, the Appropriate Assessment procedure is not yet applied on the plans or projects developed in the Natura 2000 site.

According to Article 28(3) of the GUO 154/2008 in relation to applying the AA procedure, it is necessary to use the AA Methodological Guidance, which needs to be approved through the Order of the Ministry of Environment. The AA Guidance draft was posted on the Ministry of Environment website for the public observation in December 2008 (http://www.mmediu.ro/proiecte_acte.htm).

SOR had several meetings with MoE representatives where SOR views were discussed about appropriate assessment and also a position paper was prepared with a series of observations about the biodiversity aspects which need to be taken into account during appropriate assessment.

In October 2009, the AA Guidance has not yet been approved.

MoE representatives were present at in June 2009 on the working group concerning the “*Sustainable Development of the wind energy in Dobrogea*” and at an “*Appropriate Assessment Procedure*” seminar organized by the SOR/BirdLife Romania and RSPB/BirdLife UK. At both events the representatives of the MoE specified that the AA Guidance would be published and enter into force once the decision concerning the environmental impact assessment on some private and public projects had been taken. This decision was approved in 08 April 2009, published in the Official Journal in 13 July 2009 and entered into force after 60 days around 11 September, but the AA Guidance wasn't published or approved and neither AA procedure has been applied.

So, presently there are not sufficient legislative provisions for the appropriate assessment regulation of the environmental impact, which include the biodiversity aspects. The impact assessment of the projects and plans developed in Natura 2000 sites are done through an assessment which uses methods that take into account the biodiversity aspects too little.

The lack of AA procedure enforcement on the Danube Delta SPA territory and other SPAs/SCIs from Dobrogea is resulting in damage to protected species and habitats (e.g. Sulina, Macin Mountains, Cheile Dobrogei, Dealurile Agighiolului)

- ***Delay of agreement and adoption of the DDBR Management Plan (2007 - 2012)***

To ensure conservation of the Delta's biodiversity the Romanian Authorities should be implementing the requirements of the EU Nature Directives, including establishing conservation measures (in accordance with Article 4 of the Birds Directive and Article 6(1) the Habitats Directive) to maintain or restore the site to favourable conservation status eg; through a management plan.

In the Romanian legislation the scope and regime of the management plan is stipulated in Annex 1 of Romanian law GUO no. 57/2007. The content of this Annex complies with EU legislation (Nature Directives).

The preparation/development of the new DDBR management plan started in 2006. SOR had several meetings with the DDBR Administration where we discussed our views about the Danube Delta management plan development, establishment of conservation objective for key species establishment, law enforcement inside the Natura 2000 site, potential projects, partnership with SOR and other NGOs etc. SOR also prepared a position paper about the need to establish Favourable Reference Values (FRV) and conservation objectives for the Danube Delta. This paper was developed taking into account published data, international action plans for priority species, EU legislation and meetings and discussions with specialists from INCDD (the Danube Delta Institute) and SOR.

The first version/draft of the Management plan appeared in October 2007. In July 2008 the Management Plan was sent to the Ministry of Environment for approbation. In 2009 the DD management plan was submitted to SEA procedure. Until October 2009 the DD Management plan hasn't yet been approved, even though the period of implementation is 2007 – 2012.

II. Inadequate implementation of the Natura 2000 provisions is leading to developments damaging the Danube Delta SPA/pSCI and other SPAs/pSCIs from Dobrogea

Over the two last years, many projects have been proposed inside and near to a series of SPAs/pSCIs, including the Danube Delta. These developments are likely to significantly affect habitats and species

for which the Danube Delta has already been designated as an SPA and is proposed as an SCI and affect the integrity of the site as a whole. However, despite many NGOs' protests about the potential damage, the authorities are continuing to authorize these projects without proper compliance with Articles 6(3) & (4) of the Habitats Directive or the general obligation to take protective measures for SPA/pSCIs to avoid damage to these sites before completion of the evaluation/designation process. A few examples of this widespread and systematic problem are outlined below:

- *"The Sulina beach development" project*

A case which demonstrates that inadequate implementation of the site protection provisions of the Nature Directives is already resulting in damage to the Danube Delta SPA/pSCI is the uncontrolled development/tourism on the **Sulina beach** and its neighboring areas.

Sulina is the Eastern city of Romania and is situated in the southern part of the Danube Delta.

According to the Local Action Plan (Agenda 21), Tulcea County Council (TCC) has decided to develop a tourism project in the Sulina area of the Danube Delta in period 2008-2010. Also, the intention for tourism development on the Sulina beach and also on the Sf. Gheorghe, Portita and Chituc levee beaches (all areas belong to Danube Delta) are mentioned in the draft of the Danube Delta Zonal Territory Arrangement Plan (<http://www.mdrl.ro/index.php?p=1082> - in Romanian) from which it is clear that the intention of the TCC is to maximize the tourism potential of the area. Also, in the view of TCC the Sulina Free Zone port facilities would be properly equipped to become ports of interest to recreational river and sea vessels. The land situated on the banks of the Sulina Canal would be brought to international tender for investors who want to make tourist facilities. This area has great tourism potential due to its location in the Danube and Black Sea neighborhood.

"The Sulina Beach Development" project was submitted to the SEA procedure in 2008 and after that to the EIA procedure. On 07 July 2009 the DDBRA, decided to release the Environmental Agreement concerning the project. The project's beneficiary is Tulcea County Council. The project development includes recreation places, office of health, access road, avenues (between the city and beach) and other elements. The project will be financed by Structural Funds through the Regional Operational Program (ROP) – Axis 5, managed by the Minister of Tourism.

Because of the uncertain juridical statute of the lands (beach) the beneficiary can't start to develop the project this year. But taking into account the **Government Decision 897 / 5 August 2009 (see above)** we can specify the situation was solved.

For more information about the project see annexes 4 and 5 attached documents in Romanian (EIA study, Tulcea County Council Report, DDBRA TAC Decision (Technical Analysis Commission) and public announcement, Government Decision 897/2009, substantiation note for the GD 897/2009) and on the following links (in Romanian):

<http://www.ddbra.ro/mediatizari/decizie.CAT.PLAJA.SULINA.pdf>,

<http://www.ddbra.ro/anunturi-acorduri.php>)

According to the public announcement posted on the DDBRA website the fundamental reasons for the release of the Environmental Agreement were:

- the project territory is near to the Sulina City
- it is a small project
- it won't be developed in a strictly protected area of the DDBR
- according to the 860/2009 Order because the identified habitats of the area are characteristic for the Sulina beach and Danube Delta and also the area is already affected by human activity, so the project can be developed without affecting the existing ecosystem

- in the project area where the coastal dunes and protected plant species (Red List from Romania) will be affected conservation measures will be applied
- The area will be visited by almost 1000 people /day

Example of the aspects not considered in the EIA study:

- the possible negative effects of the tourism development in the vicinity of the project area (direct and indirect impact through increasing of the tourist numbers, short and long term impact).
- it is specified that the arrangements **need to take into account** the distribution of the habitats and possibilities of the habitats' conservation but it is **not specified how this will be done** (no plan, no maps with habitats distribution) and neither that this should be applied also to the habitats from the vicinity (including priority habitats) which it's possible to be affected by the tourism.
- it is specified that in the case when a habitat of community interest will be affected by the buildings that compensatory measures will be taken, but is not specified what kind of measures.
- No plant species from Annex II of Habitat Directive were identified in the studied area according to the EIA study.
- No visitor strategies are presented.

Our key concerns are that:

- **the Sulina beach project implementation will increase the tourists number in the area which will have impacts on the biodiversity not only in the project area but also in the vicinity and will affect the habitats and plants species which includes:**
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 - o 2 priority habitats: 2130* Fixed coastal dunes with herbaceous vegetation ("grey dunes") and 1530* Pannonic salt steppes and salt marshes (*Aeluropo-Puccinellietum*, *Puccinellio-Salicornietum*) and other habitats from Annex II of HD
 - o Plants species from annex II of Habitats Directive (*Centaurea pontica* and *Marsilea quadrifolia* (affected in present by the human activities)
 - o Plants species from National Red List (*Convolvulus persicus*, *Crambe maritime*, *Leymus racemosus* ssp. *Sabulosa*, *Eryngium maritimum*, etc).
- Will promote/facilitate future tourism development at a large scale which will definitely affect the existing habitats and plant species as happened in the Vama Veche beach, which was a wild and beautiful place a few years ago.
- Even though the proposed project area is not in a strictly protected area of the DDBR according to the DD law, it is still within the Natura 2000 site (SPA and SCI). Therefore it should be subject to the protection requirements of the Habitats and Birds Directives and such projects should be subject to Appropriate Assessment according to Article 6(3) of the Habitats Directive (transposed at the national level through Article 28(2) OUG 154/2008).
- *The development of wind farm projects near to the Danube Delta Natura 2000 site will affect the bird species of the Danube Delta and continental Dobrogea territory*

Starting in 2007, several environmental agreements for wind farm projects situated near to Danube Delta have been released or are to be released. It is the same situation for the continental Dobrogea, where several wind farm projects are planned to be developed and some of them are already approved or submitted to the SEA/EIA procedures.

It is clear from the information that the wind energy development in Dobrogea region (continental Dobrogea and Danube Delta) is chaotic and that if this continues the cumulative impacts of the projects will certainly affect the Conservation Status of Natura 2000 sites from Dobrogea.

At the present time, the Romanian authorities do not have any national renewable energy or wind energy strategy. The National Strategy for Energy is in preparation and will be submitted to SEA procedure, so more than a year will probably pass until the strategy is approved. Nor have any renewable energy/wind plans/strategies/or SEA concerning wind energy development in Dobrudjia been produced by Constanza and Tulcea Counties – despite the fact that wind energy seems to be a priority economical development in these areas.

Also, according to media release, (<http://www.money.ro/energie/romania-trebuie-sa-prezinte-pana-in-iunie-2010-strategia-privind-energie-regenerabila.html>) Romania will need to present the national renewable energy strategy to the EC by July 2010.

At the present, Natura 2000 sites in Dobrogea and other protected areas are under high pressure, especially from a series of wind farms projects.

The main effects of the existing threats or those which will be appear through implementation of the wind farms which may occur are the following:

- The reduction of the priority habitats - especially the 62C0* ponto-sarmatic steppe
- The negative effects (collisions, barrier effect, disturbance and habitat reduction) on the migrating and wintering birds populations
- The reduction of raptor birds populations through collision mortality (Dobrogea is very important area for the raptor birds)
- The reduction/disappearance of the protected/rare/endemic plants species through habitat destruction
- Negative landscape impact on the one of the most important touristic areas in Romania

What favours the placement of the wind farms in/or in the vicinity of Natura 2000 sites:

- lack of knowledge, awareness and under estimation of the importance of biodiversity, habitats and landscape value of Dobrogea in national and European context;
- Absence of a national strategy which can encourage the ecotourism;
- Absence of studies concerning the fauna of Dobrogea;

At the time of writing, the following windfarms have been implemented in Dobrogea:

- Baia project located on the Ienicerilor Hill, inside ROSCI0201 Podisul Nord Dobrogean, ROSPA0091 Padurea Babadag, with 3 turbines and the 4th in construction; all turbines are build directly in the priority habitats Ponto-Sarmatic Steppes (62C0*), Annex II, Habitats Directive
- at Valea Nucarilor, near to Natura 2000 sites (including Danube Delta) with 8 turbines; for the same area or in the vicinity of this was released in 2009 four other environmental agreements for more than 100 turbines (near and inside of Natura 2000 sites)
- Cogealac and Fantanele in construction – will be almost 240 turbines (near to Natura 2000) (see the EIA studies)

Our main concern is that although almost all of the approved projects were submitted to EIA/SEA procedure, in the opinion of most Environmental NGOs/specialists the EIA studies were unprofessional and lacked relevant information and have an inadequate assessment of the impacts on the sensitive species/habitats/birds /migration routes. The assessment of cumulative impacts is missing from all studies.

Over the last two years SOR has tried to collaborate with the Ministry of Environment and other Environmental Authorities, about the urgent need for development of a renewable energy strategy at

the national level and/or at least at the Dobrudjia level. SOR has also pressed for the necessity of appropriate assessment; given the very high sensitivity of the area (approximately 83 % of Dobrudjia's territory, including the Danube Biosphere Reserve, has been designated as SPAs). However to date, unfortunately, the Minister of Environment does not seem interested in these suggestions.

At present the National Energy Efficiency Strategy approved by the GD no. 163 from 2004 (http://www.minind.ro/domenii_sectoare/H163-04.html) does not comply with EU legislation, as Birds and Habitats Directives or SEA Directive

Given the lack of interest at the national level and of collaboration between authorities, SOR is now seeking to work directly with Tulcea and Constanza CC, with investors and Environmental Authorities. In this sense SOR are developing a working group of all interested stakeholders and authorities (about the first meeting of working group (15 – 15 July 2009) see the following link - <http://www.sor.ro/Grup%20de%20lucru%20eoliene%202009.html> (in Romanian)). The scope of this working group is to put pressure on the authorities to develop a wind/renewable energy strategy/plan, a biodiversity monitoring methodology, and to implement the provisions of Article 6 (3) of the Habitats Directive regarding appropriate assessment. The Wind Energy Producers Association (APEER) has shown interest to be involved/is involved in the development of the working group.

In the view of SOR such strategies could help promote understanding of Natura 2000 within the wind sector and help to provide planning security thus reducing the likelihood of conflict at the individual wind farm project level and ultimately damage to Natura 2000. The strategy could avoid both damage from individual projects and cumulative damage from the large number of projects in the region currently being planned without any strategic planning framework. In the absence of such a coordinated approach, SOR believe that it is extremely likely that the Romanian authorities will fall short of their legal obligations to protect Natura 2000 sites and therefore could be subject to legal challenge.

However, it is important to mention that on 20th of October 2009, SOR was contacted for a possible meeting by the environmental assessor (<http://www.epcmediu.ro/en>) which will develop the Environmental Study (according to SEA) for the National Energy Strategy.

- *Other example of the inadequate implementation of the Natura 2000 provisions which is leading in damaging habitats and species in other Natura 2000 sites (from Dobrogea) than Danube Delta*

Camena Quarries

In the past few years a series of new quarries were opened inside Natura 2000 sites which is damaging habitats especially 60CO* Ponto-Sarmatic steppes.

Some of the examples are the Camena I (by S.C. Richmond Construct SRL) and Camena II, (by C.S. Comprest Util SRL) quarries in Baia commune (Environmental authorizations no 7584/04.10.2007 and no. 7689/12.05.2008 – see attached documents) inside the ROSCI0201 Podisul Nord – Dobrogean.

The works were started illegally (without environmental agreement) by S.C. COMPREST UTIL S.A. They received a penalty (by the Environmental Guard) after the EcoPontica notice (see attached – in Romanian) was sent regarding this illegality and after that consent documents (environmental and construction authorization) were obtained (the public hearing was on 7 June 2007)

Later the Company enlarged the extraction area without permit and they were once again penalized. Even now, they are extracting from a larger area than permitted by the Environmental Agency of Tulcea.

We have information that the same company is beginning, also without permits, another quarry in Esecchio Forest Natura 2000 site (ROSCI0149). This information has yet to be verified.

Illegal construction on CHEILE DOBROGEI Natura 2000 site area

The Cheile Dobrogei is one of the most beautiful Natura 2000 sites (ROSPA0019 Cheile Dobrogei and ROSCI0215 Recifii Jurasici Cheie) from the continental Dobrogea, which is also a Natural Park, according to national legislation. Situated in the oldest geological unit of Romania - Casimcea Plateau, the park represents the largest steppe and wooded steppe area on mixed substrata of green schist and coral reef limestone. The combination between the two different geological substrata with typical relief, together with the specific climatic features explains the remarkable biodiversity of this area. Also, this is the most important carstic area of Dobrogea Plateau, which includes numerous caves, two of these having an international importance.

Starting from 2006 S.C Grup Media Sud started large waterworks (to create an artificial recreation lake with artificial islands planted with poplar) in order to develop in the future a touristic complex. Also, the investor brought into the area allochthonous species as Black Swan *Cygnus atratus*.

The construction began illegally without any environmental authorization (see attached documents) and propriety title on the river bed, breaking the law which specifies that the river beds are state public domain. It is important to mention that the construction of the lake on the Casimcea River affected the natural course of the river and all specific habitats and species. The works were still continuing in February 2009

The Environmental Authorities were informed about the illegal construction since 2008 (through EcoPontica Complaint), but no actions were taken.

More details about Cheile Dobrogei see in the Annex 15

All these illegal constructions are damaging the SPA Cheile Dobrogei/SCI Recfii Jurasici Cheia habitats and species as 62 CO* Ponto-sarmatic steppe, *Moehringia jankae* and *Campanula romanica* and a series of bird species.

Conclusion and Recommendations

These developments are likely to significantly effect habitats and species for which the mentioned above areas have already been designated as SPAs and are proposed as SCIs and affect the integrity of the sites as a whole. However, despite many NGOs protests about the potential damage, the authorities are continuing to authorize a series of new projects without proper compliance with Articles 6(3) & (4) of the Habitats Directive (especially without cumulative impact assessment) or the general obligation to take protective measures for pSCIs to avoid damage to these sites before completion of the evaluation/designation process.

We therefore urge the Commission to investigate the situation as a matter of urgency and to take appropriate action. For example discussing the need for proper implementation with the Romanian Government as a matter of urgency and opening new site protection infringement actions against Romania.

For further information, please contact:

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